



Complaints Policy

| Policy Checklist | |
|------------------------------------|---|
| Policy Owner | Expectations UK |
| Policy Author | Richard Hollands |
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| Approved by Board | YES |
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| Changes made | 4.2: Role change Service Director to Director of Operations |

1. Policy aim

- 1.1 This policy sets out Expectations' approach to dealing with complaints from its tenants and other customers.

The Regulator of Social Housing (RSH) Consumer standard "Tenant Involvement & Empowerment" states that *"a registered provider shall have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly"*. This policy sets out to ensure this requirement is met.

The policy will ensure that feedback from complaints is used to improve the customer experience, deliver high levels of satisfaction and identify learning that supports process improvements.

The board has a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation's activities, as well as in its own composition. It has policies and statements which meaningfully demonstrate this commitment, and sets priorities and objectives for the organisation to achieve. Where relevant, additional detail is provided in this policy on how equality and diversity affects this policy area where it impacts upon people – service users, staff and other stakeholders. However, as a general rule, the Equal Opportunities policy and the Dignity at Work policy provide detailed policy content.

Expectations UK is dedicated to embedding equality, diversity, and inclusion throughout the complaints handling process. This includes:

- Providing accessible formats for complaints (e.g., large print, audio, different languages).
- Offering assistance to residents with disabilities or other vulnerabilities.
- Ensuring staff receive training on equality and diversity in complaint handling.
- Monitoring complaint data to identify and address any disparities.

2. Where does it apply

- 2.1 This policy applies to tenants of, and applicants for, Expectations rented

housing concerning service failure.

- 2.2 It can be used alongside relevant service standards and to influence procedures to ensure complaints are handled quickly and responsibly.
- 2.3 A complaint must be made as soon as possible – and no more than three months – after an incident has occurred. We may extend this time limit if:
- the complaint could not reasonably have been made earlier; and
 - we can still investigate the facts.
- 2.4 Expectations has adopted the Housing Ombudsman's definition of a complaint:
- “A complaint shall be defined as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents”.***
- 2.5 Examples of what we **will** consider as a complaint include: -
- Failure to provide a service that we say we will;
 - Failure to provide a service to a reasonable standard;
 - Failure to follow an Expectation's policy or published service standard;
 - The unprofessional behaviour of a member of staff (e.g., in breach of Code of Conduct); and/or,
 - Failure to provide information or the right information in a timely manner.
- 2.6 Expectations may **not** deal with any of the following as a complaint under this policy:
- An initial request for a service;
 - Reports of neighbour nuisance or anti-social behaviour (these are dealt with by separate departments);
 - Complaints about services that are not provided or contracted by Expectations;
 - A complaint which relates to alleged failure to comply with the General Data Protection Regulation (GDPR);
 - A complaint which relates to an event more than 6 months before the date that we receive the complaint. While we aim to receive complaints within 6 months of an incident, we will be flexible, and consider complaints outside of this time frame, especially when safeguarding or health and safety is a factor.
 - Any issue which is subject to ongoing legal proceedings or investigation; and,
 - A complaint that is repeated and has already been completed under this policy. (A clear and documented process is used to determine if a complaint is repeated, ensuring fairness).
- 2.7 In some instances complaints may relate to a safeguarding issue and this is dealt with separately under our safeguarding Policy.
- 2.8 If Expectations decides not to accept a complaint, a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and their right to contact the Ombudsman.

3. Our policy

- 3.1 Expectations has adopted the principles set out by the Housing Ombudsman Service in its approach to complaint resolution.

Expectations will: -

- **Be fair** – treating people fairly and follow fair processes - a constructive approach that applies consistent principles to all complaints and each complaint is considered on the facts of each individual case
- **Put things right** – where we have got things wrong
- **Learn** from the outcome of complaints – feedback to service users including the complainant on lessons learnt and actions taken to improve service delivery.

- 3.2 We will apply these principles by:

- Ensuring all staff are trained on these principles.
- Regularly reviewing our processes to ensure fairness and effectiveness.
- Providing clear and transparent information on our complaint handling.

4. The role of the Complaints Officer

- 4.1 The Complaints Officer is responsible for ensuring that we review a complaint impartially, and deal with it in line with this policy. The Complaints Officer:

- advises on our complaints policy;
- completes all investigations as part of the formal process (stage 1 – see section 6.5) to ensure they comply with this policy; and,
- reviews responses to complaints as a member of an appeals panel (stage 2 – see section 6.6.) when necessary;
- monitors all complaints made under this policy and reports on any trends or issues for action on an organisation-wide basis (for example, for service planning or risk management).
- The complaints officer will have a level of independence to ensure impartial investigations. In practice this means that they should have no direct connection with the complaint and not be the subject of the complaint.

