



# Complaints and Feedback- Web Policy

**Policy Author:** Customer Experience  
Directorate

**Valid From:** January 2021

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*The content of this policy must not be adapted or changed in any way, except where expressly directed to enter individual location names, or contact details.*

*Please use and enter information in to the Appendices*

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CARE, SUPPORT AND HOUSING

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## Our mission

**Working with people to make choices, achieve goals and take control of their lives through high quality care, support and housing.**

## Our values

**Excellence**

**Aspiration**

**Partnership**

**Trust**

**[lookahead.org.uk](http://lookahead.org.uk)**

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# Policy

## 1. Scope

- 1.1. This policy applies to all service and departments within Look Ahead and sets out our approach to acknowledging, responding, resolving and learning from to both Feedback and Complaints; and resolution.
- 1.2. This policy sets out the framework Look Ahead operates to ensure those who wish to feedback or complain know how to do so, and where to go if they feel we have not resolved the matter adequately. It outlines how we address complaints - both formal and informal - ensuring a clear, consistent approach is followed.
- 1.3. There may be occasions where the nature of the complaint or feedback may necessitate Look Ahead to investigate the concerns raised under our Safeguarding or Employee Relations procedures. In these circumstances these policies will supersede the complaints and feedback policy.
- 1.4. The policy should be read in conjunction with, but not limited to, the following policies:
 

Compensation	Incident Management
Casework Management	Anti-Social Behaviour
Confidentiality and Data Protection	Customer Reward and Recognition Policy
Safeguarding Adults	Child Protection
Inclusion and Diversity	Managing Staff Allegations
Managing Investigations	
- 1.5. See, Think Act is our chosen relational security model. It provides a framework for how our teams can work together to identify, manage and respond to factors that may pose a risk to a service's stability or safety and should be read in conjunction with this policy and associated procedures. Services will be proactive in avoiding actions or behaviours which will instigate complaints taking place at all: where they do, they should consider what issues or incidents may be connected to the complaint or feedback.

## 2. Policy Statement

- 2.1. Look Ahead wants to hear the views of customers about its services, and recognises the right of customers to make a complaint when we fall short of their expectations, the standards set by our regulator and our organisational values.
- 2.2. We view feedback and complaints as a valuable resource to help improve our service offer and delivery. Look Ahead is committed to excellence in everything we do. The success of our organisation depends on our ability to deliver excellent services that exceed expectations: we can only do this if we receive, listen to and act on feedback.

- 2.3. We are committed to ensuring our customers and others who wish to feedback or complain know how to do so by providing information on our website and provide user friendly literature in a variety of ways for customers.
- 2.4. Where appropriate, we will work collaboratively with others to facilitate the effective and early resolution of complaints. Where complainants are our customers we will support them through the complaints process.
- 2.5. We aim to resolve complaints promptly wherever possible. This could mean an on-the-spot apology and explanation if something has clearly gone wrong and immediate action to resolve the problem. If we can't resolve a complaint we will explain why. If a complainant is still dis-satisfied they can have their complaint investigated formally.
- 2.6. The full complaints reporting processes, roles and responsibilities of Look Ahead colleagues can be found below at procedure sections 7-9.

### 3. Definitions

#### What is a Complaint?

- 3.1. Look Ahead has adopted the Housing Ombudsman's definition of a complaint

*"Any expression of dissatisfaction, however made, about the standard of service, actions or lack of actions by the organisation, its own staff, or those acting on its behalf, affecting individual residents or groups of residents"*.
- 3.2. Complaints defined within this policy and procedure will relate to incidents or issues that occur within six months of raising the complaint and relate to:
  - A failure to deliver a service or standards of service delivery relating to support and/or accommodation
  - Failing to comply with policy and/or procedure
  - The behaviour of staff, volunteers or a contractor working on our behalf – including neglect or abuse
  - A disagreement with decisions made by Look Ahead in the course of our work which the complainant feels are unfair or unclear to them
  - Poor quality of maintenance (repairs, cleaning, gardening etc.)
  - Delays in responding to enquiries and requests
- 3.3. Look Ahead operates an informal complaints procedure (stage 0) and a three stage formal procedure. Our stage three process involves our customers as part of the review and decision making process.

#### Who can make a complaint?

- 3.4. Look Ahead understands that a person may be unable or reluctant to make a complaint directly. We will accept feedback and complaints which come from:
  - **Our Customers** - Individuals who are supported by Look Ahead staff or who live in a

home where we are the landlord; this can also include former customers. This includes complaints raised anonymously by our customers.

- Those authorised to **represent our customer's interests** where the customer has given consent such as family members, carers or advocates supporting a customer.
- **MPs, Councillors**, designated person or other **advocates** making a complaint on behalf of a customer. This does not include contact from legal representatives of a customer.
- Organisations who receive a service directly from Look Ahead
- People who feel directly adversely affected by a service we provide e.g. a direct neighbour.

### **What is not a complaint?**

3.5. The follow are not deemed complaints under the policy:

- Request for a service
- A report of Anti-Social Behaviour incident
- Raising a safeguarding concern
- Complaints made by Look Ahead staff
- Complaints outside of Look Ahead's remit. E.g. a complaint about the service of another organisation
- Appeals against warnings, notices to quit or evictions
- Complaints that become part of a legal process, for example a legal disrepair case reported through a solicitor
- Complaints arising from incidents more than 6 months old unless there is a pattern of concern, a potential breach of the Equalities Act or linked to regulated activity.

