

COMPLAINTS POLICY

1. Purpose

- 1.1 This policy sets out our approach to dealing with complaints from anyone who receives a service from us or is affected by a Twenty11 decision or action.
- 1.2 Comments, suggestions or ideas for service improvements are considered part of business as usual and are managed as such.
- 1.3 This policy ensures that our staff, Board members and tenants have a visible way to submit a complaint about our services, as well as providing a framework for dealing with complaints.
- 1.4 It also ensures that we take a positive, consistent, and fair approach to complaints management, setting out clearly the relevant escalation process.

2. Definitions

- 2.1 A **compliment** is when any party takes a pro-active step to make a positive statement about us or one of our services. Compliments are not complaints, but they are recorded, monitored and reviewed.
- 2.2 A **complaint** is an expression of dissatisfaction, however made, about the standard of service, action or lack of action, by the organisation, our staff, or those acting on our behalf, affecting a tenant or group of tenants. A tenant does not have to use the word “complaint” for it to be treated as such. A tenant who expresses dissatisfaction must be given the choice to make a complaint. If the residents decide their dissatisfaction should not be treated as a complaint, then it will be handled as a service request or learning opportunity, as appropriate. A complaint must be logged even when efforts to resolve the service request remain ongoing and we will not stop our efforts to resolve the service request if a tenant raises a complaint. This policy contains the steps we will take when handling a complaint.
- 2.3 A **service request** is a request requiring action, that is within our responsibilities, to be taken to put something right. Service requests are not complaints, but they are recorded, monitored and reviewed. A tenant who expresses dissatisfaction with the handling of a service request, must be given the choice to make a complaint and the actions needed to address the service request will continue.
- 2.4 A **Quick Resolution** is a service request, to put things right quickly and easily. We will aim to contact the tenant within two working days to discuss the request, how we aim to resolve it and in what timeframe. The Quick Resolution case owner or service owner will continue to liaise with the tenant, keeping them updated until the issue is resolved. Quick Resolutions are not complaints, but they are recorded, monitored and reviewed.
- 2.5 A **Formal Complaint (Stage 1)** investigation is stage 1 of our complaints process investigating dissatisfaction about the actions, decisions, or failure of our service.

- 2.6 An **Appeal Complaint (Stage 2)** investigation is stage 2 of our complaints process. This may be requested if the tenant is dissatisfied with the outcome of the stage 1 complaint investigation.
- 2.7 **Unacceptable behaviour** is when a tenant, because of the frequency or nature of their contact with us, hinders our consideration of their or other people's concerns and/or intentionally or otherwise dishonestly damages our reputation or credibility.
- 2.8 A **Subject Access Request (SAR)** is a request sent from a data subject (i.e. tenant) to a data controller (i.e. Twenty11) requesting information that is held about themselves.
- 2.9 **The Housing Ombudsman** provides an independent and impartial dispute resolution service which may be utilised once the internal complaints process has been exhausted, or contacted for guidance at any time. Twenty11 are voluntary members.

3. Responsibilities

- 3.1 Any member of staff may be required to investigate, resolve, or respond to complaints received, and is expected to follow this policy, as monitored, and directed by the Feedback team and their Head of Service.
- 3.2 Our Board Members set our strategic direction, but they do not get involved in operational matters. If contacted about operational issues, the Board member will refer the matter to the Feedback team to be dealt with in line with this policy.
- 3.3 The Head of Feedback has overall responsibility for the implementation of the policy, supported by the Feedback team.
- 3.4 All members of staff have access to staff at all levels to facilitate the prompt and fair resolution of complaints.
- 3.5 This policy will be reviewed at least every three years and will be amended to reflect changes in legislation or regulation as they come into force.

4. Legal Framework

- 4.1 The main pieces of legislation and regulation are as follows:

- Co-operative and Community Benefit Societies Act 2014
- General Data Protection Regulation (GDPR)
- The Data Protection Act (2018)
- The Equality Act 2010
- Homes (Fitness for Human Habitation) Act 2018
- The Consumer Rights Act 2015 (Part 1, Chapter 4)
- Housing Ombudsman Complaint Handling Code

