

# Complaints Policy

## 1. Summary

- 1.1. This policy is designed to create a positive culture of welcoming complaints as feedback, remedying any detriment and learning from the feedback to improve service delivery and ensuring that complaints are dealt with in a timely way. As a result high volumes of complaints are not seen as negative. SHAL welcomes the Housing Ombudsman's comment in the Complaint Handling Code that high volumes of complaints are indicative of a well-publicised and accessible complaints process and that low complaint volumes are potentially a sign that residents are unable to complain.
- 1.2. SHAL understands that we will not always get it right. Complaints handling is a core service and a key skill especially for customer facing colleagues. Everyone in SHAL will receive basic complaints training on this policy. The Housing Team and those colleagues managing and administering the maintenance service will receive training in complaints handling at least every two years. Complaints handling is a dynamic service which SHAL wants to ensure is carried out to a high degree of professionalism.
- 1.3. SHAL will not treat tenants differently because they complain.
- 1.4. SHAL is required by the Housing Act 1996 to be a member of the Housing Ombudsman Scheme 2020. The purpose of the Scheme is to enable tenants and others to have their complaints about SHAL investigated by the Housing Ombudsman Service when they have exhausted the internal process. The role of the service is to resolve disputes sent to it about SHAL, make awards of compensation or other remedies as appropriate and to support effective tenant/landlord dispute resolution.
- 1.5. A complaint is defined as:
  - 1.5.1. An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff,

or those acting on its behalf, affecting an individual resident or group of residents. (Complaint Handling Code 1.2)

- 1.6. The Complaint Handling Code 2024, which now puts a statutory duty on SHAL, requires that we ensure that tenants are aware of our policy and process regarding complaints, and that they are aware of the Complaint Handling Code and their right of access to the Housing Ombudsman Service.
- 1.7. The complaints process has two stages. Each stage has a required time frame for the resolution of the complaint.
- 1.8. The policy and process aim to be fair, focussed on the person making the complaint and the action required to put things right. Where SHAL has failed to do something or has done something which has caused detriment to the complainant, employees are empowered to put it right at the first stage.
- 1.9. SHAL's board receives an annual complaints performance and service improvement report. This is published on the on the section of our website relating to complaints. The board's response to the report is published alongside this.
- 1.10. SHAL's board also receives reports with our performance information at each meeting in order to assess risk and gain assurance that it is being well managed. The information relates to the number of complaints, the category of complaints, the stage at which they were resolved, adherence to timescales, outcome and satisfaction. Any reports to the Ombudsman are included in the performance information and updated with the outcomes of the Ombudsman's investigations and the progress made in complying with any orders related to maladministration.
- 1.11. Reports to the Ombudsman and subsequent feedback are scrutinised by the Finance Audit and Risk Committee and any strategic or operational risk is identified and managed. The Finance Audit and Risk Committee can subsequently refer this to the full board if there are significant strategic matters which need to be addressed.
- 1.12. In addition, SHAL's Board appoints a board member to have lead responsibility for complaints to support a positive complaint handling culture.

This person is referred to as the Member Responsible for Complaints. They are responsible for ensuring the Board receives regular information on complaints that provides insight on SHAL's complaint handling performance. They have direct access to the complaints log and SHAL's Complaints Officer and CEO and may report directly to the Board on any findings or concerns which arise from the exercise of their duties. They will meet with the Complaints Team quarterly to review issues and trends arising from complaint handling.

## 2. Objectives

- 2.1. The key objectives of this policy are to let our tenants know that:
  - 2.1.1. The early and effective resolution of complaints under a 2-stage internal process with clearly communicated external review via the Housing Ombudsman
  - 2.1.2. To demonstrate that we welcome and actively encourage feedback and complaints from them
  - 2.1.3. To ensure that we treat all those making complaints in a fair and consistent way, taking account of vulnerability and making reasonable adjustments where required in the handling of complaints.
  - 2.1.4. To be transparent about the number and type of complaints we receive and to be accountable to our tenants and other stakeholders with regards to learning from mistakes and from the feedback we receive by publishing the annual complaints performance and service improvement report.
  - 2.1.5. To make, maintain or mend our relationship with tenants by having a collaborative and co-operative approach towards resolving complaints.
  - 2.1.6. To maintain a sense of the SHAL Community by working with colleagues across teams and SHAL as a whole to take collective responsibility for any shortfalls identified through complaints, rather than blaming others and to act within professional standards for

engaging with complaints, within our own Code of Conduct and making use of the principles of restorative process.