### **What are Vexatious and Persistent Complaints?**

- 3.6. We have adopted the Housing Ombudsman and Local Government Ombudsman's (LGO) definitions of "unreasonable complainant behaviour" and "unreasonable persistent complaints".
- 3.7. We define unreasonably persistent and vexatious complaints as those that, because of the frequency or nature of a complainant's contact with Look Ahead, hinder our consideration of their (or other people's) complaints.

### **What is Feedback?**

- 3.8. Look Ahead defines feedback as information provided that lets us know: when we have done something well; a compliment about our services or colleagues; a suggestion about how we could improve a service, procedure or process; or constructive criticism that the customer may not wish to formalise as a complaint.
- 3.9. We ensure that when we respond to any stage 1 complaint we provide the complainant with the opportunity to complete a complaints satisfaction survey.
- 3.10. There are a number of routes to raise feedback outlined in procedure section 7 of the policy.

## **4. Feedback and Complaint Standards**

- 4.1. Our overarching approach and complaint handling standards are set out in full

## **Appendix 1. In summary Look Ahead will:**

- Ensure that all customers have access to our Look Ahead’s “Feedback and Complaints” system that is clear, simple and accessible;
- Support customers to bring complaints or make comments where required;
- Listen and respond to all feedback and use it to improve our services;
- Focus on resolving issues leading to complaints quickly;
- Provide staff with the tools and knowledge to resolve complaints promptly and appropriately
- Use appropriate forms of redress when we have done something wrong and learn from our mistakes;
- Reduce the impact of any identified unsafe or inappropriate care or treatment

## **5. Regulatory Standards**

- 5.1. This policy and procedure is in line with requirements set out by the Regulator of Social Housing (RSH) for all Social landlords to operate an internal complaints policy and procedure as well as the Housing Ombudsman Complaints Handling Code 2020.
- 5.2. Complainants have the right to contact and seek guidance and advice from the Housing Ombudsman at any point in the complaint process.
- 5.3. Regulation 19 of the Health and Social care Act 2020 (Regulated Activities) requires Look Ahead to have an effective complaints system in place to reduce the impact of unsafe or in appropriate care or treatment. As such, Look Ahead must send the Care Quality Commission (CQC), when requested, a summary of complaints received from customers receiving CQC regulated activity. The CQC also requires Look Ahead to refer complaints of customers receiving regulated activity to the Local Government Ombudsman once they have exhausted our own complaints procedures.
- 5.4. As a data controller Look Ahead operates in line with the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. We will ensure any information relating to a complaint or feedback provided is only shared with the consent of the complainant concerned, unless:
  - required to by law
  - the information is necessary for the safeguarding of adults or child protection

## **6. Diversity and Inclusion**

- 6.1. Look Ahead is committed to helping customers to be able to provide feedback or complain in a way that suits their individual needs. We provide a range of ways for feedback and complaints to be logged, provide information as part of welcome packs, during induction into Look Ahead accommodation and the Customer handbook which is available in different formats.
- 6.2. Look Ahead recognises some protected groups may be reluctant to raise a complaint or give feedback e.g. because of cultural considerations or the nature of the complaint itself. We provide support to those who need help to give



feedback or raise a complaint and clear information on who to raise a complaint with if they feel their complaint will not be considered thoroughly if raising it directly with their service.

- 6.3. It is crucial that where customers lack the confidence or capacity to give feedback or make a complaint they are offered appropriate support to do so.
- 6.4. It is essential that Look Ahead understands whether customers are the subject of discrimination because of equalities' characteristic. If any person believes they have not been treated fairly should raise a complaint in line with this policy

## 7. PROCEDURE

### Making a Complaint or Providing Feedback

- 7.1. Feedback can be made using any of the following channels (whichever is easiest for the customer):
  - In person to any member of Look Ahead staff.
  - By phone to their service, to Look Ahead's dedicated feedback and complaints line on **0800 389 6567**
  - By e-mail to [Feedback@lookahead.org.uk](mailto:Feedback@lookahead.org.uk)
  - By calling our customer contact centre during office hours on **0333 010 460**,
  - In writing to their service or to Customer Services, Look Ahead, Kings Building, and 16 Smith Square, London, SW1P 3HQ.
  - Online using our website <https://www.lookahead.org.uk/>
  - Using the Feedback and Complaints form available in all services, local suggestion boxes, local meetings and forums
  - Via an authorised advocate or external support person
  - Through the Senior Complaints and Feedback Officer (SCFO)
- 7.2. Feedback received via customer surveys will also be addressed via the policy where appropriate to do so.
- 7.3. Look Ahead does not actively encourage complaints via social media channels such as Twitter and Facebook. Any complaints received via this channel will be acknowledged by the communications team and the complainant will be advised that their complaint has been directed to the SCFO or Customer Experience Director for acknowledgement. We will then correspond with the complainant via an alternative method to maintain confidentiality.

