

## Complaints Procedure

### 1 Purpose

- 1.1 The Complaints Procedure describes how we respond to and learn from customer complaints. The procedure should be read in conjunction with the Complaints Policy and Compensation Guidance.

### 2 Scope

- 2.1 This procedure applies to all Octavia employees at all levels, contractors and sub-contractors who work on behalf of Octavia, managing agents and those employed or who act on behalf of Octavia in any other capacity. This policy also applies to all Octavia customers as set out in section 5.1 of this procedure.

### 3 Procedure statement

- 3.1 We want our customers to have confidence that we listen, learn, and take prompt action to put matters right. We strive to provide a fair and effective resolution to any complaint and use the learnings to drive service improvements across our business.
- 3.2 The Housing Ombudsman is an independent arbitrator in the housing sector, offering a free and impartial service to resolve customer complaints when things can't be resolved between the customer and Octavia. Octavia is a member of the Housing Ombudsman Scheme and is committed to developing and maintaining a good working relationship with them.
- 3.3 Our Complaints Policy, and Complaints Procedure have been developed in accordance with the Housing Ombudsman Complaint Handling Code which became a statutory requirement from 1st April 2024, our other statutory and legal duties, and customer feedback. To evidence compliance with the Housing Ombudsman Code, we will complete a Self-Assessment annually. The Code is intended to enable landlords to resolve complaints raised by customers quickly and to use learnings from complaints to drive service improvements. It is also intended to create a positive complaint handling culture amongst colleagues and customers.
- 3.4 If we are unable to comply with the Code due to exceptional circumstances, such as a cyber incident, we will inform the Ombudsman, provide information to customers who might be affected, and publish this on our website. We will endeavor to provide a timescale for returning to compliance with the Code. Octavia will also proactively complete an assessment outside the annual schedule if significant changes are made to either the Code, our internal processes or following a significant restructure or merger. Octavia will also review and update the Self-Assessment if instructed to by the Housing Ombudsman Service, following an Ombudsman investigation.
- 3.5 For the purposes of this procedure, the term 'customer' refers to a person making a complaint.
- 3.6 For the details of roles and responsibilities, please see section 15 of this procedure

- 3.7 There are two stages to our complaint process. In addition, where the customer has raised a Service Request, we will use the opportunity to resolve these requests quickly and effectively to obtain the best outcome for the customer.
- 3.8 At each stage of the complaints process, complaint handlers must:
- Deal with complaints on their merits, act independently, and have an open mind;
  - Give the resident a fair chance to set out their position;
  - Take measures to address any actual or perceived conflict of interest; and
  - Consider all relevant information and evidence carefully.
  - Respond within timescales set out in the complaints policy and this procedure.
  - Provide a full complaint response when the answer is known, not when all outstanding actions are completed.
- 3.9 We keep full records of all complaints, and monitor the progress, response and outcomes to all the complaints we receive on our customer relationship management (CRM) system. This information helps us to deliver process and service improvements.

## 4 Definitions

- 4.1 **Complaint** – We use the Housing Ombudsman Complaints Handling Code definition, which defines a complaint as:

**“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Octavia, our staff, or those acting on our behalf, affecting an individual resident or group of customers.”**

- An expression of dissatisfaction does not need to include the word complaint for it to be handled in line with our complaints policy and procedure. When a customer raises an issue with us, we will take the time to listen to their concerns. We will provide advice and support and identify if the issue raised falls within the scope of the complaints policy as detailed in this section. We'll ensure customers are given the choice to log a complaint if they express dissatisfaction.
- 4.2 **Service request** - We recognise the difference between a service request and a complaint. A service request is the first request requiring action to be taken to put something right. This is usually about a repair, provision of service or action, where the timeframe for delivering that repair or action has not yet passed or where it can be easily resolved to the customer's satisfaction. These are requests for Octavia to take appropriate action on. Service requests are not complaints. However, a complaint can be raised when a resident raises dissatisfaction with the **response** to their service request, even if the response to the service request remains ongoing. We will not stop efforts to address the service request if the customer complains. Further information is included in the Service Request Guidance.

- 4.3 We will continue our efforts to address the service request quickly and to the customer's satisfaction if the customer complains.
- 4.4 **Anonymous complaints** - are ones raised without clearly stating who is making the complaint and/or who is impacted by it. We will not normally investigate anonymous complaints, as we may have no one to respond to. The Complaints Team Manager, if appropriate, will determine whether the complaint warrants an investigation. If we do investigate an anonymous complaint, we will keep a record of our actions and any outcomes.

## 5 Stage 1 Complaints

### Step 1 - Receiving a complaint

- 5.1 This complaints procedure applies to all Octavia customers. By customers we mean people who have a lease, tenancy, licence or service occupancy or other arrangement to occupy premises owned or managed by Octavia, including ex-occupiers if they were in occupation at the time the matter complained of arose. We also accept complaints from applicants for properties owned or managed by us and we accept complaints from representatives acting on behalf of a customer (so long as they have authority to discuss or third-party authority, on behalf of the customer).
- 5.2 We also accept complaints where the Housing Ombudsman Service tells us to take on the complaint.
- 5.3 On a case-by-case basis, we may also accept complaints from third parties who feel they have been impacted by our services or a service provided on our behalf. We will endeavour to provide a response and solution to third party concerns, where appropriate. However, third parties are unable to escalate their concerns to the Housing Ombudsman Service. This is because they are not in a landlord-tenant relationship. An example of this may be the neighbour of an Octavia customer.
- 5.4 Service complaints from customers relating to Octavia's retail stores are dealt with under a separate procedure.
- 5.5 Customers can raise a complaint with any member of staff in any way that suits them best. This can be by email, via the complaints form on our website, letter, phone call, social media (after making contact through another method and verifying they are a customer), face to face, or through an advocate. The member of staff receiving the complaint should send it to the Complaints Inbox at the earliest opportunity. The Complaints Team will regularly check the Complaints Inbox to ensure complaints are investigated as quickly as possible. Where we receive a complaint by phone or in person, the Customer Experience Adviser will log the complaint.
- 5.6 An expression of dissatisfaction with services made through a customer survey is not defined as a complaint, though wherever possible, the customer completing the survey is made aware of how they can pursue a complaint if they wish to.
- 5.7 Customers can ask a representative to submit a complaint on their behalf, providing the person has given authority for them to act on their behalf. This can include a MP (Member of Parliament),

Councillor, or advocate acting on behalf of a customer. Complaints made by representatives acting on behalf of a customer will be handled in line with Octavia's complaints policy.

If the customer does not have capacity, the representative must have legal authority to act on the person's behalf through a Lasting Power of Attorney (LPA) or, have been appointed, by an authority such as the Court of Protection.