- 4.2 The Complaints Officer will normally be appointed or nominated by the Director of Operations.

5. Making a complaint

- 5.1 Expectations offers a range of ways in which people using our services may indicate that they might have a complaint – on-line, by phone or by letter. Anonymous complaints will be considered on their merit, but responses may be limited.
- 5.2 Expectations will accept complaints from authorised advocates acting on behalf of another person (with written permission to do so) where that person has a right to complain.

5.3 We will provide assistance to vulnerable residents and those with specific needs to access the complaints process.

5.4 To make a complaint, residents should provide:

- Their name and contact details.
- A clear description of the issue.
- The date(s) of the incident(s).
- What outcome they are seeking.

6. How will Expectations aim to resolve complaints?

6.1 Expectations recognises that sometimes we get things wrong or don't meet the levels of service that our customers have been promised and that we set out to deliver. When this happens Expectations UK operates a staged process that will always seek to resolve complaints at the earliest opportunity.

6.2 Expectations UK will put customers at the heart of the process by working in partnership with them through the complaints process and to deliver proportionate resolutions.

6.3 **Mediation** may be offered at any stage of the complaints process. Mediation is a balanced, positive way of sorting things out before the conflict starts to affect people's quality of life. Mediation is impartial and fair for all parties involved and helps people to find a way to work out a solution to their problems. Mediation offers both parties the opportunity to help improve communication and look at resolutions which suit both the landlord and the tenant.

6.4 Resolving the issue

If it is clear there has been no service failure (i.e., no breach of policy) we can still record dissatisfaction so that any trends can be considered for policy change. We will explain this, but there will be no further contact.

Examples of dissatisfaction are where we have delivered a service within policy, there is a temporary change that we have told you about or no evidence is provided to support a claim or complaint.

Where service failure is suspected, we will always aim to resolve the complaint by putting things right (or explaining our position) as quickly as possible. This is an informal stage, but we will log what we do or say and let the resident know what is being done or if (and why) there will be a delay. We may also explain or confirm actions in writing. We aim to log, acknowledge and find a resolution within 5 working days at this stage, although this may mean arranging an action that takes place within a reasonable time after this. "Resolution" at this stage may involve providing an explanation, taking immediate action, or agreeing on a plan of action. All actions and communication will be logged.

We look to manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic.

This means that if there is nothing further that can be done, we will explain why escalation to stage 1 (see below) will serve no purpose and that the complaints

process has been exhausted. We will provide contact details of the Ombudsman at this point.

6.5 Stage 1 – Investigating your complaint

If we were unable to resolve the complaint within 5 working days (or on receipt of a response) then the resident can set out their position, what outcome they are seeking and request that this is investigated under the formal stage of our complaints process.

This stage of the process will be logged and acknowledged within 5 working days and involve a full investigation of the complaint by, with the outcome of the investigation and the agreed resolution/remedy/redress set out in writing within 10 working days. When we know this may not be possible, we will explain why and can extend this by a further 10 working days - or longer only with the resident's agreement.

Remedies may include apologies, service improvements, or financial compensation.

6.6 Stage 2 – Reviewing your complaint

If a resident believes that Expectations has failed to fully address their complaint at stage 1, they must set out their position, what outcome they are seeking and request a review of the case and the subsequent decision. This will be logged and acknowledged within 5 working days.

We will manage residents' expectations and again be clear if a desired outcome is unreasonable or unrealistic.

A review of the case and the subsequent decision will be carried out by the CEO.

They will review the complaint to ensure that it has been conducted appropriately and that Expectations has been fair, attempted to put things right and we have learned from the complaint. The outcome from this review will be set out in writing within 15 working days. When we know this may not be possible, we will explain why and can extend this by a further 10 working days - or longer only with the tenant's agreement.

This stage forms the last internal stage of Expectations' complaints process, and the response will explain the referral process and provide contact details for the Housing Ombudsman.

Records of all complaint stages will be stored securely and in line with data protection regulations.

Residents will be kept informed of progress at each stage.

