

| <b>Complaints Handling Procedure</b>   |   |
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| <b>Approved by</b><br>Director of Corporate Services   | <b>Issue number 2</b>   |
| <b>Approved date</b> September 2025  | <b>Review date</b> September 2027                               |
| <b>Previous Version</b><br><br>Dealing with Correspondence and Complaints Handling Procedure – Issue number 1<br>Responding to correspondence from the Housing Ombudsman Procedure - Version 3 | <b>Responsible Officer</b><br>Complaints and Resolution Manager |

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| <b>1.</b> | <b>Aims and Objectives</b>  |
| 1.1       | The effective handling of complaints promotes transparency, accountability and good relationships between Hightown and residents. It is important that Hightown deals with complaints efficiently, accurately, and in accordance with the timescales outlined in the Complaints Policy and the Housing Ombudsman's complaint handling code. |
| 1.2       | Complaints are welcomed by Hightown as an opportunity to learn from resident and service user feedback and develop our services. Recording and acting upon issues that have been brought to our attention is important because it enables us to implement changes that support continuous improvement.                                      |
| 1.3       | The purpose of this procedure is to ensure a customer focused and consistent approach to dealing with complaints, learning from complaints and service improvement.   |
| 1.4       | This procedure also ensures an effective, robust and consistent approach to dealing with communication and correspondence from the Housing Ombudsman, which should be managed by a designated member of staff as outlined below.  |
| <b>2.</b> | <b>Definitions and Scope</b>  |
| 2.1       | This procedure applies to the Complaints and Resolution Team and all staff in the Housing, Development, Care and Supported Housing Departments and the Sales Team.  |
| 2.2       | A complaint is defined as "An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents".   |

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| <b>3.</b> | <b>Logging complaints relating to Hightown Tenants, Shared Owners and Leaseholders.</b>   |
| 3.1       | A complaint may be received via correspondence through Reception, direct email to a staff member, by phone, in person, or via social media.   |
| 3.2       | When a complaint is received, the recipient will forward it immediately to <a href="mailto:customer.resolution@hightownha.org.uk">customer.resolution@hightownha.org.uk</a> or put the call through to the Complaints and Resolution Officers or Complaints Assistant, who will log the complaint on the complaints log, send an acknowledgement to the complainant within five working days and advise the appropriate Manager or Head of Service that support will be required in the investigation.  |
| 3.2.1     | All correspondence relating to the complaint should be saved in the documents tab on the Complaints Log.  |
| 3.3       | Where a complaint is received via social media and the complainant can be identified, the Communications Team will acknowledge receipt to the complainant in a private message and pass the details of the complaint to the Complaints and Resolution Team by email to <a href="mailto:customer.resolution@hightownha.org.uk">customer.resolution@hightownha.org.uk</a> for logging and investigation. Where the complainant cannot be identified the Communications Team will post a response to encourage the complainant to make direct contact with Hightown. |
| 3.4       | Where a 1 or 2 star review of Hightown is posted on Google or Trust Pilot, the Communications team will post a response following the Responding to Online Reviews process. Where the person who posted the review can be identified, the Complaints and Resolution team will contact them directly regarding their concerns.   |
| 3.5       | Where a complaint relates to more than one service area, all aspects of the complaint must be logged and responded to together. The Complaints and Resolution Officer will co-ordinate the response.  |
| 3.6       | The complaint must be acknowledged within five working days to set out Hightown's understanding of the complaint and confirm the complaint reference number.  |
| 3.7       | In order to ensure appropriate levels of confidentiality, staff recording complaints on the Complaints Log must not include details in the free text boxes of the log which may identify the complainant or any staff member concerned, as these sections are used for reporting to the Complaints Scrutiny Group.  |
| 3.8       | The Complaints and Resolution Officer will identify and liaise with the relevant service manager/s to ensure a full investigation before drafting a response. This may include meeting with the complainant. The method(s) of investigation must be recorded on the complaints log.   |
| 3.9       | Reasonable adjustments to the complaints process may be required to meet the needs of vulnerable customers. Reasonable adjustments may include changing the way in which the complaint is handled or responded to and making the complaints policy and leaflet in an accessible format, to meet the diverse needs of complainants. This includes where an adjustment is made the nature of the adjustment and the   |

