

Customer Relations Procedure

VERSION [1.10]

Version Control

Note: minor updates increase version number by 0.1, major updates increase version number by 1.0.

Version Number	Sections Amended	Date of update	Approved by
1.0	Procedure introduced.	November 2020	Director of Customer Experience
1.1	Interim quality control measures introduced.	August 2021	Director of Optimisation and Business Improvement
1.2	Permanent quality control measures introduced.	May 2022	Director of Optimisation and Business Improvement
1.3	Introduction of service requests.	November 2022	Director of Optimisation and Business Improvement
1.4	Change of ownership, merger integration considerations, and Housing Ombudsman Service Complaint Handling Code readiness and changes in Regulation / Law.	March 2024	Executive Director of Operations
1.5	Amends to account for Silva partnership	September 2024	Regional Managing Director
1.6	Minor amends following system integration	November 2024	Associate Director of Customer Service
1.7	Updated with Building Safety Complaints Information	January 2025	Regional Managing Director
1.8	Minor amends following team alignment	7 April 2025	Regional Managing Director
1.9	Minor amends following HOS feedback to policy	1 September 2025	Regional Managing Director
1.10	Updated with Heat Network Legislation changes, incorporation of care complaints for London region & updates in line with Data Use & Access Act 2025.	16 February 2026	Director of Customer Experience

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1. Introduction

- 1.1 By providing good quality homes and services, and by managing data to support those services, Abri is committed to delivering a great experience. Sometimes things go wrong and when that happens, we want to put things right as quickly as possible.

Abri 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.

Abri believe their relationship with customers is important and will normally expect them to try to resolve complaints through this procedure before instructing lawyers to intervene on their behalf.

Where complaints are relevant to data the Information Commission expects customers to seek resolution through this complaints process before seeking regulatory intervention.

This procedure should be considered in conjunction with Abri's Complaints Policy.

2. The Housing Ombudsman and Abri's Commitment

- 2.1 The Housing Ombudsman is an independent arbitrator in the housing sector. It offers a fair and impartial service, resolving customer complaints when things can't be resolved between the customer and Abri. Abri is a member of the Housing Ombudsman Scheme and is committed to developing and maintain a good working relationship with the Housing Ombudsman.
- 2.2 In July 2020, the Housing Ombudsman published its Complaint Handling Code ("the Code") with the intention of enabling landlords to resolve complaints raised by customers quickly and to use the learnings from complaints to drive service improvements. It is also intended that the Code creates a positive complaint handling culture amongst colleagues and customers. The Code was updated in April 2022 and again from 1 April 2024.
- 2.3 To evidence compliance with the Housing Ombudsman Code, Abri will complete a Self-Assessment annually, at the end of each financial year. Abri will also proactively complete an assessment outside of this schedule if significant changes are made to either the Code, our internal processes or following a significant restructure, or merger (marked by the completion of the integration project). Abri will also review and update the Self-Assessment if instructed to by the Housing Ombudsman Service, following an Ombudsman investigation.
- 2.4 If Abri is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, Abri will inform the Ombudsman, provide

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information to customers who might be affected, and publish this on Abri's website. Abri endeavours to provide a timescale for returning to compliance with the Code.

- 2.5 Abri have embraced the Housing Ombudsman's Complaint Handling Code and are committed to ensuring that the Complaints Policy is accessible. A copy of the Equality Impact Assessment completed against Abri's Complaints Policy is available upon request.
- 2.6 Abri understands not everyone is able to exercise their right to raise concerns or complain about the service they have received due to their individual needs. Abri has a Reasonable Adjustments Policy in place to address this.

3. Complaint Handling Staff

- 3.1 Abri prioritises complaint handling and a culture of learning from complaints, and so everyone within Abri is empowered to accept and handle complaints. All relevant staff are suitably trained in the importance of complaint handling.
- 3.2 Abri also has a standard objective, introduced via Abri's Housing Professional of the Future programme (our housing sector learning pathway), in relation to complaint handling for all relevant staff (including third parties) that reflects the need to:
- have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;
 - take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
 - act within the professional standards for engaging with complaints as set by any relevant professional body.
- 3.3 Complaints are a core service within Abri, and the Customer Relations Team is independently responsible for complaint handling and ensuring all complaints made to Abri are dealt with in line with this procedure and the Complaints Policy. This includes liaison with the Housing Ombudsman Service.
- 3.4 Abri's Chief Operating Officer is responsible for the function and oversees the implementation of the Complaints Policy in practice and the regular reporting of complaints to Abri's governing body, including insight on complaint handling performance. Abri's Chief Operating Officer is the Member Responsible for Complaints (MRC). The MRC has lead responsibility for complaints to support a positive complaint handling culture, recognising that cultural is integral to the effectiveness with which Abri resolves disputes.
- 3.5 The Head of Complaints has line management and leadership responsibility of the Customer Relations Team The Customer Relations Manager(s) have

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responsibility for the performance of the Team and service delivery. Complaint Officers are supported by Complaints Team Managers

- 3.6 Complaint Officers are responsible for supporting customers through the complaints journey, investigating cases on their individual merits, and coming to a decision on the outcome.