- 5.8 Staff should offer access to our complaints process where:
- The Customer has contacted us several times about the same issue
  - There have been multiple attempts to resolve an issue
  - We have promised to do something but failed to do what we said we would
  - The Customer provides feedback about the conduct of a member of staff, or a contractor working on behalf of Octavia
  - The customer has expressed dissatisfaction on social media, as part of a visit, call or email, lack of service.
  - The customer raises dissatisfaction with the response to their service request.
- 5.9 Where a customer has specific needs due to disability, vulnerability or other reason we will make appropriate adjustments to ensure our complaints process is accessible, in line with our Reasonable Adjustments Policy. All complaints must also be handled sensitively, only sharing required information with those who need it, in line with data protection requirements. Where there is a safeguarding of vulnerable adults or child protection issue, we have a duty of care to fully investigate and follow the appropriate procedures.
- 5.10 Customers can access the Housing Ombudsman directly at any time throughout the complaint process (or other relevant arbitrator/escalation route as required – see section 9).
- 5.11 Mediation can be considered and offered at any stage of the complaints process. The Housing Ombudsman Service provides a free mediation service, and we have a contract with CALM Mediation.
- 5.12 **Exclusions** - There are some issues where we may not consider a complaint. We must consider each complaint on its own merits and make sure our decision is reasonable. We will let the resident know why the matter isn't suitable for the complaints process and will respond to their feedback specifically. We will advise customers of an alternative course of action, including the right to take our decision not to accept their complaint, to the Housing Ombudsman. We will not consider a complaint if:
- a) It concerns matters that are, or have been, the subject of legal proceedings and where the customer has, or had the opportunity to, raise the subject matter of the complaint as part of those proceedings. Where legal proceedings have started, this is defined as details of the claim, such as the Claim Form and Particulars of Claim having been filed at court. In such a case, customers should refer to their solicitor, as we are unable to respond through the complaints process. Where we receive correspondence initiating a pre-action protocol and legal proceedings have not yet been issued, we will be clear on how we are handling the correspondence, whether under our complaint process, the pre-action protocol or both.

- b) The complaint is about a repair, service, or action, where the timeframe for delivering that repair or action has not yet passed. We want to have the opportunity to resolve the issue first and will give the customer feedback and keep them updated.
- c) The complaint is not about us or our contractors but about another organisation.
- d) The complaint is subject to an insurance claim (unless they are unhappy about how we or the insurance company is handling a claim).
- e) The complaint is about anti-social behaviour (ASB) or a neighbour relationships issue; this is dealt with under our ASB and Neighbour Relationships Policy (unless they are unhappy about how we are responding to an ASB or neighbour dispute issue).
- f) Service Charges – if a customer contacts us about an increase, or the amount they are being charged for services, their case will be dealt with as an enquiry and responded to by the relevant person. Where issues raised regard the standard of service, lack of service or that we have not communicated properly or followed the correct process in respect of service charges is dealt with as a complaint.
- g) A customer's behaviour is unreasonable. This may include repeated, minor, and unfounded complaints, or where the volume, content or tone of contact is unreasonable. We will refer to our Unacceptable Customer Actions Policy where this is the case.
- h) We have already responded to the matter under our complaint process and stated that the process has been exhausted.
- i) The issue giving rise to the complaint occurred over twelve months ago. We will, at our discretion, consider complaints outside of this time limit where there are reasons to do so. These include exceptional personal circumstances, vulnerabilities, where the resident has not been aware of the issue and could not reasonably be expected to have brought the complaint forward sooner.
- j) If the complaint relates to an allegation about a colleague – in most cases we will accept it as a complaint and the relevant line manager and People and Culture colleagues will investigate. It's likely that the information we can provide to the customer will be limited because of data protection considerations and our HR processes. If the issue relates to a serious incident and/or a matter involving the police, we may choose to deal with it outside the complaint procedure. In these cases, this will be explained to the customer including how they will receive updates on their case.
- k) If a customer has found defects in their new build property, as defects are covered by standard warranties, the customer would be expected to raise a claim with our Development team or the relevant insurers.
- l) Complaints relating to consumer credit regulated activity which may be able to be referred to the Financial Ombudsman Service.

5.12 The Complaints Team will review the complaint on its individual merits and circumstances. Where we have a valid reason not to accept a complaint, or to deal with it differently, we will be able to evidence the reasoning. The Complaints Team will notify the customer in writing, (using the COMP00 Complaint Exclusions Letter) explaining the reasons and their right to take the decision to the Housing Ombudsman.

### Collective or group complaints

- 5.13 In general, we respond to collective complaints in the same way as complaints from an individual, and the 2-stage internal process outlined above if the customer is not satisfied.
- 5.14 If a complaint is received from an individual on behalf of a group, we will confirm with all the individuals cited that they wish to make a complaint. Where the collective complaint comes from a sizeable group, with the consent of the individuals we can agree to respond to the complaint communicating with up to 3 agreed lead complainants. This will help ensure clear lines of communication.
- 5.15 Collective complaints may highlight the scale of customer concerns about a service. At each stage of the complaint handler should offer to meet with the complainants (or the lead complainants) to try and resolve the complaint in person. Mediation can be considered at any stage and may be particularly useful where several parties are involved.

### Staff Conduct Complaints

- 5.16 Line Managers are responsible for investigating complaints about the conduct of Octavia colleagues with support of People and Culture (P&C) team and must do so with discretion and with the appropriate levels of confidentiality. Any communications and information recorded on CRM about the issue will not name any individual colleagues. If an incoming complaint has referenced the name of an implicated colleague directly onto CRM, in many cases it will be appropriate to delete the name of the colleague and replace it with a role-based title e.g., Customer Housing Lead. All discussion of that colleague's behaviour or role in the issue will then take place outside of CRM and in confidential communications. In more serious cases, the approach set out in 5.18 below will apply.
- 5.17 Where a complaint is raised with an Octavia colleague, the colleague who takes receipt of the initial customer contact must ensure they speak with their line manager before logging it, to ensure the correct course of action is taken at the earliest possible stage. For example, it may be appropriate that the line manager and P&C team are informed of the incident being complained about, before a complaint is logged, as depending on its nature there may be circumstances, particular in serious or sensitive cases, where it is not appropriate to log this as a formal complaint. This may be the case for example if there will be police involvement and/or the number of people who are party to the details of the incident needs to be kept to a minimum and this decision will be made following advice sought from HR by the colleague's line manager.
- 5.18 When a Complaints Team receives a complaint about a colleague where it has been agreed to log it through the route described in 5.16, they must reach out to the line manager of the colleague within two days of the complaint being received to establish the best way forward – for example it may be appropriate for the line manager to be the main point of contact for the customer rather than the Complaint Handler.
- 5.19 Outcome Notes will be limited to the level of detail which is appropriate to share with the customer bearing in mind data protection and confidentiality considerations relating to HR processes. No indication will be given to the customer of whether the colleague has been subject to disciplinary

actions of any kind. However, if the investigation has flagged the need for Octavia to improve training for better performance this can be conveyed.

