

Policy Owner	HoGRA	Business Area	Governance
Document Type	Key Policy		

Group Complaints Policy

1.0 Introduction

- 1.1 Coastline is committed to providing excellent services to all our customers and doing the right thing. Our Trust Charter sets out the commitments and pledges we make to our customers in our role as landlord.
- 1.2 While we strive to maintain the highest standards, we recognise that sometimes our services might fail to meet those standards. When a customer wishes to complain we will deal with the issues in line with Coastline's values remembering the following principles;
- Respect for the customer; not pre-judge or stereo-type – 'seeing the person' and 'do the right thing' including recognising, responding to and recording vulnerabilities;
 - Rapport; we are here to help, be fair and break down the 'authority barrier';
 - Everyone deserves a chance; get beneath the surface, take time to listen, understand and value what the customer has to say and learn from customer feedback; and
 - The customer is central; act in the customer's best interests and always remember the customer is why we are here.

- 1.3 Coastline will make reasonable adjustments for individuals where appropriate under the Equality Act 2010 as well as maintaining a record of any disabilities, vulnerabilities or risk an individual has disclosed. Any agreed reasonable adjustments will be kept under active review.

2.0 Aims

- 2.1 This Policy is intended to meet the requirements of the Housing Ombudsman Service Complaint Handling Code 2024.
- 2.2 This Policy is a key element of our overall approach to customer care and Coastline's values for putting our customers first and being open, honest and accountable. As part of 'striving to be the best' it is important that we identify issues and work as a team to both rectify the initial cause of a complaint as well as learning from the mistake so as to avoid repeating it.

Our complaints process is designed to be:

- Inclusive, accessible, easy to use and understand;
- Be a straightforward two stage process, each of which are clearly set out;
- Effective and timely;
- Objective, with provision for independent investigation, if necessary;
- Confidential;
- Comprehensive with the same standard features for all parts of the organisation;
- Responsive and learning, to prevent repetition of the cause of similar complaints and to take improvements forward from feedback received.

- 2.3 Customers accept that occasionally things go wrong, but expect that we make it easy for them to raise an issue, that something will be done to put things right, and that we learn from when things go wrong to prevent a recurrence.
- 2.4 We will ensure that dissatisfied customers are given an arena for voicing their views and accept that it is important for us to quickly recognise where we have failed to deliver our services to the required standard.
- 2.5 Complaints are acknowledged as a form of feedback and by investigating and acting on them we will learn from our customers. Where mistakes have been made and where impacts have arisen, we will ensure that these are rectified to the satisfaction of the customer, wherever possible and that the circumstances do not recur. We will also ensure that the customer is not financially worse off as a result of the complaint and will make amends where this has happened to ensure the customer is returned to the same position as they were before the incident occurred.

3.0 Initial expressions of dissatisfaction – resolved at first point of contact

- 3.1 We recognise that there will be times when things go wrong. Feedback received from our customers is that when this happens, wherever possible we should deal with the issue swiftly, in advance of this Policy being invoked. Where possible, initial contact from a customer will be resolved by front line colleagues, supervisors or managers responsible for service delivery as ‘business as usual’, provided this is handled to the customers satisfaction. The aim should be to ‘do the right thing’, put the matter right and apologise.
- 3.2 To raise an issue, the customer will normally contact a Customer Access Advisor who will assist the customer and attempt to resolve the issue at this first point of contact. However, any colleague, supervisor or manager is encouraged, expected and empowered to resolve initial expressions of dissatisfaction as ‘business as usual’, in line with the principles outlined in this Policy. In line with the current authorisation limits, this may result in a gesture of goodwill payment being awarded.

