

# Complaints Policy

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November 2008



## Unacceptable Actions Policy

Responsible Officer	Executive Director of Housing and Customer Service
Approved by Operations Committee	November 2008
Date of Next Formal Review	2011

GHA will provide this policy on request at no cost, in large print, in Braille, on tape or in other non-written format, and in a variety of languages.

### Application of this Policy to LHOs

Mandatory	x
Variation Possible	
Framework Only	
Local Policy Required	

Indicate which applies

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## EXECUTIVE SUMMARY

Glasgow Housing Association (GHA) undertook a review of our Complaints Policy during 2008. We have always been committed to viewing complaints as positive, recognising that they provide an opportunity to improve services. However, the review has clarified that this has not always been promoted, did not happen consistently across the organisation and therefore was not easily evidenced to our customers. We are committed to changing this situation in partnership with our customers, staff and other stakeholders.

In the GHA Inspection Report it was reported that we were 'poor at handling complaints from dissatisfied customers'. We had already identified a need to review the Complaints Policy and procedures and took our Improvement Plan as an opportunity to formalise this commitment.

The review was made up of:

- Work with staff in our Customer Relations, GHA(M), a selection of local housing organisations (LHOs) and local shared services (LSSs)
- Customer opinion was gathered from both existing sources of information (previous events and workshops) and new sources including the Tenant Conference on 29 April 2008, the Tenant Participation Event on 23 June 2008 and a working group made up of registered tenant organisation (RTO) members
- Mapping the journey of a complaint – who it is received by, who deals with it, how it is investigated, when it is closed and/or resolved, what is learnt from it
- Review of a selection of open and closed complaints received by our Customer Relations
- Consideration of the Chartered Institute of Housing (CIH) and Scottish Public Service Ombudsman (SPSO) briefing paper 'Seeing beyond the negative'.

In summary, the review told us that the complaints policy could be difficult for customers and staff to follow, did not consistently secure resolution for customers, did not always check the customer was satisfied with the outcome and process nor ensure that we consistently learned from the process and implemented service improvements. Based on the joint CIH and SPO briefing paper 'Seeing beyond the negative' we understand that this is not dissimilar to many housing associations across Scotland however we wish to change this, ensuring that our new policy meets customer's needs and delivers service improvements as detailed in our improvement plan.

### Formal Consultation

The complaint review identified a number of areas for improvement, particularly how we handle complaints. As we are committed to consultation on our policies and strategies the Interim Complaints Policy was out for consultation from September to November 2008.

We welcomed comments and suggestions on any area of the Interim Complaints Policy. As a result of consultation feedback we have made a number of changes and now present the Complaint Policy.

### Changes to the policy

We have used the review findings, including customer opinion, to ensure that the redesigned complaints process and revised policy delivers a consistent, open, transparent and customer friendly complaint handling across the organisation.

This Policy reflects the recent review and subsequent redesign based on customer feedback and need. A number of our customers (both tenants and homeowners) have helped us to draw up this new Complaints Policy. The policy sets out clearly how we will deal with complaints, ensuring our responses meet customers' needs.

With the policy we aim to:

- Have one point of contact for customers
- Resolve concerns the first time customers contact us
- Make the complaints procedure easy to use
- Help and support customers when they make a complaint
- Ensure customers have a clear understanding of how the process works
- Check that our customers are satisfied with their experience and the outcome
- Learn from complaints and feedback performance in this area to our customers
- Recognise that, in addition to reporting complaints, customers can provide compliments and comments which we need to record.