5. Key Principles

- 5.1 We should manage complaints at the first stage it comes in where possible, aiming to investigate and address concerns thoroughly enough that we are confident, where possible, our first response will be our final response.
- 5.2 We have based our approach to managing feedback on the following principles defined by the Housing Ombudsman:
- **Be fair:** a constructive approach that applies consistent principles to all complaints, whilst ensuring each complaint is considered on the facts of the individual case. Treating each case justly and without favour or discrimination
 - **Put it right:** it is important that we make sure to put things right where they have gone wrong
 - **Learn from our tenants:** demonstrate a willingness to learn from the issues raised and/or any identified service failure. Feedback to service users, including the complainant and our Board, on lessons learnt and actions taken to improve service delivery
- 5.3 Applying the three principles defined by the Housing Ombudsman effectively means having the right culture, process, and behaviours.
- 5.4 To support these principles, it is vital that we:
- encourage feedback to be given, both positive and negative
 - are accessible
 - learn where we can apply good practice elsewhere in the organisation
- 5.5 Feedback, whether it is positive or negative, allows us to:
- to keep customer focussed: gaining an understanding of what our tenants like and don't like about the services we offer
 - demonstrate that we value the opinions of our tenants
 - measure how we are doing from a tenant's perspective, providing a way to track to continuous improvement
 - build positive relationships that can turn into valuable partnerships

6. Policy Exclusions

- 6.1 Based on the issues raised, our complaints process may not be the appropriate route for handling a tenant's dissatisfaction. When considering whether to accept a complaint, we will consider the individual circumstances of the complaint. Some of the reasons we may not accept a complaint are:
- matters which occurred or the tenant was aware of, over 12 months ago, unless there is good reason to accept the complaint. When applying discretion to

accept a complaint outside of the 12-month time limit, authority from the Head of Feedback, or a Head of Service in their absence, is required

- matters which are subject to or intrinsically linked to legal proceedings (defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court), insurance, or personal injury claims
- matters which have been considered under a separate appeals process
- matters which are not within our jurisdiction to change or influence
- matters that have previously been considered under our complaints process
- an initial request for a service, information or an explanation of how a decision has been made
- a staff complaint about a personnel matter. This will be considered under our HR procedures

6.2 If we do not accept a complaint or escalation request, an explanation will be provided, setting out the reasons why the matter is not suitable for the complaints process and the right to take the decision to the Housing Ombudsman.

6.3 If a tenant expresses dissatisfaction with our services through a satisfaction survey, we do not treat this as a complaint. However, when possible, the person completing the survey will be made aware of how they can raise a complaint if they wish to.

7. Policy Statement

7.1 We are committed to providing excellent services for all of our tenants, and local communities. We take pride in our work, and we operate in a fair and open manner to build trust and mutual respect. However, we appreciate that sometimes things can go wrong, but other times they can go really well. In both circumstances, our tenants and partners may wish to tell us about this, and we will capture and manage both complaints and compliments in a uniform way.

7.2 Our internal two stage complaints process consists of: Formal Complaint Investigation (Stage 1) and, where necessary, an Appeal Complaint (Stage 2).

7.3 If a complaint relates to the service or actions of one of our contractors, we may share details of the complaint with them to support our investigation and for the purpose of seeking a resolution.

7.4 We reserve the right to conclude our internal process at any time if we deem that continuing through the process will be inappropriate, for example when legal proceedings are initiated (submitting a claim form to the Court) during a complaint investigation, then the investigation will stop. If we decide not to investigate further, an explanation will be given, setting out the reasons it is not suitable for our complaints process and the right to take the decision to the Housing Ombudsman.

7.5 We will electronically capture key tenant data as well as monitor and record, in accordance with the Data Protection Act, to allow us to pro-actively case manage complaints or compliments, report on the trends, root causes and other intelligence to aid in learning from feedback and improving our services.

- 7.6 We will review and assess the performance of complaints on a regular basis, so that we may identify areas for improvement. This information will be promoted throughout the business to ensure continuous improvement.
- 7.7 We will publicise details of the complaints policy, including information about the Ombudsman and its Complaint Handling Code on our website, in newsletters and on our formal complaints correspondence.

8. Complaints Process

- 8.1 We have a two stage complaints process.

8.2 Formal complaint (Stage 1)

- 8.2.1 Stage 1 complaints will be logged, discussed, defined and formally acknowledged **within five working days of the complaint being received.** This formal acknowledgement letter will state our understanding of the complaint, the outcome the tenant is seeking and which aspect of the complaint we are or are not responsible for. If any aspect of the complaint is unclear, clarification will be requested and we will carry out a reasonable level of investigation based on the information provided.
- 8.2.2 We will provide a stage 1 complaint response **within 10 working days** of the complaint being acknowledged. When a deadline extension is needed, the tenant will be informed of the extended deadline. The extension will not be more than 10 working days without good reason, the reason must be clearly explained and the tenant provided with the details of the Housing Ombudsman.
- 8.2.3 Where additional complaints are raised during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, or the new issues are unrelated to the issues already being investigated, or it would unreasonably delay the response, the new issues must be logged as a new complaint.
- 8.2.4 We will provide a written stage 1 complaint response, addressing all complaint points raised, provide clear reasons for any decisions, referencing the relevant policy, law, or good practice where appropriate.
- 8.2.5 A complaint response will be sent when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions will be tracked and actioned, with appropriate updates provided.
- 8.2.6 Where a response will fall outside the extended timescales set out in this policy, we will agree with the tenant suitable intervals for being updated on the complaint.

