

COMPLIMENTS, COMMENTS & COMPLAINTS POLICY

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1.0 Introduction

- 1.1 YMCA Black Country Group (YMCABCG) recognises the importance of customer feedback and welcomes compliments, comments and complaints about its services. YMCABCG is committed to using the information it receives to help drive forward improvements and welcome complaints, comments, and compliments as opportunities to improve services and outcomes for customers.
- 1.2 We operate a complaints process that is:
 - Easy to access
 - Fair and transparent
 - Responsive and resident/complainant-focused
 - Aligned with the Housing Ombudsman Complaint Handling Code
- 1.3 This procedure outlines the aims of the YMCABCG in dealing with compliments, comments and complaints made by YMCABCG customers
- 1.4 It is important that this procedure is followed so that the Association can be confident that all compliments, comments or complaints are dealt with in the appropriate manner.

2.0 Purpose and Scope

- 2.1 The purpose of this procedure is to inform staff of the process to adopt when dealing with Compliments, Comments & Complaints.
- 2.2 The procedure should be followed when dealing with a compliment, comment or complaint made by a customer, visitor or in some instances an employee.
- 2.3 This Policy applies to all YMCABCG members including its subsidiaries and associated companies.

This Policy is to be read in conjunction with YMCABCG's:

 - Data Protection Policy;
 - Staff Handbook;

3.0 Trauma-Informed Practice

- 3.1 Trauma-informed practice is an approach to interventions which is grounded in the understanding that trauma exposure can impact an individual's neurological, biological, psychological and social development. Trauma-informed practice aims to increase practitioners' awareness of how trauma can negatively impact on individuals and communities, and their ability to feel safe or develop trusting relationships with housing services and their staff.
- 3.2 It aims to improve the accessibility and quality of services by creating culturally sensitive, safe services that people trust and want to use. It seeks to prepare practitioners to work in collaboration and partnership with people and empowers them to make choices about their health and wellbeing. Trauma-informed practice acknowledges the need to see beyond an individual's presenting behaviors and actions and to ask, 'What does this person need?' rather than 'What is wrong with this person?' – 'How can we support this person to feel safe.'
- 3.3. In all interactions with staff and service users therefore, and in the implementation of this policy when dealing with Compliments, Comments and Complaints; we shall be required to embody the principles of Trauma-informed practice.

4.0 Commitment to Residents

4.1 In line with Housing Ombudsman's Complaint Handling Code, YMCABCG is committed to the following:

- Treating all complaints seriously
- Acting fairly and proportionately
- Putting things right where we have failed
- Learning from complaints to improve services
- Providing clear outcomes and explanations

5.0 Definitions

5.1 Compliment or Comment

It is good to know when we have done something well or when our services are meeting the needs of our customers and being delivered effectively. A comment or compliment can be: -

- What customers think about our services and policies,
- Ideas on how we can improve our services,
- Informing us of their satisfaction with a service, activity or a particular member of staff.

5.2 Complaints

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, the organisation, its own staff, or those acting on its behalf, affecting a resident or group of residents, or customer or group of customers. A complaint could be: -

- Customers think we have not done something we should have done,
- The Association has done something badly or in the wrong way,
- Customers think they have been treated unfairly or impolitely.
- A complaint does not need to be submitted in writing or formally labelled as a complaint.

5.3 Service Requests (Housing Specific)

A service request is a request from a resident to YMCABCG requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly. Where a resident expresses dissatisfaction with a service request response, it must be logged as a complaint at that point without delay.

6.0 Governance and Oversight

6.1 YMCABCG maintains strong oversight of complaints handling to ensure compliance with the Housing Ombudsman Complaint Handling Code and other external bodies.

6.2 The Board of Directors will;

- Receive and monitor annual Compliments, Comments & Complaints Reports
- Appoint a member of the Governing Body (the Member Responsible for Complaints, MRC) to have lead responsibility for complaints to support a positive complaint handling culture. The MRC will take a specific interest in all Complaints and Service requests received within the Housing Department.