The main changes to the policy can be summarised as follows:

- The new Customer Service Centre is an additional point of contact for customer complaints, customers can decide where the best point of contact is for them
- There is only one category of complaint. No separation will be made between 'informal' and 'formal' complaints as in the previous policy, we treat all complaints equally
- All complaints will be recorded in the same way across the organisation using the new Customer Relations Management System (with interim arrangements in place during roll out)
- Where customers remain unhappy the first time customers contact us, the complaint will be passed to a named officer. This officer will be assigned to the case and will then be responsible for renewing and investigating the complaint on the customers' behalf, until it is resolved, keeping the customer up to date and checking the customer is happy with the outcome. For complaints received by telephone at the Customer Service Centre, a dedicated team, based at the Customer Service Centre, will undertake this role. This role will be undertaken for the LHO/LSS by the Community Housing Manager/General Manager and for GHA Corporate Services by senior manager or the Head of Service
- We will always attempt to find a resolution to customer complaints and in the event that we are unable to do so we will support the customer to escalate their complaint. Customers will be given clear information about the next stage of the complaints process (including appeals where appropriate) and who to contact
- Appeals will be co-ordinated by the Customer Complaints Co-ordinators within the Customer Engagement Team. The Customer Complaints Co-ordinator will support them through the process. All appeals will be made to the GHA Board Appeals Panel
- Details of all complaints will be consistently recorded by all front line staff and monitored across the organisation by the Customer Complaint Coordinators.

## 1. INTRODUCTION

### 1.1

The Glasgow Housing Association Ltd (GHA) is a registered social landlord and provides factoring services for homeowners through its subsidiary GHA (Management) Ltd (GHAM). We are committed to putting the needs and interests of our tenants and homeowners at the heart of everything we do.

We are determined to improving the nature and quality of services for all our customers, with clear and easy to understand standards for services that are both customer-focused and customer-friendly. In the event that a customer is unhappy with any aspect of our services, they will be entitled and encouraged to make a comment or complaint.

This Complaints Policy outlines our principles, aims and objectives for responding to complaints and demonstrates our renewed enthusiasm for efficient, consistent and customer-friendly complaint handling, including a commitment to resolve, where possible, concerns on first contact and to check that customers are satisfied with their experience. It is important to us that our customers' experience is positive and that we support them through the complaints process and that they are treated with respect.

We welcome and encourage customers to also provide us with comments and compliments. We will record these, where possible, and use the information to see when we are doing well and how this information can help us do even better in the future.

We are committed to dedicating resources to the management and operation of the policy and related procedures including use of our consistent complaint recording to provide efficient and comprehensive feedback both individually with customers throughout the process as well as collectively with all customers.

### Division of Responsibilities

### 1.2

We will ensure that staff and GHA Board responsibilities in relation to this policy are clear. The Board will be responsible for approving policy and evaluating performance. Staff members will have overall responsibility for implementing and monitoring the complaints policy. The Chief Executive will be responsible for public reporting on the complaint management function.

## 2. PRINCIPLES, AIMS & OBJECTIVES

### Principles

### 2.1

We are committed to achieving a culture of continuous improvement with customer service and customer satisfaction as key indicators of our performance. Our evaluation of customer complaints is one of a number of mechanisms for customer feedback and will inform how we improve and develop our services.

We consider that a customer-friendly complaints policy, that is positive about complaints, is essential in delivering continuous improvement. GHA has adopted a systems approach that puts the customer first and considers their needs.

We aim to resolve all complaints to the customers' satisfaction first time however there are occasions where it may not be possible to reach agreement on a resolution. In these circumstances we will clearly communicate the actions we have taken and advise the customer of their rights to escalate their complaint through the GHA complaint process and externally with the Scottish Public Sector Ombudsman (SPSO) and the Care Commission.

## **Key principles for a customer friendly approach**

We will ensure the following principles when implementing our approach to complaint handling and will aim to strike a balance between them:

### **Accessibility**

We will maintain current and continuously pursue new ways for customers to report complaints, these will include: in person at our offices, in writing/email and by telephoning our Customer Service Centre. Each method of complaint reporting will be regarded equally.

We will provide support for customers who require assistance to make a complaint and, if necessary, escalate their complaint. This can include: interpretation, Braille, large print and completion of a customer feedback form if this is a problem.

### **Responsibility**

All GHA staff will take responsibility for complaints that they become aware of and do all that they can to help customers and deal with problems as fully as possible.

### **Effectiveness**

Complaints will not be divided into 'informal' and 'formal'. All complaints will be regarded equally and be dealt with in a timely manner to the point of resolution, as agreed with the customer, or to a point where the procedures have been exhausted.