### Putting Things Right

- 7.4. We encourage customers to get in touch with us straight away if something has

gone wrong and give us the opportunity to put it right. Priority will be given to resolving substantive live issues ahead of conducting any necessary investigations, without prejudicing consideration of the complaint. As such, all staff are encouraged and expected to resolve problem for customers where possible either directly or working in partnership with colleagues across the organisation. Customers should not be passed on or redirected to other colleagues or departments in order to have their concerns resolved.

- 7.5. All initial contact should be recorded on our feedback and complaints system as an informal complaint to enable Look Ahead to identify underlying causes or emerging trends in service failure or dissatisfaction.
- 7.6. If we can not resolve the problem informally within an agreed timescale, or the issue is complex or significant, the contact should be recorded and investigated as a formal complaint.

### Receiving a Complaint

- 7.7. All complaints should be acknowledged in 3 working days
- 7.8. All complaints should be assigned an investigation manager
- 7.9. Investigations should be completed within the procedural timescales for each stage (see Appendix 1).
- 7.10. Complaints received from MPs, are managed centrally by the Chief Executive's office. The complaint will be initially directed to the Senior Complaints and Feedback Officer as soon as possible on the same working day to ensure the correspondence can be acknowledged and responded to within 5 working days by the Chief Executive.
- 7.11. For all other complaints all staff must take responsibility for acting when a complaint is received, whether this is received in writing by email, text, letter, or received a phone call, in person or via an advocate.
- 7.12. At each stage of the process colleagues should record all actions required and whether these have been completed on the Complaints Management system.

### Case Management Reviews

- 7.13. Where cases are complex and have multiple layers, Look Ahead will reserve the right to adopt a case management review approach to ensure there is an organisational and joined up approach to the customer's complaint. These will ordinarily involve multiple departments, a senior management lead and facilitation by the Senior Complaints and Feedback Officer. The group will develop a comprehensive action and communication plan that will sit alongside the investigation process. This approach should ensure complex cases are resolved at an earlier stage.

### Stage 1 Formal Complaint

- 7.14. **The Investigating Manager** should:

- Contact the complainant to ensure they fully understand the complaint and ascertain what resolution they are seeking, keeping written records of the points of complaint and desired resolution.
- Ensure they fully understand the nature of the service, department or function the complaint relates to.
- Ensure they have allocated enough time to investigate the complaint fully within the procedural timeframe, including allowing time to meet with the complainant, colleagues or others as appropriate.
- Keep written records of meetings held as part of the investigation for future reference.
- Where meeting takes place with the complainant face to face or over the phone, provide them with a written copy of the notes made and confirm you have captured the complaint fully to minimise any issues where a complaint is not resolved because points have been missed.
- If an extension is required to complete the investigation, the Investigation Manager must seek approval /extension from the Senior Complaints and Feedback Officer (up to 5 extra days can be granted) to provide the outcome response to the complainant. The Complainant should be advised in writing of any delay and extension prior to the target response date being exhausted.
- Keep the complainant updated on extensions or delays.
- When the investigation has been completed the investigation manager should write a letter to the complainant explaining action taken and the outcome of the investigation within 10 days of receiving the complaint. A complaint may be upheld, partially upheld or not upheld at all (see **section 8**).

7.15. The Investigation Manager should consider the impact and potential risks to the customer / complainant in the event the complaint is not upheld. They should consider the best way to communicate the outcomes of the complaint prior to formal written communication.

7.16. The Investigation Manager must ensure that the formal complaint response complies with the following:

- Each point raised in the complaint is covered in the outcome letter response
- The resolution the complainant sought
- Clearly sets out how the investigation manager arrived at the decisions
- Clearly sets out how the complaint will be resolved or why this is not possible and alternative resolution
- The right of appeal and procedure
- The right to contact the Housing Ombudsman at any point during the complaints process
- The stage 1 response must provide the complainant with a hard copy of the complaint satisfaction survey or link to the on-line version.

7.17. The Investigating Manager should share any actions required by a Service/ Department with the relevant manager to ensure these are assigned and actioned

locally and these should be logged and assigned on the Complaints Management System.

- 7.18. The Investigating Manager should record actions on the Complaints Management System and close the complaint where the complainant is satisfied with outcome (after satisfaction survey is sent).
- 7.19. Consider compensation request and requirements (in line with the compensation procedure) with the relevant Budget Holder and record on Complaints Management System.
- 7.20. Where the complainant is dissatisfied with the outcome, the complainant must contact the investigating manager or Senior Complaints Officer within 15 days (3 weeks).

## Stage 2 Formal Complaints

### Review

- 7.21. All stage 2 complaints should be managed by the Senior Complaints and Feedback Officer
- 7.22. The Senior **Complaints and Feedback Officer** will review the reasons why the complainant is dissatisfied or whether a formal appeal has been requested. The Senior Complaints and Feedback Officer will determine whether the complaint should be **escalated to stage 2** of the complaint procedure or whether it should undertake a stage one complaints review. The ultimate focus should be to find a reasonable resolution for the customer and the following factors should be taken in to account when determining which path is appropriate:
  - Are there clear grounds of appeal such as new evidence, material omissions in the stage 1 investigation? If so, the complaint should move to stage 2.
  - If the complainant is not disputing the determination but remains dissatisfied then a stage 1 review may be better served to work with the customer to reach a place where they are satisfied. This may include assigning a separate investigation manager under stage 1. This must be communicated to the Complainant.
  - A review may enable informal or formal mediation / restorative justice to take place.

