

This policy sets out how Amplius deals with customer complaints. The policy is compliant with the Housing Ombudsman complaint handling code, and outlines our approach to ensuring an accessible, and high-quality complaints handling service is delivered to our customers.

# **Complaints Policy**

#### **Document management**

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### **Policy introduction**

#### Scope

This policy supports Amplius' values and is a commitment to improving lives and supporting colleagues by:

Providing an effective complaints service that meets both the requirements of the regulatory Tenant Involvement and Empowerment consumer standard and Housing Ombudsman's complaints handling code.

We aim to provide a complaints service that:

- enables customers to be heard and understood.
- ensures customers are aware of how to make a complaint and their right to access the Housing Ombudsman service.
- is fair, impartial, and easily accessible to all our customers.
- is customer focused and takes account of individual circumstances.
- puts things right (where appropriate) in a timely and effective manner; and
- uses learning and insight to improve and transform services.

The term Amplius incorporates all member companies and subsidiaries.

The policy applies to all complaints made by any customer, or their representative, and anyone affected by a service we provide, including services provided on our behalf by a contractor.

The policy does not form part of any colleague's contract of employment and the policy may be amended at any time.

### **Policy details**

#### **Definition of a Complaint**

A complaint can be received from anyone who is a customer and is defined as an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Amplius, it's colleagues or those acting on its behalf, affecting an individual customer or a group of customers.

When making a complaint, a customer does not have to use the word complaint for it to be treated as such. If a customer expresses dissatisfaction, we will give them the choice to make a complaint. Examples of where a complaint may be made include:

- Where a customer contacts us within 12 months of an issue occurring or becoming aware of the issue.
- There has been a failure of our published service standards, and where action has not been taken within agreed timescales.
- We have not acted in line with our policies and procedures to a customer's request.
- There has been poor conduct by colleagues or Amplius Contractors.

An expression of dissatisfaction made through a satisfaction survey is not classified as a formal complaint. However, when tenants' express dissatisfaction in survey responses, our Customer Contact Team is trained to inform them of their right to make a complaint and to signpost them to further information in our Complaints Policy

#### **Exclusions**

We will accept a complaint unless there is a valid reason not to do so.

There are circumstances in which a matter will not be considered to be a complaint for example:

- We will not normally accept complaints about issues that occurred more than 12
  months ago unless they form part of an ongoing issue. However, we may exercise
  discretion to consider complaints outside of this timeframe where there are valid
  reasons for the delay.
- Concerns where legal proceedings have commenced. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court
- Matters that have previously been considered under the complaints policy; however, where the problem is a reoccurring issue, we will consider older reports as part of the background to the complaint.
- A new request for service when a customer informs us of a problem for the first time. For example, if the word complaint is used during an initial report of a repair that has not yet been notified to Amplius.
- Enquiries or expressions of dissatisfaction from members of the public who we do not have a relationship with or provide a service.

If we do not accept a complaint, a detailed explanation will be provided setting out the reason the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman.

#### **Accessibility and Awareness**

Complaints can be received through any of our communication channels. This includes:

- by telephone.
- visiting our office.
- by email.
- in person.
- by letter/completing a complaints form.
- online form using our website at: www.amplius.co.uk
- notify us via any of our social media channels.
- through a third party e.g. advocate, staff member, support worker or a representative of an organisation working on our behalf.

Complaints can be submitted on behalf of customers by third parties, such as advocates or support agencies. In such cases, we require written consent from the customer before we can discuss any details of the complaint with their representative. This is to ensure compliance with our Data Protection Policy and GDPR requirements.

We actively promote the ways in which customers can make a complaint through all our main communication channels. This includes our website, social media platforms, written correspondence, and telephone calls.

Correspondence sent to Amplius' Executive Team will be directed to the most appropriate team for response. If the contact expresses dissatisfaction, the matter will either be logged as a new complaint in line with our Complaints Policy or added as further information to an existing complaint already under investigation.

Complaints that are not made directly to an office location, such as those raised with officers in the community, or with colleagues at care homes or sheltered housing schemes will be passed to the relevant team within the Customer Contact department.

Any complaints made via social media will be handled confidentially.