We will aim to resolve complaints at first contact and if this is not possible within two working days. In the event that this is not possible, GHA will ensure that the customer does not have to repeat their complaint as it escalates and aims to ensure that time from first reporting to resolution is minimised. Where a complaint has escalated to appeal stage we will arrange an appeal hearing within 28 days of receipt of the appeal request form.

We will set targets to monitor complaint handling performance including the end to end timescale.

### **Reflection and learning**

Complaints will be monitored and where any area of potential improvement, weakness or uncertainty is identified appropriate action will be taken

### **Openness & transparency**

Lessons learnt, patterns identified from complaint handling and any resultant changes will be regularly published alongside complaint analysis

## **Clarity**

The roles and responsibilities of GHA staff and teams will be clearly defined in the complaints procedures.

## **Confidentiality & Anonymity**

Any request from a customer for either them to remain anonymous or, where appropriate, for their identity to be kept confidential will be respected as far as is possible.

Where a complaint has been made to us anonymously, this will be dealt with where possible. Depending on the detail provided with the complaint limited investigation and action may be able to be taken. However, lessons to be learnt from this complaint will be identified.

## **Impartiality**

Each complaint will be dealt with on its own merits and impartially.

## **Fairness**

All those involved in the complaints process will be treated fairly and with respect at all times.

## **Aims**

### **2.2**

We aim to ensure an open and transparent approach to complaint handling where customers feel supported when complaining and have a clear understanding of the key principles of the complaints process.

We will proactively build up an understanding of the types, outcomes and learning points from customer complaints. The information gathered through complaints activity will be significant in the monitoring of delivery of our services for customers and will be reported back to customers through existing communication channels in anonymised form.

## **Objectives: Meeting our customers' requirements**

### **2.3**

We will ensure that the complaints policy is effectively implemented through procedures developed based on the customers' perspective and presented in a format relevant to customers and staff. To ensure this is achieved, we have involved customers in identifying the key requirements of a good complaints process. Customers highlighted the following as important:

- Customers can report the problem easily
- An investigation will take place, where required
- A complaint is resolved to the customer's satisfaction
- We learn from the complaint and stop it from happening again.

Full details of these requirements are listed at the end of this policy (appendix 1).

We will ensure the implementation of this policy will be supported by a commitment to delivering:

- A clear, simple, single process for dealing with complaints
- A single CRM system, accessible by multiple users, for logging, tracking and reporting complaints
- Allocation of responsibility for analysis and acting on complaints linked to service improvement
- The required skills, knowledge and guidance for staff dealing with complaints.

## 3. EQUALITY & DIVERSITY STATEMENT

### 3.1

We are committed to providing fair and equal treatment to all stakeholders, including tenants and homeowners, and will not discriminate against anyone on the grounds of race, colour, ethnic or national origin, religion, age, gender, sex, sexual orientation, marital status, family circumstances, employment status or physical ability.

### 3.2

This policy complies with our Equality and Diversity Policy. We recognise our pro-active role in valuing and promoting diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

### 3.3

We will check our complaints policy and associated procedures regularly for their equality and diversity implications, taking appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures.

## 4. LEGAL & REGULATORY FRAMEWORK

### 4.1

In formulating and implementing this policy, statutory requirements along with the Scottish Housing Regulator Performance Standards and good practice outlined in documents such as 'Raising Standards in Housing' have been incorporated, where required.

## 5. COMPLAINTS POLICY

### What is a complaint?

#### 5.1

We define a complaint as 'an expression of dissatisfaction or concern about the quality of service provided by or on behalf of GHA'.

This may include:

- Failure to provide a service or to achieve the standards of service we have promised
- Unacceptable delay or failure to respond to an enquiry or request

- Failure to fulfil our legal or contractual obligations
- Dissatisfaction with the process by which GHA has come to a decision, not about the decision itself
- Dissatisfaction with the attitude and behaviour of, or quality of work provided by, staff, contractors or agents
- Where we have not operated policies fairly.

