



COMPLAINTS POLICY

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1. Purpose & Scope

Unity Housing Association (Unity) is committed to providing excellent services to our residents and customers. We recognise that, at times, things may go wrong. When they do, we want to hear about it, put things right promptly, and learn from the experience. Complaints help us improve and ensure we remain accountable and responsive.

We welcome all feedback, including complaints, as opportunities to improve our services. This policy aligns with the Housing Ombudsman's Complaint Handling Code and reflects our commitment to fairness, transparency, and continuous improvement.

This policy provides guidance on:

- The definition of a complaint
- Our service standards – what residents and customers can expect from Unity when they make a complaint
- Who this policy applies to
- How we will use complaints to improve our services

This policy applies to all Unity residents, service users, staff, Board members, and third-party contractors working on our behalf.

2. Policy objectives

Our aim is to identify when we have got something wrong and offer and deliver a suitable remedy. We will recognise the impact that the issue has had and identify appropriate solutions.

In delivering a complaints service we will:

- Take all expressions of dissatisfaction seriously and to respond to dissatisfaction promptly and fairly
- Initiate an appropriate response to the issue
- Offer appropriate remedies and follow through with resolution
- Deliver on our promises
- Learn from complaints and use them to improve services.
- Ensure that complaint handling is accessible, inclusive, and free from detriment.

- Comply fully with the Housing Ombudsman’s Complaint Handling Code and Dispute Resolution Principles (Be fair, put things right, Learn from outcomes)

3. [Unity’s approach to complaints](#)

3.1 Definition of a Complaint

A complaint is defined as:

An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its staff, or those acting on its behalf, affecting an individual resident or group of residents.

A tenant or customer does not have to use the word ‘complaint’ to express their dissatisfaction and have their dissatisfaction dealt with via the complaint process.

A service request is a request for action to be taken to resolve a routine matter, such as a repair or information update, and does not constitute a complaint.

We will accept complaints from anyone who receives, requests or is directly affected by our services. This includes accepting complaints from the representative of someone who is dissatisfied with our service (for example, a relative, friend, advocate or adviser), subject to the representative having permission from the complainant to act on their behalf.

3.2 Exclusions

We will accept all complaints unless there is a valid reason not to do so. In assessing complaints Unity will assess the circumstances of each complaint before deciding whether to accept it.

A matter will not be considered as a complaint if:

- **The issue occurred more than 12 months ago** – unless the complaint concerns health and safety or safeguarding matters
- **Legal proceedings have started** – by either Unity or the complainant
- **Previous complaints** – the matter has been previously considered under the complaints policy unless new information is provided
- **Insurance claims** – issues that would be covered by insurance claims
- **Third parties** – complaints about persons or bodies over which Unity has no control, including where Unity delivers services on behalf of another organisation.

- **Unreasonable complainant behaviour** – if a complainant behaves unreasonably or we consider a complainant to be unreasonable due to the manner in which they make a complaint, or the complaint is without substance.

The grounds listed below state the reasons for unreasonable complaint behaviour and are the same grounds for not escalating a complaint to stage 2 of our complaint process. These may be categorised as:

- Refusing to specify the details of a complaint, despite offers of assistance
- Pursuing a complaint where Unity's complaint policy has been fully exhausted.
- Where Unity has correctly followed its policies and procedures.
- Persistently changing the substance of a complaint or continually raising new issues or seeking to prolong contact by raising further concerns.
- Denying or changing statements made at an earlier stage.
- Making unjustified complaints about staff who are trying to deal with an issue and requesting to have them replaced.
- All parties should be informed if recordings are being made and consent should be sought prior to sharing recordings
- Submitting falsified documents from themselves or others.
- Refusing to accept a decision; repeatedly arguing points with no new evidence.
- Persistently seeking an outcome which Unity has already explained is unrealistic for policy, legal or other valid reasons.
- Making an unreasonable number of contacts with Unity, by any means, in relation to a specific complaint or complaints
- Harassing or verbally abusing or otherwise seeking to intimidate staff dealing with the complaint.
- Deliberately attempting to bypass the complaints policy by corresponding with senior members of staff directly.

In these instances Unity reserves the right to refuse to deal with complaints or to deal with them in a different manner, where serious issues are raised, we will always investigate and take appropriate action.

If we do not accept a complaint, we will explain to the complainant the reasons and the right to take that decision to the Ombudsman.

3.3 Accessibility & Reasonable Adjustments

We are committed to ensuring all customers can access the complaints process.

