



Circle Voluntary Housing Association

Complaints, Suggestions and Compliments Policy

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1. Our Values

The actions we take underpin our vision to make a difference by providing quality homes for people in housing need. At Circle Voluntary Housing Association, we firmly believe that how we interact with our customers, communities, colleagues and key stakeholders is of fundamental importance. Our passionate commitment to caring about our tenants and the services we deliver has led to the development of our core values - six behaviour-based principles that speak directly to the characteristics we hold high.

WE HEAR

Willingness to embody all our values in a driven manner.

Empowerment of our staff and tenants

Honesty allows for complete understanding, its aids in the delivery of integrity and putting our tenants' best interests at the heart of our decision-making

Excellence reminds us of our continuous strive to be better

Accountability benefits all, transparency will foster this, and the creation of solid and reliable documentation will ensure that this accountability is enforced

Respect is the foundation of these values, without respect for ourselves, others and the service we provide we must ask ourselves why we put so much of our valuable time into the job we do

2. Policy Statement

Circle Voluntary Housing Association (CVHA) endeavours to always provide excellent services but we know that sometimes things may not go entirely according to plan. We have a complaints policy and procedure so that individuals using our services can bring to our attention any issues they may have in relation to the delivery of our services.

We also recognise the value of comments and compliments: we will actively seek learning from complaints, comments and compliments in reviewing and developing our services.

3. Purpose

The purpose of this policy and procedure is to:

- ensure complaints are considered and dealt with professionally
- to deal fairly, honestly, consistently and appropriately with all feedback
- to communicate and explain, particularly when there are delays or when the complaint is not upheld
- to learn, CVHA will endeavour to identify areas where any shortcomings in service provision or an inability to meet our published standards of service requires remedial action

- to acknowledge the importance of relationship-building and recovery – and that the complaints handling process is part of our efforts in ensuring positive relationships with our stakeholders

4. Scope

This policy applies to any individual or group, external to CVHA, either using our services directly or about our services. This policy does not apply to a complaint, suggestion or compliment from employees of Circle Voluntary Housing Association.

5. Roles and Responsibilities

- 5.1 The overall responsibility for the approval, and ensuring the implementation, control and review of this document lies with the Board of Directors and Chief Executive of Circle Voluntary Housing Association.
- 5.2 It is the responsibility of the Head of Service to authorise adjustment to policies, procedures and forms, in line with Circle VHA's policy framework, relating to services and ensure they are effectively implemented.
- 5.3 It is the responsibility of the Leadership Team to ensure that policies, procedures and forms are effectively and consistently implemented within their departments.
- 5.4 It is the responsibility of all Staff to consistently implement policies and procedures. It is an obligation contained in all employee's terms and conditions that they carry out their work in accordance with Circle Voluntary Housing Association's policies and procedures. Failure to do so may result in disciplinary action being taken. All Staff should communicate with their Line Manager in relation to their responsibilities to adhere to this policy and procedure and should always seek guidance and clarification if they ever have any concerns about carrying out any aspect of their work in accordance with the obligations imposed.

6. Legislation

Circle Voluntary Housing Association comply with all legislative requirements and regulations and sector performance standards. Specific policies, legislation and/or standards referred to within this document are listed in the references section.

7. Glossary and Definitions

- CVHA: Circle Voluntary Housing Association
- Leadership Team: Senior Managers of each department
- Complaints: For the purpose of this procedure, we define a complaint as an expression of dissatisfaction with the service provided against an agreed service standard. This applies specifically where a customer believes that:
 - We have not followed our policies, procedures or service standards
 - An employee, agent or contractor has behaved in an unprofessional manner
 - We have treated the customer unfairly

- There are excessive or unexplained delays, or enquiries or requests have not been dealt with promptly and in full
- We have failed to meet the requirements of the Performance Standard and Assessment Framework for the Regulation of Approved Housing Bodies in Ireland

We do not class the following as complaints:

- A report of antisocial behaviour
- Complaints about services which are not provided by CVHA
- The following issues will be dealt with outside of the complaint's procedure:
 - Issues involving insurance or personal injury claims. These matters are dealt with by our insurers and/or our solicitors
 - Where the complainant has appointed a solicitor, who has issued correspondence on their behalf. These matters will generally be dealt with by our solicitors
 - Where the complainant is taking legal action against us. These matters we dealt with by our solicitors
 - Where a tenant is dissatisfied with a rent increase. These issues will initially be reviewed by the Head of Service to ensure that the correct calculation has been made based on the information to hand. Where we have made an error, the tenant will be advised of this and any overpayment of rent will be credited to the tenant's rental account/refunded to them
- Suggestions: We define a suggestion as feedback from those using or who are affected by our services. A suggestion, as opposed to a *complaint* or *compliment*, may suggest areas for potential improvement and provide us with opportunities to improve our services
- Compliments: We define a compliment as positive feedback from those using or who are affected by our services. A compliment is a positive comment on any aspect of our service. We believe that it is important to acknowledge and learn from compliments so that CVHA recognise and reinforce positive behaviours as well as replicating good practice across other services

8. Making a Complaint

8.1 Introduction

Complaints, suggestions and compliments are ways in which we receive feedback on our services and how we provide those services. We will actively seek to learn lessons from all three.