- 2.1.7. To empower colleagues to respond to all complaints effectively at the first stage and make good any mistakes or detriment we have caused.
- 2.1.8. To ensure that a clean pair of eyes and ears reviews the complaint at Stage 2
- 2.1.9. To ensure that those making complaints are aware of the Housing Ombudsman and how to contact the service where they have exhausted our internal processes and remain dissatisfied or where SHAL has declined to address the issue they have raised as a complaint.
- 2.1.10. To ensure that SHAL cooperates with the Housing Ombudsman in finding a resolution to the complaint, carrying through any notifications for redress which they publish, and to publish in an anonymised version of the nature of the complaint, the redress recommended by the Ombudsman and the learning we have gained.

### 3. Details

- 3.1. Effective complaint handling enables residents to be heard and understood. The starting point for this is a shared understanding of what constitutes a complaint. (Complaint Handling Code 1.1)
- 3.2. We will deal with all complainants in a fair and timely way.
- 3.3. SHAL has a Complaints Officer who is a member of the Management team. Their role is to oversee the complaints policy and process and ensure that complaints are monitored by the Management team on a quarterly basis, reported to the Board as part of the Performance Information and that all complaints are dealt with and closed within the housing management system in line with the timescales set out in the policy, unless agreed otherwise with the complainant.
- 3.4. The Complaints Officer has the autonomy to resolve complaints across all SHAL's areas of operation, including Repairs and Maintenance, Development

and Communications. The decision will be recorded and reviewed by the Management team on a quarterly basis.

- 3.5. Complaints made about the Complaints Officer will be dealt with by another member of the Management team.
- 3.6. A complaint is defined as: An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents. (Complaint Handling Code 1.2)
- 3.7. A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction we must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the complaints policy. (Complaint Handling Code 1.3)
- 3.8. Staff will be trained to ensure that they understand the difference between a service request and a complaint. A service request is a request from a resident requiring action to be taken to put something right. Service requests are not complaints. They are recorded, monitored and reviewed regularly. (Complaint Handling Code 1.4) For example:
  - 3.8.1. “I’m not happy because I can’t lock my front door and I need to get the children from school” is a service request. (i.e. repair).
  - 3.8.2. “I’m not happy because I reported I couldn’t lock my front door and I’ve been waiting for 2 days” is a complaint (i.e. we have not attended to an emergency repair within 24 hours).
- 3.9. A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. We must not stop our efforts to address the service request if the resident complains. The complaint handling service and the service in response to the request will run concurrently. (Complaint Handling Code 1.5).
- 3.10. An expression of dissatisfaction with services made through a survey is not defined as a complaint. All surveys or requests for feedback conducted by

SHAL will include details of how the respondent can make a complaint if they are dissatisfied with our service (Complaint Handling Code 1.6).

- 3.11. SHAL must, under the Housing Ombudsman's Complaints Handling Code, accept complaints referred within 12 months of the issue occurring or the resident becoming aware of the issue. (Complaint Handling Code 2.3).
- 3.12. SHAL reserves the right to accept complaints made outside this time limit where there are good reasons to do so. E.g. to do so is a reasonable adjustment to make to address the complainant's vulnerability.
- 3.13. SHAL reserves the right to refuse to accept a complaint or to refuse to escalate a complaint to Stage 2. The person making the complaint will be given an explanation for the decision. The explanation will provide evidence to support this decision.
- 3.14. SHAL does not take a blanket approach to refusing complaints or refusing to escalate complaints. Consideration is given to the individual circumstances of each complaint or escalation and each complaint is considered on its own merits. It must be fair and reasonable to the complainant and other tenants. Consideration must be given to any known vulnerabilities including mental illness, disability, English as a second language or past trauma which may impact behaviour. (Complaint Handling Code 2.1).
- 3.15. If a complaint is not accepted or if escalation to Stage 2 is refused, the tenant will receive a letter or an email explaining why the decision has been made and giving the evidence to support this decision in detail. The letter will state that the person making the complain has the right to refer the matter to the Housing Ombudsman and will give the details of how to do this. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.
- 3.16. Below are examples of reasons for refusing to accept a complaint or refusing to escalate the complaint to Stage 2:
  - The issue giving rise to the complaint occurred over twelve months ago.