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|            | reasons for it must be clearly recorded on the Notes tab of the Complaints Log.  |
| 3.10       | Where a complaint involves a recurring issue, staff should consider the background as part of the complaint investigation and response if this will help to resolve the issue for the complainant.   |
| <b>4.0</b> | <b>Logging complaints relating to Care &amp; Supported Housing services</b>  |
| 4.1        | When a complaint is received, relating solely to care service provision provided by C&SH, or the complainant is a C&SH service user without a Hightown tenancy, the complaint will be logged by the Complaints Assistant or Complaints and Resolutions Officers on the complaints log. An acknowledgement will be sent to the complainant within five working days, allocating the complaint to the appropriate C&SH Manager or Head of Service. If the complaint is received directly by a member of the C&SH team, they are required to pass the complaint to the Customer Resolution Team for logging and acknowledgement.                                |
| 4.2        | For the complaints received from C&SH users who are registered Hightown tenant, that relate to anything else (with the exception of care provision), these will be logged as indicated in section 3.   |
| 4.3        | All correspondence relating to the complaint should be saved in the documents tab on the Complaints Log.   |
| 4.4        | The C&SH Manager or Head of Service will investigate and respond to the complainant, update the complaints log and confirm with the Complaints and Resolution Team the complaint has been responded to.  |
| 4.5        | The Complaints Assistant will monitor that C&SH care complaints have been responded to and follow up with the relevant C&SH Manager as appropriate.  |
| <b>5.0</b> | <b>Investigating and Responding to complaints</b>  |
| 5.1        | Responses to complaints at all stages must use plain language. Template letters are available on the intranet which should be used as a basis for responses to complaints.   |
| 5.2        | <p>The response to a complaint must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. They must:</p> <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul> |
| 5.3        | Communication with the resident will include operational / customer facing staff job titles and names where the name will already be known by or has been requested by residents within their complaint. Hightown contractor organisation names will be provided if required, but not their staff names. If it is considered a team member may be placed at risk by providing their name, the name will not be provided, instead the job title and team title.   |

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| 5.4        | <p>At the completion of each stage of the complaints process the Complaints and Resolution Officer will write to the complainant advising them of the following:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• definition of the complaint</li> <li>• the outcome of the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter if dissatisfied, including information about the Housing Ombudsman service.</li> </ul> |
| 5.5        | <p>The complainant shall be given a fair opportunity to:</p> <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>   |
| 5.6        | <p>Where it is not possible for a complaint to be investigated and responded to within the timescales published in the Complaints policy, the Complaints and Resolution team will contact the complainant to explain the reasons and agree an extension. The extension period must be no longer than the timescales set out in the Ombudsman's Complaints Handling Code.</p>  |
| 5.6.1      | <p>It should be agreed with the complainant, where appropriate, reasonable arrangements for frequency and method of communication during the investigation process.</p>   |
| 5.6.2      | <p>Where an agreement over an extension cannot be reached, the complainant should be contacted with the details of the Housing Ombudsman, so that they can challenge the plan or proposed timeliness of the response via the Ombudsman.</p>   |
| 5.6.3      | <p>Where there is a longer-term investigation, the complainant should be provided with interim updates on progress.</p>   |
| 5.7        | <p>Complaint responses must be sent to the complainant once the investigation has been carried out, and within the prescribed timescales. Responses must not be deferred to when outstanding actions relating to the complaint have been completed.</p>   |
| 5.8        | <p>Outstanding actions will be tracked by the Complaints and Resolution Team, and updates provided to the complainant.</p>  |
| <b>6.0</b> | <p><b>Investigating and responding to Formal Stage One Complaints</b></p>   |
| 6.1        | <p>The Complaints and Resolution Officers will be supported by the Service Managers or Head of Service with investigation of the complaint and send a written response using the template letter within 10 working days of the date the complaint being acknowledged. If an alternative format (such as translation, larger print) is needed due to the individual's known needs this should be taken into account.</p>   |
| 6.2        | <p>The complainant must be advised that if they remain dissatisfied, they are able to escalate their complaint to Formal Stage Two of the complaints process within 20 working days of the date of the response.</p>  |