Complaint Officers will not handle complaints where there may be a conflict of interests, for example, the customer is known personally to them.

- 3.7 The Customer Relations team is also responsible for ensuring issues which could affect our other customers are identified and fed back. Such issues can be fed back to Abri's Change and Service Improvement Department, business service leaders, or via the Customer Relations Manager(s) for dissemination.

- 3.8 Abri keep full records of all complaints, including the outcomes at each stage. This includes the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation. All records and communications with customers in relation to complaints will be kept on our customer relationship management (CRM) system (Open Housing), and a copy can be obtained if a customer requests it, via a Subject Access Request (SAR).

4. Definition of a complaint

- 4.1 Abri define a complaint as;

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

A customer does not have to use the word "complaint" for it to be treated as such. Whenever a customer expresses dissatisfaction, Abri gives them the choice whether they want to make a complaint.

A complaint can also refer to the way in which Abri has managed customer information.

5. Accepting Complaints

- 5.1 Both policy and procedure apply to all Abri 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 Abri, including ex-occupiers if they were in occupation at the time the matter complained of arose.

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Abri also accepts 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, Power of Attorney or Court Appointed Deputyship in relation to the customer).

Abri also accepts complaints where the Housing Ombudsman Service or Information Commission tells Abri to take on the complaint.

- 5.2 On a case by cases basis, Abri may also accept complaints from third parties who feel they have been impacted by Abri's services or a service provided on behalf of Abri.

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 Abri customer. If the complaint concerns personal information, they may however be able to escalate the matter to the Information Commission.

- 5.3 Service complaints from customers relating to shops or community cafes are dealt with under a separate procedure.
- 5.4 Abri recognises the difference between a service request and a complaint. A service request is a request from a customer to Abri to put something right. We empower and encourage all colleagues to listen to, acknowledge, and address customer service requests at the earliest opportunity, to put in place a local resolution. Abri will raise a complaint when a customer wishes to do so if they remain dissatisfied with the response to their service request, even if the handling of the service request remains ongoing. Abri will not stop efforts to address the service request if the customer complains. Further information is included in the Service Request Procedure.
- 5.5 Where a customer is not satisfied with the handling of their personal data, they should be asked in the first instance to contact the Data Protection Officer who will ensure that resolution of the issue is attempted following Abri's Data Protection Service Resolution Procedure. Only if resolution isn't achieved in this way will the matter be referred to the Customer Resolution team to be handled under this Procedure.
- 5.6 Each complaint will be dealt with on its own merits and individual circumstances. There are circumstances where Abri may not accept a complaint or where we may decide to deal with it in a different way to the normal process. Examples include:
- The issue giving rise to the complaint occurred over twelve months ago. However, where the problem is a recurring or continuing issue, Abri may

consider any older reports as part of the background to the complaint if this will help to resolve the issue. Similarly, Abri will apply discretion and may accept complaints made outside of twelve months where there is a good reason to do so;

- Complaints about housing conditions which have been the subject of legal proceedings which have come to an end after a final hearing, and all other forms of legal proceedings;
- Matters that have already been considered under the complaints policy. In this case we can refer the complainant directly to the Housing Ombudsman, or the customer may decide to start legal proceedings;
- Complaints relating to consumer credit regulated activity which may be able to be referred to the Financial Ombudsman Service; or
- If a complaint is being made unreasonably or the customer is demonstrating unacceptable behaviour when pursuing their complaint. We have a separate procedure giving guidance on dealing with vexatious contact.
- If the complaint relates to an allegation about a colleague - in most cases we will accept it as a complaint and the Complaints Officer will investigate alongside the relevant manager and HR business partner. 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.
- Where customers chose to correspond directly with our Executive team, this does not mean they can use this route for a different or quicker resolution to their issue if the most appropriate route is for them to go through Abri's formal complaints process. However, in some cases it may be appropriate to ask a senior manager or Director to respond to an escalated complaint, but we will do so within the normal complaints timescales and ensure the customer is still informed of their rights to take their case to the Housing Ombudsman if they remain dissatisfied.

