

Sturts Community Trust (SCT) Housing Association

Complaints & Appeals Policy

Date approved by board: January 2024

Last review: January 2024

Date of next review: January 2026

1. Welcome and Policy Introduction

At SCT Housing Association, we aim to provide a safe, supportive, and thriving community for all tenants. We understand that there may be times when you feel dissatisfied with a service, and we encourage you to share your concerns with us. Feedback, whether positive or critical, is at the heart of building a better co-housing environment.

We welcome complaints as opportunities to improve and resolve any issues collaboratively. With our open-door policy, tenants are encouraged to raise concerns promptly through any of our informal or formal communication channels.

Community Policy Statement: Communication, Collaboration, and Accountability

At the heart of our co-housing community is a commitment to open and inclusive communication. We believe in engaging with each resident through every available means, ensuring that all voices are heard and valued. Our approach fosters collaboration across all areas of the community, working together to address issues and support one another.

We emphasize shared responsibility, particularly in the management of community finances. This responsibility is approached with transparency and integrity, recognizing that everyone plays a role in the sustainability of our shared environment. We do not exclude or disregard any individual, instead prioritizing cooperation and mutual support.

Our work is always conducted with the utmost professionalism. We strive to uphold the highest standards in everything we do, whether in managing the community's day-to-day operations, addressing concerns, or planning for the future. Through this culture of communication, collaboration, and accountability, we continue to build a community where everyone feels respected, involved, and empowered.

This policy complies with the Housing Ombudsman's Complaint Handling Code and reflects our commitment to fostering an inclusive, fair, and transparent community environment.

2. What is a Complaint?

A complaint is any expression of dissatisfaction about SCT's actions, lack of action, or the quality of services provided. This includes actions by staff members, contractors, or anyone acting on our behalf that impacts a tenant or group of tenants.

You don't need to use the word "complaint" to have your concern treated as one. Simply share your dissatisfaction, and we will ensure it is handled in line with this policy.

Complaint Outcomes:

- **Upheld:** Your dissatisfaction is justified, and we will take corrective action.
- **Partially Upheld:** Some aspects of your dissatisfaction are justified, while others are not.
- **Not Upheld:** Your dissatisfaction is not justified based on the information available.

3. Differentiating Complaints from Service Requests

Sometimes, you may need to report an issue or request a service, such as fixing a maintenance problem. These requests are not treated as complaints unless:

- There is dissatisfaction with how your service request was handled.
- Further enquiries are needed to resolve the issue.
- You explicitly ask for your concern to be treated as a complaint.

We encourage tenants to submit service requests through:

- The maintenance platform for repairs and updates.
- Direct discussions with housing officers.
- Neighbourhood meetings or representatives.

Our goal is to ensure your concerns are addressed in the right way from the start.

4. Complaint Handling Process

At SCT, this is the only complaints policy we use. We want to reassure you that we welcome complaints as opportunities to improve and strengthen our community. You will never be treated differently for raising a concern, and we encourage early and local resolutions wherever possible. Our process is simple, transparent, and limited to two stages.

We are committed to promoting equality and diversity in all aspects of our work. As part of this, we recognize that some tenants may have communication difficulties. In such cases, concerns may often come from advocates acting on their behalf—family members, carers, or others who have observed issues in the environment that may affect the tenant. This is particularly important in matters relating to disability adaptations in homes. We want to ensure that all voices are heard and that our process is accessible to everyone.

Reasonable Adjustments in the Complaints Process

Under the Equality Act 2010, we are committed to making reasonable adjustments to ensure all tenants can raise and follow up on complaints fairly. If you have a disability or specific needs that affect how you communicate with us, please let us know. We will work with you to agree on suitable adjustments, such as providing information in different formats, offering additional support, or allowing more time where needed. We will keep a record of any agreed adjustments and review them regularly to make sure they continue to meet your needs.

Our complaints handling team comprises two key individuals:

1. **A Senior Housing Officer:** This individual is part of our housing association team and reports directly to the Co-Housing Committee.
2. **An Independent Member of the Co-Housing Committee:** This person may be asked to manage more complex complaints if deemed necessary at Stage 1.

If your complaint requires the involvement of the independent member, you will be informed. However, the two-stage process will still apply. In such cases, Stage 2 will be conducted by a co-director within the leadership team of the charity. This ensures that all complaints are handled fairly and transparently while maintaining our commitment to community and governance.