A copy of our Complaints Policy is available on our website, where customers can also access the policy in alternative formats, including options to adjust contrast levels, modify font size, and access translation support for different languages.

#### **Fairness in Complaint Handling**

We are committed to ensuring that all complaint investigations are conducted impartially and fairly. To uphold this commitment, we will:

- Assess complaints based on their individual merits.
- Act independently and with an open mind.
- Take steps to identify and manage any actual or perceived conflicts of interest.
- Carefully consider all relevant information and evidence.
- Maintain confidentiality as far as possible, sharing information only when necessary to investigate the complaint.

We will also consider the individual circumstances of each complaint throughout the investigation and before reaching a decision on the outcome.

#### **Reasonable Adjustment and Support**

We recognise that some customers may experience difficulties in accessing the complaints process due to their personal circumstances, in these instances we will make reasonable adjustments. We will agree jointly with the customer the reasonable adjustments and will consider their personal circumstances ensuring we meet their needs.

Complaints may be made with the assistance of a representative acting on the customer's behalf (such as a family member, friend, support worker, MP, or local councillor). The customer must provide us with consent to deal with the representative.

We will give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented and/or accompanied at any meeting with Amplius upon request, and where this is reasonable.

#### **Types of Complaints**

#### **Money Advice Complaints**

Any complaints relating to debt adjusting, debt counselling and credit information services will follow our Money Advice Complaints procedure. If the complainant is not satisfied with our response, they will need to complain to the Financial Ombudsman Service. They can contact the Financial Ombudsman Service if they are not satisfied with our response, or if we take longer than eight weeks to respond.

#### **Definition of a Service Request**

A service request is a request from a resident to Amplius requiring action to be taken to put something right.

Whilst a service request is not considered a complaint, we will record and monitor the types of service requests we receive to help improve our services. If a customer expresses dissatisfaction with the handling or outcome of their service request, we will treat their concerns as a formal complaint. Importantly, raising a complaint will not prevent, delay, or otherwise impact the actions required to resolve the original service request. Both processes will be managed concurrently to ensure timely and effective resolution.

#### **Complaint Stages**

Where possible, we will aim to resolve a customer's concern immediately. In situations where we are unable to resolve a service request, or where a customer expresses dissatisfaction with the actions taken, we operate a two-stage complaints process. This ensures that concerns are formally reviewed and addressed while continuing efforts to resolve the original service request.

#### Stage 1

The complaint will be assigned to a Complaint Resolution Officer and investigated as a first stage formal complaint.

Our customers will receive an acknowledgment of their complaint within 5 working days of us being notified of their concerns. This will include confirmation of which aspects of the complaint we are responsible for and which, if any, fall outside our remit.

We will aim to provide customers with an outcome to their complaint at this stage, within 10 working days from the date of acknowledgement. We will agree with customers any extensions to this timescale.

#### Stage 2

The complaint will be escalated to Formal Review if customers inform us, they are unhappy with the formal investigation outcome they have received, and we will review their complaint and how it has been handled. This will include confirmation of which aspects of the complaint we are responsible for and which, if any, fall outside our remit.

We will aim to provide customers with an outcome to their complaint at this stage, within 20 working days from the date of acknowledgement. We will agree with customers any extensions to this timescale.

Any complaints related to our contractors will be investigated in line with our own complaints policy. Customers are not expected to go through two complaint processes.

#### **The Complaint Handling Process**

When a complaint is received, we will:

- Acknowledge, define, and log at Stage 1 of the complaints process within 5 working days of the complaint being received.
- Issue a full response to Stage 1 complaints within 10 working days of the complaint being acknowledged.
- If an extension to this timescale is needed, we will inform the customer of the
  expected timescale for response. Any extension must be no more than 10 working
  days without good reason, and the reason(s) must be clearly explained to the
  customer.
- Complaints at Stage 1 of our process will be assigned to a member of our Complaints Team. They will be suitably trained in the importance of complaint handling and given the autonomy to resolve complaints promptly and fairly.
- Review of any additional complaints raised as part of our first stage response, unless the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response in these cases we will raise a new complaint.
- If a customer is unhappy with our Stage 1 response, they can request for this to be escalated to Stage 2. Requests to escalate a complaint to review stage should be received within 20 working days of receiving the formal outcome.
- Requests for Stage 2 must be acknowledged, defined, and logged at Stage 2 of the complaint process within 5 working days of the escalation request being received.
- Issue a final response to the Stage 2 within 20 working days of the complaint being acknowledged.
- If an extension for this timescale is needed, then we will inform the customer of the
  expected timescale for response. Any extension must be no more than 20 working
  days without good reason, and the reason (s) must be clearly explained to the
  customer.

