

SNG Complaints Policy

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Document Control Sheet

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Policy author	Head of Complaints
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Version Control

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November 2019	Head of Customer Feedback	0.1	Annual review.
November 2020	Head of Customer Feedback	0.2	Annual review.
November 2021	Head of Customer Feedback	0.3	Update to vexatious and anonymous descriptions.
July 2023	Head of Customer Feedback	0.4	Review following HOS review Minor changes to wording.
January 2024	Head of Customer Specialist Services	0.5	Move to new Business Process and Control Template. Minor changes to wording incorporating feedback from the RBP 26 January 2024.
Feb 2024	Head of Customer Feedback	1.0	Final version published.
June 2024	Head of Complaints	1.1	Amendment: Minor change to timeframe for accepting a complaint, to 12 months from 6 – to align to HOS Code, also minor word changes.
Oct 2024	Head of Complaints, Central Complaints Manager	2.0	Create a SNG wide (integrated) Complaints policy, following a review of existing legacy organisation policies.

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1. Scope

- This policy applies to all Sovereign Network Group (SNG) customers.
- Any reference to 'we,' 'our,' 'us' refers to SNG. When we use 'you' and 'your' we mean any SNG resident or customer.

2. Purpose and objectives

- We want to make sure we're giving our customers the best service possible. But sometimes things don't go to plan. If this happens, we want to put it right for you as quickly as we can and learn from your feedback.
- This Policy is designed to outline how we will manage complaints to ensure we provide a simple and accessible complaints service.
- This policy has been developed in line with the Housing Ombudsman Service Complaint Handling Code, 2024 and our regulatory and legal duties.

3. Policy statement

- We hope that a customer never has to let us know that something has not gone well or that they have been let down by us. But if it happens, we need to make it right.
- When a customer tells us about an issue, we will try to sort it out straight away. If we cannot resolve problems there and then, we will agree what actions need to be taken, and by when. We will keep customers updated on what we are doing using a communication method that best suits them.
- We expect our staff to take every possible step to assist and support our customers, working promptly to resolve any issues they encounter
- We will consider the root cause of an issue so we can stop it happening again.
- Complaints relating to safeguarding shall be resolved through the measures set out in our Safeguarding policy.
- We will not close a complaint until we have tried everything that we believe can reasonably be done to resolve it, or until we have an agreed action plan in place. When we know the outcome or have an agreed plan in place, we will communicate to the customer about all the issues that have been raised.
- Building and maintaining our customers' trust is at the heart of our approach and we will make sure customers feel we are taking their issues seriously.

4. Policy

What is a complaint?

- We use the Housing Ombudsman Service definition of a complaint: '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.'
- While customers may not use the word 'complaint,' if it is evident that they are dissatisfied, we will always give them the option to make a complaint.

Raising complaints in good time

- We ask for complaints to be made within 12 months of the matter arising and, unless there is a good reason for doing so, we may not be able to consider complaints made after this time.
- We will use our discretion when considering if a complaint cannot be accepted and will always consider the individual circumstances of the complaint in question.
- Where a decision is made to not accept a complaint, we will provide a clear explanation to the customer and provide information on their right to contact the Housing Ombudsman Service.

Stage 1 complaints

- When we first receive a complaint, it is known as a 'Stage 1'. The complaint will be logged and acknowledged within 5 working days of receipt.
- We aim to issue a full response to the customer within 10 working days of logging a complaint. If this is not possible, such as where a complaint is complex, we may need a further 10 working days, and we will let the customer know why and agree this with them.

Stage 2 complaints

- A complaint can only be taken to Stage 2 after it has received a Stage 1 response. If a customer is unhappy with a decision received at Stage 1, they have the right to have the decision reviewed. This is known as a 'Stage 2' complaint. We will acknowledge any Stage 2 complaint within 5 working days of receipt.
- A senior manager (overseen by a director) will review how the complaint was handled and the decisions made.
- If a customer would like their Stage 1 complaint reviewed, they should request this within one calendar year from the date of our Stage 1 response.
- We aim to have a decision on Stage 2 complaints made within 20 working days. As with Stage 1 complaints, we sometimes need extra time to make the right decision, so we may take up to a further 10 working days. If we need to do this, we will let the customer know why and agree this with them.

- There may be times where the complexity of a case requires an extension for more than the additional 10 working days mentioned above. If this is the case, we will ensure the customer understands and we will arrange to update them at agreed periods. We will also inform them of the Housing Ombudsman's contact details.