- 5.20 We are unable to share specific personnel notes with customers following any investigation. If any subsequent Subject Access Request (SAR) request is made, we would need to review the record with our Data Protection Officer to see if any of it is subject to disclosure if properly redacted, but we will offer assurance on the depth of that investigation and confidence in our complaint outcome as a result. Any information shared with customers to outline the outcome of the complaint's investigation would need to be reviewed by the line manager and P&C, and if required, the Data Protection Officer. In terms of the limitation of the information we provide on the outcome, the same may also apply to Housing Ombudsman Complaint Investigations. If challenged on this by the Housing Ombudsman, we'd review on a case-by-case basis.
- 5.21 Communication with the customer should not generally identify individual colleagues or contractors who are acting on behalf of Octavia.

#### Housing Condition Claims

- 5.22 Any housing condition claims need to be brought to the attention of Octavia's legal representation. When the pre action protocol is initiated, it is important that we do not disengage from either our internal complaints process or the repair issue itself. Commencing the protocol does not constitute legal proceedings and alternative dispute resolution can be pursued at any stage of the protocol. The Housing Ombudsman's view is that a matter does not become 'legal' until proceedings have been 'issued'. The issuing of proceedings involves filing details of the claim, such as the Claim Form and Particulars of Claim, at court. Where proceedings have been issued, we should ensure that all matters raised in subsequent correspondence form part of those proceedings and do not need addressing our internal complaints process. Compliance with this escalation process will be quality checked and assured in line with the Quality Control Framework.
- 5.23 Colleagues from repairs and maintenance teams should also be engaged with when investigating and responding to all complaints regarding house conditions, to ensure management of the substantive issue(s) the customer has raised.
- 5.24 The Complaints Team will monitor the case and work with our repairs team to reach a resolution, to prevent the complaint from escalating and to avoid the need for the customer to have to engage lawyers on their behalf to continue, or to bring a legal claim. The customer will be clearly informed of how a case is being managed, and if/when the internal complaints process has been exhausted.

### **Step 2 – Acknowledging a stage 1 complaint**

- 5.25 Within two working days of receiving the complaint, the Complaints Team should:
- Log the complaint of CRM, generating a complaint reference number which should be used on all correspondence.



- Complete sections within the complaint case on CRM relating to trends, responsible manager, due date, categories (where relevant)
- Assign the complaint to the Complaints Team Leader to re-assign to a Complaint Handler.

- 5.26 The Complaint Handler is responsible for ensuring the complaint is acknowledged within two working days of receipt of the complaint being logged. In line with the Housing Ombudsman Code, the total time from the customer making the complaint and it being logged and acknowledged should not exceed five working days.
- 5.27 Where the complaint is not acknowledged within five working days, the reason should be logged in the field on CRM. The target date should also be updated to account for this delay and ensure the customer is not disadvantaged by the late acknowledgement. The overall number of days to respond should be the same as if it was acknowledged on time.
- 5.28 The Stage 1 acknowledgement letter (**COMP01**) outlines the investigation process and includes:
- The timescale to provide a full response
  - A complaint reference number
  - Our understanding of the complaint and the outcomes the customer is seeking based on the details of the complaint the customer has put forward.
  - The name and contact details of the person handling the complaint
  - Details of the Housing Ombudsman Service (or other Arbitrator where appropriate – see section 9).
- 5.29 The Complaint Handler will complete the acknowledgement task on CRM and send a copy of the acknowledgement letter to the customer.
- 5.30 Where the complaint requires service actions, such as a repair is still not completed, the Complaints handler should assign these to the responsible service area.

### **Step 3 – Responding to a Stage 1 complaint**

- 5.31 The Complaint Handler is responsible for fully investigating the complaint, collaborating with colleagues, and contractors where necessary, keeping the customer updated on progress, and responding as quickly as possible. The Complaint Handler must fully record all details of the case within our CRM Complaints module and complete all assigned workflow tasks within the case. Refer to the [CRM Responding to Complaints guide](#). Complaint Handlers can use the [Investigation Plan Template](#) to assist them in planning their investigation, and they should record their findings and outcomes in the Complaint [Investigation Report Template](#), both of which can be found on the Hub.
- 5.32 The Complaint Handler will seek to telephone the customer no later than two working days of being allocated the stage 1 complaint, and:
- Say that they are sorry to hear the customer is unhappy with the service.
  - Clarify their understanding of the complaint and the outcome the resident is seeking. The Complaint Handler must be clear which aspects of the complaint we are, and are not, responsible for. If any aspect of the complaint is unclear, the Complaint Handler must ask the customer for clarification and the full definition agreed between both parties.



- Let the customer know how any urgent service failures will be put right.
- Where resolving the complaint to the customer's satisfaction will be complex, work through the issues with them to establish acceptable expectations for both parties. The complaint handler will thank the customer for their contact, reassure them we are taking the matter seriously and that we will get back to them with a full response.
- Offer to meet with the customer in person if they wish.
- Complete the follow up contact task on CRM
- Signpost the customer to any relevant policies
- Send them a copy of the complaints policy or roadmap if this will be helpful

- 5.33 In exceptional cases the Complaint Handler will not make the follow up call where the customer has indicated they do not wish to be contacted by phone. The complaint handler may also decide not to make the follow up call if they judge that it would not be helpful (for example based on knowledge of the customer from previous contacts). The Complaint Handler must record their reasons for not calling in the outcome section of the CRM task – Stage 1 follow up Phone Contact when completing the task.
- 5.34 When investigating the complaint, the Complaint Handler must:
- Deal with the complaint on its own merits, act impartially and independently, and have an open mind;
  - Ensure they have a full understanding of the complaint and the outcome the customer is seeking
  - Take measures to address any actual or perceived conflict of interest; and
  - Consider all relevant information and evidence carefully.
  - Respond within timescales set out in the complaints policy and this procedure
- 5.35 As well as reviewing all necessary system notes and listening to calls in line with our Call Recording Policy and Procedure, Complaint Handlers will work with relevant teams or departments within Octavia to investigate all aspects of the customer's complaint and it may be necessary for a surveyor to visit the customer's home in a housing condition complaint. Complaint Handlers have access to colleagues at all levels to facilitate the prompt resolution of complaints. Whilst teams, departments, and colleagues at all levels may be asked for input, it is the role of the Complaint Handler to come to an independent and fair outcome to the complaint, and they have the authority and autonomy to decide what action, if any, we should take to put things right for our customer and resolve disputes promptly and fairly.
- 5.36 The complaint outcome and any remedial action should be in line with our Policies and Procedures. If the Complaint Handlers feels that an alternative approach is required to satisfy the customer's complaint, they should seek approval from the Complaints Team Manager.
- 5.37 To support the Complaint Handler in completing a prompt investigation, internal teams are asked to respond to queries within two working days, and to prioritise complaints. When investigating complex cases, or cases where the customer has concerns with the service delivered by multiple Directorates and/or teams, the Complaint Handler should bring these to complex case/escalated cases forum meeting to discuss a resolution for the customer.

