

**FEEDBACK POLICY:  
COMPLAINTS, COMPLIMENTS & COMMENTS**

DOCUMENT CONTROL	
<b>Policy owner:</b>	Director of Finance and Business Support
<b>Policy author:</b>	Director of Finance and Business Support
<b>Effective date from:</b>	March 2024
<b>Approved by:</b>	SMT
<b>Date approved:</b>	28 <sup>th</sup> November 2023
<b>Review cycle:</b>	1 year
<b>Next Review start date:</b>	June 2023
<b>This policy applies to:</b>	Everyone who uses our services or for those supporting them and staff.
<b>Method of delivery:</b>	SharePoint Team and Operational Managers meetings

**Version Control**

Date	Author	Version	Reason for Change
28/11/2023	L Shaw	2	Update policy including changes proposed in the Housing Ombudsman Consultation document. Renumbered all sections.

**Summary of Changes**

Section/s	Change
Section 1	Added in Section 'Purpose' and Section 1.2
Section 2	Added in Section 2 'Scope'
Section 3	Added in Section 3 'Policy Owner'
Section 5	Added in Section 5 'Housing Ombudsman Complaint Handling Code'
Section 6	Added in Section 6.2 'Definitions'
Section 8	Amended Section 8 including: Adding Sections 8.3 & 8.4 to 'The Complaints Process' Added more detail to Stage 1 and Stage 2 Processes. Amended 2 working days to 5 working days to Stage 1 and Stage 2 Processes. Amended 10 working days to 20 working days.
Section 9	Added in Section 9 'Outcomes'
Section 10	Added in Section 10 'Recording Complaints'
Section 11	Added in Section 11 'How Long is Available to Make a Complaint?' Amended 6 months to 12 months.

Section 12	Amended role of Complaints Officer and added in Sections 12.6, 12.11, 12.12 and 12.16.
Section 13	Removed Section on 'Designated Person' and 'Financial Ombudsman Service' details.
Section 14	Changed 6 months to 12 months.
Section 15	Added in Section 15 'Unacceptable Behaviour Policy'
Section 17	Removed details referring to 'Designated Persons'
Section 19	'How Brighter Futures Manages and Uses Complaints' - changed Chair of CSC to Chair of Board.
Section 21	Added in Section 21 'Data Protection and Confidentiality'
Section 22	Added in Section 22 'Safeguarding'
Section 23	Added in Section 23 'Reasonable Adjustments'
Section 24	Added in Section 24 'Equality, Diversity and Inclusion'
Section 25	Added in Section 25 'Compensation'
Section 26	Added in Section 26 'Communication Of This Policy'
Section 27	Added in Section 27 'Whom This Policy Applies To'
Section 28	Updated Section 28 'Legislative and Regulatory Requirements'
Section 29	Updated Section 29 'Related Policies, Procedures and Documents'

### Consultations

Consulted with	Version	Date
Customer and tenant engagement panels		
Staff speak out		
Volunteers		

## **1. Purpose**

1.1 At Brighter Futures we believe that all feedback, including complaints, comments and compliments, gives us an opportunity to review the way we work, identify changes that we can make and lessons we can learn to continually improve the services we operate.

1.2 We will:

- Listen to your feedback.
- Ensure we understand your complaint.
- Be open and honest about the process.
- Investigate your complaint thoroughly.
- Keep you up to date with progress.
- Aim to resolve your complaint quickly and manage your expectations.
- Provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.
- Address all points raised in the complaint, identify any failings and apologise for this, seek an agreeable resolution that is appropriate and proportionate to the situation.
- Conduct the investigation in an independent and fair manner using the evidence available, making appropriate recommendations to resolve the complaint, providing realistic timescales and to manage complainants' expectations.
- Keep the investigation confidential as far as possible and manage potential conflicts of interests.
- Treat everyone fair and respond to individual's needs, where possible unless determined by time constraints.
- Share your compliments so we recognise good practice.

## **2. Scope**

2.1 This policy covers:

- Expressions of dissatisfaction (complaints)
- Compliments
- Comments

2.2 This might be about the quality of service you received, how we delivered the service to you and how you were dealt with.

2.3 Brighter Futures Housing Association will consider complaints from the following people:

- Anyone who receives or requests a service from Brighter Futures Housing Association.
- People seeking to use our services.
- Others who could be affected by the actions of Brighter Futures Housing Association.