Any discretion will be applied fairly and appropriately, and complaints will be progressed as far as possible to maximise the opportunity to resolve an issue.

- 5.7 As well as the examples above, below are some common examples of matters Abri may decide to deal with in a different way than a complaint:
- Anti-Social Behaviour (ASB) - Any report or "complaint" of ASB is managed by Abri's Housing and Community Safety teams. However, should a customer wish to complain about how their ASB case was handled, they can raise a complaint relating to this.
 - 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.

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5.8 If Abri has valid reason not to accept a complaint, or to deal with it differently, we will be able to evidence the reasoning, and explain to the customer the reasons why the matter is not suitable for the complaints process or outline how we are dealing with it and why, and the right to escalate the complaint, including to the Ombudsman Service or Information Commission (as appropriate).

6. Group Complaints

6.1 Complaints can be raised by a 'group' of residents, such as a Resident's Association. Where complaints are raised by a group, the Complaint Officers will communicate with each of the group members or with the representative of the group.

6.2 Where a complaint is raised by a representative, it's important the Complaint Officer establishes whether the concerns are held by the other customers being represented.

6.3 The investigating Complaint Officer should inform their Complaints Team Manager and/or the Customer Relations Manager(s) if a group complaint is received, to ensure that the complaint response(s) receives the appropriate quality assurance.

7. Housing Condition Claims

7.1 All housing condition complaints (potential legal claims) need to be brought to the attention of Abri's Legal Team, whether or not legal proceedings have begun, but if lawyers have contacted Abri, the Customer Relations team should reply to them confirming they will treat the Letter of Claim or other document as a complaint and start the complaints process (or continue if already underway), and independently of the legal team. Compliance with this escalation process will be quality checked and assured in line with Abri's Quality Control Framework.

7.2 Colleagues from Abri's repairs and maintenance teams should also be engaged with when investigating and responding to all complaints regarding home conditions, to ensure management of the substantive issue(s) the customer has raised.

7.3 The Customer Relations team will monitor the case and work with Abri's 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.

8. How to Raise a Complaint

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- 8.1 Complaints will be accepted via any of our contact methods, these can be found at <https://www.abri.co.uk/complaints>, ensuring the complaints process is accessible to all.

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. Abri asks for wider feedback about services, we provide details of how residents can complain.

Abri have made our complaint policy available in a clear and accessible format for all residents. This details the two-stage process, what will happen at each stage, and the timeframes for responding. The policy is published on the Abri website.

- 8.2 Not everyone is able to exercise their right to raise concerns or complain about the service they have received due to their individual needs. Abri will make necessary adjustments if a customer needs us to and seek to remove any barriers, in line with our Reasonable Adjustments Policy.
- 8.3 Abri will handle the complaint sensitively, telling only those who need to know and complying with relevant 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. Safeguarding matters shall typically be handled by Abri's Housing Management Team(s).
- 8.4 Should Abri receive a complaint via a representative or advocate, permission to deal with the complaint will need to be provided by the customer, where possible. If a complaint is brought by an external support provider in our South and South West regions, within Partnership Living, the complaint should be raised against the block address (specifically against a room, if this information is available). The support provider should be listed as the individual reporting the matter.
- 8.5 Allegations of a breach of a customer's data protection are responded to, in the first instance, by Abri's Data Protection team. However, a customer may raise a complaint about the handling of this allegation or other related matters if they are not satisfied with the Data Protection team's response. When raising a complaint in relation to an alleged breach of a customer's data protection rights, the Data Breach Procedure and Data Security Procedure should be followed, and the Data Protection Officer informed of the complaint. These procedures are located on the ARC. The response to the complaint incorporate any advice or suggested wording offered by the Data Protection Officer, as the subject matter expert on matters of data protection at Abri.
- 8.6 Customers may also request a Subject Access Request (SAR) which is covered by a separate procedure (Data Transparency and Subject Access

Request procedure) owned by the Data Protection Officer (DPO), and such requests are managed under that procedure. If a customer requests a SAR via the Customer Relations team, they must refer it immediately (the same day it is received where possible) to the Data Protection team. Under new Access to Information rules which will apply to social housing providers, customer may also make requests to receive business information (ATI requests). These ATI requests are about business information rather than personal data and as with SARs, are covered by a separate policy (Transparency Policy) owned by Abri's DPO. Whilst we await the final version of the STAIRS standard from the Regulator, we're meeting ATI requests on a voluntary basis. Requests made by customers for both types of information (SAR & ATI) 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 either a SAR or ATI, 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 Officer must work alongside Abri's DPO in their investigation and when putting together their response.

