



Homelessness has no place

Complaints Comments and Compliments Policy and Procedures

File Reference Number: PP004

Version: Final

Document Control

Title:	Complaints Comments and Compliments
Reference Number:	PP004
Author: (Responsible)	Business Excellence Partner
Owner: (Accountable)	Executive Director of Services
Directorate:	Operations
Contact:	quality@depaulcharity.org.uk
Version no:	3.0
Status:	Final
Reviewed by: (Consulted)	Voice of Depaul
Approved by:	Services and Business Development Committee
Date of Approval:	01 February 2017
Applicable to: (Informed)	All staff
Issued on:	08 May 2017
Last reviewed:	08 February 2023
Date of next review:	07 February 2026
Related policies & procedures:	Confidentiality and Data Protection; Equality, Diversity and Inclusion; Safeguarding Children and Adults at Risk; Whistleblowing; Recording Standards; Document Retention; Anti-Social Behaviour; Client Involvement; Staff Handbook and Staff Code of Conduct

Version Number	Revision/ Issue Date	Summary of Changes
1.0	08 May 2017	New policy and procedure, dissolved previous policies regarding complaints. Approved by Services Committee.
1.1	10 October 2017	Updates to job roles and addition of appendix of complaints received on social and online media channels.
1.2	9 November 2017	Minor updates to process.
2.0	26 November 2020	Update to Policy Statement to adopt Housing Ombudsman new definition of Complaint and Complaint Handling Code.

		Approved by Services Committee.
2.1	18 February 2021	Minor updates to job roles and process based upon changes from Housing Ombudsman.
3.0	08 February 2023/ Issued 21 July 2023	Full review of procedures, removed stage 3 complaints, introduced service requests and aligned with Housing Ombudsman Complaint Handling Code.

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Complaints Comments and Compliments Policy Statement

Depaul UK is committed to ensuring both that accessible customer feedback mechanisms are in place and are promoted in order to bring about genuine improvement for customers. Our Complaints, Comments and Compliments Policy and Procedures are an essential part of putting this commitment into practice.

Customers are defined as those in receipt of a service from or who are donors and supporters of Depaul UK.

For the purpose of this Policy and Procedures, Complaints, Comments and Compliments are defined as follows:

- A **complaint is 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, members of the public or any customer of Depaul UK
- A **comment is a suggestion, idea or observation** about our services. Comments help us to be innovative and creative about the way in which we deliver our services to customers.
- A **compliment is positive feedback** from a customer regarding an area of our service or how we deliver our services. Compliments let us know we are getting it right.

Depaul UK will publish Complaints, Comments and Compliments information on how to make a complaint in leaflets, newsletters, online and as part of regular correspondence with customers, as well as upon request in a format that is accessible to the user. Our Complaints, Comments and Compliments processes are available to any prospective, current or ex-customer.

We will include Complaints, Comments and Compliments handling as part of our staff induction and core training programme, as well as providing tools for staff to help them handle and recognise complaints early.

This Policy and Procedures ensures a quality approach; helping us gain further customer insight which we will monitor and use to improve services and service delivery across the organisation, so that all of our customers benefit.

The underlying basis of this Policy Statement is Depaul UK's commitment to equalities, fair access and inclusion. We recognise and value all customer feedback.

Our Approach to Complaints, Comments and Compliments

We have adopted the Housing Ombudsman's Principles for Dispute Resolution as a good practice guide in handling Complaints. Where applicable, these Principles may also be used for handling Comments and Compliments. The Housing Ombudsman identified three principles behind effective dispute resolution:

Depaul UK, Sherborne House, 34 Decima Street, London, SE1 4QQ www.depaul.org.uk
Registered Charity Number: 802384, Company Number: 02440093 (Registered in England and Wales)
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Depaul Housing Services is a subsidiary of Depaul UK
Registered Charity Number: 1155073, Company Number: 08561164 (Registered in England and Wales)
Registered with the Regulator of Social Housing Number: 4792

- **Being fair – treating people fairly and following fair processes through:**
 - providing a constructive approach which applies consistent principles to all complaints received, whilst ensuring each complaint is considered on its own facts; and
 - treating each complaint justly and without favour or discrimination.
- **Putting things right**
Our commitment is to being open to learning from our mistakes and putting the problem right for our customers and as soon as possible.
- **Learning from outcomes**
We will demonstrate our willingness to learn from the issues raised and/or identify where our services may have failed. We will provide feedback to relevant parties including the complainant on lessons learnt and actions taken to improve service delivery.