8.3 Appeal Complaint (Stage 2)

- 8.3.1 If the complaint is not resolved to the tenant's satisfaction at stage 1, it must be escalated to stage 2 of the complaints process. This is the final stage of our internal complaints process.
- 8.3.2 A tenant can only appeal a stage 1 complaint response after we have provided a stage 1 response.
- 8.3.3 Reasonable efforts will be made to understand why the tenant is unhappy with the stage 1 response, but the tenant is not required to provide reasons for requesting their complaint be escalated to stage 2.
- 8.3.4 The tenant's dissatisfaction with the stage 1 outcome must be provided to us within 20 working days of our stage 1 response. We will not accept an appeal outside of these timescales without good reason.
- 8.3.5 Stage 2 complaints will be logged, discussed, defined and formally acknowledged **within five working days of the appeal request being received**. This formal acknowledgement letter will state our understanding of the complaint, the outcome the tenant is seeking and which aspect of the complaint we are or are not responsible for. If any aspect of the complaint is unclear, clarification will be requested and we will carry out a reasonable level of investigation based on the information provided.
- 8.3.6 The person considering the complaint at stage 2 will not be the same person that considered the complaint at stage 1.
- 8.3.7 We will provide a stage 2 complaint response **within 20 working days** of the complaint being acknowledged. When a deadline extension is needed, the tenant will be informed of the extended deadline. The extension will not be more than 20 working days without good reason, the reason must be clearly explained and the tenant provided with the details of the Housing Ombudsman.
- 8.3.8 Where additional complaints are raised during the investigation, these must be incorporated into the stage 2 response if they are related and the stage 2 response has not been issued. Where the stage 2 response has been issued, or the new issues are unrelated to the issues already being investigated, or it would unreasonably delay the response, the new issues must be logged as a new complaint.
- 8.3.9 We will provide a written stage 2 complaint response, addressing all complaint points raised, provide clear reasons for any decisions, referencing the relevant policy, law, or good practice where appropriate.
- 8.3.10 A complaint response will be sent when the answer to the complaint is known, not when the outstanding actions required to address the issue,

are completed. Outstanding actions will be tracked and actioned, with appropriate updates provided.

8.3.11 Where a response will fall outside the extended timescales set out in this policy, we will agree with the tenant suitable intervals for being updated on the complaint.

8.3.12 A stage 2 complaint response is the final response in our two stage complaints process.

9. The Housing Ombudsman

9.1 Twenty11 is a voluntary member of the Housing Ombudsman Scheme. The Ombudsman provides an impartial and independent dispute resolution service to social housing tenant and landlords. Tenants can contact the Ombudsman for guidance and support at all stages of our complaints process. This includes requesting support from the Ombudsman if there are complaint handling delays or a matter is excluded from the complaints process.

9.2 After exhausting our internal complaints procedure, a tenant can contact the Housing Ombudsman to investigate a complaint further.

9.3 The contact details for the Housing Ombudsman are:

- Website: www.housing-ombudsman.org.uk
- Phone: 0300 111 3000
- Write to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

10. Information Commissioner's Office

10.1 The Information Commissioner's Office (ICO) as the data protection regulator, investigates complaints from individuals who believe there has been an infringement of data protection law.

10.2 After exhausting our internal complaints procedure, if you are not happy with the outcome of a data protection complaint, the ICO can be contacted for guidance or to investigate further.