- 8.7 Where a customer raises additional complaints to those initially raised during the investigation, these will be incorporated into the stage one response if they are relevant and the stage one response has not already been issued. Where the stage one response has already been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the complaint will be logged as a new and separate complaint.

9. Timescales

- 9.1 Abri endeavours to respond to complaints as soon as possible once we have investigated the customer's concerns. We commit to responding to Stage 1 complaints within 10 working days of the complaint being acknowledged, and Stage 2 complaints within 20 working days of the complaint being acknowledged, where possible.
- 9.2 Where suitable and possible, the investigating Complaint Officers or suitable handler, will contact the customer and agree how often they will provide the customer with an update on the progress of their investigation. The agreed timescales should be noted on the system and within the Investigation Report.
- 9.3 There may be circumstances where Abri requires more time to complete an investigation due to the complexity of the case. If this is the case, we'll contact the customer to confirm this, explain why, and agree with the customer suitable intervals on when we'll keep them up to date on progress. All Stage 1 complaints should be handled within 20 working days from the date of acknowledgement and Stage 2 complaints should be

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handled within 40 working days from the date of acknowledgement, unless there is a good reason why Abri cannot respond. On housing condition/disrepair complaints this timescale may not be achievable, and the customer should be informed accordingly, and given contact details for the Housing Ombudsman.

- 9.4 These timescales align to those laid out in the Housing Ombudsman Complaint Handling Code, subject to the proviso about housing disrepair/condition claims, and they are also consistent with the requirements of the Data Use and Access Act 2025. Abri will agree upon request to suspend the operation of the legal Limitation Period during the period a complaint is being considered in either stage of the complaints process.
- 9.5 Where agreement over an extension period cannot be reached between Abri and the customer, Abri will provide the Housing Ombudsman's contact details so the customer can challenge the Abri's plan for responding and/or the proposed timeliness of Abri's response.

10. Written Responses

- 10.1 All written responses should be written in a clear, unified, and positive tone, in line with Abri's Tone of Voice. However, the Complaint Officers are responsible for ensuring the tone of the correspondence is appropriate for the individual customer and the nature of the matter being discussed.
- 10.2 When referring to Abri colleagues in written responses, Complaint Officers should strive to use job titles rather than colleague names. This helps to provide the complainant customer with clarity over responsibilities and points of contact. However, colleague first names can be used to provide clarity where required, or a personal touch.
- 10.3 Written responses should be quality checked and assured in line with Abri's Quality Control Framework.

11. Complaint Acknowledgement

- 11.1 Once a complaint has been logged, the dedicated Complaint Officer will seek to telephone the customer to set out their understanding of the complaint and the outcomes the resident is seeking. The Complaint Officer must be clear which aspects of the complaint Abri are, and are not, responsible for. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.
- 11.2 In any case, the complaint will also be acknowledged in writing within a maximum of 5 full working days from its receipt. This written acknowledgement will explain the timescales in which we expect to respond, and outline the investigation process the dedicated Complaint

Officer will follow. This written acknowledgement will usually be via email, unless the customer does not have access to an email address, in which case it will be sent via a letter.

12. The Investigation

- 12.1 A dedicated Complaint Officer will complete a thorough independent, impartial, investigation, free from bias, which considers all relevant information and evidence carefully. Each case will be dealt with on its own merits, and measures will be taken to ensure that any actual or perceived conflicts of interest are addressed. The customer will be given a fair chance to set out their position and the complaint will be treated sensitively and confidentially as far as possible, and information only discussed for the purpose of the investigation.

As well as reviewing all necessary system notes and listening to calls, Complaint Officers will work with relevant teams or departments within Abri 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 Officers 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 Officer 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.

The complaint outcome and any remedial action should be in line with Abri's Policies and Procedures. If the Complaint Officer feels that an alternative approach is required to satisfy the customer's complaint, they should seek approval from the Customer Relations Manager(s).

- 12.2 To support the Complaint Officers 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 Officers are encouraged to book in a meeting to facilitate interdepartmental dialogue and evidence collation, with a focus on coming to a resolution for the customer.

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 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 a suitable justification.

- 12.3 Complaint Officers are required to detail the investigation they have completed for each individual complaint, including their findings. Complaint

Officers 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 should be saved on the system once the case is closed. A copy of the Investigation Report can be found in Appendix A.

- 12.4 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.