Follow on responses

- There are also occasions where we may consider issuing a follow-on response instead of logging a new complaint or escalating to Stage 2. There are various reasons why we may choose to complete a follow-on response, for example, there would be little merit of starting the process over and/or we consider that we can deal with the matter quickly and to the customer's satisfaction. When we decide to issue a follow-on response, log a new complaint, or escalate to Stage 2, we will contact the customer to confirm our decision, understanding the complaint and the desired resolution. This will form the basis of our complaint investigation.

Using a third party or representative to raise a complaint

- We understand that some customers may want someone else to make their complaint for them and we will support this. We will still handle these complaints in line with our policy.
- To make sure we protect our customers' best interests, we will ask for written authority to tell us who can act on their behalf.

Anonymous complaints and confidentiality

- An anonymous report relating to one of our services, a member of staff or a customer will be reported to a Director/ Head of Service/ Senior Manager depending on the information disclosed for the service area for follow up and investigation if appropriate.
- All members of staff are required to adhere to our code of conduct and maintain confidentiality as appropriate to the circumstances. Our colleagues managing complaints should seek support when handling a complaint of a sensitive nature or if asked not to disclose the identity of the complainant. We need to manage the expectations of our customers, ensuring we can adhere to our complaints process for investigation and resolution and have regard to our duty of care to our customers, employees, and 3rd party contractors.
- It may not be possible to fully investigate a complaint without disclosing the identity of the complainant, and if so, we will ask the complainants permission to do this. While we respect our customers' right to confidentiality, if we don't have this permission, we may not be able to investigate fully.

How we will try to put things right

- We will always try to put things right and that usually means getting the customer back to where they should have been before they had a problem.
- For most problems, a genuine apology and putting things right straight away is where it ends. Sometimes, if it has taken us longer than it should have to get something sorted out or if the problem keeps happening, we may offer compensation.
- Our Complaints team are fully trained and are supported by experts from across SNG. Our training ensures that we are best placed to manage our customers' complaints in an impartial way and with empathy.
- The things we will look at will be:
 - The customer's situation, for example, if they need additional help.
 - How much the customer has been disrupted.
 - How long it's taken to put right.
 - If there's been distress and/or inconvenience.
- If a service goes wrong:
 - We will make it easy to tell us what's happened.
 - We will make sure that we understand what's happened from the customer's viewpoint and look for a solution that works for them.
 - We will be clear about what we can and will do, and then do it.
 - We will tell the customer who will help them if the issue is complex.
 - We will keep in touch until everything is sorted out.
 - We will recognise any failings on our part and consider these in line with our Compensation Policy which can be found on our website.

When we cannot reach an agreement

- When we have done all we reasonably can to resolve a complaint but a customer is still unhappy, they can refer the matter to the Housing Ombudsman Service.

In the instances where we don't consider or escalate a complaint, customers will be informed of their right to take their complaint to the Housing Ombudsman.

- Customers have one year from the date of our Stage 2 response to raise the matter with the Housing Ombudsman Service. They can also ask a designated person, such as an MP or councillor to act on their behalf. We will still handle such complaints in line with our policy.

Housing Ombudsman Service

- The Housing Ombudsman Service (the Ombudsman) is a free and independent dispute resolution service. Customers can contact the Housing Ombudsman Service at any point during the complaint procedure.

- The Ombudsman cannot formally investigate while complaints are going through our internal process but may be able to give advice and support to help reach a resolution.
- The Ombudsman will contact us to get the facts of the case from our point of view and then make a final decision.

Housing Ombudsman Service

Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

Email: info@housing-ombudsman.org.uk

Phone: 0300 111 3000

Other complaints handling avenues

- If you have purchased a home from us and remain unhappy, you will need to contact the Consumer Code for Home Builders rather than the Housing Ombudsman Service.

Consumer Code for Home Builders

Consumer Code for Home Builders Limited, Westgate House, Royland Road, Loughborough, Leicestershire LE11 2EH

Email: enquiries@consumercode.co.uk

Phone: 0345 608 9797

- For shared owners and long leaseholders who have complaints about service charges and the terms of their leases.