To ensure complaints are handled fairly and consistently, SCT follows these principles:

1. **Deal with complaints on their merits:** Each complaint will be considered independently, with an open mind and without preconceptions.
2. **Provide tenants with the opportunity to set out their concerns:** Tenants will have the chance to share their experiences and explain their complaints clearly. We will adapt our communication methods to support those with additional needs, ensuring everyone can fully participate in the process.
3. **Take measures to address any conflicts of interest:** Steps will be taken to ensure impartiality, including reassigning complaints where necessary.
4. **Consider all relevant information and evidence carefully:** Decisions will be based on a thorough review of all available facts and documentation.

These principles ensure fairness, openness, and clarity throughout the complaint resolution process.

Stage 1: Local Resolution

The first step in handling your complaint is to define the issues clearly, and we are committed to helping you do this. Within the first 5 working days, the complaint handler will work with you to establish the specifics of your concern. This includes clarifying which aspects of the complaint fall under SCT's responsibility.

If the matter is determined to be within SCT's remit, it will be addressed promptly. Where necessary, immediate action will be taken to resolve urgent issues, particularly those affecting safety or essential services. If the complaint involves an external party or falls outside SCT's responsibility, we will inform you clearly and provide guidance or signpost you to the appropriate organisation.

The complaint handler will aim to resolve your complaint within 10 working days, issuing you with a full response. However, if the handler determines that the complaint is complex and cannot be resolved within this timeframe, they may decide to extend the timescale. In such cases:

- The extension will be limited to an additional 10 working days.
- You will receive a clear explanation as to why the extension is necessary.
- You will also be provided with the contact details of the Housing Ombudsman, should you wish to raise concerns about the extended timeframe.

By the end of Stage 1, you will receive a summary of the outcome, including any actions taken or planned. This ensures that the process remains transparent, timely, and focused on resolving your concerns effectively.

You will receive your response as soon as it is ready, rather than waiting until all issues are resolved. The response will include a list of actions and timescales that are part of the proposed resolution.

The complaint handler will not refuse to escalate your complaint to Stage 2 of the process unless there is a valid reason to do so. If escalation is refused, you will receive a clear explanation of the reasons, along with the contact details of the Housing Ombudsman, should you wish to challenge the decision.

Stage 2: Review

If you remain dissatisfied, your complaint will be reviewed by a senior manager or another appropriate individual as described above and acknowledged within 5 working days, with a full response issued within 20 working days.

Stage 2 is the final stage of the complaints process and will include the final statements regarding the complaint, along with details of how to escalate the matter to the Ombudsman as outlined below. The new complaints handler at Stage 2 will make every effort to understand why the tenant remains dissatisfied with the outcome of Stage 1 and ensure that all concerns are thoroughly considered before reaching a final decision.

We aim to make this process clear and accessible to everyone, ensuring open communication and timely updates at all stages. We believe in working together to resolve issues and strengthen the relationships that make our community thrive.

The complaint handler will aim to resolve your complaint within 20 working days, issuing you with a full response. However, if the handler determines that the complaint is complex and cannot be resolved within this timeframe, they may decide to extend the timescale. In such cases:

- The extension will be limited to an additional 20 working days.
- You will receive a clear explanation as to why the extension is necessary.
- You will also be provided with the contact details of the Housing Ombudsman, should you wish to raise concerns about the extended timeframe.

Complaint Handling Procedure at Stage 1 and Stage 2

At both Stage 1 and Stage 2, the complaint handler will provide the tenant with a written definition of the complaint before proceeding further. This written communication will detail the stage of the complaint (Stage 1 or Stage 2), a clear definition of the complaint, and a summary of discussions with the complainant to help articulate their concerns and the outcomes they are seeking. It will also include the decision on the complaint, the reasons for the decision, any remedies offered to address the complaint, and any outstanding actions that need to be completed. Additionally, the tenant will be informed of how to escalate the matter to the Ombudsman if they remain unsatisfied with the outcome. If at any time the response falls outside the timescales, we will agree suitable intervals with the tenant for keeping them informed about their complaint. If you raise an additional complaint while we are already looking into an issue, we will include it in our response if it relates to the original complaint and if our first response has not yet been sent. If the new issue is separate or would cause an unreasonable delay, we will log it as a new complaint and handle it separately. Our aim is to ensure every concern is addressed fairly and efficiently.