## **3. Policy Owner**

3.1 The responsibility of the policy falls under Director of Finance and Business Support.

## **4. Policy Statement**

4.1 We will make it as easy as possible for people to give us feedback, make comments, compliments, or complaints. We understand that it can be difficult for some people to make their voice heard so people can be accompanied, advised, represented, or supported by a person of their choice at any time.

- 4.2 We aim to make sure that our actions are carried out as quickly as possible and that our communication is timely and polite. We will treat all feedback as an opportunity to build and mend relationships with residents.
- 4.3 We will provide transparent information about our complaints service, trends and data on the types and volumes received and how we are using this information to improve our service.
- 4.4 Our response to feedback is driven by our corporate values and by our compliance with the Regulator of Social Housing's Regulatory Standards and the Housing Ombudsman's Complaint Handling Code.

## **5. Housing Ombudsman Complaint Handling Code**

The Housing Ombudsman Complaint Handling Code was issued in 2022 and sets out good practice and allows landlords to respond to complaints effectively and fairly. Landlords must complete an annual self-assessment against the code and publish the results on their website. The Housing Ombudsman Complaint Handling Code and our latest Housing Ombudsman Complaint Handling Self-Assessment can be viewed on our website on the 'Contact Us' page.

## **6. Definitions**

6.1 We use the definition of a complaint included in the Housing Ombudsman's Complaint Handling Code 2022:

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'.

6.2 A tenant does not have to use the word 'complaint' for us to treat their concerns as a complaint under this policy. We will identify where a customer/tenant has expressed dissatisfaction and will respond to their complaint within the timeframes stated in this policy.

Other definitions:

- A *service request* is when a tenant contacts us to ask us to do something to their tenancy to put something right, for example, a repair. This is not a complaint but if we fail to carry out the repair this may become a complaint. Similarly, a customer may raise an enquiry to ask us for information about their rent account. This too would not be a complaint but may become one if we fail to provide the information requested.
- A *compliment* is an unsolicited expression of gratitude or praise for a member of staff or service area. It's feedback that lets us know if we did something really well.
- A *compliment* is an unsolicited expression of gratitude or praise for a member of staff or service area. It's feedback that lets us know if we did something really well.
- A *comment* is a volunteered personal opinion or belief, feedback or remark expressed by a tenant or customer or an idea for making changes or improvements to any part of Brighter Futures' services.
- *Feedback* helpful information or criticism given to indicate what can be done to improve something.

- An *appeal* – will be defined as ‘a disagreement with the decision we have made in line with our published policies and procedures’.

## **7. Values in Action**

The following are Brighter Futures’ Values relevant to our handling of feedback:

- We are passionate about our services and the important role we play in the lives of our customers.
- We empower people to express how they feel about the services they need and to think about how we could improve them.
- We give everyone an opportunity to express an opinion. We respect and listen to them all equally and keep them fully informed of the outcome.
- We will feed back creatively on how we run our services and what we could do to improve them.
- A sustainable service meets the needs of its customers. We recognise that where we cannot meet our customer needs, we have a responsibility to ensure commissioners understand this and how existing unmet needs could be addressed.

## **8. The Complaints Process**

8.1 Brighter Futures operates a 2 stage complaints process. The process focuses on resolving issues at an early stage. We will therefore seek to remedy issues before a formal complaint is made. We will apologise if we have got things wrong, put things right quickly and let the complainant know what we plan to do.

8.2 We recognise that it is sometimes more difficult to get to a resolution where everyone is satisfied, so our second stage enables the findings of the first stage to be reviewed. Our complaints process also signposts complainants to organisations and individuals that can help people make complaints and deal with appeals.

8.3 Each complaint will be assigned an investigating officer who will speak or meet with the complainant prior to issuing their response to ensure that they have fully investigated the complaint in order to resolve the complaint.

8.4 Once we have sorted out your complaint, our customer services team will contact you to conduct a feedback survey to find out if you were satisfied with how we handled it.

### **Stage 1**

- We will acknowledge Stage 1 complaints within 5 working days of receipt.
- Our acknowledgement letter will include:
  - Case reference number
  - Our understanding of the complaint and the desired outcomes
  - The name of the investigating officer
  - The date for when a full written response will be received by
  - A copy of the Feedback Policy: complaints, compliments and comments.
- If any aspect of the complaint is unclear, the investigating officer will contact the complainant, by their preferred method of contact stored on our database, to discuss their complaint and the desired outcome/s.
- If no preferred method of contact is known, we will write to the complainant to seek their preferred method of contact, enclosing a copy of the Feedback Policy.