To do this we will:

- widely promote and publicise our complaints service and ensure that it is accessible to all tenants and customers through a variety of channels including digitally.
- Accept complaints via any channel (email, letter, phone, in person, digital platforms)

- Make reasonable adjustments to support and assist individuals with disabilities, vulnerabilities or any other special needs to make a complaint
- Accept complaints from authorised representatives or advocates subject to having permission from the complainant
- Provide materials in alternative formats or languages where needed.
- Never penalise or discriminate against any person for making a complaint.
- We will also ensure that we publicise information about the Ombudsman's Complaints Handling Code and contact information for the Ombudsman.
- Accept complaints from other person(s) acting on behalf of the complainant if they have written permission to do so from the complainant. The advocate may be a friend, relative or representative from an external organisation such as the Citizens Advice Bureau. The advocate may not be a solicitor or legal professional unless they are acting in a "lay" capacity i.e., not representing the complainant in a legal capacity.
- The advocate may not be a tenant or former tenant who is either currently in breach of their tenancy agreement, been evicted or had been informed they have previously had access to the Complaints Policy restricted.

Annual training is provided to Unity staff to share best practice and updates to the complaint handling code.

3.4 Resourcing our complaints handling service

We will have a 'Designated Complaints Officer' (DCO) who will lead on and take responsibility for complaint handling. Their role will involve communicating with the Ombudsman and ensuring complaints are reported to Unity's Board of Management and/or any sub-committees delegated to oversee complaints. This officer will have the skills needed to support the managers responding to complaints and when required step in to ensure complaints are resolved quickly and fairly.

3.5 Complaint Handling Procedure

Complaints will be dealt with through a two-stage process:

Stage 1:

When we receive a complaint, it will be defined, logged and acknowledged within **5 working days** of receipt.

The complaint will be investigated by a manager from the relevant service area and a response provided within **10 working days of the complaint being acknowledged**.

If an extension to this timescale is needed we will inform the resident of the expected timescale for response, which will be no more than **10 working days**,

the reason(s) will be explained to the resident and details of the Housing Ombudsman service will also be provided.

When we deal with a complaint at Stage 1, the complaint handler will:

- Establish the detail of the complaint in line with our definition of a complaint and set out in our response the outcome the complainant is seeking
- Investigate impartially with an open mind
- Consider information and evidence carefully
- Consider any additional complaints that are raised during the investigation and include these in the response
- Provide a full response that includes the decision, reason for the decision and details of any remedy offered
- Details of how to escalate the matter
- Respond to the complaint when the answer to the complaint is known not when the outstanding actions are completed
- Provide contact details of the Housing Ombudsman in our response

Stage 2:

If a complaint cannot be resolved at Stage 1 the tenant or customer can request that the matter is escalated to Stage 2. The request to escalate must be made **within 10 working days** of receiving the Stage 1 response.

The complainant does not need a reason to escalate the complaint to stage 2 but we will make sure we understand why the complainant was not satisfied with the stage 1 response.

The request for stage 2 will be logged and acknowledged within 5 days of the escalation request. **At Stage 2 the tenant will have the option to have the complaint reviewed by a Director or be heard by a panel. The tenant may choose to have either a tenant representative, a UHA board member, or both join the director on the panel. A response to the complaint will be provided within 20 working days of the complaint being acknowledged.**

If an extension to this timescale is needed we will inform the resident of the expected timescale for response, this will be no more than **20 working days**, the reason(s) will be explained to the resident and details of the Housing Ombudsman service will also be provided.

When we deal with a complaint at Stage 2, the complaint handler will:

- Establish the detail of the complaint in line with our definition of a complaint and set out in our response the outcome the complainant is seeking
- Review the handling of the complaint at Stage 1
- Determine whether the complaint or part of it should be upheld and details of any outstanding actions and remedies offered
- Confirm that this is the final stage and how to escalate to the Ombudsman

- Respond to the complaint when the answer to the complaint is known not when the outstanding actions are completed

Unity will not unreasonably refuse to escalate a complaint through the complaints process. However, we may decline to escalate a complaint and if we do this we will provide the complainant with clear reasons.

Where it is considered appropriate, Unity may engage the services of a third party to investigate a complaint. Unity may also employ alternative dispute resolution arrangements such as mediation where this would assist in resolving a complaint.

Where the services of a third party are used to investigate the complaint this will still form part of the 2-stage process.