2.0 Application and Scope

2.1 This Complaints Comments and Compliments Policy and Procedures provides principles and processes to be followed by all Depaul UK employees, students, trainees, volunteers and Trustees, hereafter referred to as staff, to handle all complaints comments and compliments received from Depaul UK clients and members of the public.

2.2 Depaul UK's Complaints Comments and Compliments Policy and Procedures applies where any current or ex client of Depaul UK and members of the public, including donors, applicants and neighbours of the communities in which we serve, wish to raise a complaint and provide us with feedback.

2.3 Depaul Housing Services may consider compensation in the context of guidance provided by the Housing Ombudsman Service.

3.0 Legislation and Compliance

3.1 Whilst Depaul UK is not a Registered Provider we will ensure that complaints are dealt with effectively based on best practice and have adopted the Housing Ombudsman's Complaint Handling Code <https://www.housing-ombudsman.org.uk/wp-content/uploads/2022/03/Complaint-Handling-Code-Published-March-2022-1-1.pdf>

3.2 Depaul Housing Services, a subsidiary of Depaul UK, is a Registered Provider and will comply with all relevant legal and regulatory requirements in its approach to and handling of complaints. Primary legislation which relates directly to complaints received by Depaul Housing Services only includes:

- [Housing Act 1996 section 51 schedule 2](#)
- [Housing and Regeneration Act 1996, 2008](#)
- [Localism Act 2011](#)

3.3 The Regulator of Social Housing Regulatory Framework for Social Housing in England 2015 Tenant Involvement and Empowerment Standard states that Registered Providers shall:

“Have an approach to complaints that is clear, simple and accessible that ensures that Complaints are resolved promptly, politely and fairly.” “Providers shall accept complaints made by advocates authorised to act on a tenant’s/tenants’ behalf.”

4.0 Roles and Responsibilities

4.1 Whilst students, trainees, volunteers and Trustees may act in an advocacy role, or may assist with informal complaints and mediation resolution, formal complaints can only be received, logged, investigated and resolved by employees of Depaul UK.

4.1 Depaul UK have a Complaints Officer (the Business Excellence Partner) who is responsible for this policy and for making sure that our staff are trained to handle complaints effectively.

4.2 All employees must respond to complaints sensitively and fairly, and engage with complaint handling training.

4.3 Employees may be appointed to investigate and resolve complaints by service or department managers, this is referred to as the ‘investigating officer’. Investigating officers will have access to staff at all levels to facilitate quick resolution of complaints, have the authority and autonomy to act to resolve disputes quickly and fairly.

5.0 Procedures

5.1 How we will handle a complaint

5.1.1 We will take all complaints received seriously and aim to resolve them as swiftly as possible.

5.1.2 The word ‘complaint’ does not have to be used. However, we will distinguish between a Service Request, Feedback and a Formal Complaint.

5.1.3 We will promote and encourage opportunities to complain and accept complaints in person, by phone, by email, by letter, via an advocate (see 5.2) or using the online complaints form on our website.

5.1.4 Any complaints or expressions of dissatisfaction received via Depaul UK Social Media will be responded to by the Fundraising Team and handled confidentially, where possible by direct message on the platform it is made, or by signposting the complainant to our website.

5.1.5 In the first instance all complaints will be dealt with as a Stage 1 complaint.

5.1.6 Complaints made by a group of people will be responded to accordingly. If a complaint is received during a group meeting, such as a Residents Meeting, we will respond appropriately to the whole group affected by the complaint by posting our response and action taken on the service notice board and inclusion in the meeting minutes.

5.1.7 We will refer complaints received about a specific Depaul UK Service or Department to the relevant Service Manager or Head of Department for investigation.