- 5.38 If internal teams do not respond to requests for information, or the information provided is not of an adequate quality, the Complaint Officers should escalate this to the colleague's Line Manager. This could include a Team Leader, Manager, Head of Service, or Director, subject to the role of the colleague in question. This also applies if colleagues do not attend meetings called, without suitable justification.
- 5.39 Complaint Handlers are required to detail the investigation they have completed for each individual complaint, including their findings. Complaint Handlers must also offer justification into the outcome they reach and further actions to be taken to put things right with our customer. This [Investigation Report Template](#) should be saved on the system once the case is closed.
- 5.40 This Report should be appropriately detailed as it could form part of a Stage 2 Pack / Ombudsman Pack if the case is escalated by the customer. Similarly, it will be used for Quality Check and Quality Assurance purposes.
- 5.41 A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the customer.
- 5.42 Where the Complaint Handler feels they need further clarification on the complaint or outcomes expected, or where they need to update the customer on how urgent service actions will be put right, they should call the resident to discuss this.
- 5.43 All Stage 1 complaints must be responded to and, where possible, resolved within 10 working days of the complaint being acknowledged.
- 5.44 A complaint response is provided when the answer is known, not when all outstanding actions are completed. However, we will track and promptly action any actions that are outstanding after we issue our response and keep Customers informed. We will ensure we follow the solution offered through to completion.
- 5.45 The Complaint Handler may need to extend the response time, for example where the complexity of the case means more time is needed to investigate. If so, the complaint handler will extend the complaint giving a clear explanation and details of when a response will be received. This will not exceed a further 10 working days without good reason. They will agree with the customer suitable intervals, to keep the customer informed about their complaint. **COMP02** Stage 1 Extension Letter should be used, and we must provide the contact details of the Housing Ombudsman (or other arbitrator as required – see section 9).
- 5.46 If we're unable to issue a full complaint response after the initial and extended timescales set out in the Code, the complaint handler will contact the customer to agree suitable intervals to update on the progress of their complaint. Where the 10-day timeline for responding to complaints (and any extension) is not met, the reasons should be logged in the field on CRM, with any formal evidence of agreement to extensions uploaded to CRM.

- 5.47 For housing condition/disrepair complaints, the Housing Ombudsman's timescales may not be achievable, and the customer should be informed accordingly, and given contact details for the Housing Ombudsman.
- 5.48 Where agreement over an extension period cannot be reached, the Complaint Handler must provide the customer with the Housing Ombudsman's contact details so the customer can challenge Octavia's plan for responding and/or the proposed timeliness of the response.
- 5.49 Where the Complaint Handler or Complaints Team needs advice or information from another manager, this must be done at the earliest opportunity to ensure a complete response within agreed timeframes.
- 5.50 Where the problem is a recurring issue, the Complaint Handler or Complaints Team will consider any older reports as part of the background to the complaint if this helps to resolve the issue.
- 5.51 The response 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. All relevant information and evidence should be carefully considered. The style and tone are equally as important – use clear, simple language, be customer focused and not bureaucratic.
- 5.52 If the customer raises additional complaints during the investigation, these must be incorporated into the stage one response if they are relevant, and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint following step 1 of the process.
- 5.53 Use standard letter template **COMP03** Stage 1 Response Letter for the response using the Create Document facility on CRM (refer to [CRM Responding to Complaints guide](#)) and include the details of any remedy offered to put things right and:
- The complaint stage
  - The complaint definition
  - The decision on the complaint
  - The reasons for any decisions made, with reference to the relevant policy, law and good practice where appropriate
  - The details of any remedy offered to put things right
  - Details of any outstanding actions
  - Details of how to escalate the matter to stage two if the customer is not satisfied with the response
  - Details confirming that if the customer is not satisfied with the response, they have 20 working days to request a stage 2 review by a Senior Manager.
  - A link to the complaints survey
  - If the complaint has been upheld or not upheld (we either acted reasonably and in accordance with our policies or did not). The lessons learnt tracker should be completed whether the complaint was upheld or not, as in both cases service improvements may still be identified.

- 5.54 Where suitable, we will call the customer to explain our investigation findings, unless the customer has indicated that they don't want us to. This provides the Complaint Handler with the opportunity to confirm what information has been reviewed, what they found, the outcome of their investigation into the complaint, and what action we may be taking to put things right to repair the relationship with the customer. The customer can also ask any questions they may have and provide feedback on the complaint investigation and outcome.
- 5.55 If an MP supported the customer in bringing their complaint to Octavia, the MP should be copied into correspondence with the customer, or a separate update provided.
- 5.56 The Complaint Handler may also need to have their response reviewed by a Quality Officer before it is sent. The Complaint Handler must allow at least two working days for this to happen.
- 5.57 The Complaint Handler is responsible for ensuring follow up actions are passed to the relevant service area to be carried out. If actions have not been carried out as agreed they should be prioritised, and a new date should be agreed with the customer and the relevant Head of Service should be made aware where necessary.
- 5.58 The Complaint Handler will use the email template in the complaint case in CRM and must attach a copy of the complaint response as a PDF with the appropriate title and complaint case reference in the email subject heading. The Complaint Handler will send this email to the customer and cc in the complaints email address. If the response is to be sent via post, the Complaint Handler must upload a pdf copy of the response to the CRM case confirming how it has been sent. The Complaints Officer will then close the case on CRM.

## 6 Complaints requiring input from our partner contractors

- 6.1 Sometimes, our partner contractors may provide us with the information to respond to complaints at Stage 1. This will be agreed by the relevant Complaint Handler in liaison with the Complaints Team and will form part of the complaints process described in this procedure. Customers will never be expected to go through two complaints processes.
- 6.2 Where the contractor is providing information for the response, they will:
- Provide an update and as much information for the complaint handler so that the complaint handler can include it in the response, which will be sent using Octavia's standard template complaint letters
  - Work to the timescales and process stages set out in this procedure
- 6.3 Where the contractor is providing information for the response, the Complaints Team must:
- log and administer the complaint on CRM
  - Send the letter of acknowledgement to the customer as well as to the contractor for their reference.
- 6.4 The Complaint Handler will send the response to the customer.