13. Staff Conduct Complaints

- 13.1 The Customer Relations Team is empowered to investigate complaints about the conduct of Abri colleagues, which may include complaints about bullying or discrimination, with support of HR and the colleague's Manager, and must do so with discretion and with the appropriate levels of confidentiality. Any communications and information recorded on the Housing Management system about the issue will not name any individual colleagues. If an incoming complaint has referenced the name of an implicated colleague directly onto the Housing Management System, in many cases it will be appropriate to delete the name of the colleague and replace it with a role-based title e.g. Housing Partner. All discussion of that colleague's behaviours or role in the issue will then take place outside of the Housing Management system and in confidential communications. In more serious cases, the approach set out in 13.2 below will apply.
- 13.2 At the point of a complaint being received, 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 HR 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 (refer also to Serious & Sensitive Case procedure which may be invoked). 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 HR by the colleague's line manager.
- 13.3 When a Complaints Officer receives a complaint about a colleague where it has been agreed to log it through the route described in 13.2, 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 Complaints Officer.
- 13.4 Where conversations need to be held with the colleague to investigate the matter, the Complaint Officers will be sent a summary or notes on the matter to inform them of the complaint outcome ('Outcome Notes'). Line

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Managers are also required to record the nature of conversations held and actions on the colleague's HR record where necessary. HR system notes will not be shared with the Complaints Officers. 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 Abri to improve training for better performance this can be conveyed.

- 13.5 Abri won't be able to share specific personnel (HR system) notes with customers following any investigation (and if any subsequent SAR request is made Abri would need to review the record with our Data Protection team 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 complaints investigation would need to be reviewed by the line manager and HR, and if required, the Data Protection Team. 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.
- 13.6 Communication with the customer should not generally identify individual colleagues or contractors who are acting on behalf of Abri.

14. Timescales

- 14.1 Abri recognise some complaints may take longer than 10 working days to investigate and resolve. We will only close the complaint once the investigation is complete and this will be communicated to the customer. If it takes longer, we will inform the customer and explain the reasons why. We'll also agree with the customer how often we will keep them up to take on progress.
- 14.2 As standard, we will communicate with the customer via their preferred contact method.

15. Stage 1 Response

- 15.1 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 Officer with the opportunity to confirm what information has been reviewed, what they found, the outcome of their investigation into the complaint, and what action Abri 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.

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- 15.2 A written response will be sent to the customer, confirming what has been discussed and agreed during the telephone conversation or the above information, if a call has not taken place. This written response will always contain the Housing Ombudsman's contact details (or other relevant Ombudsman Service, or the Information Commission) and explain that the customer has the option to bring forward a Stage 2 complaint, if they remain unhappy with the handling or the outcome of the complaint. The customer can also begin or continue legal proceedings if they're dissatisfied with the outcome offered.
- 15.3 If an MP supported the customer in bringing their complaint to Abri, the MP should be copied into correspondence with the customer, or, a separate update provided.
- 15.4 If the complaint is an Executive or Board level complaint, and an Executive Director or Board Member is in direct correspondence with the customer, this written correspondence will serve as Abri's final response to the matter outside of the formal complaints process. This exception applies where a customer has specifically asked for a member of Abri's Executive Team to correspond with them over the matter.

If the case is being managed by the Customer Relations team, the relevant Executive Assistant should be kept up to date on progress and provided with a copy of the response sent to the customer.

- 15.5 If Abri's records show that a customer is or may be vulnerable or they have notified us within their complaint of a vulnerability, or potential vulnerability, then the Complaint Officers should refer to Abri's Reasonable Adjustments Policy to ensure that the customer is appropriately supported throughout the complaint journey.

The Complaint Officers should also notify their Complaints Team Manager and discuss whether this has an impact on the investigation and/or handling of the complaint. If further input or advice is required, the Complaints Team Manager should raise this with the relevant Senior Manager or involve the appropriate Housing Manager.

16. Outcomes

- 16.1 The written response to the customer should make the outcome of the complaint investigation clear. The outcome of a complaint will be one of the following:
- **Upheld** - This could mean we have agreed that all or some aspects of the customer's complaint have been upheld, and we agree mistakes may have been made or we have provided a poor service. This may have had a negative impact on the customer, which we will strive to put right.
 - **Not Upheld** - This could mean we acted correctly and provided a service to the standard we would expect.

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- 16.2 Where a key issue of a complaint relates to the parties' legal obligations Abri will clearly set out our understanding of the obligations of both parties.
- 16.3 Case Closure: Once the written response is sent out to the customer the case must be closed in the system adding in any final case notes, documents or points of detail. Where the response contains sensitive information, consideration should be given to sending the response via mimecast from Abri's Customer Relations outlook inbox, to provide security.