- Staff and residents who have had complaints made against them will be given the opportunity to give their version of events and respond to the investigation's findings.
- Investigations will consider previous complaints and reports made if the complaint relates to an unresolved issue.
- We will provide a full written response within 10 working days of receipt of the complaint and will include:
  - i. The complaint stage and case reference number.
  - ii. A definition of a complaint.
  - iii. Details of the initial complaint.
  - iv. An impartial review of the investigation addressing all points raised in the complaint.
  - v. The outcome of the complaint i.e. either upheld, partially upheld or not upheld.
  - vi. The reason for any decision/s made, referencing the relevant policy, law or good practice where applicable.
  - vii. The details of any remedy to put things right and any outstanding actions, with expected timescales.
  - viii. Any learning outcomes identified including service improvement resulting from the complaint.
  - ix. Details of how to escalate the complaint to the next stage of the complaint process, should the complainant be dissatisfied with the outcome.
  - x. Details of the Housing Ombudsman Service.
  - xi. A copy of the Feedback Policy: complaints, compliments and comments.
  - xii. The response will refrain from identifying individual members of staff and contractors connected with the complaint issues, except in exceptional circumstances.
- There may be exceptional circumstances where we cannot meet the timeframe of ten working days, for example, where further evidence is required. If this is the case, we may need to extend this timeframe by a further ten working days. When this happens, we will contact the complainant to obtain their agreement. Where an agreement over an extension cannot be agreed we will provide the complainant with the Housing Ombudsman's details so they can challenge our plans for responding and/or the proposed timeliness of our response.
- Where a formal complaint has been resolved quickly (i.e., within 3 working days), to the satisfaction of the customer, the case will be closed and a formal letter may not be received if the customer agrees.
- Complainants who are not satisfied with the outcome of Stage 1, may escalate their complaint to Stage 2. Complainants must notify Brighter Futures within 10 working days that they wish to take their complaint to Stage 2. Complainants must inform Brighter Futures of their outstanding issues and what outcome they are looking for.
- Cases will only be escalated where the substance of the case remains the same as Stage 1. If new elements are raised, which would result in a different resolution than would normally have been offered in Stage 1, a new complaint will be opened.
- We will only escalate a complaint once it has been through our stage 1 complaint process and at the request of the complainant.

## **Stage 2**

- We will acknowledge Stage 2 complaints within 5 working days of receipt.
- Our acknowledgement letter will include the same information as detailed in our Stage 1 acknowledgement letter.
- The complaint will be investigated by a more senior member of staff who was not involved in the original complaint.

- If agreed between the investigating officer and the complainant, or requested by the complainant, a meeting may be arranged for the case to be discussed in person at an agreed location.
- Complainants can choose to be accompanied if they advise Brighter Futures two days in advance and state in what capacity they are attending.
- We will provide a written response within 20 working days of receipt of the stage 2 escalation request and this will include the same information as detailed in our Stage 1 acknowledgement letter.
- In exceptional circumstances, it may not be possible to provide a written response within 20 working days. In this case, we will write to the complainant providing them with an explanation and a clear timeframe for when a response will be provided. This will not exceed a further 20 working days without good reason.
- Where an agreement over an extension cannot be agreed with the complainant for our stage 2 response, the complainant will be provided with the Housing Ombudsman's details to discuss the timeframe for managing the complaint.

## 9. Outcomes

Complaints can be resolved in a number of ways. The outcome of a formal complaint will be:

- **Upheld** – This means that the complainant's reasons for dissatisfaction with Brighter Futures are justified.
- **Partially Upheld** – This means that some of the complainant's reasons for the dissatisfaction are justified but some of the of the issues/claims raised by the complainant are unfounded, unreasonable or not the fault of Brighter Futures.
- **Not Held** – This means that none of the complainants reasons for dissatisfaction with Brighter Futures are justified.

## 10. Recording Complaints

10.1 All complaints including anonymously received complaints are logged in a systemic way for analysis and reporting.

10.2 A full record of the complaint will be kept, including all correspondence with the complainant and any reviews that have taken place for ease of retrieval and for audit trail purposes.