- 5.1.8 We will treat all customers respectfully during and after an investigation into their complaint, the principles of the Equalities Act 2010 will apply to protect against direct and indirect discrimination, harassment or victimisation in services and public functions, for people who are perceived to have, or are associated with, someone who has a protected characteristic.
- 5.1.9 We will keep details of complaints confidential and only share them when required in accordance with the law.
- 5.1.10 We may take disciplinary action against an employee, or start action under other procedures, for example, legal procedures or Safeguarding as a result of complaints made through this policy and procedures.
- 5.1.11 If we receive an anonymous complaint we will still record and investigate it as far as that is possible. If we identify a service failure, we will act to put it right to ensure that other customers may benefit from our learning and action.
- 5.1.12 We will signpost customers to make a complaint if they are dissatisfied with an area of our service, how our services have been delivered to them, or where there has been a lack of action which may have negatively impacted upon them.

5.2 Who can make a complaint

5.2.1 We will accept complaints from current or ex-customers of Depaul UK:

- Residents of Depaul UK owned or managed accommodation services
- People who access support or advice services from Depaul UK, including SAFE@LAST, Reconnect family mediation and Depaul UK Nightstop services
- Member of the general public
- Donors and supporters.

5.2.2 We will not accept complaints from:

- External contractors
- Employees - they should instead refer their concerns to their Line Manager and use Depaul UK's policies for Grievance (Dispute Resolution) and Disciplinary.
- Volunteers - they should instead refer their concerns to their nominated supervisor and use the processes set out in Depaul UK's Volunteering Policy and Procedures.
- Partner and commissioning stakeholders - they should instead refer to the processes contained in the agreement or contract and liaise with the relevant contract manager.

5.2.3 Customers may decide to ask someone to help them make their complaint. This person is known as their advocate. An advocate may be a parent, friend, partner, relative, a staff member of Depaul UK. Their role may include helping a customer to write or formulate their complaint, or providing more general support in order to resolve the customer's concerns.

5.2.4 An advocate must have a complainant's written permission to make a complaint on their behalf and discuss their complaint with Depaul UK, we must receive a copy of this before we can discuss any complaint with an advocate. Due to confidentiality and Data Protection requirements we cannot comment upon complaints submitted on someone's behalf until we have obtained the

written consent of the individual on whose behalf they are acting. If such consent cannot be obtained we will write and explain this.

5.3 Exemptions to this policy

5.3.1 There are some issues that will not be dealt with as a complaint. We will always communicate this with the person raising the issue and offer an alternative course of action. These issues include but are not limited to:

- Where a complaint concerns anti-social behaviour we will follow the procedures set out in Depaul UK's Anti-social Behaviour Policy.
- Where a complaint relates directly or indirectly to open or existing legal proceedings being taken by a complainant against Depaul UK. In such instances the complaint will be referred to Depaul UK's Head of People and Organisational Development and addressed as part of the legal proceedings.
- In all instances where actual or inferred personal injury is an issue, Depaul UK employees will not comment or discuss the case with the claimant. All personal injury claims and allegations of physical damage to a claimant's property or possessions must be referred directly to the Head of People and Organisational Development and Depaul UK's Insurers. The only exception to this rule is in the case whereby the service is a Registered Provider, such as Depaul Housing Services.
- In cases where a complaint concerns a Safeguarding matter, we will follow the Procedures as detailed in Depaul UK's Safeguarding Children and Adults at Risk Policy, and liaise with their local Designated Safeguarding Officer, whether or not a customer wishes to make their concerns formal.

5.4 Service Requests

5.4.1 A service request is a request requiring action to be taken to put something right. Service requests will be recorded, monitored and reviewed regularly.

Service requests (informal)	What we will do
<p>Examples of service requests include:</p> <ul style="list-style-type: none">• Scheduling a repair• Missed appointment• Missed information request• Not attending a scheduled appointment	<p>In response to a service request we will provide an explanation and where possible resolution.</p> <p>A formal Stage 1 complaint will be raised if the customer raises dissatisfaction with the response to their service request or if substantial further enquiries are needed to resolve the matter.</p>