All staff are trained to deal with complaints, suggestions and compliments. Staff are trained and empowered to:

- Recognise the potential value to the organisation of complaints, suggestions and compliments
- Pass on or act upon suggestions and compliments to ensure that learning is captured and that opportunities for recognising and replicating good practice are acted upon
- Explain the complaints procedure to a complainant

- Seek to resolve the issue on an informal basis if appropriate

8.2 Overview of complaints

We operate a three-stage complaints procedure:

- Stage 1 is managed by the front-line member of staff responsible for the functional area; except where the complaint is about that individual, in which case the complaint will be referred to their line manager
- Stage 2 is managed by the relevant Head of Service
- Stage 3 is managed by a senior manager from a different department

8.3 Complaint timescales

Acknowledgement of receipt of a complaint: written receipt of a complaint will be sent out within five working days.

- Stage 1: complaint will be investigated, and a response sent to the complainant within 20 working days of receipt. If the complainant is not satisfied with the response, they can request the matter be escalated to stage 2.
- Stage 2: complaint will be investigated by a manager, and a response sent to the complainant within 20 working days of receipt. If the complainant is not satisfied with the response, they can appeal.
- Stage 3: appeal will be reviewed, and a response sent to the appellant within 20 working days of receipt.

8.4 Appeals

The decision taken by the Senior Manager at Stage 3 is final and binding save that in the event the Complainant believes that this procedure has not been followed they can bring a process appeal to the CEO. A process appeal will be acknowledged within 15 working days and responded to in full within 30 working days from the date of acknowledgement.

A tenant who has a tenancy registered with the Residential Tenancies Board may contact the Residential Tenancies Board to make a complaint, register concern or dissatisfaction with their landlord. However, the Residential Tenancies Board generally expects tenants to have exhausted their landlord's internal procedures before they will become involved.

8.5 Who can make a complaint

This policy and procedure apply to complaints from anyone who has submitted a complaint against CVHA and/or the services it provides. This includes complaints from:

- Anyone who is currently accessing or has previously accessed CVHA's services
- Funders of CVHA
- Members of the communities in which CVHA provides housing and services.

8.6 How to make a complaint

Complaints may be made in person, by phone, in writing (letter or email) or via our website. Where the complainant is unable to write down the complaint, the member of staff taking the complaint will record the details on the complainant's behalf.

Where a third party is lodging a complaint on behalf of a tenant, we will require specific and verifiable written authorisation from the tenant appointing the third party to act on their behalf. We will not begin investigation of a complaint or correspond with a third party without the explicit written consent of the tenant.

A complaint must be made within 12 months from the date of action that gave rise to the complaint. A person may make a request to have a complaint investigated outside of these time frames. The Head of Service may extend the time limit for making the complaint if special circumstances make it appropriate to do so. Examples of this are if new information becomes available or if the complaint is of such potential seriousness it cannot be ignored. The Head of Service will inform the person of the decision to extend or not extend the timeframe within 5 working days of the request.

8.7 Dealing with persistent and vexatious complainants

A complainant may be defined as "persistent" and/or "vexatious" if they meet one or more of the following criteria:

- The complainant continues to pursue a complaint when the complaints procedure has been fully and properly completed
- The complainant makes repeated and unsubstantiated complaints
- The complainant is unwilling to accept that facts can be difficult to verify when a long period of time has elapsed;
- The complainant has been physically or verbally abusive or aggressive to a member of staff investigating the complaint;
- The complainant has made an excessive number of contacts in relation to a complaint, placing unreasonable demands on staff. Discretion will be used in determining what constitutes an excessive number of contacts.

Cases will be considered on an individual basis, and the final decision of whether to define a complainant as persistent or vexatious will be made by the Chief Executive Officer in conjunction with the relevant Head of Service.

8.8 Anonymous complainants

Anonymous complaints may be vexatious or malicious and the anonymity of the complainant may preclude the principles of natural justice and procedural fairness from being fully upheld. Notwithstanding the foregoing all anonymous complaints both written or verbal will be documented and reported in accordance with the standard complaint's procedure. The Head of Service who has carriage of the anonymous complaint should assure themselves that the welfare of tenants is not at risk and a decision is made as to whether quality improvements are required on the basis of the complaint. Heads of Service are responsible for trending anonymous complaints as part of the reporting systems.

8.9 Confidentiality

If a complainant makes a complaint in confidence, the identity of the complainant will only be known to the recipient of the complaint and the department and company Complaints Records Officers. If the investigation of the complaint requires the identity of the complainant to be disclosed, the consent of the complainant must be obtained before this information is disclosed to any third parties. The complainant must be informed that it may not be possible to carry out a full and proper investigation of the complaint without their consent to disclose their identity and that due to legal obligations confidentiality can never be fully guaranteed (i.e. Data Protection Legislation)

If an anonymous complaint provides details that enable the identification of individual staff members, these details must be anonymised and there must be no record of any anonymous complaint on the file of any individual staff members.

8.10 Safeguarding

All frontline officers will receive training on our Safeguarding procedures to ensure that appropriate processes are followed where any safeguarding issues are identified.

8.11 Equality statement

CVHA is committed to equality and diversity. We work hard to provide homes and services that meet the needs of our diverse communities. We will provide training for our staff on equality and diversity to ensure that tenants are not discriminated against in the way that we deliver services for reasons of:

- Gender
- Civil status
- Family status
- Sexual orientation
- Religion
- Age (does not apply to a person under 16)
- Disability
- Race
- Membership of the Traveller community.

8.12 Data Protection

CVHA takes its data protection responsibilities very seriously and is compliant with all current data protection legislation.

For further information, please refer to our Data Protection policy.

9. References

N/A

10. Appendices

10.1 Process Map