10.3 Complaint responses will be sent to the complainant when the answer to the complaint is known and where resolution is proposed it will clearly set out what has been agreed and by when. A final complaint response will be sent once the resolution has been agreed and if there are any outstanding actions to complete, they will be detailed within the letter. The response will not be delayed for outstanding actions to be completed. Outstanding actions will be entered onto the outstanding works/repairs tracker for monitoring purposes and updates provided to the complainant.

10.4 On closing a complaint, the lessons learnt and outcomes tracker is updated to record the underlying cause of the complaint and any remedial action(s) taken. By recording complaints in this way we can identify and address the cause of complaints and where appropriate identify any changes to working practices/service improvements and identify any training opportunities.

## **11. How Long Is Available To Make a Complaint?**

11.1 A complaint will only be considered if it is made within 12 months of the initial incident taking place. This is to ensure a thorough investigation can be completed with all relevant notes and documentation.

## **12. How To Submit Complaints, Comments, and Feedback**

12.1 Our complaints officer is the Governance, Procurement and Contract Coordinator.

12.2 Complaints can be sent by email to: [complaints@brighterfutures.org.uk](mailto:complaints@brighterfutures.org.uk)

12.3 Complaints can be posted to:

Complaints Officer.

Brighter Futures Housing Association

Unit 5 Whittle Court

Town Road

Hanley

Stoke-On-Trent

ST1 2QE

12.4 Complaints can be made by phone by ringing 01782 406000.

12.5 Through our website at [www.brighter-futures.org.uk/contact-brighter-futures/](http://www.brighter-futures.org.uk/contact-brighter-futures/)

12.6 Completing a Feedback Form – By asking a member of staff at any of our services for a feedback form.

12.7 Tenants, customers and others can also make complaints, comments, compliments and give feedback directly by talking to a member of Brighter Futures staff.

12.8 Brighter Futures also acknowledges that groups of tenants and customers may submit petitions, and these will be treated as complaints.

12.9 Brighter Futures will also review comments and other forms of feedback and identify those which constitute a complaint and treat those as complaints to be managed through the complaint process.

12.10 Tenants and customers are not encouraged to make complaints by social media but to make complaints through the channels specified in this policy. This enables compliance with data protection rules, maintains privacy and reputations.

12.11 If complaints are posted through social media channels, these are directed by the Marketing and Communications Officer to the Complaints Officer, to be recorded and actioned accordingly within the timeframes stated in this policy.

12.12 In the absence of the Complaints Officer and the Marketing and Communications Officer, staff have been trained to deal with complaints through the various channels to ensure that these are handled within the timeframes set out in this policy.

12.13 Tenants, customers and others can make complaints and give feedback, make comments and compliments in person or get an agent such as a friend or relative or an independent advocate to make them on their behalf.

12.14 The Brighter Futures' complaints officer, the Governance, Contracts and Procurement coordinator will help complainants find an independent advocate if requested.

12.15 Confidentiality and data protection apply to the complaints process; Brighter Futures will not share personal or property information gathered as part of the complaint investigation with any third party who is not entitled to receive it, in line with data protection legislation.

12.16 A complaint submitted via a third party or representative will still be handled in line with our complaints policy. We will accept a complaint unless there is a valid reason not to do so. We will always provide a detailed explanation setting out the reasons why the matter is not suitable for our complaints process and your right to escalate to the Housing Ombudsman. We will always manage your expectations from the outset being clear where your desired outcome is unreasonable or unrealistic.

### **13. Other Options Available to Tenants and Customers**

#### *The Housing Ombudsman*

13.1 In each stage of our complaints process, we will inform complainants that they can contact the Housing Ombudsman Service although they will not be able to investigate a complaint whilst it is going through our internal complaints process.

13.2 However, they will be able to provide advice on the way that a complaint is being managed. In our stage 1 response we will provide the complainant with details of how they can contact the Housing Ombudsman Service for advice and guidance.

13.3 If the complainant is still dissatisfied with the outcome at the end of our two stage complaints process, our stage 2 response provides contact details of the Housing Ombudsman Service contact so they can further escalate their complaint externally. This is an independent, impartial and free service. The Ombudsman will decide if the complaint is appropriate for them to consider.