4.0 Service Failures – to be resolved within four working days

- 4.1 When we are unable to resolve issues straight away (as ‘business as usual’) the case will be forwarded to the Complaints & Compliments Team as a ‘Service Request/Failure’ and will be assigned to the relevant service manager to try and resolve with the customer within four working days, if the customer is in agreement with this proposal. However if a customer is not in agreement the matter will be taken forward as a Stage 1 complaint
- 4.2 The customer will be contacted by the Complaints & Compliments Team to outline the process to be followed, including a copy of our guidance ‘Raised an issue? What Happens Now?’ This guidance includes how customers can request to make a Stage 1 complaint if we are unable to resolve the issue as an initial ‘Service Request/Failure’ including contact details for the Housing Ombudsman Service.
- 4.3 If on initial review by the Complaints & Compliments Team, the issues raised are found to have already been reported previously and we have been unable to resolve them or they will require a more detailed investigation by a senior manager, these will progress direct to a Stage 1 complaint.

5.0 Definition of complaint

- 5.1 Under the Housing Ombudsman Complaint Handling Code a complaint is defined as “*an expression of dissatisfaction, however made, about the standard of service, action or lack of action taken by us, affecting an individual, a customer or group of customers.*”

6.0 Exclusion of complaints

- 6.1 Complaints will be accepted unless there is a valid reason not to do so. Each complaint must be considered on its own merits and if not accepted the reasons for not doing so will be explained to the customer and be evidence based.
- 6.2 Complaints should be made as soon as possible and no more than 12 months after the event to enable a robust and thorough investigation to take place. Complaints made after 12 months may be considered on a case-by-case basis, where there is good reason to do so.
- 6.3 Some complaints may be received which fall beyond the scope of our responsibilities and abilities, i.e.; a request for a service which the Group does not perform. In these circumstances we will aim to provide customers with the relevant information or signpost to other agencies who may be able to assist, such as Cornwall Council.
- 6.4 Complaints regarding Anti-Social Behaviour (ASB) are subject to a separate Policy and will be dealt with by the Tenancy Management Team, although complaints regarding our handling of ASB will be investigated via this Policy.
- 6.5 Complaints made regarding ASB Handling will review whether action taken is in line with our ASB policy, rather than investigation of the ASB issues themselves.
- 6.6 The following types of complaint are also excluded from this Policy, those relating to;
1. Individual colleagues which arise directly from a customer's dissatisfaction with a decision made in line with our policies or information provided, and where no other basis for the complaint exists;
 2. A matter where legal or tribunal proceedings have started (details of a claim have been filled at court or with a tribunal), or which is in the hands of our insurers (i.e. personal injury or damage claims);
 3. A disagreement with or refusal to accept a rule of law which we are applying unless the complaint relates specifically to the way the matter has been administered.
 4. Concerns regarding the level of rent or rent increase (depending on whether a rent/tenancy is secure/affordable/social, customers can appeal to the Government about their level of rent. Customers are encouraged to contact their housing officer in the first instance for information); and
 5. Concerns regarding the level of service charge or service charge increase. (Any customers complaining about the process by which service charges have been determined will be dealt with as a service failure initially and progressed to Stage 1, if necessary. Should the customer not be satisfied with the outcome of any Stage 1 investigation, rather than progress to Stage 2, the customer would be advised to appeal to the First-Tier Leasehold Valuation Tribunal if it was felt that the Stage 2 process was unlikely to resolve the issue.)
- <http://www.justice.gov.uk/tribunals/residential-property#leasehold>

7.0 Stage 1 complaint - to be resolved in 10 working days from acknowledgment, where possible

Making a complaint

- 7.1 Where a customer is not satisfied with the initial response received from Coastline colleagues, a complaint can be made in any reasonable format such as; in person, in writing via a complaint form, by letter, email, through the website, portal ('My Coastline'), by telephone or a third-party in cases where this is justified. Colleagues can also be made available to assist in the completion of complaints forms and in certain circumstances, reviewed on a case-by-case basis, we can arrange for a colleague to meet a customer at home to take the details of their complaint.
- 7.2 We ask that complaints are made direct to us for review to ensure a swift review and response rather than via social media platforms. We do occasionally receive complaints via our social media platforms. If this happens, we will ask the customer to private message us the details of their complaint. If we become aware that any customer's private information has been included in a public comment on our social media platforms, we will delete this to ensure customer privacy is maintained.