3.6 Putting Things Right

Where service failures are identified, we will:

- Acknowledge the failures and apologise
- Explain what went wrong and why
- Consider the impact on the complainant
- Set out the actions we will take to put things right and seek to agree this with the complainant
- Set out clear timescales for the actions and ensure we follow through on these actions
- Offer compensation, if deemed necessary, in line with our Compensation Policy
- Monitor and follow through with all agreed actions.

3.7 Continuous learning and improvement

We will use complaints as an opportunity to learn and improve and to introduce positive changes in our services.

We will have a standard objective in relation to complaint handling for all relevant employees of third parties that reflects the need to have a collaborative approach to resolving complaints, working with colleagues across teams and departments and take collective responsibility for any shortfalls identified through complaints, rather than blaming others and act within the professional standards for engaging with complaints as set out by any relevant professional body.

4. Reporting

We are committed to fostering a culture of accountability and transparency in our complaint handling processes. To support this, we will regularly share insights and improvements derived from complaints and compliments with key stakeholders, including our Board, colleagues, and customers.

Each year, we will publish a Complaints Performance and Service Improvement Report. This report will be subject to scrutiny and challenge and will include:

- Our annual self-assessment against the Housing Ombudsman's Complaints Handling Code, including any findings of non-compliance;
- A qualitative and quantitative analysis of our complaint handling performance, including a summary of complaints we did not accept;
- A record of service improvements implemented as a result of learning from complaints;
- Any relevant reports or performance assessments issued by the Housing Ombudsman Service.

This report will be presented to the Board and made publicly available on our website.

Additionally, we will review and update our self-assessment of the Complaints Handling Code annually, and following any investigation by the Ombudsman.

5. Responsibilities

The DCO will oversee the complaints handling process to ensure complaints receive the necessary attention.

Monitoring of the implementation of this policy will be the responsibility of the Senior Management Team and the Operations Committee. The Member Responsible for Complaints (MRC) Board member will report back to board and ensure that complaints remain a key focus area for the organisation.

6. Consultation and customer involvement

Unity recognises the importance of working in partnership with our tenants and customers to develop and continuously improve our services. We have consulted with customers and will ensure that our complaints service complies with the requirements of the Ombudsman's Complaints Handling Code.

We will ask complainants to provide us with feedback on the way we have handled their complaint and provide information to all customers on how we are performing in delivering our complaints service.

7. Confidentiality and Data Protection

Unity HA have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation and codes of practice. This is clearly set out in our Data Protection Policy which, along with its associated procedures, must be followed throughout the operation of this policy

To support effective service delivery, we securely collect and store key tenant information electronically. This enables us to proactively manage complaints and compliments, identify trends and root causes, and use this insight to continuously improve our services.

In cases where a complaint involves a third party, it may be necessary to share relevant details to facilitate a thorough investigation. If the information is sensitive, we will always consult with the customer before sharing any data.

8. Equality and Diversity Statement

Unity HA are committed to treating people fairly, and without bias and discrimination. We promote equal opportunities to all our customers and stakeholders regardless of race, religious or non-religious belief, gender, age, ethnic origin, disability, marital status or sexual orientation.

We also recognise that we have a diverse customer base and will therefore make reasonable adjustments to ensure all residents can access the complaints service and understand this policy.

We will continue to monitor and analyse our complaints data to understand the impact of any service failures within different groups.

All staff receive Equality and Diversity training at Unity HA and are responsible for ensuring that the Equality, Diversity and Inclusion policy is incorporated into all aspects of their work.

9. Review

This policy will be reviewed every three years and will be amended to reflect changes in legislation/regulation as they come into force.

10. Associated documents

- Compensation Policy Equality & Diversity Policy
- Data Protection Policy

Appendix A – Complaint handling process

	Acknowledge by	Respond by	Respondent
Stage 1	5 working days of receiving complaint	10 working days from acknowledgment	Service Manager
Stage 2	5 working days from escalation request	20 working days from acknowledgement	Director or Chair of panel

Policy review summary

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1.	August 2012	August 2012	Original document.
2.	August 2018	August 2018	Routine review.
3.	November 2020	November 2020	Interim review to adopt the standard definition of a complaint contained in the HOS Complaints Handling Code.
4.	August 2022	September 2022	Full review to align with the revised HOS Complaints Handling Code issued in April 2022.
5.	July 2025	September 2025	Reviewed in line with the HOS Complaints Handling Code April 2024
6	May 2026	June 2026	Updated to reflect change to stage 2 process giving residents option to have the complaint heard by a panel.