Their contact details are:

1. Website, <https://www.housing-ombudsman.org.uk/contact-us/>
2. Email [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)
3. Write to: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ
4. Telephone number: 0300 111 3000.

#### *13.4 The Local Government and Social Care Ombudsman.*

Local Complaints about support services can be taken to the Local Government and Social Care Ombudsman. Any customer receiving care services may choose to access their local council's complaints process instead of the Brighter Futures' complaints process before approaching the Ombudsman.

The Local Government and Social Care Ombudsman can be contacted at:

PO Box 47771, Coventry. CV4 0EH

Telephone: 0300 061 0614

Web: [www.lgo.org.uk](http://www.lgo.org.uk)

## **14. Exemptions**

14.1 In some situations, and circumstances, we will deal with your complaint differently. These include, for example:

- The issue you are raising is better dealt with using another Brighter Futures policy or process, anti-social behaviour or repairs are examples.
- A request for a service, such as the first report of a repair
- Reports of anti-social behaviour or nuisance (not the handling of an existing ASB case)
- The complainant is taking legal action related to their complaint.
- The complaint is not about Brighter Futures but about another organisation or person.
- The complainant has or is also making a significant insurance claim (unless they want to complain about the way we handled this)
- The complainant has made repeated or clearly unfounded complaints.
- The complainant has made repeated complaints about the same or related matters that have already addressed.
- The complainant has made an unreasonable number of complaints over a short period of time about matters that are minor.
- The volume of contact from a resident or customer is unreasonable (in which case response times in our service standards may not apply)
- The content or tone of the contact causes a disproportionate or unjustified level of disruption.
- Any complaints/appeals that are more 12 months old will not normally be investigated unless the complainant is able to demonstrate that there are ongoing/unresolved issues.
- If Brighter Futures decides not to accept a complaint, the complainant will be provided with a detailed explanation of the reasons why and will be provided with information on how the complaint can be escalated to outside organisations including the Housing Ombudsman.

## **15. Unacceptable Behaviour Policy**

15.1 Where Brighter Futures believes complaints are being made in an unacceptable way including persistent, vexatious, or malicious, they may be dealt with under its unacceptable behaviour policy. This may involve Brighter Futures liaising with external bodies such as the Housing Ombudsman to resolve the complaint. Brighter Futures will consider the implications of the Equality Act when managing complaints through its Unacceptable Behaviour Policy.

## **16. Statutory Appeals**

16.1 In addition to 'general appeals' there are a number of areas of service delivery where Brighter Futures' customers have a legal right to an internal appeal, known as 'statutory appeals' as below).

16.2 All statutory appeals are on a 1 stage process and will be heard via an appeal meeting, at which the customer may choose to make personal representation, submit evidence, and be accompanied by a person of their choice, giving Brighter Futures 48 hours' notice in advance of the meeting. All statutory appeals will be heard by a more senior officer than sanctioned the original decision.

16.3 Any subsequent changes to this evidence or change of the person accompanying may result in the review being postponed, the evidence not being considered or a refusal to hear the customer(s) representative.

16.4 If having requested an internal appeal hearing the customer(s) fail to attend or inform Brighter Futures of the reasons why they cannot attend, the reviewing officer may proceed with the hearing in their absence.

16.5 On a discretionary basis, Brighter Futures may choose to postpone a hearing if requested by the customer(s) and there is a justifiable reason for doing so or if the person due to hear the appeal is unavailable for any reason.

16.6 This may, however, not always be possible if the delay would prevent Brighter Futures from taking expedient legal action to remedy a tenancy breach or it would result in hearings being outside the permitted legal framework.

16.7 If during a hearing an adjournment is requested by either Brighter Futures, the tenant, customer(s) or their representatives and a further meeting is necessary, Brighter Futures will give reasonable notice of the date, time, and venue of the adjourned hearing.

16.8 When hearing internal statutory appeals, the reviewing officer will assess the following:

- If the legal procedures and notice periods have been adhered to in serving of notices or letters sent to customer(s) advising of actions to be taken
- It was appropriate in terms of evidence provided.
- The decision will stand up to scrutiny.

## **17. External Complaint and Appeals Process**

17.1 Where the internal complaints process is exhausted, and the complainant is not satisfied with the response, they may take their complaint to the independent Housing Ombudsman.

17.2 The Independent Housing Ombudsman will only review cases that have exhausted Brighter Futures' internal complaint and appeal handling process.