7. How will we deal with complaints? Our principles

7.1 Having a positive approach to complaints

Expectations will adopt a positive culture towards complaints throughout the organisation, recognising complaints as a learning opportunity to improve services to our customers. We will do this by:

- ensuring our Board and staff provide effective complaint management, ensuring clear accountability throughout our structures, with a focus on achieving positive outcomes and learning from complaints;
- ensuring adequate resources are made available for complaint handling;
- providing open and transparent processes, which are accessible to customers;
- ensuring tenant expectations are properly managed;
- aiming to resolve complaints at the earliest opportunity, learning from the outcomes and ensuring staff understand their roles and responsibilities and have the authority to resolve complaints;
- providing training to staff to ensure they have the skills and ability to resolve complaints at any stage; and,
- ensuring that diversity is taken seriously to make sure that tenants are treated fairly whatever their circumstances.
- regularly analyse complaint data to identify trends.
- publish annual reports on complaint handling.
- provide clear documentation of all complaint handling activities.

7.2 Being fair – Treating people fairly and following fair processes

Expectations UK will ensure that we treat people fairly by:

- providing people with the same standard of service, while taking account of the individual and their circumstances and respecting privacy and confidentiality;
- being flexible in our application of policies and procedures to ensure we take account of individual needs and agree what reasonable adjustments can be made;
- being consistent and transparent in our approach to complaints;
- being clear about where responsibilities lie for resolving complaints;
- giving everyone involved in a complaint the opportunity to explain their point of view; and,
- being clear how we will deal with complaints, or complainants which we consider to be vexatious or unreasonable.

Expectations will ensure we follow fair processes by:

- providing clear and accessible information in a range of formats about our complaints process;
- offering different ways in how to make a complaint, with help to access the process if needed;
- seeking to resolve complaints at the earliest opportunity;
- providing opportunities for customers to challenge decisions and have their complaint escalated if an agreed resolution cannot be found;

- being clear and realistic on timescales to manage expectations;
- basing our decisions on evidence and the facts of the particular complaint; and,
- giving clear information on how decisions have been made and how they may be challenged.

Fairness is at the heart of what we do and we will regularly review our practices, policies and procedures to ensure compliance with our commitment to diversity and inclusion and the supporting policies and procedures.

In making a complaint, no individual will be unjustly discriminated against. This includes, but is not limited to, discrimination because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

7.3 Putting things right - where we have got things wrong

Expectations UK will always aim to find appropriate and satisfactory resolutions to complaints and will seek to remedy situations where we have got things wrong. We will do this by:

- seeking to find solutions which satisfy all parties to a complaint and maintain a positive relationship with our tenants and other customers;
- ensuring that staff who deal with complaints are trained, empowered and can make decisions that will resolve complaints appropriately;
- managing expectations by not making promises that we can't keep;
- aiming to rectify situations by putting tenants back in the position where they would have been before we got things wrong;
- offering financial compensation, where appropriate, to recognise a failure to put something right;
- always complying with law, policy and good practice; and,
- learning from individual complaints and putting right any wider issues with policy, procedures or service delivery.

7.4 Learning from the outcome of complaints

Expectations UK will aim to learn lessons from the outcome of complaints in order to improve the services that we deliver for our residents and other customers. We will do this by:

- having systems in place to proactively record and analyse data from complaints, and reviewing the outcomes to identify implications for service delivery, e.g., the complaints logs;
- capturing and recording satisfaction levels through our various feedback mechanisms on how complaints have been handled, to identify areas for improvement; and,
- reporting this information throughout our governance, involved resident structures and communications to ensure we focus on continuously improving the services we deliver.

8. Designated Persons and the Housing Ombudsman

- 8.1 In addition to Expectations UK internal complaints process, residents may also contact a designated person (Councillor, MP, etc.) to mediate in their complaint.
- 8.2 Expectations UK will liaise with designated persons to find an appropriate resolution to complaints within the principles of being fair and putting things right.
- 8.3 Residents may also refer their complaint directly to the Housing Ombudsman Service via a designated person or wait 8 weeks from the completion of Expectations UK's internal complaint process.

9. Vexatious, Persistent or Unreasonable Complaints

- 9.1 Expectations UK has a process that it will apply to ensure we use our resources effectively when faced with tenants who may make vexatious, repeated or unreasonable complaints. We define this where complainants demonstrate any of the following:

- Persist in pursuing a complaint when Expectations UK's complaints process has been fully and properly implemented and exhausted.