## 7 Stage 2 Complaints

### Step 1 – Receiving a stage 2 complaint

- 7.1 If the customer remains dissatisfied following with the outcome of their complaint at Stage 1, they have the opportunity to escalate their concerns to Stage 2 for the handling and outcome of the complaint to be reviewed. Complaints will only be escalated to stage 2 if a response has been provided at stage 1 and it is at the customer's request.
- 7.2 The Complaints Team may receive confirmation that the customer would like to escalate to stage 2 via the complaint's inbox, email, in-person, online, by phone or letter and proceeds with the stage 2 complaint on CRM.
- 7.3 Customers are not required to explain their reason for requesting a stage 2 review. We will, though, make reasonable efforts to understand why a customer remains unhappy as part of our stage 2 response. We must not refuse to escalate a complaint unless it falls within the exclusions listed in 5.12 or, for example, we have justification for stating that the customer is escalating the matter solely with malicious intent, as the customer knows that the outcome of the complaint will not change.
- 7.4 Decisions to not accept a stage 2 complaint will be reviewed on a case-by-case basis, by the stage 1 Complaints Officer and the Complaints Team Manager. Where we decline to escalate a complaint, the Complaints Team must explain to the customer clearly, and in writing, the reasons for not escalating as well as the customers right to approach the Housing Ombudsman.
- 7.5 Where the escalation to stage 2 is accepted, the complaints team will log the complaint to the Customer Relations Manager or Complaints Team Leader who will subsequently assign to a Stage 2 Complaint Handler.
- 7.6 The complaint reference number from stage 1 will be the same for stage 2 and should be included on all correspondence.

### Step 2 – Acknowledging a stage 2 complaint

- 7.7 The Stage 2 Complaint Handler will aim to acknowledge the complaint in writing within two working days from assignment. The Stage 2 acknowledgement letter (**COMP05**) must include:
- The timescale to provide a full response
  - A complaint reference number
  - The name and contact details of the person handling the complaint
  - Our understanding of the complaint and the outcomes the customer is seeking. If unclear, the Complaint Handler must contact the customer and

ask them to clarify the details of the complaint and the outcomes they are seeking. The officer must then confirm their understanding with the customer.

- Details of the Housing Ombudsman Service (or other arbitrator as required – see section 9)

7.8 Where the five-day timeline for logging and acknowledging complaints is not met, the reason should be logged in the field on CRM.

### Step 3 – Responding to a Stage 2 complaint

- 7.9 The Complaint Handler is responsible for fully reviewing the stage 1 complaint and response, collaborating with colleagues, and contractors where necessary, and keeping the customer updated on progress. The Complaint Handler must fully record all details of the case within our CRM Complaints module and for completing all assigned workflow tasks within the case. Refer to the [CRM Responding to Complaints guide](#). The Complaints Handler will seek to telephone the customer within two working days of receiving the stage 2 complaint, and will:
- Say that they are sorry to hear the customer remains unhappy with the service.
  - Clarify the nature of the complaint and the outcome the customer is seeking.
  - Clarify areas of disagreement and background information if necessary
  - Where it is clear resolving the complaint to the customer's satisfaction will be complex, discuss this with them to set realistic expectations.
  - Thank the customer for their contact, reassure them we are taking the matter seriously and that we will get back to them with a full response.
  - Offer to meet with the customer in person if they wish.
  - Send the customer a copy of the complaints policy or roadmap if this will be helpful
  - Complete the follow up contact task on CRM.
- 7.10 In exceptional cases the Complaint Handler will not make the follow up call where the customer has indicated they do not wish to be contacted by phone. The complaint handler may also decide not to make the follow up call if they judge that it would not be helpful (for example, based on knowledge of the customer from previous contacts).
- 7.11 We must respond to all Stage 2 complaints within 20 working days of the complaint being received. The Complaint Handler may need to extend the response time, for example where the complexity of the case means more time is needed to investigate. If so, the complaint handler will extend the complaint giving a clear explanation and details of when a response will be received. This will not exceed a further 20 working days without good reason. They will agree with the customer suitable intervals, to keep the customer informed about their complaint. Any formal evidence of agreement to extension is uploaded to CRM.
- 7.12 Any extension should be communicated to the resident using **COMP06** Stage 2 Extension Letter and the resident should be provided with the Ombudsman's contact details (or other arbitrator as required – see section 9).
- 7.13 Where the 20-working day timeline for responding to complaints (or any extension) is not met, the reason should be logged in the field on CRM and we must agree with the customer suitable

intervals to keep the customer informed on the progress of their complaint.

- 7.14 Where the Complaint Handler needs advice or information from another manager or director, this should be done at the earliest opportunity to ensure a timely, complete response. The response must involve all suitable staff members needed to issue a final response.
- 7.15 A complaint response is provided when the answer is known, not when all outstanding actions are completed. However, we will track and promptly action any actions that are outstanding after we issue our response and keep Customers informed. We will ensure we follow the solution offered through to completion.
- 7.16 The Complaint Handler will review the Stage 1 decision and decides whether the complaint was handled:
- Thoroughly having considered all the available relevant facts.
  - Fairly and reasonably.
  - In accordance with Octavia's policies and procedures.
- 7.17 The Complaint Handler will consider if any reasonable flexibility can be exercised to resolve the complaint without setting a poor precedent or that would result in other customers receiving an unfair service.
- 7.18 The stage 2 response 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. The style and tone are equally important - be customer focused and not bureaucratic.
- 7.19 A Stage 2 complaint response is provided to the when the answer is known, not when all outstanding actions are completed. However, we will track and promptly action any actions that are outstanding after we issue our response, and keep you informed. We will ensure we follow the solution offered through to completion.
- 7.20 The Complaint Handler will use the **COMP07** Stage 2 Response Letter to draft the response and include:
- The complaint stage
  - The complaint definition
  - The decision on the review
  - The reasons for any decisions made
  - The details of any remedy offered to put things right
  - Details of any outstanding actions
  - Information on how a customer can escalate the matter to the relevant Arbitrator if they remain dissatisfied with the review (see section 9)
  - A link to the complaints survey <https://forms.office.com/e/0QJ53iwM5T>
- 7.21 The Complaint Handler will use the email template in the complaint case in CRM and must attach a copy of the complaint response as a PDF with the appropriate title and complaint case reference in the email subject heading. The Complaint Handler will send this email to the customer and cc in the complaints email address. If the response is to be sent via post, the



Complaint Handler must upload a pdf copy of the response to the CRM case confirming how it has been sent. The Complaints Officer will then close the case on CRM.

- 7.22 The Complaint Handler must complete the stage 2 response task on CRM immediately after sending the letter. Refer to the [CRM Responding to Complaints guide](#).

### **Putting things right**

- 7.23 Effective dispute resolution requires a process designed to resolve complaints.
- 7.24 Where something has gone wrong the Complaint Handler must acknowledge this and set out the actions we have already taken, or intend to take, to put things right for the customer. These can include but are not limited to:
- acknowledging where things have gone wrong
  - providing an explanation,
  - providing assistance or reasons for what went wrong
  - apologising to the customer
  - taking action if there has been a delay
  - reconsidering or changing a decision
  - amending a record
  - providing a financial remedy
  - reviewing policies, procedures or practices
- 7.25 Any remedy offered must reflect the extent of any service failures and the impact on the customer. The manager must carefully manage the expectations of customers and not promise anything that cannot be delivered or would cause unfairness to other customers.
- 7.26 The manager should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all customers.
- 7.27 Factors to consider in formulating a remedy can include, but are not limited to, the:
- length of time that a situation has been ongoing
  - frequency with which something has occurred
  - severity of any service failure or omission
  - number of different failures
  - cumulative impact on the customer
  - customers' particular circumstances or vulnerabilities.
- 7.26 The remedy offer must clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed must be followed through to completion.
- 7.27 In awarding compensation, the manager must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble the customer has been put to as well as any distress and inconvenience caused.