## **18. Putting Things Right**

18.1 If our own complaint investigation or reviews by outside agencies including the Housing Ombudsman find that we have failed in our duties to our tenants, customers and other stakeholder we will seek to put things right to the satisfaction of the complainant. We will make a sincere apology, put things right and offer compensation where appropriate in line with our Compensation policy. We will seek to honour all our legal obligations for redress.

18.2 Brighter Futures will act upon and fully implement any recommendations or determinations that are made because of cases that have been reviewed by the Independent Housing Ombudsman.

## **19. How Brighter Futures Manages and Uses Complaints**

19.1 With strategic direction from the Board and Senior Management Team (SMT), a positive approach is provided for complaints, appeals and all forms of customer feedback, with this information being used to deliver improvements in customer services.

19.2 The Chair of the Board will be the lead responsibility for driving the positive complaints handling culture.

19.3 Brighter Futures will ensure that it provides complaints, comments, compliments and feedback opportunities that are easy to understand and easy to access for all customers. This will be done by:

- Involving customers in designing and improving all information on complaints, appeals and feedback to ensure it is jargon free and easy to understand.
- Making relevant information available in alternative languages and formats such as large print, on request.
- Ensuring customers receive support from Brighter Futures staff, or via working in partnership with community support agencies and advocacy groups.
- Analysing complaints, appeals and feedback information against our known customer profile information and the diversity of the community where Brighter Futures operates.
- Resolving complaints to customers' satisfaction, efficiently and learning from it to improve customer service.

19.4 Brighter Futures will use appropriate resources to gather, analyse and act upon complaints, comments, compliments, and feedback. We will do this by:

- Ensuring staff are trained and regularly assessed in complaints, appeals and feedback handling including being aware of the relevant policies and procedures and taking ownership of the issue with an aim to resolve at the first point of contact.
- Ensuring we use complaints, appeals and customer feedback to improve the service delivered to customers.

19.5 Brighter Futures will constantly monitor its standards of service and the way it responds to complaints/compliments and feedback. To achieve this, we will:

- Provide information to our managers, customers, and Board to show trends and responses provided and subsequent actions taken to improve the service.
- Set targets to benchmark performance against our peers.
- Undertake regular reviews of the policy and best practice in dealing with complaints, compliments, and feedback to improve the service to customers.
- Publish data including lessons learned so that performance and satisfaction overall is improved.

## **20. Feedback**

20.1 Brighter Futures will maximise all types of formal and informal customer feedback to drive service improvement. The intelligence gained from all forms of feedback including performance and satisfaction information is regularly shared with customers. The information is used to identify improvement opportunities and may trigger a service review and remedial actions when there are any dips in performance.

20.2 Brighter Futures aims to capture informal interactions which are not complaints, appeals, suggestions, or compliments, whether positive or negative comments about the services it delivers and will use this information to identify issues that are common to several customers and detail the action taken as a result in customer newsletters and on the website.

20.3 Brighter Futures encourages customers to let us know when we have done something well, in addition to areas it needs to improve in. A register of all compliments received is maintained to improve future service delivery.

20.4 All customers (internal/external) are encouraged to submit suggestions on how it can change and improve the ways in which it works to deliver better services.

20.5 Surveys will be used to gain customer intelligence and assess satisfaction with the ways in which it is delivering services. Brighter Futures has a programme of surveys that is reviewed annually with the tenant led Service Review Groups and includes STAR (Survey of Tenants and Residents) surveys, ongoing in-house surveys, and one-off service-specific surveys. People participating in surveys will be informed of the complaints process as a mechanism to remedy dissatisfaction with services provided by Brighter Futures.

## **21. Data Protection and Confidentiality**

21.1 Brighter Futures will treat all complaints we receive as confidential unless we have a legal obligation to disclose information to a third party such as the police.

21.2 We will do our best to investigate anonymous complaints that clearly state their matters of concern. However, our ability to investigate will be greater if we are able to communicate with the person making the complaint to discuss their concerns with them.

21.3 The Data Protection Act sets out how we handle personal data. We are committed to safeguarding the right of our customers to confidentiality and privacy. Brighter Futures staff are required to maintain a duty of care towards information regarding our customers in line with data protection legislation and our Data Protection Policy. Our Privacy Statement Summary can be found on our website.