17. Putting Things Right

- 17.1 If we find we could have done things better, or have provided a poor service, the investigating Complaint Officer will acknowledge this and set out the actions Abri has taken, or intends to take, to put things right. This could include:
- Apologising;
 - Acknowledging where things have gone wrong;
 - Providing an explanation, assistance or reasons;
 - Taking action if there has been delay;
 - Reconsidering or changing a decision;
 - Amending a record or adding a correction or addendum;
 - Providing a financial remedy;
 - Changing policies, procedures or practices.
- 17.2 Any remedy offers will reflect the impact on the customer as a result of any fault identified, and Complaint Officers should refer to Abri's Putting Things Right Guidelines to support them in making remedial action decisions, including redress. Complaint Officers should refer to Housing Ombudsman Service guidance when deciding on appropriate remedies.
- 17.3 Redress or remedial actions that carry cost must be signed off, in writing, in line with the authorisation levels dictated in Abri's Putting Things Right Guidelines. It is important to ensure that offers of redress are consistent and awarded in line with the Putting Things Right Guidelines due to the Financial Regulations which govern Abri. Further to this, decisions on redress or remedial action on Development complaints should also be shared with the Head of Customer Care.
- 17.4 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.

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 Housing Partner.

18. Involving Abri's Insurers or Legal Team

- 18.1 Should an aspect of a complaint require involvement from Abri's Legal Team or Insurers, we recognise this may cause a delay in resolving the customer's complaint. The Complaint Officers 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 Officers involve the Legal Team to provide the technical information related to the insurance review and recommended next steps for the Complaint Officers to be able to resolve the complaint.
- 18.2 Should the customer's complaint be superseded (for example, by the customer commencing legal action against Abri), 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 complaints procedure are completed.
- 18.3 If a customer wishes to raise a claim against Abri's insurance, the Customer Relations team should provide the customer with the information and contact details below, as well as inform the customer that they can seek independent legal advice:
Protector Insurance
Policy no: 877158-4.1
Claims can be reported via the following means:
Telephone - 0161 274 9077
Email - claims@protectorinsurance.co.uk
Online - <https://www.protectorinsurance.co.uk>

The Complaint Officers should not instigate a claim but should be transparent with the customer and be clear that a claim can be brought.

The Complaint Officers should inform the customer that Abri's insurers will investigate the matter and either accept or reject the claim based on whether Abri is legally liable. Abri cannot guarantee an outcome. The customer may be required to communicate with Abri's Insurers directly, and Abri cannot become involved in this, including submitting a claim on Abri's behalf or chasing or an outcome.

If the Complaint Officer believes that an insurance claim may be pursued by the customer, they should work with our Legal Team to put Abri's Insurers on notice. An email to the Team should include the date of the incident, the claim made by the claimant, and a basic description of the incident.

19. Stage 2

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- 19.1 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. Customers are asked to get in touch with their Complaint Officer to advise if they wish to escalate to stage 2.

Although a customer does not need to explain their reasons for requesting a stage 2 escalation, Abri will make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.

- 19.2 Before a complaint is escalated, a review is completed to assess whether it is appropriate for the complaint to be taken to Stage 2.

A review should then take place between the Stage 1 Complaint Officer and their Team Manager and where required the Customer Relations Manager, or in their absence, the Head of Complaints. For example, if Abri has 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, we may refuse to escalate the complaint. Should this be the case, our decision will be explained to the customer in writing, usually within five working days of their request.

If Abri refuses to escalate a complaint to Stage 2, this must be approved by the Head of Complaints.

- 19.3 Once a Stage 2 complaint has been logged, a written acknowledgement should be issued to the customer.

The Stage 2 complaint will be allocated to an appropriate colleague who will then liaise with the customer over the next steps. The colleague allocated at Stage 2 will not be the colleague who handled the Stage 1 complaint. The dedicated reviewer(s) will seek to telephone the customer to set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the customer must be asked for clarification and the full complaint definition agreed between both parties.

- 19.4 There are two options for the complaint to be reviewed at Stage 2:

- The complaint is reviewed by our Customer Complaints Panel (further information available in the Customer Complaints Panel Terms of Reference). The option of the customer panel is dependent on appropriate availability of customers and volunteers.
 - The Panel is made up of a mixed demographic of Abri customers and independent volunteers, and will be Chaired by a Senior Complaints Officer. The Panel will be provided with our Stage 2 complaints pack which includes details of the complaint, our investigation and the outcome of the complaint. The Pack should be constructed by a

Customer Relations Administrator and signed off by a Customer Relations Manager before being issued to the Panel.