- 6.3 The Governance Committee will;
 - Review the quarterly complaints report (as part of the Corporate KPI's) as presented by the Chief Finance Officer.
 - Instruct Chief Officers to provide ad hoc reports / additional information as required.
- 6.4 Chief Finance Officer (for the purpose of this policy the 'Complaints Officer') will;
 - Log and file all compliments, comments and complaints and the responses (supported by CEO EA), together with a RAG rating for each entry.
 - Report to the Chief Officers on a quarterly basis of all compliments, comments and complaints received.
 - Report to the Governance Committee as part of the Corporate Quarterly KPIs a summary of all compliments, comments and complaints received.
 - Provide monthly feedback to the Senior Leadership Team as appropriate.
 - Take responsibility for complaint handling, oversight of the compliance with the Complaint Handling Code, liaison with the Ombudsman and ensuring complaints are reported to the relevant governing body.
- 6.5 Chief Operating Officers will;
 - Notify the Chief Executive Officer of any serious complaints received from third parties, including commissioners, local authority and stakeholders
 - Analyse all Complaints received within their department and put in place actions to improve the service if necessary.
 - Produce an Action Plan if required for consideration by the Senior Leadership Team.
 - Monitor the progress of all compliments, comments and complaints for their areas to ensure they have been responded to in accordance with the Policy and in line with the specified timeframes.
- 6.6 Executive Heads and Heads of Service will;
 - Advise the Chief Operating Officer for the project immediately of any complaint from third parties, including commissioners, local authority and stakeholders.
 - Ensure all compliments, comments and complaints are responded to in accordance with the Policy and in line with the specified timeframes.
- 6.7 Departmental / Project Managers will;
 - Deal with all compliments, comments and complaints in accordance with the Policy.
 - Advise their Executive Head / Head of Service of any complaint, comment or compliment received by the project.
 - Advise their Executive Head / Head of Service and Chief Officer immediately of any complaint from third parties, including commissioners, local authority and stakeholders.

7.0 Accessibility and Support

- 7.1 We will ensure our complaints process is available through multiple channels (in person, phone, email, online and through social media.) We will ensure it is accessible to all service users and is inclusive to those requiring advocacy, translation and reasonable adjustments.
- 7.2 Complainants may be represented by a third party and be accompanied in meetings if required.

8.0 Dealing with compliments or comments

8.1 When we receive a compliment, we will: -

- Record the compliment or comment and pass it on to the relevant member of staff and the appropriate manager.
- If the compliment or comment is made orally, we will thank the person orally although we may wish to consider thanking them in writing as well where appropriate.
- If the compliment or comment is made in writing, we will write and thank the person for their comments within 7 working days.
- Compliments and comments will be used to inform service delivery and service improvements.

9.0 Complaint Handling Process

9.1 YMCABCG operates a two-stage complaints process designed to ensure that complaints are handled promptly, fairly, and consistently. The process is intended to be accessible and responsive, ensuring that complainants are listened to and that appropriate outcomes are reached. YMCABCG will seek to resolve complaints at the earliest opportunity, while still ensuring that the complainant has access to the formal complaints process where they remain dissatisfied.

9.2 Complaints can be made through any communication channel, including in person, by telephone, email, online, or via a representative. There is no requirement for complaints to be made in writing or on a specific form, although a form is provided if requested and can be found on our website. Where a complaint is made verbally, staff will ensure that it is recorded appropriately.

9.3 We will accept complaints within 12 months of the issue occurring or the complainant becoming aware of the issue, unless there are reasons for this time frame to be extended. Extensions to this time frame will be dealt with on a case-by-case basis and the Chief Finance Officer will ultimately decide if a complaint should be heard. Time limits will be applied flexibly, considering vulnerability, awareness of the issue, and fairness.

9.4 Stage 1 – Initial Investigation

Upon receipt of a complaint, YMCABCG will acknowledge the complaint within **five working days**. The acknowledgement will confirm that the complaint has been logged and outline the next steps in the process. A named contact will be provided for each complaint to ensure the complainant has a clear point of contact throughout the process.

9.5 All expressions of dissatisfaction meeting the complaint definition will be recorded as a complaint at the earliest opportunity.