- 7.28 In some cases, the customer may have a legal entitlement to redress. The manager should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.
- 7.29 Customers are entitled to begin or continue legal proceedings following accepting an offer of redress if they are dissatisfied with the amount of redress or work offered. The details of the customer's issue and the justification for the remedy must be provided to the customer in writing, commonly in the complaint response; setting out what will happen and by when.
- 7.30 The customer should accept the offer in writing, ensuring that is clear what the customer is agreeing to accept. If necessary, reasonable adjustments can be made to this, but this should be offered with the support of a suitable colleague, such as the customer's Customer Housing Lead.
- 7.31 For further information on remedies please refer to our [Compensation guidance](#) and the [Housing Ombudsman's Guidance](#). You can also refer to: [Decisions Archive - Housing Ombudsman](#).

## 8 MP and Councillor Enquiries

- 8.1 The Complaints Team may receive confirmation that an MP or Councillor has submitted an enquiry on behalf of a customer via the complaint's inbox, email, in- person, online, by phone or letter and proceeds with an MP enquiry on CRM.

Complaints that are submitted via a third party or representative, such as an MP, must be handled in line with this complaints policy and procedure. See paragraph 5.7

- 8.2 MP enquiries should be logged as an 'MP/Councillor Enquiries' case on CRM and linked to the complaints case where relevant. Where a complaint case is already in progress regarding the issues raised by the MP / 1Councillor, we should update the MP / Councillor on this.
- 8.3 Where an issue raised presents a potentially high risk, the senior manager should notify the Communications Team.
- 8.4 The MP enquiry should be acknowledged by the Complaints Team using COMP11 MP Acknowledgement Letter within 5 working days.
- 8.5 The MP / Councillor enquiry should be sent to the relevant senior manager to complete their investigation and draft the response within 5 working days. This is then sent to the Complaints Team to be quality checked.
- 8.6 The MP enquiry should be responded to using **COMP12** MP Response Letter and must be sent within 10 working days of acknowledgement.
- 8.7 Where a repair has been carried out, in all cases for MP enquiries we must contact the resident to ask their satisfaction with the repair.
- 8.8 All MP enquiries must go out in the name of the Regional Managing Director. For councillor enquiries, depending on the area the enquiry is addressed to, the response will be reviewed by and sent out in the name of the relevant Assistant Director:
- Property –Relevant Assistant Director – Repairs, Asset Compliance or Asset Management
  - Housing – Assistant Director Housing
  - Customer Experience – Assistant Director, Customer Experience, Insight & Partnerships
  - Care and Support – Assistant Director Care and Support
- 8.9 Weekly reports will be issued to senior managers from the Complaints Team tracking progress with MP / Councillor enquiries.

## 9 Housing Ombudsman and other Ombudsman Services

- 9.1 If a customer remains dissatisfied with the outcome of their complaint having been through our internal complaints process, they have the right to take their complaint to an Ombudsman service and/or into the legal process, with the help of solicitors. The Complaints Team are expected to advise on the suitable arbitrator and the customers escalation rights.

### **Housing Ombudsman**

- 9.2 In the majority of customer complaints, the Housing Ombudsman Service is the appropriate Arbitration service to review complaints where customers remain dissatisfied.
- 9.3 Where the customer refers the complaint to the Housing Ombudsman, generally the Housing Ombudsman will:
- Inform us that they have received a complaint/contact and let us know what information and / or actions they require from us
  - Confirm in writing their estimated timescale for investigating the complaint
  - Request that relevant papers are submitted to them within the timeframe stipulated
- 9.4 Abri's Dispute Resolution Team will:
- Log on CRM and acknowledge any correspondence sent from the Housing Ombudsman on behalf of the resident
  - Notify the relevant Managers, Heads of Service and Assistant Directors who will help support with the information compilation
  - Monitor the case in line with the timescales set by Housing Ombudsman
  - Co-operate fully will all requests for information made by the Ombudsman, and work with them to resolve complaints effectively, and adhere to recommendations made to put things right
  - Track the progress of the investigation until the Housing Ombudsman decision is received
  - Provide a copy of the decision to the relevant Director or their Executive Assistant.
- 9.5 The Assistant Director of Customer Experience, Insight and Partnership will in conjunction with the Dispute Resolution Team:
- Prior to responding to the Housing Ombudsman, review every response to a request for information to ensure all information is present and accurate. Legal advice should also be sought where appropriate.
  - Review the Housing Ombudsman decision and decide if Octavia should request a further review by the Housing Ombudsman.
  - Provide a report on the learning and actions for the Executive Team and lead governing body Committee to review when there is a finding of maladministration or severe maladministration.
  - Report back to Housing Ombudsman evidence of implementation of any service improvement recommendations.

### **The Energy Ombudsman**

- 9.6 If customers do not agree the amount of scheme benefit passed to them is just and reasonable, customers can raise this with Octavia in the first instance. If a customer is still unhappy with the

amount of scheme benefit passed on, and they have reason to believe that the pass-through requirements in the Energy Bill Relief Scheme Pass-through Requirement (Heat Suppliers) (England and Wales and Scotland) Regulations 2022 have not been met, customers are entitled to raise a complaint with the Energy Ombudsman.

- 9.7 Customers can raise a complaint on the following grounds:
- The heat supplier has not notified the customer in writing that they are in receipt of the EBRS.
  - The heat supplier has not notified the customer in writing of how and when the benefit of the EBRS will be passed on to the customer.
  - The heat supplier has not passed the benefit of the EBRS on to the customer in their next bill, given this bill was issued after 30th November 2022 and when the heat supplier has been in receipt of the EBRS for at least 30 days.
  - The heat supplier has not complied with any other part of the pass-through requirement.

### **Financial Ombudsman Service**

- 9.8 If we receive a Financial Ombudsman Service complaint, the Complaints Team will work with our legal representation and relevant Manager, Head of Service or Assistant Director to collate the information required and manage communications with the Ombudsman.

### **Local Government and Social Care Ombudsman**

- 9.9 Customers who have a complaint related to our Care and Support services and remain dissatisfied with the final response issued at Stage 2 and with the subsequent review by the local authority, can complain to the Local Government and Social Care Ombudsman (LGSCO).