Or, at any stage in the complaint process they:

- persistently change the substance of a complaint or continually raise new issues or seek to prolong contact by raising further concerns about the issue without presenting any new information;
 - use abusive or inappropriate language or make threats to, or about, any Expectations staff or a person or body acting on its behalf in any format (verbal or written). Unsubstantiated allegations can be abusive behaviour;
 - are repeatedly unwilling to accept decisions or explanations, that documented evidence given is factual or deny receipt of an adequate response despite correspondence specifically answering their questions;
 - repeatedly fail to clearly identify the precise issues that they wish to be investigated;
 - have an excessive number of contacts with the company, and/or the amount of information they seek or provide - placing unreasonable demands on staff; or,
 - regularly focus on a trivial matter to an extent that is out of proportion to its significance and continue to focus on this point.
- 9.2 We will always look to understand this behaviour and will consider any health and well-being information we have available to help us. We will offer support, suggest advocacy or signpost to other services where appropriate.
 - 9.3 We will always inform residents that if they continue with their behaviour, restrictions may be imposed on their contact with us.

- 9.4 We may not deal with correspondence or other forms of communication at any stage that is abusive to staff or contains allegations that lack substantive evidence. We reserve the right in these circumstances to contact the resident, or advocate, to explain that the complaint may be suspended, or escalation refused.

10. Implementing this Policy

- 10.1 All staff are responsible for implementing this policy.
- 10.2 All staff will receive training on this policy.
- 10.3 This policy and associated service standards and procedures will be made available in a range of formats where there is a specific need or request. Internal procedure documents containing sensitive information may be withheld.
- 10.4 Information on complaints made will be made available to the Board on at least an annual basis.

11. Complaints Performance and Service Improvement Plans

To align with the UK Housing Ombudsman guidance on Complaints Performance and Service Improvement Plans, Expectations UK will implement the following measures:

11.1 Annual Complaints Performance and Service Improvement Report

Expectations UK Ltd will produce an annual Complaints Performance and Service Improvement Report covering the previous year's complaint data. This report will include:

- A qualitative and quantitative analysis of complaint handling performance, including a summary of the types of complaints refused.
- Any findings of non-compliance with the Housing Ombudsman's Complaint Handling Code and actions taken to address them.
- Service improvements made as a result of learning from complaints.
- Actions taken following the Housing Ombudsman's annual report on Expectations UK's performance.
- Actions following any other relevant reports or publications produced by the Housing Ombudsman.

The report will be presented to the Board and published by Expectations to ensure transparency.

11.2 Recording and Analysing Complaint Data

Expectations UK will systematically collect, analyse, and report complaint data to identify trends and improve service delivery. This will include:

- Regular monitoring of complaints received, response times, and resolution rates.
- Identification of recurring themes to drive policy and service

- improvements.
- Inclusion of complaint insights in strategic decision-making and risk management.

The Complaints Officer will oversee this process and ensure that all data is used effectively to enhance service provision.

11.3 Non-Compliance and Corrective Actions

If the Housing Ombudsman finds that Expectations UK has failed to comply with the Complaint Handling Code, the organisation will:

- Document and review the Ombudsman's findings.
- Develop and implement corrective action plans.
- Report progress to the Board and publish updates on corrective measures taken.

11.4 Ensuring Service Improvements from Complaints

Learning from complaints is a core part of Expectations UK's commitment to continuous improvement. To ensure effective learning from complaints, we will:

- Actively use complaints data to inform service improvement plans.
- Regularly review policies and procedures in response to complaints.
- Provide training to staff based on insights gained from complaints.
- Share key learnings with stakeholders to promote best practices.

11.5 Ombudsman Reports and Recommendations

Expectations UK will take proactive steps in response to reports from the Housing Ombudsman, including:

- Reviewing all recommendations and findings related to the organisation's performance.
- Taking necessary actions to address identified issues and ensure compliance.
- Incorporating feedback from the Ombudsman into policy and service delivery improvements.
- Publishing an update on the actions taken in response to the Ombudsman's reports.

11.6 Commitment to Transparency and Accountability

Expectations UK is dedicated to maintaining clear accountability for complaints handling and service improvement at all levels of the organisation. To ensure this:

- The Board will receive regular reports on complaints performance.
- A designated senior leader will be responsible for complaints oversight.
- Complaint performance data will be made publicly available in line with transparency commitments.

- We will engage with stakeholders, including tenants, to improve service delivery based on complaints insights.

12. Self-Assessment Process

12.1 To ensure ongoing compliance with the Housing Ombudsman Complaint Handling requirements, we will implement a self-assessment process as follows:

- **Annual Self-Assessment:** Conduct an annual self-assessment against the Housing Ombudsman Complaint Handling Code to identify any areas of non-compliance and areas for improvement.
- **Documentation and Reporting:** Document the findings of the self-assessment and report them to the Board. This report should include any actions taken or planned to address identified gaps.
- **Public Disclosure:** Publish the results of the self-assessment through publicly available outlets to ensure transparency and accountability to tenants and other stakeholders.
- **Action Plan:** Develop and implement an action plan to address any areas of non-compliance or improvement identified in the self-assessment. This plan should include specific actions, responsible parties, and timelines for completion.
- **Review and Update:** Regularly review and update the complaints policy and procedures based on the findings of the self-assessment and any changes in the Housing Ombudsman's guidance or relevant legislation.