- Legal proceedings have started i.e a claim against SHAL has been filed in Court.
  - The matters that have previously been considered under the complaints policy. (Complaint Handling Code 2.2).
- 3.17. A complaint can be made by any individual, group of individuals, organisation, or company, including:
- 3.17.1. An applicant for housing
  - 3.17.2. A current or former tenant of SHAL
  - 3.17.3. Other organisations and businesses, including other landlords
  - 3.17.4. Any member of the public directly affected by our activities
  - 3.17.5. A group of complainants (e.g. a petition)
- 3.18. We will accept complaints made by advocates on behalf of a complainant if we are satisfied that the advocate is supporting the complainant in making a complaint (and not using the complainant to pursue their own complaint).
- 3.18.1. We will ask for evidence that the advocate has been authorised by the complainant to represent them.
  - 3.18.2. Advocates may include a friend, solicitor, advice agency, politician or statutory authority.
  - 3.18.3. Where a customer would like an advocate but has difficulty finding one, we will do all we can to identify an organisation that may be able to fulfil that role.
- 3.19. Any colleague may accept a complaint. For example, a member of the Business Support Team may receive a complaint via a telephone call if covering the phones during a period when other colleagues are receiving training. All colleagues are expected to deal effectively with the complaint, however received, to log it appropriately and to ensure that either they deal with it themselves or a named person has been notified that the complaint has been logged for action by them.
- 3.20. Every colleague in SHAL will receive annual training in complaint handling and on the contents of this policy.

- 3.21. The personal circumstances and vulnerabilities of the individual tenant making the complaint will be taken into account. For example, we will pay for translation services so that the complainant can make the complaint in their first language. We will take account of the impact of previous trauma which may be triggered by the event or omission complained of in responding to the complaint. We will ensure that people feel safe with the person who is investigating the complaint and provide alternatives if this will ensure the complainant feels confident in making the complaint.
- 3.22. We do not expect complainants to complete a complaints form, although one is available. (Complaint Handling Code 3.1). Complaints can be made by:
  - 3.22.1. Email
  - 3.22.2. Letter
  - 3.22.3. Social media
  - 3.22.4. Telephone
  - 3.22.5. Text
  - 3.22.6. Verbally to a member of staff
- 3.23. At acknowledgement, the complainant will be informed of the time frame for a response and the complaints procedure.
- 3.24. Regular contact will be maintained with the complainant throughout stage 1 and stage 2. If we are not able to meet the timescales outlined in this policy, we will talk to the complainant at the earliest opportunity and agree a revised timescale which will be confirmed in writing.
- 3.25. There are two stages to our complaint's policy. A complaint cannot be referred directly to Stage 2 without being considered at Stage 1.
- 3.26. The goal of Stage 1 of the process is the early resolution of issues between SHAL and the complainant. The person responding to the complaint is empowered to find a resolution with the tenant.
- 3.27. At each stage, the response will describe the complaint being made and the outcomes being sought. The Complaint Handling Code refers to this as the "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification. (Complaint Handling Code 5.6).

3.28. At each stage, the response must clarify which aspects of the complaint SHAL is responsible for and which aspects of the complaint SHAL is not responsible for. Any areas which are not clear must be clarified as part of the investigation into the complaint so that the response can be drawn up. (Complaint Handling Code 5.7).

a) STAGE 1 .

b) The SHAL employee who initially receives the complaint will

- a. record the complaint on the Housing Management system
- b. formally acknowledge the complaint using the template documents provided within 5 working days of receiving the complaint.
- c. inform the person responsible for responding to the complaint at Stage 1 and give them the date by which the response must be sent – 10 working days from the date of acknowledgement.

(Complaint Handling Code 6.3)

- c) The person responsible for the response at Stage 1 will consider whether the complaint is complex and will require any extension to this timescale. If the person responsible considers that an extension is required they will contact the complainant to explain why and set another deadline no later than 10 working days later than the original deadline. (20 working days from the acknowledgement) (Complaint Handling Code 6.4). This will be confirmed in writing to the complainant and the contact details for the Housing Ombudsman will be added to the communication. (Complaint Handling Code 6.5).
- d) The person investigating at Stage 1 will agree with the complainant suitable intervals for keeping them informed about their complaint if an extra 10 working days is added to the deadline. (Complaint Handling Code 5.9).
- e) The person responsible for responding to the complaint at Stage 1 will ensure that the response to the complaint is communicated to the complainant by the deadline when the answer to the complaint is

known. Any outstanding actions required to address the issue will be tracked by the person responsible for answering the complaint at Stage 1 to ensure that they are actioned promptly, and updates provided to the complainant. (Complaint Handling Code 6.6).