- Complaints at Stage 2 will be considered by someone different to that at Stage 1 within the Complaints Team to provide a fair and impartial perspective.
- When we inform customers about an extension to these timescales, they must be provided with the contact details of the Housing Ombudsman.

At both stages of our complaints process we will:

- Be clear which aspects of the complaint we are, and are not responsible for
- Provide the opportunity to set out their concerns and outcomes being sought
- Confirm our understanding of the complaint.
- Consider all relevant information and evidence in investigating the concerns.
- Address all points raised and provide clear reasons for any decisions made.
- Consider remedies at any point within the complaints process to resolve the complaint as early as possible.
- We will agree with the customer on their preferred method and frequency of communication. This will apply both when the complaint is being handled within our target timescales and when additional time is required to complete the investigation.
- We will manage customers' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.
- Any remedy offered will reflect the extent of any service failures and the level of detriment caused to the customer as a result. We will carefully manage the expectations of customers and not promise anything that cannot be delivered or would cause unfairness to other customers.

The customer, and if applicable any employee who is the subject of the complaint, will be given a fair chance to: set out their position and comment on any adverse findings before a final decision is made.

All complaints will be recorded on our contact management system and a full record will be kept of the complaint; including the original complaint details, date received, all correspondence, reports, and communication (including third parties), any review and the outcomes at each stage.

We will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law, and good practice where appropriate.

#### **Putting things right**

Where we identify that something has gone wrong, we are committed to putting things right. Our response will clearly set out the actions we have taken or will take to resolve the issue. This may include:

- Offering a meaningful apology
- Taking corrective action where there has been a delay or service failure.
- Reconsidering or amending a decision
- Updating or correcting records
- Providing a financial remedy where appropriate
- Reviewing and improving relevant policies, procedures, or practices

We may offer remedies at any stage of the complaints process. These will be proportionate to the impact of the issue and tailored to the individual circumstances of the case, considering the effect on the customer.

Where our service has fallen short, financial compensation may be considered as part of our redress. This will be guided by the principles of fairness, proportionality, and the specific context of each case.

Compensation will not be automatically offset against any arrears. Each situation will be assessed on its own merits to ensure that the remedy achieves its intended purpose.

#### Dissatisfaction with our Decision-Making

There will be occasions where customers have exhausted our complaints process and remain dissatisfied with the outcome. In these circumstances there are a range of options available for further escalation.

Customers can contact the Housing Ombudsman at any point during our complaints process. The Housing Ombudsman contact details can be found on our website, and also on our formal complaint responses at Stage 1 and 2, and are also set out below:

Website: Contact us | Housing Ombudsman Service

For complaints relating to our care and support services, customers can refer their complaint to the Care Quality Commission.

Website: Contact us - Care Quality Commission

#### **Unacceptable Actions and Behaviours**

Sometimes customers using our complaints service use behaviour, actions or general conduct that makes it very difficult for us to deal with their complaint effectively. In these instances, colleagues should refer to the Customer Conduct Policy.

In such circumstances we reserve the right to use different communication methods for individual customers, refuse to consider the complaint or to terminate the investigation.

We will confirm this to the person making the complaint in writing, with the reasons for our decision including a review date.

Any restrictions placed on a customer's contact due to unacceptable behaviour will demonstrate regards for the provisions of the Equality Act 2010.

#### **Learning from Complaints**

We will use complaints to drive continuous learning and improvement.

Complaints will be reviewed to identify any common themes and areas for learning. Although, we will actively highlight any major service failures as a matter of urgency and without delay. Any issues identified will be raised with the relevant service area and/or contractor to aid service improvement.

Senior management will assess any themes or trends to identify systemic issues, serious risks, and policies and procedures that require revision. This will also inform training for both colleagues and contractors.

We will proactively use learning from complaints to revise policies and procedures, to train colleagues and contractors and to improve communication and record-keeping.