Acknowledgment

- 7.3 Complaints will be acknowledged in writing, defined and logged within **five working days** of being received, by the Complaints and Complements Team who will manage and oversee the complaint process. The acknowledgement will confirm which colleague will be acting as the Investigating Manager who will be dealing with the complaint together with our understanding of the complaint and the outcomes the customer is seeking (the 'complaint definition').

Investigation

- 7.4 The target timeframe for investigating and responding to a complaint is within **ten working days** from the date of acknowledgement.
- 7.5 Exceptionally, we may provide an explanation to the customer containing a clear timeframe for when the response will be received if it is expected to be longer than within ten working days from acknowledgement, but this should not exceed a further ten working days without good reason. If an extension is required to enable us to respond to the complaint fully, this will be explained to the customer and agreed with the customer if possible. However, we will agree with the customer suitable intervals for keeping the customer informed of progress. In the event of an extension being required the customer will be provided with contact details for the Housing Ombudsman Service.
- 7.6 As part of the procedure and to ensure we take all relevant information into account a site visit will be undertaken by the Investigating Manager. If the customer does not wish to have a site visit they have the right to decline this although in the case of property complaints a site visit will be a vital part of the decision-making process. Coastline understands that customers may become frustrated by the issue(s) causing them to have complained. We do not view behaviour as unacceptable just because someone is assertive or determined. However the actions of some customers who are angry or persistent may result in unreasonable demands on, or behaviour towards Coastline staff, and if so the Investigating Manager will follow our published [Acceptable Behaviour Policy](#) to manage such behaviour.
- 7.7 In line with our vision and values and '*seeing the person*' Investigating Managers are asked to review the impact of the reported situation on individual customers and if they believe it necessary to take action outside of our standard policies and procedures to find a reasonable solution to the problem for that particular customer. Investigating Managers will be of a suitably senior position with the relevant experience and expertise to ensure they are able to identify the small number of cases, where our standard policy or procedure may not be appropriate for an individual customer in a particular situation.

- 7.8 Once the investigation has been completed (including any site visit) the Investigating Manager will provide the complainant with a full written response re-confirming our understanding of the complaint and what outcomes the customer was seeking and outlining what actions have or will be undertaken by Coastline and expected timeframes for any outstanding actions. This will include an outline of where learning and improvements have been identified as a result of the complaint received.

Close

- 7.9 Once the investigation response has been sent by the Investigating Manager the Complaints and Compliments Team will send a letter by post or email to the customer to advise that the process at Stage 1 has been concluded. The completion letter will seek feedback on their experience, to help inform /improve our service, advise the customer how to request escalation to Stage 2 if they remain dissatisfied and will include contact details for the Housing Ombudsman Service.

8.0 Progression to Stage 2- to be resolved in 20 working days from acknowledgment, where possible

Requesting escalation

- 8.1 Whether a complaint has been upheld or rejected at Stage 1 or any remedial works / actions have been completed or remain outstanding should the customer remain dissatisfied in whole or in part they will be advised they can request progression to Stage 2.
- 8.2 A customer can request progression to Stage 2 in any reasonable format such as; in person, in writing, by letter, email, through the website, portal ('My Coastline'), by telephone or a third-party in cases where this is justified.
- 8.3 There is no template form that is required to be completed when customers are requesting progression to Stage 2. Customers are not required to explain why they remain dissatisfied although this is helpful to provide the Panel at Stage 2 with a better understanding of areas for focus in advance of the Panel Review taking place.
- 8.4 Any request for escalation to Stage 2 will be accepted unless it is considered there is valid reason not too and such reasons will be communicated to the customer and be evidence based.