- f) The person responsible for responding to the complaint at Stage 1 will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. (Complaint Handling Code 6.7).
- g) Where additional complaints are raised during the investigation, these may be incorporated into the stage 1 response if they are related, and the stage 1 response has not been issued. Where the stage 1 response has been issued or the new issues are unrelated to the issues being investigated or would unreasonably delay the stage 1 response, the new issues must be logged as a new complaint. (Complaint Handling Code 6.8).
- h) The person responsible for issuing the response at Stage 1 will reply in writing using plain language. A template is provided for the response which will comply with the requirements of the Complaint Handling Code. The letter will address:
  - a) the complaint stage;
  - b) the complaint(s) definition;
  - c) the decision(s) on the complaint(s);
  - d) the reasons for the decision(s);
  - e) the details of any remedy offered to put things right;
  - f) details of any outstanding actions; and
  - g) details of how to escalate the matter to stage 2 if dissatisfied with the response. (Complaint Handling Code 6.9).

(h) Where something has gone wrong this must be acknowledged and an apology given. The reasons for the mistake should be given where they are known. Any actions already taken to put it right

and any actions SHAL intends to take to put it right must be set out in the letter. These can include:

- a. Providing assistance
- b. Taking and completing actions which may have been delayed
- c. Changing a decision already made
- d. Making a payment to refund or compensate the complainant.
- e. Amending a record or adding an addendum
- f. Changing a policy process or practice

(Complaint Handling Code 7.1)

- (i) If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of SHAL's complaints policy. Stage 2 is SHAL's final response. (Complaint Handling Code 6.10).
- (j) The complaint must be escalated to Stage 2 unless there are valid reasons for refusal. Any refusal must be in writing. The reasons for the refusal must be clearly set out. The reasons must comply with the provisions of s2 Complaint Handling Code. The letter giving details of the refusal and the reasons for the refusal must include the contact details of the Housing Ombudsman and state that the complainant can access them to review the decision. (Complaint Handling Code 5.11)
- (k) If there are no reasons to refuse the escalation the person receiving the request for escalation (in most cases the person who replied at Stage 1) will log the complaint at Stage 2, with the definition of the complaint, and acknowledge the request for escalation within 5 working days of receipt. (Complaint Handling Code 6.11).
- (l) This ends stage 1 of the complaint process.

### 3.28.1. Stage 2

- (a) A member of the Executive team along with the Complaints Officer (or another member of the Management team) will consider the complaint and the Stage 1 response.
- (b) The person considering the complaint at stage 2 must not be the same person who considered the complaint at stage 1. (Complaint Handling Code 6.13).
- (c) The Stage 2 response must be issued within 20 working days of the complaint being acknowledged. (Complaint Handling Code 6.14).
- (d) Consideration of the need for an extension to the deadline must be made at the start of the investigation at Stage 2. The complexity of the complaint must be taken into account when making the decision about the need for an extension of time in order to properly respond at Stage 2. The complainant must be informed of the expected date for the response. The extension must be no more than 20 working days from the original deadline date. The reasons for the extension must be clearly explained in writing to the complainant and the contact details of the Housing Ombudsman must be included in the letter to the complainant so they can refer to them. (Complaint Handling Code 6.15-16).
- (e) The person responsible for issuing the response at Stage 2 will reply in writing using plain language. A template is provided for the response which will comply with the requirements of the Complaint Handling Code. The letter will address:
  - a) the complaint stage;
  - b) the complaint(s) definition;
  - c) the decision on the complaint(s);
  - d) the reasons for any decisions made;
  - e) the details of any remedy offered to put things right;

- f) details of any outstanding actions; and
- g) details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. (Complaint Handling Code 6.19).
- h) Where something has gone wrong this must be acknowledged and an apology given. The reasons for the mistake should be given where they are known. Any actions already taken to put it right and any actions SHAL intends to take to put it right must be set out in the letter. Any remedy offered must reflect the impact on the resident as a result of any fault identified. (Complaint Handling Code 7.2). These can include:
  - a) Providing assistance
  - b) Taking and completing actions which may have been delayed
  - c) Changing a decision already made
  - d) Making a payment to refund or compensate the complainant.
  - e) Amending a record or adding an addendum
  - f) Changing a policy, procedure or practice (Complaint Handling Code 7.1)
- g) The remedy must clearly set out what will happen and by when. The agreement of the complainant must be obtained where appropriate. Any remedy must be carried out to completion. The person who has responded to the Stage 2 complaint is responsible for tracking this to ensure that it is completed. (Complaint Handling Code 7.3).