5.5 Complaint stages

5.5.1 There are two stages to our complaint process:

Stage 1 (formal) complaint	What we will do
<p>Where we have been unable to resolve a service request, a customer has had to make substantial further enquiries to resolve a service request, or where a customer requests a complaint is handled within the formal process, the case is handled as a Stage 1 formal complaint.</p> <p>If a customer raises additional complaints during the Stage 1 investigation, these will be incorporated into our Stage 1 response if they are relevant, and the Stage 1 response has not been issued.</p> <p>Where the Stage 1 response has been issued, or it would unreasonably delay the response, we will log the complaint(s) as a new complaint.</p>	<p>All complaints will be assigned to an investigating officer, who may be any employee. They will listen to your concerns; offer you support and investigate your feedback.</p> <p>On receiving your formal complaint, we will:</p> <ul style="list-style-type: none"> • Acknowledge receipt of the complaint within 3 working days and provide the contact details of the investigating officer and the case reference number. • Contact the complainant to confirm our understanding of the complaint and to find out what resolution they are seeking. • Provide a full response to the complainant within 10 working days. We may agree an alternative timescale with you in exceptional circumstances, but this will not exceed 20 working days in total. Where agreement over an extended timescale cannot be reached, we will provide the details of a Regulator or external body where appropriate so the complainant can challenge our proposed plan for responding and/or the proposed timeliness of our response. • We recognise that complaints can be resolved in several different ways. When responding to complaints we will offer a solution that takes into consideration any service failure and the overall circumstances of the complaint. • Examples of solutions we may offer are: <ul style="list-style-type: none"> - Acknowledging when we have got it wrong - Offering an apology - Providing an explanation - Taking action to resolve the issue - Reconsidering or changing a decision - Making changes or improvements to our services, policies, or procedures

Stage 2 (internal review) complaint	What we will do
<p>If a complainant is not satisfied with our response at Stage 1, they should contact us within 20 working days to ask us to escalate to Stage 2.</p> <p>Requests to escalate a complaint should explain why they are dissatisfied and what they consider has not been resolved.</p> <p>We will ask complainants to tell us what they expect from the resolution.</p> <p>Complaints will only be escalated to Stage 2 if it has been responded to at Stage 1 and it is at the request of a complainant.</p> <p>Our Stage 2 process is an internal review. The review will check that the decisions at Stage 1 were fair, reasonable and in accordance with our policies. It is unlikely that we will change the judgement in decision making where the decision was reasonable at Stage 1.</p> <p>The person who investigates a complaint at Stage 2, must not be the same person that considered the complaint at stage 1.</p> <p>Sometimes it might not be appropriate to escalate a complaint to Stage 2. We will always set out why we think the complaint response is final and if signpost complainants where escalation is available through Regulators and external bodies.</p>	<p>Stage 2 complaints will be assigned to a senior manager, who will listen to the complainants concerns; offer them support and investigate the matter raised by them.</p> <p>On receiving a stage 2 complaint, we will:</p> <ul style="list-style-type: none"> • Acknowledge receipt of the complaint within 3 working days and provide the contact details of the investigating officer and the case reference number. • Contact the complainant to confirm our understanding of the complaint and to further discuss what resolution they are seeking. • We will provide a full response within 20 working days. We may agree an alternative timescale with complainants in exceptional circumstances, but this will not exceed 30 working days in total. Where agreement over an extended timescale cannot be reached, we will provide the details of a Regulator or external body where appropriate so the complainant can challenge our proposed plan for responding and/or the proposed timeliness of our response. • Before we issue our final response, we will share the proposed outcome in relation to the Internal Review and give the complainant an opportunity to respond to the findings before formally issuing our response. We will always aim to reduce our response times.

5.6 If a complainant is not satisfied

5.6.1 If at any time during the complaint process a complainant is not satisfied or wishes to access impartial advice they may be able to contact a Regulator or external body.

5.6.2 Depaul UK staff should be open, transparent and supportive in advising complainants of their right to escalate their complaint further or access support by assisting complainants to identify where to go in order to progress their complaint externally.