### Stage 2

- 7.23. **The Senior Complaint and Feedback Officer will:**
  - Acknowledge the complaint by letter within 3 days
  - Assign a stage 2 Investigations Manager – this should ordinarily be by a manager senior to the stage 1 manager.
- 7.24. **The Investigation Manager will:**

- Contact the complainant to ensure they fully understand the complaint and ascertain what resolution they are seeking, keeping written records of the points of complaint and desired resolution.
- Review all the information collated as part of the Stage 1 investigation.
- Review the status of actions agreed at stage 1.
- Undertake the investigation into the complaint, meeting with the complainant, colleagues or others as appropriate to fully investigate the complaint. They should keep written records of meetings held as part of the investigation for future reference.
- Where meeting takes place with the complainant face to face or over the phone, provide them with a written copy of the notes made and confirm you have captured the complaint fully to minimise any issues where a complaint is not resolved because points have been missed.
- Write a letter to the complainant explaining action taken and the outcome of the investigation within 18 days of receiving the complaint. The investigation manager has the right to uphold, partially or not uphold the original stage 1 outcome and make further recommendations (see **section 8**).

7.25. The Investigation Manager should consider the impact and potential risks to the customer / complainant in the event the complaint is not upheld. They should consider the best way to communicate the outcomes of the complaint prior to formal written communication.

7.26. The Formal response letter should:

- Ensure each point raised in the appeal is covered in the outcome letter response.
- The response clearly sets out how the investigation manager arrived at the decisions.
- The response clearly sets out how the complaint will be resolved or why this is not possible and alternative resolution.
- The right to appeal and the procedure - all stage 2 appeals should be directed to the Senior Complaints and Feedback Officer.
- The right to contact the Housing Ombudsman at any point during the complaints process.

7.27. The Investigating Manager should share any actions required by a Service/ Department with the relevant manager to ensure these are assigned and actioned locally and these should be logged and assigned on the Complaints Management System.

7.28. The Investigating Manager should record actions on the Complaints Management System and close the complaint where the complainant is satisfied with outcome.

7.29. Consider compensation request and requirements (in line with the compensation procedure) with the relevant budget holder and record on Complaints Management System.

7.30. Where the complainant remains dissatisfied with the outcome the complainant must make contact with Look Ahead contact within 18 days (3 weeks) of date of

the outcome correspondence.

7.31. All appeals should be addressed to the Senior Complaints and Feedback Officer

### Stage 3 – Complaints Panel

7.32. The **Senior Complaints and Feedback Officer will** facilitate the final stage of the internal formal complaints process, overseen by the Customer Experience Director.

7.33. The Senior **Complaints and Feedback Officer** will:

- Log the Stage 3 complaint on the Complaints Management System and acknowledge receipt within 2 working days.
- Liaise with the relevant Director, complainant and other panel representatives to convene a mutually convenient date for the Panel hearing.
- Send the Letter to the complainant outlining the Panel hearing arrangements within 7 working days of receipt of the stage 3 appeal.
- Ensure that any customer panel members do not have a conflict of interest and work with customer experience colleagues to ensure customers have had appropriate confidentiality and Data Handling Training
- Provides the Chair of the panel a full briefing and pack in advance of the panel.
- Ensures the Panel Hearing date is convened within 20 days of move to Stage 3.
- Circulate Papers/ briefing overview 5 days before Panel meeting (within Data protection and confidentiality guidelines and procedures).
- Ensures Panel agenda timetable has a briefing session built in to avoid inappropriate sharing of data in advance.

7.34. The **Stage 3 Panel** is chaired by the Customer Experience Director or appropriate independent Executive Director. The chair ensures all panel members understand the process and confidentiality and Data Handling requirements. They support the representatives of the complaints Panel in responding to the complainant's complaint. The Director will support the complainant and the panel to seek a resolution to the complaint.

7.35. The panel should comprise of a Director, customers (maximum of 2), subject matter expert, and independent manager.

7.36. The investigating stage 2 manager will be required to attend the panel in part to present the findings. They will not form part of the decision making panel.

7.37. The **complainant**:

- Has the right to attend and address the panel.
- The right to be accompanied by a friend advocate or support circle. Legal representation will not be permitted to attend.
- Right not to attend – they must be informed that the panel will be convened in their absence.
- To submit a written statement.

7.38. The **Panel** will:

- Consider the complaint and listen to any further feedback from the complainant, investigation manager and review all documentation in connection with the complaint at all stages.
- Work to reach a resolution that is satisfactory to the complainant.
- Will meet to agree the outcome of the panel hearing once the complainant has had opportunity to provide any further evidence in connection with their complaint.
- Make recommendations to the organisation such as lessons learnt, policy change requirements.