- The complainant customer is also invited to the Panel meeting, either in person or virtually over Microsoft Teams. The Panel meeting should be scheduled by a representative of Abri. A review of the complaint is completed, and a decision is made on whether the outcome was correct or whether further remediation is required. Customer data and private information (such as email addresses) should be redacted from the Pack, if it is to be reviewed by a Customer Panel. A final response in writing, following the stage 2 Panel meeting will be provided within 5 working days.
- The complaint is reviewed by a senior member of Abri: This may be a Senior Complaints Officer or another senior colleague within Abri. Prior to responding to the customer, the reviewer will review every response to ensure all information is present and accurate.

All Stage 2 complaints will be reviewed and resolved within 20 working days from when the stage 2 complaint has been acknowledged, where possible. If further time is required, we'll inform the customer, explain why, and aim to respond in a further 20 working days, although it may not be possible to do so with housing condition/disrepair complaints.

Clear reasons will be provided to the customer for any decisions made. See Sections 16 & 17 for information on complaints outcomes and redress decisions.

20. Building Safety Complaints

- 20.1 This section is limited in scope to buildings that are owned and managed by Abri 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.
- 20.2 **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.
- 20.3 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.
- 20.4 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.

20.5 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, they complete the relevant flag in Open Housing and notify the Head of Building Safety immediately. This needs to happen at the earliest possible stage so if possible, should be picked up at the complaints logging triage stage by the administration team.

20.6 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](#).

21. Heat Network Complaints

21.1 This section is limited to the scope of customers who receive their heat and/or hot water supply from a heat network owned and operated by Abri.

21.2 For Heat Network complaints, any remedies for complaints in terms of redress, need to be considered in line with the guidance issued by the Energy Ombudsman and under the Heat Network Guaranteed Standards of Performance and Compensation Payments which have been developed in line with Heat Trust Standards. Further information on which is provided in Abri's 'Putting Things Right' guidance, including information on how customers can claim and receive such payments, the timescales involved and any applicable exemptions.

21.3 For Heat Network related complaints, the jurisdiction of the Housing Ombudsman may not apply and this must be made clear in communication with the customer. The Energy Ombudsman is the appropriate adjudicator, with details provided throughout the complaint of how to contact them for advice - [Resolve Energy Complaints | Energy Ombudsman](#).

22. Care Complaints

22.1 Our two-stage complaints process also applies to complaints about our Care and Support services. If the complaint is about a Care or Support service provided by Octavia, and customers are unhappy with how we have investigated the complaint at Stage 2, they can refer the complaint to the Local Authority who commission and contract care and support services.

22.2 The contact details for the Local Authorities where we provide Care or Support Services are:

- Royal Borough of Kensington and Chelsea Council - hsscustomeercare@rbkc.gov.uk
- Westminster Council - ascustomerfeedback@westminster.gov.uk
- Hounslow Council - complaints.crt@hounslow.gov.uk

- 22.3 If a customer has completed Octavia's complaints process and referred the complaint to the relevant Local Authority, and is still not satisfied with the response, they can complain to the Local Government and Social Care Ombudsman (LGSCO). The LGSCO will advise on the process for registering a complaint with them. Their contact details are:
- Online Complaint Form: Complaint Form - Local Government and Social Care Ombudsman
 - Phone: 0300 061 0614
 - Postal address: Local Government and Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH.

23. Housing Ombudsman and other Ombudsman Services

- 23.1 If a customer remains dissatisfied with the outcome of their complaint having been through Abri's internal complaints process, they have the right to take their complaint to an Ombudsman service and/or to the Information Commission (where appropriate) and/or into the litigation process, with the help of solicitors. Complaint Officers are expected to review customer complaints and the suitable Arbitrator and advise the customer accordingly of their escalation rights.
- 23.2 In the majority of customer complaints, the Housing Ombudsman Service is the appropriate Arbitration service to review complaints where customers remain dissatisfied.
- 23.3 Where the complaint concerns allegations about the use of personal data, the Information Commission will adjudicate on the matter if it is still unresolved to the satisfaction of the customer.
- 23.4 As outlined above the appropriate Arbitrator for customers on a Heat Network will be the Energy Ombudsman.
- 23.5 If Abri receives a Financial Ombudsman Service (FOS) complaint, the Complaint Officers who handled the initial complaint will work with our Legal Team to collate the information required and manage communications with the Ombudsman.

24. Housing Ombudsman Timescales

- 24.1 Abri will provide contact information for the Housing Ombudsman as part of the complaints process. Abri is bound by the terms of the Housing Ombudsman's scheme and will fully co-operate with all requests for information made by the Ombudsman, work with them in resolving complaints effectively, and adhere to recommendations made to put things right.