A complaint differs from an enquiry or a request for a service. We consider these as follows:

- An enquiry is when a customer seeks information or assistance related to a service provided by or on behalf of GHA
- A request for a service is when a customer asks for a service for the first time or following an enquiry requests or agrees that required action is taken.

Complaints can be reported either explicitly, with a customer saying for example 'I am complaining' or implicitly, where a customer may not state they are complaining but express dissatisfaction, and can be warranted or not.

## Who can complain?

### 5.2

Any customer can complain. A customer is anyone who receives or requests a service from us or who is affected by our activities. This includes services and activities provided on our behalf by subsidiaries, contractors (including their workmen) and agents. Whatever we think of the justification of the complaint a customer is complaining and there is procedure to follow.

The majority of complaints received are from tenants and homeowners, although other stakeholders are welcome to complain. The term customer is used throughout the policy to ensure everyone's rights are provided for.

At times, customers may ask another organisation or individual to complain on their behalf, such as the Citizen's Advice Bureau or other advice agency, a relative or friend. In these circumstances, we must check whether a current mandate exists and where it does not, request that the customer representative completes a Representation Mandate form to allow them to complain on the customers' behalf and to correspond with GHA.

Where a Councillor, MEP, MSP or MP is making the complaint on a customer's behalf, they will not be required to produce evidence of a mandate being in force as they are all elected representatives. This is in line with the provisions of Appendix 3 to GHA's Code of Conduct, which sets out the protocol for handling communications etc received from elected representatives. Solicitors, when making a complaint on behalf of their client, will not be required to produce evidence of a mandate. Solicitors are governed by laws and a professional Code of Conduct.

## Complaints Procedure

### 5.3

We have produced both a Customer Guide and Staff Guide containing procedures. The procedures detail each stage of the complaints process to ensure that both customers and staff are fully aware of what happens from reporting of a complaint to final resolution and follow up.

We work to a three stage procedure to ensure customers can raise and escalate their complaint where required but in a context that is also clear and easy to understand. The outline of this is shown at the end of this document (Appendix 2).

## **Stage 1 - First Contact**

The first stage of GHA's complaints procedure is when the customer first report their issue. The complaint can be received through any one of a number of methods and to any staff across the organisation. Irrespective of where and how the complaint is received all will be treated equally.

Staff will aim to respond within two days. If this is not possible we will contact the customer and advise of the expected timescale.

## **Stage 2 - Renew and Investigation**

Where the customer remains unhappy they can ask for their complaint to be moved to stage two.

Stage 2 is the opportunity to renew and investigate the actions taken and response made at stage 1, with the aim of identifying what else, if anything, could be done to ensure that the customer is happy.

Staff will aim to complete this stage within 10 working days.

## **Stage 3- Appeal**

### **5.3.2**

The final stage of GHA's complaint procedure is formal appeal to the GHA's Board Appeal Panel. Further guidance on the appeals stage is provided in the Customer Guide and the 'Guide to Requesting an Appeal'. This leaflet will be made available to those customers completing Stage 2 of the procedure and contain the Appeal Request Form.

If the request for appeal is within the scope of this policy (see section 5.4, Limitations) it will be heard within 28 days of receipt of the Appeal Request form. The customer will be given at least 14 days notice of the date and time of the hearing. GHA will attempt to be as flexible as possible in order to arrange a date and time for the appeal that is suitable for the customer.

The customer will be invited to attend the appeal with a friend, relative, advisor or representative. A translation service will be provided where required.

The appeal will be heard by the three GHA Board members and facilitated by an Appeals Officer. The Appeals Officer will be an Executive Director or Head of Service.

Following the appeal the customer will be informed that this marks the end of GHA's complaint procedures and provided with details of external bodies, SPSO and Care Commission, who they can approach for External Review if they remain unhappy.

## **Limitations of the policy**

### **5.4**

Where the subject of the complaint is covered by another GHA policy and related procedure, the complaint will be recorded but referred to the correct team for investigation, resolution and any appropriate action. The outcomes and resolution of these complaints will be recorded under the complaints procedures with the exception of complaints against members of staff.