7.39. The **Director Chair** will:

- Write a letter to the complainant explaining the outcome of the Panel hearing and any recommendations within 5 days of the panel hearing and the external appeals procedure and contact details.
- Feedback any actions in respect of the complaint to the Senior Complaints and Feedback Officer and the relevant manager of the service or department concerned.
- Ensure any organisational learning is followed up.
- Consider compensation request or requirement and record on Complaints Management System.

7.40. The **Senior Complaints and Feedback Officer** will:

- Will record the panel deliberations and set out in full any reasons for reaching their decision.
- Ensure all discussions are auditable.
- Record all outcomes and actions on the Complaints Management System.
- If no response received within 15 days (3 weeks) complaint stage closed on Complaints Management System.
- If complainant still dissatisfied, move to external complaints process (see **section 8**).

## 8. Complaint Decisions and Redress

- 8.1. We expect most complaints to be resolved informally at stage 0 or stage 1 of the formal process.
- 8.2. Formal complaints may be completely or partially upheld or not upheld. Outlined below are descriptions the Investigating Manager may use to determine the outcome of a complaint.

Decision	Description
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Upheld	<p>The customer was fully justified in making their complaint. Our response should acknowledge this in any of the following methods of redress:</p> <ul style="list-style-type: none"> <li>• Say sorry to the complainant</li> <li>• Provide, review or change service to the customer</li> <li>• Provide an explanation or answer to the customer</li> <li>• Review a policy or procedure</li> <li>• Take action or enforce a decision</li> <li>• Arrange training or guidance for staff</li> <li>• Employee action (such as changing support worker)</li> <li>• Provide a compensation or goodwill payment</li> <li>• Offer mediation</li> </ul>
Partially Upheld	<p>Some, but not all of the customer’s complaint was justified. This can sometimes happen where a customer has made a complaint covering multiple issues. Where the complaint is justified, the above steps apply.</p>
Not Upheld	<p>The customer’s complaint was not justified. This might occur where it is found following investigation that the complaint is groundless.</p>

- 8.3. If a complainant is still unhappy at the exhaustion of our complaints process, their case should be referred to the Housing Ombudsman Service. The stage 3 outcome letter should clearly set this out along with the Ombudsman’s contact details.
- 8.4. Complaints regarding CQC regulated activity should also contain the contact details of the Local Government Ombudsman.

## 9. Persistent or Vexatious Complaints

- 9.1. Look Ahead is committed to investigating and responding to all complaints fairly, comprehensively, and in a timely manner. However, there are a minority of cases where a person complains in a way that prevents colleagues from investigating the complaint; takes up a disproportionate level of resources; or behaves in a way that is unacceptable
- 9.2. Look Ahead will not assume a new complaint from a complainant who has made unreasonable or vexatious complaints in the past is unreasonable. Look Ahead will consider each complaint raised on its own merits. All relevant correspondence will be evaluated to consider the circumstances, including:
  - Whether a complainant has made persistent or unreasonable demands.
  - Whether there is a strong likelihood that complaints are being made to intentionally cause harassment, divert resources or to disrupt Look Ahead services.
  - Whether the complainant or their representative has been abusive or threatening to staff or has produced excessive correspondence.
  - Whether the complainant displays vexatious behaviour.



9.3. Look Ahead will treat as abusive, any behaviour that seeks to harass, verbally abuse or otherwise intimidate our colleagues. This can include the use of foul or inappropriate language or the use of offensive and racist language.

9.4. Abusive behaviour may be demonstrated through:

- Using threatening, offensive or foul language on the telephone
- Using threatening, offensive or foul language face to face
- Sending multiple threatening or offensive emails or text messages
- Leaving multiple threatening or offensive voicemails
- The use of offensive or threatening posts on social network

### **Dealing with abusive behaviour**

9.5. Look Ahead accepts that people under stress or who are feeling angry or upset may react in an abusive or aggressive way to the person with whom they are dealing. However, a balance must be drawn between the ability and desire to assist a complainant, and what can reasonably be achieved in the circumstances.

### **Over the telephone**

9.6. In situations where the language and content of telephone calls becomes abusive or threatening to colleagues, it is acceptable for a Look Ahead colleague to terminate the call. In all cases the colleague should remain polite and, wherever possible:

- Provide the complainant with the opportunity to modify their behaviour, by informing the complainant that unless they do so, the call will be terminated.

### **Face to face**

9.7. The personal safety of Look Ahead colleagues is of paramount importance and if during face to face meetings the complainant's behaviour becomes aggressive, abusive or displays high levels of distress, the meeting should be brought to an end as quickly as possible.

9.8. The decision to end a meeting should (if possible) be explained clearly and politely, so that the complainant does not feel that they are being dismissed or their complaint ignored. Unless it is clearly inappropriate to do so, they should also be informed that it may be possible to continue the conversation at a future meeting when they are less distressed.

### **In correspondence**

9.9. Colleagues in receipt of abusive or threatening correspondence need not reply to this other than to acknowledge its receipt. All such correspondence should be brought to the attention of the relevant Contract Manager and the Senior Complaints and Feedback Officer. The relevant manager will review the case and may decide to respond to the complainant explaining that the tone of their correspondence is unacceptable and that no further correspondence will be entered into unless the complainant amends their tone.