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| 6.3         | When the response is sent, the Complaints and Resolution Officer / member of staff responsible for the investigation should update the outcome and lessons learned sections of the Complaints Log. Lessons learned should highlight any changes made or required to a service, process or policy/procedure as a result of the complaint. Where changes are made, these should be communicated to the complainant and team involved in that service provision. Outcomes should also be passed to the Communications team for inclusion in the You Said/We did section of resident newsletters |
| 6.4         | Where a lesson learnt requires follow up action, the Complaints and Resolution team will agree actions, target completion dates and responsible persons with the appropriate Head of Service.  |
| <b>7.0</b>  | <b>Formal Stage Two</b>  |
| 7.1         | If, within 20 working days of the Formal Stage One response, the complainant requests to escalate their complaint to Formal Stage Two of Hightown's complaints process, the Complaints and Resolution Manager will obtain details and confirm with the complainant the outcome they are seeking from their complaint. Consideration will be given to escalating Stage One complaints more than 20 working days following response. Escalations to Stage Two complaint level must be acknowledged within five days of receiving the Formal Stage Two complaint.                               |
| 7.2         | The Complaints and Resolutions Manager, supported by the Complaints Assistant will escalate the complaint to Formal Stage Two on the complaints log and advise the relevant Director and Service Managers of the department/s to which the complaint relates.  |
| 7.3         | The Complaints and Resolution Manager will co-ordinate an investigation and written response, using the template letter which will be sent within 20 working days of the escalation date.  |
| 7.4         | The response will outline any applicable external sources of dispute resolution the complainant can refer their complaint to if they remain dissatisfied ( i.e. Housing Ombudsman Service, Building Safety Regulator, CQC, First Tier Tribunal (Property Chamber)).  |
| <b>8.0</b>  | <b>External Remedies</b>   |
| 8.1         | Any communication from the Housing Ombudsman must be dealt with in accordance with the Responding to Correspondence from the Housing Ombudsman Procedure.  |
| 8.2         | Other remedies may be available to C&SH scheme service users and home owners, and reference should be made to these where relevant in complaint responses.   |
| <b>9.0</b>  | <b>Closing complaints</b>  |
| 9.1         | The circumstances in which Hightown will close a complaint are outlined in the Complaints Policy.  |
| 9.2         | Where a complaint is to be closed, the Complaints and Resolution Team will close the complaint on the Complaints Log, giving the reason for closure.   |
| <b>10.0</b> | <b>Housing Ombudsman complaint investigations</b>  |

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| 10.1   | The Housing Ombudsman Service (The Ombudsman) investigates complaints which have completed a landlord's internal complaints process, which the complainant then refers to the Ombudsman.   |
| 10.2   | The Ombudsman is able to make a wide range of orders where maladministration or service failure is identified. These can include requiring the landlord to carry out a specific action (for example, completing a repair or making an apology), and/or order a landlord to pay compensation.   |
| 10.2.1 | In some cases, the Ombudsman may make recommendations, even where no maladministration has been found during their investigation.  |
| 10.3   | The Ombudsman publishes all determinations on its website and may carry out deep dives to identify patterns and themes in complaints across an organisation and/or the housing sector.   |
| 10.4   | Where a complaint has completed Hightown's internal complaints process and the complainant refers it to the Ombudsman, the Ombudsman will make contact with Hightown via the portal to confirm that they are investigating the complaint and to request information. The notification will outline the nature of the complaint being investigated, a list of documents the Ombudsman requires to investigate, and a deadline for submitting the documents. |
| 10.5   | All enquiries and correspondence from the Ombudsman will be sent via the Housing Ombudsman Portal with a Case ID number, which must be quoted when replying.   |
| 10.6   | Any contact from the Housing Ombudsman Service must be responded to quickly and accurately. Any contact from the Housing Ombudsman must immediately be brought to the attention of the Complaints and Resolution team, who will co-ordinate a response.  |
| 10.7   | If a member of staff receives direct correspondence from the Ombudsman confirming that they are investigating a complaint, they must immediately notify the Complaints and Resolution team.  |
| 10.8   | The Complaints and Resolution Team must update the complaints log, and tick the "referred to Ombudsman" box on the complaint tab.  |
| 10.9   | The Complaints and Resolution Team will collate the information required and prepare a covering letter and index. Where the Ombudsman has provided reference numbers for documents, these should be used in the information pack and index. Correspondence between Hightown and the Complainant should be presented in chronological order with the most recent date first.  |
| 10.10  | The pack will be compiled as PDF documents and uploaded to the Ombudsman portal, with copies saved in O:\Complaints, titled with the property code and Ombudsman case ID,  |
| 10.11  | The pack must be submitted to the Ombudsman by the deadline date given. If there is a reason that the information cannot be supplied by the deadline, the Complaints and Resolution Team must contact the Ombudsman's Investigating Officer to explain and agree an extension date.  |