Complaints that will be dealt with through other policies and procedures include:

- Complaints specifically about the attitude or quality of work of a staff member will be dealt with by their line management in accordance with staff's terms and conditions of employment. Customers will be advised that the complaint will be considered but as we have a requirement to maintain employee confidentiality no specific details will be provided other than whether the complaint has been upheld or not
- Complaints against a senior member of GHA staff will be dealt with in accordance with their terms and conditions of employment. Complaints against the Executive Team members will be dealt with by the Chief Executive. Complaints relating to the Chief Executive will be dealt with by the Appointment and Appraisals Committee.
- Complaints against neighbours will be dealt with in terms of the Neighbour Relations Policy and procedures. A complaint can, however, be made about the way in which a neighbour complaint has been handled
- Complaints where a customer is seeking financial compensation as they hold us responsible for loss, damage to property or personal injury. The complaint will be recorded and passed to our Insurance Section for investigation and decision
- Complaints by staff members will be dealt with under the GHA Whistleblowing Policy and procedures
- Complaints relating to matters, which are already the subject of litigation.

Complaints where only limited investigation and action may be taken and therefore limited feedback provided to customers include:

- Those that involve third parties, where another person's confidentiality needs to be maintained
- Those where the customer asks for their identity to be kept confidential or where they have made an anonymous complaint.

In these cases, the customer may be provided with information on general policy and procedure to help explain a particular decision or action relating to the complaint, and in relevant cases where the complaint has been upheld or not.

Those dealing with any complaints must ensure that if any personal data is likely to be disclosed, this should be checked with the our Information Compliance Advisor or our Legal Team first before it is sent out.

## **Housing decision appeal process**

A complaint should be restricted to looking at the way in which a situation has been handled, rather than the actual decision itself. However, customers have the legal right to appeal certain decisions on housing matters. These include decisions about succession, assignation, suspending a housing application, medical priority and granting a Short Scottish Secure Tenancy. The Allocation Appeal process is separate from the complaints process and is designed to safeguard the rights of tenants and also of staff. Details of the Allocation Appeal process are given in the appendix to the Staff Guide.

## **Unacceptable Actions**

### **5.5**

This section confirms the GHA policy that unacceptable behaviour will be dealt with in an appropriate way and that GHA will provide support to its staff. However, if this section of the policy is applied, the complaint will still be recorded in the same way as any other complaint.

### 5.5.1

We understand that upsetting or distressing circumstances can result in people acting out of character and we do not view behaviour as unacceptable just because a complaint is forceful or determined. However, the actions of customers who are angry, demanding or persistent may result in unreasonable demands or unacceptable behaviour towards our staff. It is in these relatively few occasions that the behaviour of a customer or their representative is considered to be unacceptable. Such circumstances will be dealt with under GHA's Unacceptable Actions Policy.

As detailed in the policy there are three broad areas of unacceptable actions:

**Aggressive or abusive behavior** - Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language (oral or written) that may cause staff to feel afraid, threatened or abused

**Unreasonable demands** - Customers or their representatives may make what we consider unreasonable demands on our office through the amount of information they seek, the nature and scale of service they expect or the number of approaches they make

**Unreasonable persistence** - We recognise that some customers will or cannot accept that we are unable to assist them further or provide a level of service other than that provided already.

## Deciding to Restrict Complaint Contact

### 5.5.2

As detailed in the Unacceptable Actions Policy, staff who directly experience aggressive or abusive behaviour from a customer have the authority to deal immediately with that behavior. Although immediate action may be needed in certain circumstances, wherever possible we will give the customer the opportunity to modify their behavior or action before a decision is taken. Customers will be told in writing why a decision has been made to restrict future contact, the restricted contact arrangements and, if relevant, the length of time that the restriction will be in place.

We will record all incidents of unacceptable actions. Staff are encouraged to report incidents to the police, both for their own protection if there are further incidents and to enable any required legal action to be taken where circumstances merit this. A decision to restrict contact may be reconsidered if the customer demonstrates a more acceptable approach.