12.2 We will adopt a structured approach to self-assessment using the questionnaire at Appendix A as the basis for this work.

13. Review of Policy

13.1 This policy will be reviewed on an annual basis and may be revised accordingly. This policy will be re-published following any revision.

Appendix A: Self-Assessment Form



This self-assessment form should be completed by the Complaints Officer and reviewed and approved by Expectations UK's Board governing body at least annually.

Once approved, Expectations UK must publish the self-assessment as part of the annual complaints performance and service improvement report. The governing body's response to the report must be published alongside this.

Expectations UK is required to complete the self-assessment in full, supporting all statements with evidence and additional commentary where necessary. Where compliance is not met, a justification and action plan for improvement must be provided.

Section 1: Definition of a Complaint

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 1.2 | A complaint must be 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 a resident or group of residents. | | |
| 1.3 | A resident does not have to use the word 'complaint' for it to be treated as such. All staff must recognise dissatisfaction as a potential complaint. | | |
| 1.4 | Service requests must be distinguished from complaints and recorded accordingly. | | |

Section 2: Complaint Exclusions

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|--|----------------|---------------------------------|
| 2.1 | Complaints must be accepted unless there is a valid reason not to. If a complaint is not accepted, the decision must be explained and justified. | | |
| 2.2 | The complaints policy must clearly outline fair and reasonable exclusions, such as legal proceedings or historic complaints beyond the accepted timeframe. | | |

Section 3: Accessibility and Awareness

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|--|----------------|---------------------------------|
| 3.1 | The complaints process must be accessible through various channels and accommodate reasonable adjustments. | | |
| 3.2 | Residents must be able to submit complaints via any member of staff. | | |
| 3.3 | Complaint volumes should not be viewed negatively, as they indicate an accessible system. | | |

Section 4: Complaint Handling Staff

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 4.1 | A Complaints Officer must be assigned responsibility for complaint handling and reporting. | | |
| 4.2 | The Complaints Officer must have access to all levels of staff to facilitate prompt resolution. | | |
| 4.3 | Complaint handling must be a priority, with ongoing training provided to relevant staff. | | |

Section 5: Complaint Handling Process

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 5.1 | A single, transparent complaints policy must be in place. | | |
| 5.2 | Early resolution should be prioritised, and extra unnecessary stages should be avoided. | | |
| 5.3 | The complaints process must not exceed two stages before referral to the Ombudsman. | | |
| 5.6 | A clear complaint definition must be established at each stage. | | |

Section 6: Complaint Resolution

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 6.1 | Complaints must be acknowledged within 5 working days and resolved within 10 working days at Stage 1. | | |
| 6.5 | If an extension is required, the resident must be informed and provided with Ombudsman details. | | |
| 6.14 | Stage 2 complaints must be resolved within 20 working days. | | |

Section 7: Learning from Complaints

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 7.1 | Where service failures occur, actions must be taken to put things right. | | |
| 7.2 | Remedies must be proportionate to the impact of the failure. | | |
| 7.4 | The organisation must use Ombudsman guidance when deciding on appropriate remedies. | | |

Section 8: Oversight and Reporting

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|--|----------------|---------------------------------|
| 8.1 | An annual complaints performance and service improvement report must be produced, covering the previous year's complaints data. | | |
| 8.2 | The report must include a qualitative and quantitative analysis of complaints handling performance, including a summary of refused complaints. | | |
| 8.3 | Any findings of non-compliance with the Code by the Ombudsman must be documented and addressed. | | |

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|---|----------------|---------------------------------|
| 8.4 | The service improvements made as a result of learning from complaints must be outlined in the report. | | |
| 8.5 | Actions taken following the Ombudsman's annual performance report and any other relevant Ombudsman publications must be recorded. | | |

Section 9: Accountability and Continuous Improvement

| Code Provision | Requirement | Comply: Yes/No | Evidence Commentary/Explanation |
|----------------|--|----------------|---------------------------------|
| 9.1 | Complaints must be used as a learning tool for service improvements. | | |
| 9.3 | Complaints data and lessons learned must be shared with stakeholders. | | |
| 9.5 | A senior governing body member must be appointed as the Member Responsible for Complaints. | | |

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