Independent Panel Review

- 8.5 Upon escalation to Stage 2, the complaint will be reviewed by a Panel of three, namely one Executive Director, one Customer Member from the Customer Experience Committee and one Non-Executive Director who will Chair the Panel. The Executive Director will usually be independent to the service directorate to emphasise that an open, honest and fair review is undertaken. In complex or detailed technical cases it may assist the customer and the panel process by having the service Executive Director participate in the panel for complaints arising within their service area. In addition a colleague from the Complaints & Compliments Team will also be in attendance to take notes which will be sent to the complainant with the Panel's findings.
- 8.6 The usual approach will be to hold Panel Reviews face-to-face at Coastline House, Redruth. Alternatively, dependent on the customer's wishes or in line with their identified individual needs, a Panel Review may be held remotely via video conferencing such as Teams. Where a customer is unable or does not wish to attend Coastline House we will consider arrangements for a member of our Executive Team to attend (replacing the Panel of three)

along with the Head of Governance, Risk and Assurance or Assistant Company Secretary to take notes, a copy of which will be sent with the findings.

Acknowledgement

- 8.7 A request for progression to Stage 2 will be acknowledged in writing, defined and logged by the Complaints & Compliments Team **within five working days** of being received. The acknowledgement will confirm who the panel members will be with a proposed date for the Panel Review, together with our understanding of the complaint and the outcomes the customer is seeking (the 'complaint definition').

Panel Review & response

- 8.8 The overall target timeframe for a Panel Review to be held and a written response provided is **within twenty working days** from the date of acknowledgement at Stage 2.
- 8.9 Exceptionally, we may provide an explanation to the customer containing a clear timeframe for when the response will be received if it is expected to be longer than within 20 working days from acknowledgement, but this should not exceed a further 20 working days without good reason. If an extension is required to enable us to respond to the complaint fully, this will be explained to the customer and agreed with the customer if possible. However, we will agree with the customer suitable intervals for keeping the customer informed of progress. In the event of an extension being required the customer will be provided with contact details for the Housing Ombudsman Service.
- 8.10 The complainant will be invited to meet with the Panel in person to outline in their own words why they believe Coastline has not dealt with their complaint fairly or properly. Coastline understands that customers may become frustrated by the issue(s) causing them to have complained. We do not view behaviour as unacceptable just because someone is assertive or determined. However the actions of some customers who are angry or persistent may result in unreasonable demands on, or behaviour towards Coastline staff, and if so the Panel will follow our published [Acceptable Behaviour Policy](#) to manage such behaviour.
- 8.11 The Complaints & Compliments Team will supply the complainant and Panel members with a timeline of the complaint. The complainant is welcome to be accompanied at the Panel Review by a Complaint Mentor, family member, friend or informal advocate acting or speaking on their behalf or for support, as long as the Assistant Company Secretary is advised in advance who this will be. If the customer wishes to provide a supporting statement in advance of the Panel Review this should be forwarded to the Complaints & Compliments Team for inclusion in the complaint timeline.
- 8.12 In addition, the complainant may be accompanied at the Panel Review by an individual acting as a professional advisor to them on technical matters, for cases that are considered to be of a complex technical nature. This is to be considered on a case-by-case basis and is subject to prior written approval by the Complaints & Compliments Team.
- 8.13 After the customer has met with the Panel, the Investigating Manager from Stage 1 will meet with the Panel to outline their findings and advise how their decision was made.
- 8.14 The Panel Chair will send a written response to the complainant, giving the outcome of the Panel's findings with a copy of the Notes taken, and where appropriate highlighting remedial actions to be carried out and any significant changes to Coastlines processes or procedures which will be used to improve future service delivery.

Stage 2 Close

- 8.15 Once the response has been sent by the Panel Chair, the Complaints & Compliments Team will send the Stage 2 completion letter by post or email to the customer to advise that our internal procedures have now been exhausted. The communication will confirm that the customer retains the right to refer their complaint to the Housing Ombudsman Service for independent review. Contact details for the Housing Ombudsman Service will be included.

9.0 Complaint Mentors

- 9.1 At any point during the process a customer can ask for a 'Complaint Mentor' to be assigned to them to help and support them through the process. Mentors are trained volunteers who are actively involved in the Customer Voice. As Mentors are volunteers, we cannot guarantee one will be available.
- 9.2 Use of a Complaint Mentor will be recommended where we believe this will positively help a customer.
- 9.3 Complaint Mentors receive full training on the Complaints Policy and Procedures and Safeguarding as well as Data Protection.
- 9.4 Complaint Mentors will not be able to influence the investigation or outcome of a complaint and they will be able to feed back to the Complaints & Compliments Team on the customer experience journey for future service improvements.