### **Building Safety**

- 9.10 This section is limited in scope to buildings that are owned and managed by Octavia and to which building safety cases currently apply – that is High Risk Buildings that are 18 meters or 7 Storeys or more and in occupation. The scope is also limited to the matters defined below.
- 9.11 Definition: For the purpose of this section only, a relevant complaint is defined in the Building Safety Act as a complaint relating to:
- a ‘building safety risk’ - a risk to the safety of people in or about the building arising from either the spread of fire or structural failure; and
  - the performance by an accountable person with regard to their duties.
- 9.12 Where a complaint regarding building safety does not meet the above definition, it may still be able to be reviewed under the wider complaints policy. We will advise if this will be used instead.
- 9.13 The complaints policy outlines further detail in terms of exceptions and adjustments for Building Safety Act complaints, as well as how to ensure we keep appropriate records of relevant complaints.

- 9.14 Complaints Officers must ensure that if a complaint is received that falls within the criteria of a relevant complaint as defined under the Building Safety Act, the Head of Building Safety is notified immediately. This needs to happen at the earliest possible stage so if possible, should be picked up at the complaints logging stage by the administration team.
- 9.15 For Building Safety related complaints, the jurisdiction of the Housing Ombudsman does not apply and this must be made clear in communication with the customer. The Building Safety Regulator can be contacted by phone on 0300 790 6787 or through their website. Contact the Building Safety Regulator

## 10 Insurance claims & involving the legal advice

- 10.1 Should an aspect of a complaint require legal advice or involvement from Octavia's Insurers, we recognise this may cause a delay in resolving the customer's complaint. The Complaint Handler will take ownership and ensure that the customer is kept up to date on the progress of their complaint, working collaboratively with other departments, when required. It is important the Complaint Handler seek appropriate legal advice and input from the insurance team to provide the technical information related to the insurance review and recommended next steps for the Complaint to be resolved.
- 10.2 Should the customer's complaint be superseded (for example, by the customer commencing an insurance claim against Octavia), we may decide to close the complaint and explain our decision to the customer, but we may also ask that the legal action is put on hold until both stages of the complaint's procedure are completed.
- 10.3 If a customer wishes to raise a claim against Octavia's insurance, the Complaints Team should inform the relevant service area and the Insurance Team through [insurance@octavia.org.uk](mailto:insurance@octavia.org.uk), as well as inform the customer that they can seek independent legal advice. An email to the Insurance Team should include the date of the incident, the claim made by the claimant, and a basic description of the incident.
- 10.4 The Complaint Team should not instigate a claim but should be transparent with the customer and be clear that a claim can be brought.
- 10.5 The Complaint Officers should inform the customer that Octavia's insurers will investigate the matter and either accept or reject the claim based on whether Octavia is legally liable. The customer may be required to communicate with Octavia's insurers directly and that full cooperation with the insurer is recommended. Octavia cannot interject in the direct correspondence between the customer and the insurer up to and including submitting a claim on Octavia's behalf, submitting information requested by the insurer on behalf of the customer, and making enquiries on the claim status on behalf of the customer. It is of vital importance that the customer is informed and accepts that Octavia cannot guarantee a favourable outcome for the customer.

## 11 Data Protection and Subject Access Requests

- 11.1 Allegations of a breach of a customer's data protection are responded to by Octavia's Data Protection Officer. However, a customer may raise a complaint about the handling of this allegation or other related matters. When raising a complaint in relation to an alleged breach of a customer's data protection, the Data Protection Policy and Information Security Policy should be followed. These policies. Allegations should be reported. The response should append the outcome previously provided by Octavia's Data Protection Officer, as the authority on matters of data protection in Octavia.
- 11.2 Customers may also request a Subject Access Request (SAR) which is covered by the Subject Access Request policy and procedure owned by the Data Protection Officer (DPO), and such requests are managed under this procedure. If a customer requests a SAR via the Customer Experience team they must refer it immediately to the Data Protection Officer. Subject Access Requests made by customers must be actioned immediately as they are subject to strict timescales, so the DP team should be notified immediately by whoever takes the initial request from the customer. As with Data Breaches, requests for data under a SAR could give rise to a complaint if the customer doesn't agree with or is unhappy with information they have or have not received as part of their request. In these cases, the customer may log a formal complaint, but as with data breaches, the Complaint Handler must work alongside Octavia's DPO in their investigation and when putting together their response.

## 12 Continuous Improvement and Lessons Learnt

- 12.1 We recognise the value that complaints provide. We want to learn from customer feedback, from complaints and our handling of complaints.
- 12.2 At the conclusion of each stage of the complaints process, we ask the customer for feedback on their experience of how we handled their complaint by completing a short survey <https://forms.office.com/e/0QJ53iwM5T>. Each stage of the complaints process is surveyed. In the event the electronic survey is unsuitable, customers can complete the survey over the phone. The officer must not seek to encourage or influence the customer's scoring.
- 12.3 The Complaints Team will hold monthly lessons learnt reviews, bringing together key service areas which have been involved in recent complaint handling to discuss complaints over the past month and identify service improvements. The outcomes and actions of these meetings must be tracked and monitored by the Complaints Team to ensure implementation of learning and service improvements. Each month the Complaints Team will request an update from senior managers on service improvements recorded and not yet completed to ensure we can report back on our learnings in our formal reporting.
- 12.4 A member of our governing body has lead responsibility for complaints to support a positive complaint handling culture. This person is our Member Responsible for Complaints (MRC). As a minimum, the MRC is responsible for ensuring our governing body receives:
- Regular updates on the volume, categories, and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders
  - Regular reviews of issues and trends arising from complaint handling
  - The annual performance report produced by the Ombudsman



- Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses will be tracked to ensure they are delivered to agreed timescales.
- We will produce an annual complaints and performance service improvement report which includes our annual self-assessment against the Complaint Handling Code for scrutiny and challenge.
- Each year we will carry out an annual self-assessment against the Complaint Handling Code to ensure our complaint handling remains in line with the code's requirements. We will also carry out a self-assessment following significant restructures, merger, changes in procedure, or when asked by the Housing Ombudsman. Following each self-assessment, we will report the outcome of our self-assessment to the governing body and publish the outcome of the assessment on our website, our Annual Report, and our governing body's response to the report.

- 12.5 All relevant staff must commit to and have objectives in relation to complaint handling which reflects the need to:
- Have a collaborative and co-operative approach towards resolving complaints and working with colleagues across teams and departments.
  - Take collective responsibility for any shortfalls identified through complaints rather than blaming others
- 12.6 The Learning & Development Team will regularly provide complaints handling training to relevant staff. Staff handling complaints are expected to behave professionally and courteously and their professional development will be supported by the Housing Ombudsman's Centre for Learning.
- 12.7 We report on detailed complaints performance monthly, quarterly and annually. The forums include the following:
- Executive Team (monthly)
  - Resident Panel (Quarterly) Members Responsible for Complaints (Quarterly)
  - Service Quality Committee (Quarterly)
  - Octavia Board
- 12.8 Examples of information that will be reported include:
- Number of Complaints received monthly
  - Percentage of complaints responded to within timescale
  - Satisfaction with the complaints service
  - Percentage of complaints upheld, not upheld
  - Average time to respond to complaints at Stage 1 and Stage 2
  - Cost of complaint related service failure
  - Service improvement outcomes
  - Comparison across the sector using HouseMark
  - Trends analysis of types of complaints, categories and trends by departments
- 12.9 High volumes of complaints should not necessarily be seen as negative, as it can be an indication of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.