## **22. Safeguarding**

22.1 If we receive a complaint about safeguarding, we will follow the steps set out in our safeguarding policy to address it.

## **23. Reasonable Adjustments**

23.1 Brighter Futures is committed to providing excellent services to all our customers and tenants enabling fair and equal access to all of our services. We are committed to making reasonable adjustments to this policy in line with the Equality Act 2010. We encourage customers and tenants to contact us if they believe that we can make reasonable adjustments to enable them to fully access our services, including the complaints process.

23.2 If a complainant would like to request a reasonable adjustment, then they should notify the staff member at the initial point contact or the complaints officer. There is no prescribed list of reasonable adjustments. These could include but are not limited producing this policy and related information in different formats such as large print and alternative languages on request. There is an easy read how to complain guide which is available on our website. A paper copy can be provided on request.

## **24. Equality, Diversity and Inclusion**

24.1 Brighter Futures operates an Equality, Diversity and Inclusion policy, and this applies to all aspects of our services. We will ensure that no customer, tenant or service user is treated less favourably on the grounds of age, ethnicity, religion or belief, disability, gender, gender reassignment, sexual orientation, pregnancy or maternity, marriage or civil partnership status.

24.2 We offer opportunities for complaints to be made in different ways that are accessible to complainants and we will offer support in accessing this process if it is required. All decisions will be based on evidence and facts so that they are free from bias and impartial. All of our complaint responses will be clearly set out with reasons for decisions made and any further actions to be taken.

## **25. Compensation**

25.1 Brighter Futures Housing is committed to delivering quality services that consistently meet or exceed customers' expectations. Our Compensation Policy sets out our approach to compensation where that service falls below these expectations. It details some circumstances when compensation will be considered and what the compensation may be. It should be noted that each case will be considered on its own merit.

## **26. Communication of this Policy**

26.1 This policy will be communicated to customers' and tenants' by: discussed at customer and tenant panel meetings and the organisation's website.

26.2 This policy will be communicated to staff by publishing it on our intranet SharePoint for staff to access and will be discussed at Team and Operational Managers' meetings.

## **27. Whom this Policy Applies To**

27.1 This policy applies to everyone who uses our services or for those supporting them and staff.

## **28. Legislative and Regulatory Requirements**

<b>Relevant Regulation or Legislation</b>	<ul style="list-style-type: none"> <li>• Human Rights Act 1998 (<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>)</li> <li>• Localism Act 2011 (<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>)</li> <li>• Housing Act 1996 (<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>)</li> <li>• Data Protection Act 2018 (<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>)</li> <li>• General Data Protection Regulations (GDPR)</li> <li>• Equality Act 2010 (<a href="http://www.legislation.gov.uk">www.legislation.gov.uk</a>)</li> <li>• The Housing Ombudsman's Complaint Handling Code (<a href="http://www.housing-ombudsman.org.uk">www.housing-ombudsman.org.uk</a>)</li> <li>• Guidance on Remedies – Housing Ombudsman Service</li> <li>• Regulatory Standards</li> </ul>
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## **29. Related Policies, Procedures and Documents**

<b>Policies</b>	<ul style="list-style-type: none"> <li>• Draft Compensation Policy</li> <li>• Data Protection Policy</li> <li>• Equality, Diversity and Inclusion Policy</li> <li>• Unacceptable Behaviour Policy</li> </ul>
<b>Forms / Guides / Leaflets</b>	<ul style="list-style-type: none"> <li>• Brighter Futures feedback form</li> <li>• How to Complain leaflet</li> </ul>
<b>Websites</b>	<ul style="list-style-type: none"> <li>• Brighter Futures Website</li> </ul>

	<ul style="list-style-type: none"><li>• <a href="https://www.brighter-futures.org.uk/">https://www.brighter-futures.org.uk/</a></li><li>• Brighter Futures Privacy statement</li><li>• <a href="https://www.brighter-futures.org.uk/wp-content/uploads/2023/03/Privacy-Statement-Summary-002.pdf">https://www.brighter-futures.org.uk/wp-content/uploads/2023/03/Privacy-Statement-Summary-002.pdf</a></li></ul>
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### **30. Monitoring and Review**

30.1 This Policy will be reviewed every annually year by the Director of Finance and Business Support unless significant changes are made to the Complaints Handling Code by the Housing Ombudsman Service which necessitates an earlier review.