Putting Things Right

When things go wrong, we will acknowledge it and explain what actions we've taken or will take to put things right. These actions may include:

- Apologising.
- Acknowledging where things went wrong.
- Providing an explanation or reasons for the issue.
- Taking action if there's been a delay.
- Reconsidering or changing a decision.
- Amending a record or making a correction.
- Offering a financial remedy, if appropriate.
- Changing a policy, procedure, or practice to prevent future issues.

The remedy will reflect the impact on you as a tenant because of the problem. In the response, we will clearly outline what will happen, by when, and, where appropriate, we will agree on the remedy with you.

This written communication will detail the stage of the complaint (Stage 1 or Stage 2), a clear definition of the complaint, and a summary of discussions with the complainant to help articulate their concerns.

The same principles apply to Stage 2 as in Stage 1. However, if you are still dissatisfied at the end of Stage 2, we will provide details on how to escalate the matter to the Ombudsman Service.

5. Submitting a Complaint

We understand that raising a concern can feel daunting, but we want to assure you that we are here to listen and work with you to find the best resolution. You can share your concerns in the way that feels most comfortable for you:

- Speaking face-to-face with housing officers or staff.
- By phone, email, or letter.
- During neighbourhood meetings.

- Through an advocate, friend, or family member who you trust to share your concern.
- By connecting with your neighbourhood representative.
- Through your Care Together support team, who are always ready to help.

If you have a service request related to your concern, we want you to know that it will continue to be acted upon throughout both stages of the complaints process. This ensures that important services will not be interrupted while we work together on your complaint.

We value your feedback through surveys, but please be aware that surveys are not used to log complaints. That said, every survey will include a note guiding you to our complaints process if needed.

We believe that all complaints should be heard and will accept them unless there is a valid reason not to. If we cannot accept your complaint, we will explain why and share any relevant evidence with you. These decisions will always be fair and reasonable. Examples of situations where we may not be able to accept a complaint include:

1. The issue happened more than 12 months ago, unless there are exceptional circumstances.
2. Legal proceedings have started, and the claim form and particulars of the claim have already been filed with the court.
3. The matter has been addressed previously through this complaints policy.

If we are unable to accept your complaint, we will also provide you with information about how to contact the Housing Ombudsman. The Ombudsman is an independent body that can review the situation and, if appropriate, ask us to process your complaint.

We promise to approach every complaint on a case-by-case basis and apply this policy fairly. Your voice matters to us, and we are committed to fostering an environment of respect, understanding, and collaboration.

6. Outcomes and Remedies

We aim to resolve complaints with outcomes that address the issues raised and improve our services. Possible outcomes include:

- Providing an apology.
- Offering an explanation or further information.
- Reconsidering a previous decision.
- Undertaking specific remedial actions or service improvements.
- Making changes to policies, procedures, or practices.

All outcomes will be communicated clearly in writing, with reference to relevant policies and laws.

7. Handling Sensitive Complaints

We handle complaints involving sensitive issues, such as personal matters or staff conduct, with confidentiality and care. Complaints flagged as sensitive will be managed by a designated officer to ensure discretion and thorough handling in line with data protection regulations.

8. Learning and Monitoring

We regularly review complaints to identify trends and areas for improvement. Reports on complaint handling and service improvements are shared with staff, tenants, and governance bodies.

At SCT, we treat all complaints with equal importance, regardless of whether they are high-level or low-level. We are committed to connecting with our tenants, resolving issues quickly, and maintaining open communication. Our focus is on fostering a culture of openness and learning, where feedback is valued and acted upon.

We aim to learn from both individual complaints and by analysing patterns of overall feedback. This approach helps us to identify areas that may need attention and address them proactively. Through our open forums and learning culture, we work together to continuously improve our services and strengthen our community.

Key monitoring activities include:

- Tracking the number and types of complaints received.
- Reviewing customer satisfaction with the complaints process.
- Using complaints as a learning tool to prevent recurrence.

The Complaints Handling Team are members of the Co-Housing Committee and operate at a governance level, ensuring oversight of complaints and their resolutions. They also monitor adherence to the timescales stipulated in this policy. As part of their commitment to accountability, complaints and resolutions are a standing agenda item at all Co-Housing Committee meetings, which take place quarterly. This helps maintain transparency and ensures that complaints handling remains a priority at the governance level.

To support this commitment, SCT's training matrix includes specific training on handling complaints for all individuals responsible for managing them. Furthermore, the wider team recognizes the importance of collaboration. Complaints officers are empowered to conduct thorough investigations, which may involve accessing necessary information, engaging with staff, co-workers, and tenants, and ensuring all perspectives are considered. This inclusive approach ensures that complaints are addressed comprehensively and fairly.