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- 24.2 Any communication, enquiry or request for investigation by the Housing Ombudsman must be reported immediately to the Dispute Resolution team who will notify Customer Relations Managers and the Head of Complaints
- 24.3 Housing Ombudsman responses should be constructed by Dispute Resolution Case Managers who are independent of the Stage 1 or 2 complaint. When collating the response, the operational Director(s) and Head(s) of Service will also be notified and will help support the information compilation. A representative of Abri's Legal Team should also be asked to support by the relevant Officers. There are approved templates to be used for investigation responses.
- 24.4 Prior to responding to the Housing Ombudsman, the Executive Director for Operations and relevant Director or Head of Service will review every response to a request for information to ensure all information is present and accurate. A representative of Abri's Legal Team should also be consulted when responding to an Investigation.

25. Complaint Handling Survey

- 25.1 Abri encourages all customers at the end of the complaints process to feedback on their experiences and we will report outcomes, learning points and statistical performance to relevant customer groups, our Board and Committees. All stages of the formal complaints journey are surveyed, namely Stage 1 and 2.
- 25.2 These surveys are to be completed via an automated solution, such as a text or email sent to the customer. This is to allow the customer to provide open and honest feedback on their complaint journey and experience, including any further comments they may wish to provide.

In the event that text or email surveys are not suitable, or Abri would like to gather further feedback, telephone surveys may be completed. Complaint Officers should in no way seek to encourage or influence a customer's scoring. However, customers should be informed in written complaint responses that they may be sent a survey to complete / contacted to complete a survey. This will be monitored in line with quality checks and assurance checks.

A copy of post complaint survey process and the questions asked in the survey can be found in Appendix B.

26. Equality & Diversity considerations

- 26.1 We must ensure we take into account customer disabilities within our decision making and evidence how we've done this. There is a '*mainstreaming EDI into decision making form*' available to assist with this, ensuring we're considering customer impact and meeting equality

legislation. Advice can be sought as needed from our Head of Diversity & Inclusion as required.

27. Continuous Learning and Improvement

- 27.1 Abri seeks to look beyond the circumstances of individual complaints, and considers whether service improvements can be made as a result of any learning. Abri therefore uses customer complaints as a source of intelligence to identify issues and introduce positive changes to service delivery.
- 27.2 Abri completes Root Cause Analysis on customer complaints in order to assess any theme or trends to identify potential systemic issues, serious risks, or Policies and Procedures that require revision. The Head of Change and Service Improvement has leadership responsibility of the Root Cause Analysis function.
- 27.3 Accountability and transparency are integral to a positive complaint handling culture, and so analysis of the root cause of complaints is published and shared with staff and with the wider organisation through several forums.

28. Scrutiny and Oversight

- 28.1 The following forums or committees regularly receive information on complaints that provide insight on Abri's complaint handling performance and wider learning and improvements from complaints:

- Performance Committee (monthly)
- Executive Board (monthly) - as the lead governing body
- Customer Service and Performance Committee (quarterly)
- Group Combined Board (quarterly)
- Resident's Scrutiny Panel (quarterly)
- Information Security Forum (quarterly) regarding data complaints

As a minimum, this information will include:

- updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;
 - regular reviews of issues and trends arising from complaint handling;
 - regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and
 - the annual complaints performance and service improvement report.
- 28.2 The Member Responsible for Complaints will produce an annual complaints performance and service improvement report. As a minimum, it will include:
- the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.

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- a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;
- any findings of non-compliance with this Code by the Ombudsman;
- the service improvements made as a result of the learning from complaints;
- any annual report about the landlord's performance from the Ombudsman; and
- any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

The annual complaints performance and service improvement report will be published on Abri's website, along with the Customer Service and Performance Committee's response to the report.

28.3 The Customer Relations Managers will produce information and case studies for the Customer Annual Report. As a minimum, this should include:

- The volume of complaints relative to the size of the landlord;
- The % of complaints resolved within agreed timescales;
- Tenant satisfaction with landlord's complaint handling;

Associated Documents

- Investigation Report & Complaint Letter templates
- Equality Impact Assessment
- Reasonable Adjustments Policy
- Café & Retail Complaints Procedure
- Unacceptable Behaviour Policy
- Data Protection Policy
- Data Security Procedure
- Data Protection Service Request Procedure
- Data Breach Procedure
- Service Request Procedure
- Stage 2 Customer Complaints Panel Terms of Reference
- Putting Things Right (Redress Guidance)
- Housing Ombudsman Investigation Pack template
- Customer Relations Quality Control Framework Guidelines
- Data Transparency and Subject Access Request procedure
- Transparency Policy
- Serious and Sensitive Case Procedure
- Mainstreaming EDI into decision-making form