First Tier Tribunal (Property Chamber) Southern Region

Residential Property, Havant Justice Centre, The Court House, Elmleigh Road, Havant, Hampshire PO9 2AL

Email: rpsouthern@hmcts.gsi.gov.uk

Phone: 01243 779394

First Tier Tribunal (Property Chamber) London Region

Residential property: London Region, 10 Alfred Place, London, WC1E 7LR

Email: London.Rap@justice.gov.uk

Phone: 0207 446 7700

- Complaints over debt advice for third party creditors only

Financial Ombudsman Service

Make a complaint on the Financial Ombudsman Service website.

Financial Ombudsman Service, Exchange Tower, London E14 9SR

Email: complaint.info@financial-ombudsman.org.uk

Phone: 020 7964 1000

Complaints we may not consider or escalate

- While we welcome complaints and we don't normally restrict the number of complaints or level of contact made by our customers, there may be circumstances under which we may not consider or escalate complaints. In any situation where we cannot support a customer, we will contact them to explain why and assist where we can.

Examples include, but are not limited to:

Service requests

- Often a customer's concerns can be resolved at 'first point of contact' and will not need to go through our two stage complaints process. These are known as 'Service Requests.'
- Unless a customer asks us to, we won't register a service request as a complaint in the first instance. If the customer is unhappy with how we dealt with the matter, we will log this as a complaint. In line with our definition, the customer does not have to use the word 'complaint.'
- Where we do log a complaint in relation to a service request, this will not stop our work to resolve the service request.

Matters already considered

- If a customer raises an issue that has previously been considered under the Complaints Policy, this will not be considered, and we will explain this to the customer.

Service Charges

- If a complaint relates to the figures or data provided in a service charge notice, we may not be able to consider the complaint under this policy. However, if this is the case, we will explain this to the customer and explain which process will be followed and what referral rights may be available to them.

EW1S Certification, External Cladding and general Building Safety

- If a complaint relates to building safety requirements, we may not be able to consider it under this policy, however, we will explain this to our customer. We will also provide information on their escalation rights.

High-Risk Residential Building complaints (HRRB)

- In addition to the above, where we receive a complaint about building safety risks in HRRB this will be handled under this policy, it will be prioritised based on the risk-level and not necessarily based on the date of receipt. Examples of what might constitute a relevant HRRB complaint are:
 - A full petrol can left unattended within the grounds of a HRRB.
 - Flammable material/substances found inside communal areas causing a fire hazard.
 - Loose electrical wiring exposed within the building.
 - Significant buckling/bowing of the main, joint or sub-structure.
 - The building is noticeable leaning.
 - Excessive corrosion of external wall materials.
 - Concerns about the performance of us, as the Principal Accountable Person.
- Each case will be reviewed on an individual basis to understand the level of risk and dealt with as appropriate. We will explain our approach to each customer and each case will be handled by the appropriate department.

Court proceedings

- If the complaint concerns matters that are, or were, subject to formal court proceedings, we may not be able to investigate and we would explain this to the customer.

Matters outside our control

- Where the complaint concerns matters outside SNG's control, such as a Local Authority responsibility, we will not be able to investigate and would explain this to the customer.

SW9 Complaints

- Where a complaint is received from a customer living on the Stockwell Park Estate, we will contact these customers to explain who they should raise their complaint to, so that they can receive the support they need.

Working with our involved residents to shape our services

- Complaints highlight to us which services are working well and which need a closer look. The residents in our Scrutiny Coordination Group play an important role in this as they:
 - consider feedback from our customers.
 - help us learn from what has gone wrong.
 - complete scrutiny activities.
 - make sure that we put measures in place to fix things.
 - check that we act on recommendations that come out of a scrutiny review.
- Working with residents in the Scrutiny Coordination Group allows us to hear first-hand about our customers' experiences. As a result, our residents' views are the starting point for any changes we make. Working this closely with our residents makes sure that the way we handle complaints is fair and transparent to all.

Unreasonable customer behaviour

- We ask that our customers treat our staff with respect and that they behave in a way that does not stop us from being able to resolve their complaint or the underlying concerns. However, we may occasionally receive complaints from customers whose behaviour and/or frequent contact prevents us resolving the complaint or adversely affects the ability of our teams to help other customers.
- In these cases, we will speak with them to understand why they keep contacting us. We will also liaise with external agencies to find out if they need support.
- We will explain clearly what we have done to resolve the complaint and decide what we will do the next time they contact us about the same issue.
- This could be to:
 - acknowledge the contact but not offer any additional responses.
 - ask them to only contact one named employee.
 - ask them to only contact us using a channel of our choice.
 - ask them to contact us at mutually agreed times.
- We will review customers we manage this way each year. If a customer wants to challenge the way they're managed, they can ask us to review it. The Head of Complaints will undertake this review and will only do this once.