- 5.6.3 This may include providing information or access to information, such as the use of a computer, signposting to the nearest library, ICT facilities or an external agency, or helping the complainant to identify a suitable advocate.
- 5.6.4 Housing complaints may be referred for support from their local MP or Councillor, who may contact us about their complaint or refer them to the Housing Ombudsman.
- 5.6.5 Depaul Housing Services customers may be able to contact the Housing Ombudsman directly. The contact details for the Housing Ombudsman Service are:
- Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/
 - Phone: 0300 111 3000
 - Email: info@housing-ombudsman.org.uk
 - Postal address: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ
- 5.6.6 Support complaints may be referred to the Local Authority or funding partner for the relevant service. Contact details will be made available in each service.
- 5.6.7 Donor or supporter complaints may be referred to the Fundraising Regulator <https://www.fundraisingregulator.org.uk/complaints>
- 5.6.8 Personal data use complaints may be referred to the Information Commissioner's Office <https://ico.org.uk/make-a-complaint/>
- 5.6.9 General consumer advice is available from Citizens Advice <https://www.citizensadvice.org.uk/about-us/>

5.7 Malicious, Vexatious, Offensive and Discriminatory Complaints

5.7.1 We expect all complainants to act in good faith and to raise issues of concern that are both genuine and can be substantiated. If at anytime a manager feels that a complaint is malicious, vexatious, persistent or inappropriate they will immediately forward the complaint to the Complaints Officer.

5.7.2 A complaint may be considered offensive if it includes inappropriate language or views which discriminate against anyone. If an offensive complaint is received, it will be logged in the same way as any other complaint and then immediately forwarded to the Complaints Officer.

5.7.3 The Complaints Officer will review any complaints referred to them and may discuss complaints with senior management. They will decide if the complaint should be closed for purposes of offensiveness, discrimination or inappropriateness.

5.7.4 Complaints decided to be closed on these grounds must be approved by two Executive Directors of Depaul UK. The Complaints Officer or an Executive Director will inform the complainant and relevant Service Manager in writing of the decision, within 10 working days of the complaint being received (according to the original date it was logged as being received).

5.7.5 Depaul UK may liaise with legal advisors regarding complaints that appear to be of such an offensive nature that they may need to be referred to the police.

5.8 Comments and Compliments

5.8.1 We are always looking for ways to improve our services and our customers may have ideas about how we can do this, we encourage our customers to tell us when things are working well for them or not.

5.8.2 We will handle comments and compliments in the same way.

How we handle comments and compliments

- When we receive a written comment/ compliment we will consider how we can use it to improve our services. Comments/ compliments should be shared and discussed with the relevant team members. This may, for example, include sharing the comment at the next available Team Meeting for discussion or decision, at a Managers Meeting, with the local Area or Assistant Area Director or making an agency wide recommendation to the Business Excellence team.
- We will write to all customers who make written comments/ compliments, thanking them for their feedback and let them know what we have done or what changes we have made as a direct result of their comment. Customers can expect a written acknowledgement letter from us within 10 working days of their comment being received and logged, which will as a minimum standard include:
 - The date their comment/ compliment was received and who has dealt with it
 - A summary of their comment/ compliment
 - How it was reviewed and with whom it was shared with
 - Any action which will be taken as a direct result of their comment/ compliment
 - Thanking the customer for their written comment/ compliment

Any employee can deal with a customer comment/ compliment. Employees who handle comments/ compliments must ensure their Line Manager authorises the letter's content to be sent to the customer before it is sent.

6.0 Monitoring and Review

6.1 The Depaul UK Executive Director of Services will report Client Complaints quarterly to the Depaul UK Services Committee.

6.2 The Complaints Officer will review the number of complaints received, the nature of complaints received and complaint satisfaction annually, in order to identify trends, risks and review Policies and Procedures and staff training needs in relation to complaint handling.

6.3 Depaul UK will publish complaint data in its Annual Report, and use the data as appropriate to make changes to the provision of services and they are delivered to customers.

6.4 The nominated Board Member responsible for complaints, Father Eugene Curran, and Executive Director of Services will hold joint responsibility for strategic oversight of Complaints at Depaul UK, and will meet annually with the Head of Business Excellence and Business Excellence Partner to review complaints data.

7.0 Continuous Improvement Renewal Clause

7.1 This Policy and Procedures will be reviewed every three years from the date of issue to determine its continued relevance, effectiveness and appropriateness. This Policy and Procedures may be assessed before that time as necessary to reflect substantial organisational changes, following an inspection, review or validation visit, or as recommended by auditors, changes required by law, or changes required by Depaul UK Governance structures.