10.0 Complaints relating to Coastline Colleagues

- 10.1 Complaints received regarding specific identifiable colleagues will be reviewed by an appropriate senior manager and may, if found to be justified, be progressed via the Group's internal Disciplinary Procedures.
- 10.2 In the vast majority of cases, it is likely that training will be provided along with an assessment of whether issues are systemic or isolated. Any systemic issues identified will be reviewed by the relevant Head of Service or Executive Director to progress improvements.
- 10.3 If a complaint is progressed via Disciplinary Procedures the customer will only be informed of this fact. No other information will be shared regarding outcomes in line with the Data Protection Act 2018.

11.0 Complaints relating to personal injury, property damage or other legal liabilities

- 11.1 Coastline is committed to providing excellent customer service and our complaints process looks to provide redress for service failures. If the potential service failure includes any element or allegation of personal injury this cannot be dealt with by way of a complaints process and will be handled pursuant to the legislative provision relating to liability.
- 11.2 However, any other aspects raised within a complaint will be investigated, i.e. if the injury occurred due to a repair that needs to be undertaken.

12.0 Complaints relating to disrepair claims

- 12.1 We encourage all customers to ensure any issues with their homes are reported to us in the first instance to ensure we are given an opportunity to review and to resolve these.

- 12.2 If we receive contact direct from solicitors representing customer disrepair claims when no reports of repairs required have been made to us in the first instance, the customer will be signposted to follow this complaints procedure through to the conclusion of Stage 2.
- 12.3 This will not prevent a customer from pursuing a claim of disrepair simultaneously to making a complaint, but rather is aimed at ensuring the internal complaints process has been exhausted as a way of attempting to resolve any issues of concern.
- 12.4 The complaints process remains available to a customer until disrepair claim papers are served in the courts. Coastline will review all claims submitted to court to check they include all aspects of the complaint before suspending the complaint process.
- 12.5 Customers are advised to consider the independent advice provided here;

[Citizens Advice - things to consider before making a disrepair claim](#)

Details of the legal process are given here;

[Pre-Action Protocol for Housing Conditions Claims \(England\) - Civil Procedure Rules \(justice.gov.uk\)](#)

13.0 Complaint handling performance monitoring & reporting

- 13.1 On completion of all stages within this Policy a Customer Voice satisfaction survey form will be automatically generated and sent to the customer for feedback and performance monitoring purposes.
- 13.2 Feedback from all complaint surveys will be monitored by the Complaints & Compliments Team on a weekly basis and will be used to identify improvements. Where negative feedback is received prior to Stage 2 the customer will be contacted by the Complaints and Compliments Team to ask if the customer wishes to progress to the next stage.
- 13.3 A quarterly and annual complaints performance and service improvement report will be provided to the Customer Experience Committee and Board respectively. These will include; analysis of service failures and complaint handling performance (including disrepair cases and summary of any types of complaints refused to be handled), service improvements made and findings or other related communications from the HOS. In addition, the annual report will include our self-assessment against the Code,
- 13.4 As well as regular performance updates to the Customer Voice, a summary of the annual complaints performance and service improvement report is also included in the Autumn Customer Newsletter and as part of our Annual Report to customers and external stakeholders.
- 13.5 We will publish this Policy, the annual complaints performance report (including our annual self-assessment against the HOS Code), together with the Boards response to the annual report on our website.
- 13.6 Assurance on the effectiveness of the Policy is achieved by the Board and Customer Experience Committee receiving regular updates. The Chair of the Customer Experience Committee will take lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the Customer Experience Committee and Board receives regular information on complaints that provides insight to the Customer Experience Committee and Board on complaint handling performance.

14.0 Review

- 14.1 This Policy will be reviewed at least every three years by the Head of Governance, Risk and Assurance in conjunction with the Executive Team and will be benchmarked against areas of current Best Practice or following an update to the Housing Ombudsman Service Complaint Handling Code.