5. Compliance

- We will ensure all complaint handling staff are trained and aware of the complaints policy and of our commitment to excellent service delivery standards.
- We record all complaints, regularly monitor our progress in handling them, and measure our performance against targets.

- Performance on complaints and how complaints have been used to improve services is reported to our involved residents, so that they can hold us to account and recommend improvements.
- We will carry out an annual self-assessment against the code to ensure our complaints handling remains in line with its requirements.
- We will publish an annual complaints report to provide insight and information for our residents about the complaints we receive and what we've looked to improve as a result.

6. Sustainability

- At SNG, we recognise the critical importance of sustainability in our operations and services. We are committed to embracing sustainable practices that contribute to environmental protection, social equity, and economic viability.

7. Responsibilities

Role	Responsibility
SNG Executive Board	Ultimate responsibility for determining and directing SNG's response to service failures and Ombudsman complaints.
CCO (Chief Customer Officer) and CCO LT (Leadership Team)	Provides assurance to the Board on the effectiveness of complaint and compensation policies, Ombudsman decisions and strategies to improve services and reduce service failures.
Resident Engagement Groups	Provides feedback on SNG's approach to complaints and collates customer feedback on past issues.
Customer Operations Director	Responsibility and ownership over the Complaints Policy and related process.
All colleagues and contractors	All colleagues should be aware of this policy. Colleagues dealing with compensation and/or complaints must read this policy and comply with this policy.

<p>Customers</p>	<p>Please read this policy carefully, along with our 'Compensation Policy'.</p> <p>Let us know if you need any assistance with understanding this policy or making a formal complaint or compensation claim. We encourage you to contact us as soon as an issue arises.</p> <p>We will endeavour to redress the problem before a formal complaint is required and there may be discretion to offer some form of compensation depending on the circumstances.</p> <p>If you are unhappy with our proposed solution or wish to formally complain about the service failure, please follow the steps on our website or talk to a customer agent for guidance.</p> <p>If you are still unhappy once the formal complaints process has concluded, a complaint should be made through the Housing Ombudsman website.</p> <p>It is important that formal complaints are raised with us within 12 months of the incident occurring.</p>
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8. Equality and diversity

- We will apply this policy consistently and fairly and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010.
- We'll be transparent about our responsibilities around equality and treat everyone fairly and respectfully, regardless of their: age, gender, marital status, sexual orientation, disability, religion, race, nationality, ethnicity, or national origin.
- We'll make sure our services and workplaces are as inclusive and accessible as possible and take seriously any concerns that we've not acted in a fair way, dealing with them as quickly as we can.
- We are committed to helping residents to access information about their homes and services in a way that suits individual needs. We will apply this policy consistently, fairly, and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equality Act 2010. We will also consider any reasonable adjustment requests in line with our Reasonable Adjustments Policy.
- Adjustments may include letters or information in another format or language. For example, recordings of complaint letters to listen to instead of reading. Making sure customers are not excluded is important to us. Find out more about SNG's commitment to inclusivity.

9. Related documents

- This Policy is supported by the following documents:
 - [Compensation policy](#)
 - [Housing Ombudsman Complaint Handling Code](#)
 - [Equality, Diversity and Inclusion Policy](#)
 - [Safeguarding Policy](#)
 - [Data Protection Policy](#)

10. Legislation and regulation

- The legislation listed in this policy is not intended to cover all legislation applicable to this policy. To comply with clause 1.1 of the Regulator of Social Housing's Governance and Financial Viability Standard, which requires adherence to all relevant law, SNG will take reasonable measures to ensure compliance with all applicable legislation by reviewing policies and procedures and amending them as appropriate. Any queries relating to the applicable legislation should be directed to the policy owner.
 - Housing Ombudsman Complaint Handling Code
 - Consumer Rights Act 2015
 - Equality Act 2010
 - Data Protection Laws (GDPR and Data Protection Act 2018)
 - Regulatory Framework for Social Housing (Regulator of Social Housing)

11. Review

- This document will be reviewed annually, or sooner if significant changes occur in the relevant legal or operational landscape.