- 3.28.2. In deciding whether and what remedy is appropriate the person responding to the Complaint will take account of guidance issued by the Ombudsman. (Complaint Handling Code 7.4).
- 3.28.3. Those responding at Stage 1 and Stage 2 of the complaints process must provide complainants with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. (Complaint Handling Code 3.7).
- 3.28.4. Where the person responding to the complaint at Stage 1 or Stage 2 has decided that compensation is required the Compensation Policy will be applied. [Link]
- 3.28.5. Those responding to complaints at Stage 1 and 2 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.
- (Complaint Handling Code 5.8).
- 3.29. The person responding to the Complaint at Stage 1 or Stage 2 will keep a full record of the investigation into the complaint as well as the outcome. This will include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports, statements or surveys. (Complaint Handling Code 5.12).
- 3.30. The Management Team will review all complaints every quarter and consider whether service improvements can be made as a result of any learning from the complaint. A note will be made of the decision and the Management Team will be responsible for tracking and confirming the service improvement. This will be reported to the Board in the annual statement on Complaints and reported to tenants via the newsletter and the website. The

reports will highlight the trends arising from complaint handling and service improvements made as a result of the complaints.

(Complaint Handling Code 9.1).

- 3.31. SHAL will co-operate with the Ombudsman where local resolution is sought by mediation, arbitration or some other means and will report back to the Ombudsman on the outcome where this is required. This will also be reported to the Board and to the tenants in the annual statement on complaints handling and learning.
- 3.32. Complaint handling is the responsibility of the Housing Manager in their capacity as Complaint Officer.
- 3.33. The Complaints Officer liaises with the Housing Ombudsman and ensures complaints are reported to the Board. (Complaint Handling Code 4.1).
- 3.34. Wider learning and improvements put in place as a result of complaints will be reported to the Board annually and to tenants in the newsletter, at Community Chats and on the website during the course of the year.
- 3.35. The number of complaints and the monitoring of handling in terms of meeting timescales, outcomes and learning will be shared quarterly at Huddles. (Complaint Handling Code 9.3).
- 3.36. The Board appoints a Board member each year to take lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). (Complaint Handling Code 9.5).
- 3.37. The MRC ensures that the Board receives regular information on complaints that provides insight on SHAL's complaint handling performance and has full access to all complaint's cases, the Management Team and the Complaints Officer. (Complaint Handling Code 9.6).
- 3.38. Complaints Key Performance Indicators are reported to each Board meeting and include:
  - The number, categories and outcomes of complaints, alongside complaint handling performance;

- The number categories and outcomes of complaints to the Housing Ombudsman
- The number, categories and compliance relating to maladministration orders and compensation.
- The amount of compensation paid

3.39. In responding to complaints colleagues must:

- have a collaborative and cooperative approach towards resolving complaints, working 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. (Complaint Handling Code 9.8)

3.40. The annual complaints performance and service improvement report is presented to the Board and published to tenants and on the website and will include:

- the outcomes from the annual self-assessment against the Complaint Handling Code to ensure complaint handling policy remains in line with its requirements.
- a qualitative and quantitative analysis of SHAL's complaint handling performance. This must also include a summary of the types of complaints SHAL have 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. (Complaint Handling Code 8.1)

- 3.41. The Board's response to the report is published alongside the report.  
(Complaint Handling Code 8.2)
- 3.42. The self-assessment process is undertaken whenever there is a significant change to ensure that SHAL remain compliant. (Complaint Handling Code 8.3)
- 3.43. Following the closing of a complaint at Stage 2 the complainant will be contacted to seek feedback in relation to the complaint handling and outcome.
- 3.44. SHAL has a policy and procedures for managing unacceptable behaviour from residents and/or their representatives. The evidence for the restrictions placed on individuals or households will be reviewed at least annually. (Complaint Handling Code 5.14). Restrictions placed on contact due to unacceptable behaviour aim to be proportionate and demonstrate regard for the provisions of the Equality Act 2010. (Complaint Handling Code 5.10).
- 3.45. If SHAL are unable to comply with the Complaint Handling Code or this policy due to exceptional circumstances, such as a cyber incident, we must inform the Ombudsman, provide information to residents who may be affected, and publish this on our website. SHAL would also have to provide a timescale for returning to compliance with the Code.