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| <b>11.0</b> | <b>Dealing with determinations from Ombudsman investigations</b>  |
| 11.1        | Ombudsman determinations will be reviewed by the Complaints and Resolution team and a prompt response made within any deadline given. Hightown must comply with their determinations and orders and provide confirmation of compliance.   |
| 11.2        | The Ombudsman allows a period for Hightown and the complainant to respond to their findings so that any misunderstandings can be clarified and if necessary more evidence provided.   |
| 11.3        | If there are any lessons to be learned from the findings these must be followed up by the Complaints and Resolution Team and the relevant Head of Service.  |
| <b>12.0</b> | <b>Monitoring and reporting</b>   |
| 12.1        | The Director of Corporate Services and Director of Care and Support will report the outcomes from any Ombudsman investigations quarterly to the Operations Committee.   |
| 12.3        | Outcomes are recorded on the Complaints log and are reported to the Complaints Scrutiny Group/C&SH service user voicebox.   |
| <b>13.</b>  | <b>Legal/Regulatory Background</b><br><br>Regulator of Social Housing's Transparency, Accountability and Influence Standard.<br><br>The Housing Ombudsman's Complaints Handling Code  |
| <b>14.0</b> | <b>Other considerations</b>   |
| 14.1        | The Complaints Scrutiny Group, made up of residents and staff, meets quarterly to review complaints regarding head office services received in the previous quarter.  |
| 14.2        | The Residents Voice and Scrutiny Panel reviews information regarding the number of complaints received at each stage of the complaints process every 6 months.  |
| 14.3        | The Service User VoiceBox, made up of staff and Care and Supported Housing service users, meets quarterly to review complaints regarding Care and Supported Housing services received in the previous quarter.  |
| <b>15.0</b> | <b>Role and Responsibilities</b>  |
| 15.1        | The Complaints Assistant, supports the Complaints and Resolution Officers and Manager, with the logging of complaints and monitoring the complaint log.   |
| 15.2        | The Complaints and Resolution Officers are responsible for responding to the Stage One complaints and for tracking progress of agreed actions and lessons learnt.   |
| 15.3        | The Complaints and Resolution Manager is responsible for responding to stage two complaints, reports on complaints received by head office departments (excluding C&SH) monthly, including performance against complaint response timescales, lessons learned and action plans. |

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| 15.4  | The Complaints and Resolution Team is responsible for liaising with the Ombudsman, responding to any information request and determinations, and confirming compliance with any orders or recommendations   |
| 15.5  | Heads of Care and Supported Housing report monthly on the complaints received by the C&SH department for complaints related care services of C&SH customers.  |
| 15.6  | Details of the number of complaints received at each stage of Hightown's internal complaints process, and learning points from complaints are reported to residents in the Annual Report to Residents each year.  |
| 15.7  | <p>Directors report the following to the Operations Committee:</p> <ul style="list-style-type: none"> <li>• outcomes from any Housing Ombudsman investigations</li> <li>• any systemic failure which may lead to serious detriment or harm to residents or service users</li> <li>• A complaint that reaches local or national media that might bring Hightown into disrepute</li> <li>• Any complaint that has completed Formal Stage Two of the complaints process where residents have not confirmed that they are satisfied with the outcome so may lead to an Ombudsman enquiry</li> <li>• Progress on lessons learnt and the impact of implementing these changes.</li> </ul> |
| 15.8  | The Operations Committee receives quarterly and annual reports on complaints and determinations from the Housing Ombudsman Service.   |
| 15.9  | The Complaints and Resolution Manager will review Hightown's complaints self-assessment annually, (or more frequently if required), complete the annual submission to the Housing Ombudsman and produce the annual report and service improvement plan for Board approval and comment.  |
| 15.10 | The Chair of the Operations Committee is Hightown's Member Responsible for Complaints (MRC) and is responsible for ensuring that complaint handling drives service improvements. The MRC champions a positive complaint handling culture, seeking assurance from complaints and operational teams that complaints are being managed, change is happening and that residents are being heard through the process.  |
| 16.0  | <p><b>Policy/document References:</b></p> <p>Complaints Policy<br/> Higher-Risk Buildings Complaint Policy<br/> Compensation Policy<br/> Reception Services Procedure<br/> Responding to MP and Councillor Enquiries Procedure<br/> Call Handling Procedure<br/> Hightown's Customer Charter</p>  |