## Liaison with regulatory and key stakeholders

### 5.6

We are regulated by and work in partnership with a number of regulatory bodies, including the Scottish Housing Regulator, Care Commission and Scottish Public Services Ombudsman (SPSO). On occasion, these regulatory bodies may have an interest in complaints raised with us. The required information will be provided in an accessible and timely manner with full co-operation from GHA staff members involved. We will comply with the Data Protection Act 1998 and will not disclose personal data unless this is necessary and justified.

At the conclusion of the GHA complaints appeal stage the customer will be advised of their rights to approach the SPSO or Care Commission, if they remain unhappy with the outcome of the GHA Complaint process.

Where a complaint raises matters concerning competency of staff from stakeholders, including public bodies, we will ensure that the complaint is passed to the appropriate governing body. This will be agreed with the customer beforehand and we will maintain the customers identity where required.

## Special cases

### 5.7

A complaint may be fast tracked through the complaints procedures, and any related bodies, including the police, notified, where it is identified that the issues raised may concern:

- Allegations of abuse or neglect of service users
- Conduct that may be a criminal offence
- Serious malpractice
- Circumstances indicative of a present or potential risk to service users.

## 6. COMPLAINTS ABOUT SERVICES PROVIDED BY GHAM AND OTHER TRADING SUBSIDIARIES

### 6.1

Complaints made by homeowners in relation to the factoring services provided by GHAM will be dealt with under GHAM's Complaints Policy and practice. There are occasion when homeowner complaints are about services provided by GHA, in these circumstances these complaints will be dealt with under the provisions of the GHA Complaints Policy.

### 6.2

Any trading subsidiary complaint policy must include the provisions detailed in 5.4 Limitations of the policy. In the event of the trading subsidiary choosing not to set its own complaints policy then the provisions set out within this policy will apply.

### 6.3

Complaints can be made by or on behalf of anyone who receives or requests a service from a trading subsidiary or who provides a service to the trading subsidiary.

## 7. TRAINING AND AWARENESS

### 7.1

We will ensure that all staff and governing body members are aware of the complaints policy and procedures. Frontline complaint handling staff will be empowered with clear responsibilities to resolve complaints wherever possible and will receive appropriate training and support. Information on the complaints policy and procedures will also form part of induction training for new staff and governing body members.

## 8. PERFORMANCE MONITORING

### 8.1

We have agreed a number of customer focused performance indicators. This information will be gathered through a combination of complaint analysis and regular customer satisfaction feedback. Performance indicators will be reported to the Operations Committee, with quarterly trend and

analysis report to GHA Board. This feedback will be used to provide Managers and other staff with information on learning outcomes from complaint analysis.

## 9. POLICY REVIEWS/ CONSULTATION

### 9.1

We will review this policy at least every 3 years. Any review will take account of the tenant participation requirements of Section 54 of the Housing (Scotland) Act 2001 and all relevant legislative changes. Where we intend to amend this policy, we will consult with tenants, tenant organisations and other relevant stakeholders.

### 9.2

On a regular basis we will take account of the views of the customers and staff who use this policy and procedures.

## 10. CUSTOMER SERVICE

### Confidentiality

#### 10.1

We will comply with the requirements of the Data Protection Act 1998.

### Compliments and Comments

#### 10.2

We are happy that there are also many times when we get things right, where customers have been happy with the standard of service or times when our staff efforts are able to help our customers. We also want to hear about these times. We welcome and encourage customers to also provide us with compliments and comments.

As with complaints, compliments and comments can be received in a variety of ways. We will record these, where possible, and use the information to see when we are doing well and how this information can help us do even better in the future.

### Customer Feedback and Satisfaction

#### 10.3

We are committed to reflecting on, learning from and being open and transparent in the reporting of complaint activity. Recent customer engagement in this area has highlighted that the best methods for this communication to customers is through:

- Direct feedback to those customers who have complained
- The Key and Factoring Matters magazines
- LHO newsletters
- GHA and GHAM websites.

We will analyse the complaints we receive, along with comments and compliments, to identify any patterns they may show. We will publish details of any action we take following this analysis, on an annual basis. All information that might identify anyone involved will be removed before this analysis takes place.