### **Through the Look Ahead website**

9.10. We aim to respond to all social media posts made on our website within 24 hours

or less. Anyone using our corporate social media accounts to raise complaints will, whenever possible, be:

- Responded to quickly in the same way that the comment was made, to reassure other users that the issue has been responded to.
- Encouraged to move discussion of the complaint away from the public areas by continuing discussions through private/direct message to the person who has made the complaint.
- Responded to with an update.

### **To the Management Team**

- 9.11. Where abusive and/or unreasonably persistent complainants are escalated to the Senior Management Team or the Chief Executive. In these circumstances members of the Senior Management Team will wherever appropriate, refer the complainant back to the colleague dealing with their complaint, or their line manager.

### **When there is a serious incident**

- 9.12. This procedure is specifically aimed at dealing with complaints that have become vexatious. However, in extreme cases where there are direct and credible threats or incidents of violence, this will be referred immediately to the police.

### **Imposing restrictions**

- 9.13. Look Ahead encourages customers to approach us with questions about service delivery and to challenge any service that they feel has failed. In all cases where a customer feels the service they have received has fallen short of the high standards we set for our organisation their complaint will be investigated in accordance with our published complaints procedure.
- 9.14. If a complainant is persistently abusive when they contact our colleagues or persistently call to discuss a complaint or make further complaints and this is proving time consuming and disruptive, the following steps will be taken to deal with this:
- The Contract Manager will contact the complainant either by phone, in writing or by email to explain to the complainant why their behaviour is causing concern and ask them to modify their behaviour.
  - The Contract Manager will explain the actions that Look Ahead may take if the behaviour does not change.
  - If the disruptive behaviour continues, a senior manager will write to the complainant advising them that the way in which they will be allowed to contact us in future may be restricted. The letter will contain information about the procedures that have been put in place to deal with the complainant. This will include information about any flagging of their account and the reasons for this.
  - Any restriction that is imposed on the complainant's contact with us will be appropriate and proportionate and the complainant will be advised of the period of time the restriction will be in place for. In most cases restrictions will relate to the individual complainant. For example, we would need to continue contact with a customer but we may limit the contact to an identified member of staff only, or to certain days of the week. In such cases the restrictions would need to be regularly reviewed.
- 9.15. Restrictions will be tailored to deal with the individual circumstances of the complainant and may include:

- Refusing to take further contact by telephone except through a third party e.g. solicitor/councillor/friend acting on their behalf.
- Refusing to accept emails from the complainant insisting instead that they correspond by letter.
- Banning the complainant from accessing any of our offices except by appointment.
- Requiring contact to take place with one named member of colleague only.
- Restricting telephone calls to specified days / times / duration.
- Requiring any personal contact to take place in the presence of an appropriate witness.
- Letting the complainant know that we will not reply to or acknowledge any further contact from them on the specific topic of that complaint (in this case, a designated colleague should be identified who will read future correspondence).

### **Informing complainants of the decision to treat their complaint as vexatious**

- 9.16. When the decision has been taken to apply restrictions to a complainant, the Senior Complaints and Feedback Officer or relevant director will contact the complainant in writing (and/or as appropriate) to explain:
- why we have taken the decision.
  - what action we are taking and the duration of that action.
  - The review process of this policy, and the right of the complainant to contact the Housing Ombudsman or Local Government Ombudsman about the fact that they have been treated as an unreasonable, persistent or vexatious complainant.
- 9.17. Where a complainant continues to behave in a way which is unacceptable, the Senior Complaints and Feedback Officer in consultation with the Director may decide to refuse all contact with the complainant and stop any investigation into his or her complaint.
- 9.18. Where the behaviour is so extreme or it threatens the immediate safety and welfare of colleagues, we will consider other options, for example reporting the matter to the police or taking legal action. In such cases, we may not give the complainant prior warning of that action.

### **New complaints from people who have been identified as abusive, unreasonable or persistent**

- 9.19. New complaints from people who have been identified as abusive, unreasonable or persistent under this policy will be treated separately and will be dealt with in line with the Look Ahead complaints policy. We do not support a “blanket policy” of ignoring genuine service requests or complaints where they are well founded and will review each complaint.

### **Review arrangements**

- 9.20. The status of a complainant judged to be unreasonably persistent or abusive will be reviewed by the Senior Complaints and Feedback Officer after three months

and at the end of every subsequent three months within the period during which the vexatious complaints procedure applies.

- 9.21. The complainant will be informed of the result of this review if the decision to apply this procedure has been changed or extended.

### **Referring unreasonable or persistent complainants to the Housing or Local Government Ombudsman**

- 9.22. We will always try to work through a complaint, however, on very rare occasions, there may be no resolution to a complaint raised by unreasonably persistent complainants and relationships may break down completely and we may not achieve a satisfactory outcome. In such circumstances we will direct the complainant to the Housing Ombudsman for review.

## **10. Monitoring and Reporting**

- 10.1. The Customer Experience Directorate will assume day to day responsibility for monitoring complaints performance and compliance within the policy.
- 10.2. The Quality Audit Team will monitor adherence to the policy in operational services through the Quality Management Framework Audit framework.
- 10.3. Central service customer service quality management audits will monitor adherence of the policy across central service departments
- 10.4. The Customer Experience Directorate will review customer satisfaction with the complaints process and outcomes.
- 10.5. Reports will set out performance against procedure, trends, actions learning, satisfaction and outcomes.
- 10.6. The Customer Experience Directorate will oversee a complaints and Feedback service improvement plan and report against progress.