#### 4. Outcomes

- 4.1. Customers will be fully aware of what is a complaint, how they can make one and feel comfortable in making one.
- 4.2. Complaints will be dealt with promptly and efficiently and complainants will be kept well informed of the progress of their complaint.
- 4.3. We will learn from and improve services as a result of receiving complaints and the overall level, type and handling of complaints is transparent.
- 4.4. Our performance with regards to individual complaints is transparent.
- 4.5. As a result of the way we encourage complaints where residents feel we have got it wrong, SHAL may have higher numbers of complaints than other similar sized housing organisations. This is acceptable to the Board as long as we

learn from mistakes and are fair, proportionate and transparent in putting them right.

- 4.6. We take account of individual vulnerabilities and we apply our 5 commitments when responding to complaints by seeking to maintain and mend relationship, to listen, include and understand, to be transparent and accountable and to deliver good quality homes and services to the SHAL community.

## 5. Consultation

- 5.1. SHAL makes the Complaints Policy available to all new tenants in the tenants Handbook.
- 5.2. Every letter to a tenant at both Stage 1 and 2 of the Complaints Process will attach a copy of this policy.
- 5.3. SHAL will ensure that the policy is translated or available in braille where we are aware that this will make it accessible to tenants.
- 5.4. The policy is available on SHAL's website.
- 5.5. The tenant's newsletter will have an article on Complaints Performance in each edition along with information on how to access the policy and its availability in other languages and in braille.
- 5.6. All tenants will be contacted to let them know of its availability online and a copy will be made available on request.
- 5.7. SHAL's involved tenant group will review the policy and suggest any comments and amendments to the board annually.

## 6. Equality, Diversity & Inclusion

- 6.1. We will treat all our customers fairly and equally. We will not, under any circumstances, discriminate against anyone because of:
- 6.1.1. Age
- 6.1.2. Being or becoming a transsexual person
- 6.1.3. Being married or in a civil partnership
- 6.1.4. Being pregnant or on maternity leave
- 6.1.5. Disability
- 6.1.6. Race including colour, nationality, ethnic or national origin

- 6.1.7. Religion, belief or lack of religion/belief
- 6.1.8. Gender
- 6.1.9. Sexual orientation
- 6.2. SHAL seeks to anticipate the needs of tenants with vulnerabilities arising from their protected characteristics for people who may seek to use the Complaints Process. We aim to treat people as individuals and not to stereotype people because of their protected characteristics. (Complaint Handling Code 3.1).
- 6.3. We will make reasonable adjustments for where appropriate under the Equality Act 2010 and keep a record of any reasonable adjustments agreed, as well as a record of any disabilities or vulnerabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review. (Complaint Handling Code 5.10).
- 6.4. We work in a way which is trauma aware and informed. This means that we seek to ensure that residents feel safe with us; that we build trusting relationships over time by being transparent, clarifying expectations, doing what we say we will do and explaining why we do what we do; listening to needs, creating and explaining choices; working in a way which is collaborative and looks to the strengths of all of us and acknowledging the emotional and psychological aspects of our work with people.

## 7. Value for Money

- 7.1. For SHAL, value for money means delivering our purpose as efficiently, economically, equitably and effectively as possible.
- 7.2. This policy will provide value for money by ensuring that time and resources are not wasted and that SHAL uses complaints to improve its services efficiently and effectively.

## 8. Owner

8.1. Housing Manager

## 9. Version and Revisions

9.1. This policy will be reviewed every 3 year(s)

9.2. Revisions

New version	Date	Revision details
1.0	10/09/20	
1.1	18/09/20	See minutes of the Board meeting (17/09/20)
2.0	15/06/22	Timeframes for stages 1 and 2 amended in line with Complaint Handling Code and all changed to “working days”.
2.1	17/11/22	3.23 added to detail that the Complaints Officer will seek feedback on the handing of each complaint following its resolution.
2.2	12/03/24	Updated policy to reflect staff member who received the complaint will acknowledge it and pass it to an appropriate colleague to investigate and respond.
2.3	23/04/24	Updated policy to reflect the changes in the new Complaint Handling Code.
2.4	10/09/25	Updated policy to remove reference to Complaint’s Committee as this has now been merged with the Management Team (Performance) meeting.