- 12.10 A customer focus group of recent complainants and the complaints panel will be held at every review of the Complaints Policy to learn from customer journeys and feedback.

### 13 Compliments

- 13.1 Any Officer receiving a compliment about a member of staff or service will log the contact on CRM and acknowledge and thank the customer for the compliment.
- 13.2 The Officer receiving the compliment will notify the staff member concerned (if they are not the subject of the compliment themselves), and if they are not the line manager of the service concerned, they should also inform the relevant Complaint Handler.
- 13.3 The line manager of the staff member/s complimented considers if the work involved merits an Award or a Workplace post.

### 14 Equality, Diversity and Inclusion

- 14.1 We will treat all customer with fairness and respect and will apply this procedure fairly and consistently.
- 14.2 We will deliver all services and activities within the spirit and context of current equality legislation including the Equality Act (2010). Whether it's ensuring accessibility for those with physical disabilities, providing support for individuals with mental health challenges, or accommodating cultural and religious requirements. We understand not everyone is able to exercise their right to raise concerns or complain about the service they have received due to their individual needs. In line with our Reasonable Adjustments Policy, we will make reasonable adjustments to the procedure when identified.
- 14.3 We will not discriminate against any person or group of persons on the grounds of age; disability; gender reassignment; marriage or civil partnership; pregnancy or maternity; race; religion or belief; sex; sexual orientation.
- 14.4 Our complaints procedure promotes open communication between our customers and Octavia, for our staff to understand the complaint and resolve it in a positive manner. We will consider customers' communication needs and preferences and offer support or tailor our approach accordingly.

## 15 Roles and responsibilities

Role	Responsibility
Complaints Team /	<ul style="list-style-type: none"> <li>Overall co-ordination of the complaints process, tracking and monitoring responses.</li> <li>Log complaints</li> <li>Administer complaints satisfaction monitoring,</li> </ul>
Complaint Officer – stage 1	<ul style="list-style-type: none"> <li>Acknowledge the complaint by phone - to clarify any points of the complaint and outcome sought. Follow up in writing.</li> <li>Investigate and respond to stage 1 complaints.</li> <li>Attends monthly lessons learnt and service improvement meetings where appropriate and ensures service improvements identified are implemented.</li> </ul>
Complaint Handler – stage 2	<ul style="list-style-type: none"> <li>Acknowledge the complaint by phone – to clarify points of disagreement and outcome sought. Follow up in writing.</li> <li>Investigates and responds to stage 2 complaints.</li> <li>Attends monthly lessons learnt and service improvement meetings where appropriate and ensures service improvements identified are implemented.</li> </ul>
Complaints Team Leader/Customer Relations Manager	<ul style="list-style-type: none"> <li>Assigns Stage 1 and Stage 2 Complaints</li> <li>Reviews the complaint measures and key performance indicators to ensure compliance against internal and external reporting.</li> <li>Works with Assistant Director - Customer Experience, Insights &amp; Partnerships to develop quarterly reports and lead on HOS Evidence Requests.</li> <li>Completes monthly reports of performance metrics e.g. balance scorecard Housemark comparative data.</li> </ul>
Assistant Director of Customer Experience, Insights and Partnerships	<ul style="list-style-type: none"> <li>Carries out the yearly self-assessment.</li> <li>Works with the Complaints Team Leader to produce the quarterly report for Member Responsible for Complaints (MRC).</li> <li>Chairs service improvement and case reviews meetings into complaint handling and learning.</li> <li>Carries out the annual review of complaints and compiles the Annual Complaints Performance and Service Improvement report to Board and ensures this is published to website.</li> </ul>
Member Responsible for Complaints (MRC)	<ul style="list-style-type: none"> <li>Governing body member with lead responsibility for complaints to support a positive complaint handling culture.</li> <li>Responsible for ensuring governing body receives specified updates.</li> </ul>

## 16 Monitoring and reporting

Reports	Reported to	Frequency
Annual complaints performance and service improvement report	Transition and Integration Working Group, Performance Panel, Resident Panel	Annually
Quarterly Performance Report– Complaints	Performance Panel, Transition and Integration Working Group, Resident Panel	Quarterly
Housemark Complaints performance	Housemark	Annually
Balance Scorecard - Complaints	Performance Panel Senior Leadership Group Transition and Integration Working Group	Monthly

## 17 Toolkit documents

Name of document	System
<ul style="list-style-type: none"> <li>COMP00 Complaints Exclusions Letter</li> <li>COMP02 Stage 1 Extension Letter</li> <li>COMP03 Stage 1 Response Letter</li> <li>COMP04 Not Escalating to Stage 2 Letter</li> <li>COMP05 Stage 2 Acknowledgement Letter</li> <li>COMP06 Stage Review Extension Letter</li> <li>COMP07 Stage 2 Response Letter</li> <li>COMP08 Complaints Withdrawal Letter</li> <li>COMP09 Advocate Consent Letter</li> <li>COMP10 Advocate Consent Return Letter</li> <li>COMP11 MP Acknowledgement Letter</li> <li>COMP12 - MP Response Letter</li> <li>COMP16 - MP Acknowledgment Letter</li> <li>COMP17 Service Request Letter</li> </ul>	The Hub & CRM
<ul style="list-style-type: none"> <li>Complaint investigation plan</li> <li>Complaint investigation report template</li> </ul>	The Hub

## 18 Governance

<b>Procedure Owner</b>	Complaints Team Manager
<b>Parent policy</b>	Complaints and Feedback Policy

<b>Associated policies and procedures</b>	Compensation Guidance Reasonable Adjustments Policy Unacceptable Customer Actions Procedure Safeguarding - Protecting Adults at Risk of Abuse Procedure Safeguarding - Protecting Children from Abuse Procedure Anti-social Behaviour and Neighbour Relationships Procedures
<b>Approved by</b>	Assistant Director of Partnerships, Insight and Performance
<b>Endorsed by</b>	Assistant Director of Partnerships, Insight and Performance
<b>Date approved</b>	02/05/2025
<b>Date effective</b>	06/05/2025
<b>Review date</b>	Annually

Revision History			
Date	Reviser	Revision Detail	Approved by
21.08.2025	Assistant Director of Customer Experience	Amends to Sections 5,7,9,15 & 16 following HOS feedback.  Added section on Building Safety Complaints and details of Local Government and Social Care Ombudsman	Transformation and Integration Working Group (TIWG)