We will report back on wider learning and improvements by publishing information to customers, scrutiny groups, colleagues, and stakeholders, as well as providing evidence on our website, annual report, and customer magazine.

#### **Culture and Training**

We encourage a culture that welcomes complaints and the opportunity they give to help improve our services. We fully recognise that a positive complaint handling culture is integral to the effectiveness of our ability to resolve disputes, improve the quality of the service provided and the relationship with our customers.

Training, communication, and awareness will be provided to all relevant colleagues required to implement this policy. This also includes our contractors and involved customers.

#### **Contractors**

All contractors will be expected to provide the relevant information to our complaint resolution officers in a timely manner and to an agreed standard. This includes agreed appointments (kept and made) within the agreed set timescale, from the date of when the complaint was logged by Amplius.

#### Equality, diversity, and inclusion

We will demonstrate regards for the provisions of the Equality Act 2010. Amplius is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following protected characteristics, age, disability, race, gender reassignment, sex, sexual orientation, religion or belief, marriage and civil partnership and pregnancy and maternity.

Amplius is committed to equality, diversity, and inclusion and such will make reasonable adjustments to the policy to recognise, accommodate, and support customers' individual needs, where needed.

#### Additional needs (addressing vulnerabilities)

Amplius recognises that, for various reasons, some of our customers and service users may be vulnerable. Policies therefore will take account of the recommendations made by the Housing Ombudsman and Regulatory recommendations on vulnerabilities. Amplius will take a proactive approach when making a decision relating to a customer or service user and where practicable, tailor and adapt our services to suit the needs of customers and support vulnerable people.

## **Compliance and administration**

#### Legal and regulatory compliance

This policy fully complies with Amplius' legal and regulatory obligations.

- Regulator of Social Housing Transparency, Influence and Accountability Standard
- Housing Ombudsman Service Complaint Handling Code (April 2024)

This list is not exhaustive, and policy authors will undertake thorough research and/or seek professional advice to ensure that Amplius meets its obligations and complies with the current and relevant legislation and regulations.

#### Evaluation, review and performance monitoring

This policy will be reviewed on a Triennial basis to ensure that it remains fit for purpose. A policy review may also be required earlier, in response to internal or external changes for example changes in legislation. Prompt and effective action will be taken where improvements are identified.

We will monitor the following:

- Volume of complaints received (Stage1 and Stage 2)
- Number and % of Stage 1 complaints escalated to Stage 2 (including refusals)
- The type of complaints received (i.e., service areas) and the root cause.
- Performance against our Stage 1 response timescale (including any extensions)
- Performance against our Stage 2 response timescale (including any extensions)
- Performance against the number of commitments made and completed within the agreed timescales.
- % of complaints upheld at Stage 1 and Stage 2
- Satisfaction levels complaint handling and outcome
- The outcome of closed complaint cases
- Number of complaints referred to the Housing Ombudsman, % of referrals completed within the agreed timescale and the outcome.
- Housing Ombudsman determinations (both number and percentage) received.
- Goodwill and compensation payments
- Actions taken and changes made resulting in service improvements.

In addition, complaints performance is also reviewed:

- By the Head of Customer Experience and Complaints Management Team, weekly, monthly, and quarterly.
- With our partner contractors every month as part of their contractual requirements.

#### **Related policies**

 All Amplius' operational policies and procedures are related to the Complaints Policy and will be utilised where required to investigate complaints effectively.

## **Appendices**

- A. Associated documents Internal procedural document, colleague use only
  - NA.

# Changelog

Amended date	Summary of changes	Version №
11/02/2025	<ul> <li>Language updated to provide more clarity including:</li> <li>Accessing the Complaints Service</li> <li>Fairness in Complaint Handling</li> <li>Formal Complaints – Stage 1</li> <li>Putting Things Right</li> <li>Dissatisfaction with our Decision-Making</li> </ul>	1.1
06/05/2025	Formal Complaints (Stage 1):  • Added a request for any evidence to be provided.	1.2
12/08/2025	Strengthened the clarity of sections within the Policy based on Ombudsman feedback:  Definition of a complaint Exclusions Definition of a Service Request Complaint Stages Complaint Handling Process	1.3