## **11. Governance**

- 11.1. SLT and Board are responsible for overseeing compliance against the regulatory code of conduct; annual review, action plan and publication.

## Appendix 1 Look Ahead Complaints Standards

### Values

- Complaints and Feedback are welcomed and encouraged and we will handle complaints in an open, accountable and respectful way. We believe that all feedback helps Look Ahead improve the quality of the services we deliver to our customers
- Look Ahead will apologise when our services have fallen below our organisational standards and expectations and will use appropriate forms of redress when we have done something wrong to put things right. Where appropriate this will include consideration of discretionary compensations and other payments in line with the compensation policy.
- Look Ahead will equip staff with tools and knowledge to handle complaints effectively and resolved complaints promptly and appropriately. Colleagues will receive training on how to deal with complaints as part of their induction.
- Our colleagues will be supported by a dedicated Senior Complaints and Feedback Officer.

### Timescales

- All formal complaints will be **acknowledged** within **3 working days**
- **Stage 1** complaints will be **investigated** and a written outcome provided within **13 working days** of receipt of the complaint
- **Stage 2** complaints will be **investigated** and a written outcome provided within **18 working days** of receipt of the complaint
- **Stage 3** complaints will be **acknowledged** within **3 working days**
- **Stage 3** complaint panels will be **organised** within **7 working days** of receipt of the complaint
- **Stage 3** complaint panels will be **convened** within **20 working days** of receipt of the complaint
- The **outcome** of **stage 3** complaints will be **communicated** in writing within **5 working days** of the panel meeting

### Communication

- We will promote our complaints and feedback policy to all customers in their "Welcome Packs"; during tenancy sign up; during key working sessions and customer appointments; posters and leaflets in our offices, supported accommodation and our estate notice boards; our customer magazine; websites and through our commissioners, Family and Friends, and Advocates.
- We will keep in touch with complainants throughout the complaints process
- Sometimes it may take longer to finalise an investigation – for example due to the complexity or the availability of key individuals who we need to speak to as part of the investigation. In these circumstances we will

communicate any delays or investigation extensions and revised timescales.

- We will record all complaints, whether informal or formal on our complaints management system.

## **Rights**

- We will ensure that customers are aware that they have the right to make contact with the Housing Ombudsman at any stage of their complaint
- We recognise that making a complaint can be a sensitive matter and will wherever possible protect the confidentiality of the person making the complaint where requested
- Where anonymous complaints are received these will be still be logged and recorded. We will work with the anonymous complainant and record on our complaints management system how they would like to be updated. All steps in handling the complaint will be follows, however staff handling the complaint may not be able to communicate or provide the anonymous complaint with a response

## **Inclusion**

- Look Ahead will ensure systems and information are in place to ensure customers know how to provide feedback, complaints channels are clear, simple and easy to access and there are multiple ways for Customers to complain
- We will make information on how to make complaints available in easy read and other accessible formats and languages where required
- Look Ahead understands that complainants may be upset about an issue they raise about their experiences or on behalf of others. We will always endeavour to accommodate ways of resolving complaints in partnership with the customer/ or their advocate.
- Look Ahead will not tolerate abuse of colleagues or excessive demands on resources. We will operate a clear framework for handling vexatious or persistent complaints that doesn't dilute the customer's right to complain.

## **Consent**

- Where a complaint requests another person act on their behalf we will always review and or request the complaints written consent before progressing the complaint. Where we do not have consent or where we are waiting for consent we will direct all communication directly to the customer unless it would be detrimental to do so

## **Quality & Continuous Improvement**

- All customers who have a complaint at stage 1 will be invited to complete a complaints satisfaction survey. Feedback will hep us improve our complaints handling and outcomes.

- Look Ahead will routinely monitor and assess the quality of individual complaints handling through monthly quality assessments
- Look Ahead Board and Senior Leadership teams will ensure Look Ahead has the organisational structures and management systems in place to report on and review the management of complaints, to ensure complaints are managed effectively and learning is shared and integrated in to organisational policies, procedures, practice and colleague learning and development.
- Senior Managers will analyse and review complaint handling, trends, issue and action plans on a regular basis and report back to customers at least once a year via our Tenant and Landlord scrutiny panel, our annual reports and on the customer performance page of our website.