Annual Complaints Performance and Service Improvement Report

Tim Woodward, Co-Director, will compile an annual complaints performance and service improvement report. This report will be supplied to the trustees alongside the annual report. The purpose of this report is to focus on identifying improvements and progress. It will assess performance against the code to ensure compliance with its requirements. The report will review both the quality and quantity of complaints, analysing them in detail.

It will summarise any complaints that the Housing Association has refused to accept, and if any matters have escalated to the Ombudsman, it will detail any findings from the Ombudsman. The report will also identify any service improvements that can be implemented as a result of learning from complaints.

As part of our annual performance and service improvement reporting, we will include any relevant guidance, findings, or reports from the Housing Ombudsman that relate to our work. This ensures we stay informed of best practices and continue to improve our services based on external recommendations and feedback.

This process supports a positive culture within the organisation and will be overseen as a standing agenda item in the Co-Housing Committee. Regular updates and information will be passed to the trustee board, ensuring transparency and continuous improvement.

Within the process, and sitting on the Co-Housing Committee, will be a co-housing member, **John Reading**, who will take the lead responsibility for complaints, supporting a positive complaints-handling culture. He will be referred to as the **Member Responsible for Complaints** (MRC) and is responsible for ensuring that the governing body, the **Co-Housing Committee**, receives regular updates on complaints and provides insights into complaint handling.

The committee will receive regular updates on the volume, categories, and outcomes of complaints, alongside the complaint handling performance in line with the policy. These updates will include:

- **A:** Regular reviews of issues and trends arising from complaints handling.
- **B:** Regular updates following Ombudsman investigations and progress in complying with orders related to severe maladministration findings.
- **C:** Being the first recipient of the **Annual Complaints Performance and Service Improvement Report**.

It is just as important to foster a culture of collaboration and cooperation in resolving complaints, ensuring a positive working relationship with all parties involved across teams, departments, and colleagues. The committee will:

- **A:** Take collective responsibility for any shortfalls identified, rather than blaming others.
- **B:** Act professionally at all times, adhering to the standards set by the housing regulator and the housing ombudsman.

Additionally, the committee will ensure that complaints handling is integrated into broader governance activities. Regular reviews of complaints will inform both policy and practice improvements. The committee's role will include overseeing the process, ensuring compliance, and helping to develop strategies for continuous improvement.

9. Publicity and Accessibility

The complaints procedure is made accessible through:

- Tenant welcome packs.
- Regular community newsletters.
- The SCT website.
- Alternative formats upon request, including Braille, audio, and Easy Read.

We encourage tenants to share feedback and concerns, ensuring they are supported throughout the process.

10. What You Can Expect from SCT

We are committed to:

1. **Fairness:** Handling all complaints impartially and ensuring a fair process.
2. **Transparency:** Providing clear communication and regular updates throughout the process.
3. **Resolution:** Taking swift action to resolve complaints and prevent recurrence.
4. **Learning:** Using feedback to improve our services and community experience.
5. **Accessibility:** Making reasonable adjustments for tenants with specific needs.
6. **Standards:** We always strive to work within policy, legal requirements, and best practice guidance to ensure that our services meet expected standards. If a complaint highlights a situation where these principles may not have been met, we will address it as quickly and effectively as possible. Our goal is to resolve concerns fairly while maintaining high standards across all areas of our work.

11. What SCT Expects from You

To ensure a respectful and effective process, we ask that tenants:

- Treat staff and other tenants with courtesy and respect.
- Provide accurate and timely information to help us address your concerns.
- Engage constructively to achieve resolution.

If a tenant behaves unreasonably (e.g., abusive language, excessive persistence), we may take steps to manage interactions while still addressing the complaint. If you are unable to behave in the way we expect, we will seek to agree a communication plan with you.

12. Contact Information

For any questions or to submit a complaint:

Patrick Denis

patrick.denis@sturtsfarm.com

Complaints Officer

John Redding (MRC)

john@civis.co.uk

Independent Committee Member

Tim Woodward

tim@sturtsfarm.com

Co-director

Housing Ombudsman Service:

Exchange Tower, Harbour Exchange Square, London E14 9GE

Tel: 0800 111 3000

Website: www.housing-ombudsman.org.uk

SCT will also carry out a self-assessment following a significant restructure, merger and/or change in procedures.

If SCT is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to residents who may be affected, and publish this on our website. We will provide a timescale for returning to compliance with the Code.