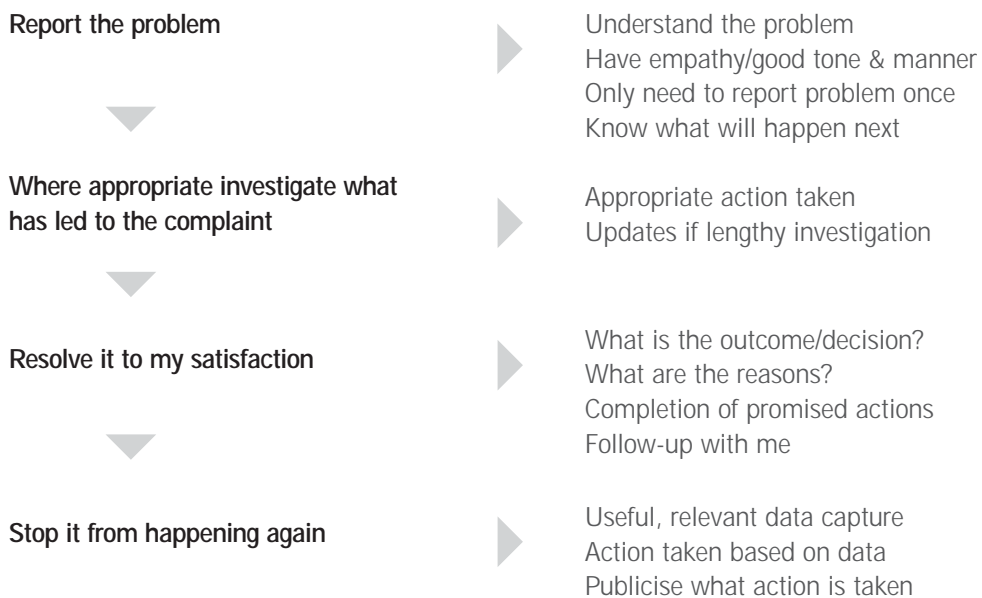
We are committed to undertaking representative monthly telephone customer satisfaction surveys throughout the year and will involve customers who have experienced the GHA complaints service. These surveys will provide:

- Customers with the opportunity to provide feedback on the complaint handling process and achieved outcomes
- Us with accurate and up to date customer satisfaction information that can be used to implement changes and track performance over time.

## Appendix 1

### COMPLAINT HANDLING FROM THE CUSTOMERS' PERSPECTIVE

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# Appendix 2

## OVERVIEW OF COMPLAINT HANDLING STAGES

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### Stage 1 - First Contact Complaint Handling

Staff empowered with clear responsibility to resolve complaints wherever possible.

All complaints recorded on CRM system where available and where not on a consistent IT system, where available. Where CRM system is not available staff should also complete a Stage 1 Proforma and email this to [complaints@gha.org.uk](mailto:complaints@gha.org.uk) with 'Proforma' in subject.

We aim to resolve complaints during first contact or within 2 working days.

Where a customer remains unhappy following response the complaint will be escalated to stage 2.

### Stage 2 - Review and Investigate

An opportunity for another staff member to renew and investigate the complaint. This will be conducted by either:

- A member of the dedicated team in the Customer Service Centre
- A senior member of staff, for example CHM for LHO's and Head of Service for GHA Corporate

The response will aim to provide in writing within 10 days and clearly answer each point raised in the complaint.

This response will detail the customer's right to appeal and contain a guide to requesting on appeal.

### Stage 3 - Appeal

The customer is requested to complete and submit an appeal request form within 28 days of Stage 2 written response.

GHA Customer Complaints Coordinator will provide support for customers during this time. This may include assistance in completion of the appeal request form.

On certain occasions, a final attempt at resolution may be made, with consent of customer, prior to appeal hearing.

An appeal hearing date and time will be mutually agreed with 14 days notice and within 28 working days of the completed Appeal Request form being received. The customer will be supported through the appeal.

An appeal response will be provided within 14 days of appeal hearing. This response will include information on the customer's options for external review.

#### External Review

GHA will liaise with Scottish Public Services Ombudsman and Core Commission as required.

# Better homes, better lives

Contacts us on:

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