## Connected Documents

Document	Link
<b>Connected Policies</b>	<ul style="list-style-type: none"> <li>• Compensation Policy</li> <li>• Casework Management Policy</li> <li>• Confidentiality and Data Protection Policy</li> <li>• Safeguarding Adults at Risk Policy</li> <li>• Managing Challenging Behaviour Policy</li> </ul>
<b>Forms and Letters</b>	Customer Feedback and Complaints Form
<b>Information Sheet</b>	Yes
<b>Easy Read</b>	Yes
<b>External Websites</b>	<a href="http://www.lookahead.org.uk">http://www.lookahead.org.uk</a> <a href="http://www.housing-ombudsmen.org.uk">www.housing-ombudsmen.org.uk</a>
<b>Legislation/ Regulation</b>	<ul style="list-style-type: none"> <li>• The Homes and Communities regulatory framework</li> <li>• Regulation 19 of the Health and Social Care Act 2008 (Regulated Activities)</li> <li>• Care Quality Commission</li> <li>• The Housing Act 1996, s.51 (2) requires that all social landlords have a duty to become a member of any Housing Ombudsman Service scheme approved by the Secretary of State.</li> <li>• The Localism Act (2012) introduced measures that mean that tenants who have exhausted their landlords complaints procedure have the choice either to approach a 'designated person' for help or to contact the Housing Ombudsman Service directly when eight weeks have elapsed. The designated person could be either an MP, local councillor or a 'tenant panel'.</li> </ul>

## Version Control

<b>Version no.</b>	2	<b>Date effective:</b>	November 2013
<b>Brief summary of changes:</b>	Stage 3: A member of the CSC will sit on the stage 3 panel rather than a board member.		
<b>Colleague consultation:</b>	Contract Managers; Operational Managers; Staff focus groups, Look Ahead SMT.		
<b>Customers consulted:</b>	Customer Services Committee (CSC); Customer Focus Groups		
<b>Results customer consultation:</b>	<ul style="list-style-type: none"> <li>• More training for staff on how to deal with complaints face to face and on how to spot abuse of the system.</li> <li>• Group customer meetings in which complaints can be raised and discussed without staff present and then channelled through one customer to staff.</li> <li>• Deal with complaints on time.</li> <li>• Promote positive feedback more.</li> <li>• Simplify information but ensure customer involvement in helping to do so.</li> <li>• Customers to be more involved generally.</li> <li>• Improved communication on how the complaint is being dealt with, how long it will take, who is handling it etc.</li> <li>• Compensation linked to complaints- perhaps based on a sliding scale linked to severity and type of complaint.</li> <li>• Categorise complaints</li> <li>• Improve training for staff in how to deal effectively with complaints.</li> <li>• Deal with complaints on time.</li> <li>• Utilise customers more in the complaints process.</li> </ul>		
<b>Other consultation:</b>	N/A		
<b>Signed off by:</b>	Look Ahead Board, November 2013		
<b>Author:</b>	Graeme Beadham, Customer Services and Policy Manager		
<b>Review date:</b>	November 2016		
<b>Version no.</b>	3	<b>Date effective:</b>	April 2014
<b>Brief summary of changes:</b>	Clarification on who the policy applied to. New template only		
<b>Colleague consultation:</b>	N/A		
<b>Customers consulted:</b>	N/A		
<b>Results customer consultation:</b>	N/A		
<b>Other consultation:</b>	N/A		
<b>Signed off by:</b>	Beth Wagstaff, Customer Services and Policy Manager		

<b>Author:</b>	Beth Wagstaff, Customer Services and Policy Manager		
<b>Review date:</b>	November 2016		
<b>Version no.</b>	4	<b>Date effective:</b>	March 2015
<b>Brief summary of changes:</b>	Updated complaints and feedback forms		
<b>Colleague consultation:</b>	N/A		
<b>Customers consulted:</b>	N/A		
<b>Results customer consultation:</b>	N/A		
<b>Other consultation:</b>	N/A		
<b>Signed off by:</b>	Beth Wagstaff, Customer Services and Policy Manager		
<b>Author:</b>	Beth Wagstaff, Customer Services and Policy Manager		
<b>Review date:</b>	November 2016		
<b>Version no.</b>	5	<b>Date effective:</b>	December 2015
<b>Brief summary of changes:</b>	<p>Updated to include lessons learnt – Complaints Improvement Plan  Housing Ombudsman Code of Practice 2020  Clearer role of investigation manager – expectations and standards  Enhanced monitoring and reporting  Clear definition of when ASB becomes a complaint  Managing residual actions arising from a complaint following case closure  Case management for complex cases – whole organisational approach  Best practice – stage 3 panels  Clear case management standards</p>		
<b>Colleague consultation:</b>	SLT Operational colleagues Policy Group		
<b>Customers consulted:</b>	TALP, Customer annual survey feedback and Complaints satisfaction surveys		
<b>Results customer consultation:</b>	Customer Satisfaction Surveys and TALP Improve response times/ communication/ quality of responses at local service level/ complaints information Improve response to repairs		
<b>Other consultation:</b>	N/A		
<b>Signed off by:</b>	Beth Wagstaff, Customer Services, Policy and Governance Manager		
<b>Author:</b>	Nicole Njie - Customer Experience Director and Kieran Carr- Senior Complaints Officer		
<b>Review date:</b>	November 2018		

<b>Version no.</b>	6	<b>Date effective:</b>	January 2021
<b>Brief summary of changes:</b>			
<b>Colleague consultation:</b>	Operations Senior Complaints Officer SLT		
<b>Customers consulted:</b>	Customer Satisfaction Survey Feedback TALP		
<b>Results customer consultation:</b>	N/A		
<b>Other consultation:</b>			
<b>Signed off by:</b>	SLT and Policy Group		
<b>Author:</b>	Customer Experience Directorate		
<b>Review date:</b>	January 2024		