10.3 The contact details for the ICO are:

- Website: www.ico.org.uk
- Phone: 0303 123 1113
- Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

11. Accessibility & Confidentiality

- 11.1 Complaints and compliments can be received by anyone in the organisation through any supported channel which includes in person, via our website, by email, by letter or through Twenty11-owned social media channels.
- 11.2 Feedback, including complaints, can be given on behalf of a tenant by another person acting on their authority, although personal data will not be disclosed to any third party without prior written agreement from the relevant tenant being received. This allows a tenant to use a representative to deal with a complaint on their behalf, and a tenant can choose to be represented or accompanied at any meeting. We may choose to contact the tenant if we have any concerns as to the authenticity of the statements provided by the third party or representative.
- 11.3 We will consider any reasonable adjustments that may be required to ensure that access to our services is available wherever possible, to all tenants, providing language and translation support through our digital communications channels (also accessible in our offices and during site visits). This will include access for tenants with disabilities who require audio and visual support. And we will consider all requests to make this policy available in an accessible format.
- 11.4 We will proactively ask the tenant during the investigation process whether they require any reasonable adjustments or if there are any vulnerabilities they wish to make us aware of. If this information is provided it will be considered when communicating or reaching a complaint decision.
- 11.5 All feedback is treated as confidential unless we, or one of our partners, are asked to use that feedback to make further contact or carry out additional actions or investigations. We will not otherwise share details of feedback received with any third party without prior permission.

12. Unacceptable Behaviour

- 12.1 When instances of unacceptable behaviour occur, we may choose to cease dealing with that tenant, or put in place a limited contact arrangement as laid out in our Unacceptable Behaviour Procedure. However, in the event that a tenant is abusive or threatening to a member of staff, action may be taken in line with our Staff Protection Policy, Tenancy Sustainment Licence, and the Tenancy Agreement.

13. Compensation

- 13.1 Our approach to compensation is laid out in our Compensation Policy and Procedure.
- 13.2 Reviews of compensation paid will be conducted at least annually to ensure that we are actively working to use the learning from cases where compensation has arisen as a result of complaints about our services.

14. Learning from Feedback

- 14.1 Learning from feedback, including complaints, is a core focus for us as a business. It is important that we take on board the feedback we receive, whether positive or negative, and use it to find ways of improving services, streamlining, or realising efficiencies, as well as improving the way in which we deal with our tenants.
- 14.2 Where possible, we will seek to ensure that learning or improvements are identified from the feedback we receive to help inform process reviews or improvements as appropriate.
- 14.3 We undertake a satisfaction survey to help us capture feedback from tenants who have used our Complaints service to help inform any improvements we can make.


15. Reporting

- 15.1 For internal purposes, we will report regularly via Twenty11 project team meetings on all quick resolution, complaints, or compliments we receive, including high level root cause analysis, the outcomes and learning from such feedback. We will also report on any complaints escalated to the Housing Ombudsman Service which they confirm is within their jurisdiction to investigate.
- 15.2 We will publish our Annual Complaints Performance and Service Improvement Report including our self-assessment against the Housing Ombudsman's Complaint Handling Code on our website.
- 15.3 Reporting will allow us to:
- highlight the feedback we receive, what we have done about it and how we have learnt from it
 - explain to staff the quantity and type of complaints and compliments received, including which areas of the business they relate to, their justification and their root causes
- 15.4 We will share our performance with our tenants by publishing how we are doing on our website.

16. References

- 16.1 The Financial Conduct Authority sets out the expectations and obligations of financial services firms and financial markets in the UK. The Housing Ombudsman recommends an approach to feedback management which describes the key elements involved to be successful in this area. We have adopted this model as good practice.
- 16.2 The Consumer Rights Act 2015 (Chapter 4) which demands that any service should be carried out with "Reasonable care and skill, within a reasonable time, at a reasonable price".

17. Related Policies & Procedures

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- Complaints Procedure
 - Compensation Policy and Procedure
 - Unacceptable Behaviour Policy and Procedure
 - Staff Protection Policy and Procedure
 - Anti-Social Behaviour Policy and Procedure
 - Privacy and Data Protection Policy
 - Equality & Diversity Statement

Document Controls			
Version	4	Effective date	October 2025
Subject matter expert drafter	Head of Feedback	Policy owner	Head of Feedback
Related pod	Feedback	Related policy	<ul style="list-style-type: none"> • Compensation Policy and Procedure • Staff Protection Policy • Anti-Social Behaviour Policy • Privacy and Data Protection Policy • Unacceptable Behaviour Policy • Twenty11 Equality Statement
Review period	3 years	Next review due by	October 2028
			YES
The 3 lines of defence have been checked and are valid			<input checked="" type="checkbox"/>
Equality Impact Assessment completed			<input type="checkbox"/>
Delegated approvals			
Approved by ELT	Alan Keers, DCEO & Twenty11 CEO	Approved Date	August 2025
Approved by Twenty11 Board	Yes	Approved Date	August 2025
This policy was also approved by our Resident Representative Team and our Operational Performance & Tenant Services Committee	Yes	Approved Date	August 2025