9.6 The complaint will then be investigated by an appropriate manager who has the authority to resolve the issue. The investigation will include a review of relevant records, discussions with staff involved, and, where necessary, further engagement with the complainant to clarify the issues raised.

9.7 A full written response will be provided within **ten working days** of the complaint being acknowledged. This response will clearly set out:

- The issues raised by the complainant
- The findings of the investigation
- Whether the complaint is upheld, partially upheld, or not upheld

- An apology where a service failure has been identified
 - Details of any actions taken or proposed to put things right
 - Any lessons learned or service improvements identified
 - Details of how to escalate their complaint Stage 2 if they are not satisfied
- 9.8 Where appropriate, the response will also confirm any outstanding actions and the expected timeframe for completion. These actions will continue to be monitored until resolved.
- 9.9 **Stage 2 – Final Review**
- 9.10 If the complainant is dissatisfied with the Stage 1 response, they have the right to request escalation to Stage 2, which is the final stage of the internal complaints process.
- 9.11 The escalation request does not need to include new information or justification. YMCABCG will accept the request and will not unreasonably refuse escalation.
- 9.12 The Stage 2 review will be carried out by a senior member of staff who has not been directly involved in the Stage 1 investigation. This ensures an independent and objective reassessment of the complaint.
- 9.13 The complaint will be acknowledged at Stage 2 within **five working days**, and a final written response will be issued within **twenty working days**. The Stage 2 response will:
- Reassess the original complaint and Stage 1 findings
 - Address any ongoing concerns raised by the complainant
 - Provide a clear and final decision on the complaint
 - Outline any further actions to be taken to resolve the matter
 - Confirm that this is the organisation's final response and that the complaint is closed.

10.0 Extension to Timescales

- 10.1 YMCABCG aims to meet all response times; however, in exceptional circumstances, more time may be required to complete a thorough investigation. Any extension will not exceed 10 working days without agreement from the complainant.
- Where this occurs:
- The complainant will be informed promptly
 - The reasons for the delay will be clearly explained
 - A revised response date will be provided
- 10.2 The organisation will keep the complainant updated throughout the extended period to ensure transparency and maintain trust.

11.0 Exclusions

- 11.1 YMCABCG will generally accept all complaints unless there is a valid reason not to do so, in line with Housing Ombudsman guidance.
- 11.2 A complaint may be declined only where:
- The issue has already been fully investigated and responded to
 - The matter falls outside the organisation's responsibility or jurisdiction
 - The issue is subject to ongoing legal proceedings or insurance claims
 - The issue relates to an employee grievance
- 11.3 Where a complaint is not accepted, the decision will be clearly explained in writing to the complainant, including the reasons for the refusal. The response will also provide

information about the complainant's right to contact the Housing Ombudsman Service for further advice.

- 11.4 Where a complaint has been raised via social media, an appropriate member of staff will be asked to respond by signposting the complainant to the Complaints Form which can be found on the YMCABCG website, however complaints raised by social media will be logged and handled as complaints without requiring completion of the form.
- 11.5 YMCABCG has a separate policy (within Housing) for managing unreasonable or unacceptable behaviour. This policy will be applied fairly and proportionately and will not be used to prevent a complaint from being investigated.

12.0 Putting Things Right

- 12.1 Where an investigation identifies that YMCA BCG has failed to meet its service standards, appropriate action will be taken to remedy the situation. This may include:

- A clear and sincere apology
- Taking practical steps to resolve the issue
- Reviewing and improving processes or procedures
- Providing compensation where appropriate and proportionate

- 12.2 The organisation is committed not only to resolving individual complaints but also to ensuring that similar issues do not occur in the future. Any agreed actions will be tracked to completion, and complainants will be kept informed of progress where relevant.

13.0 Learning and Continuous Improvements

- 13.1 Complaints are a valuable source of insight and play a key role in improving services. As such, YMCA BCG will ensure that:

- All complaints are recorded centrally and accurately
- Data is monitored and analysed to identify patterns or recurring issues
- Outcomes and learning points are shared with relevant teams and senior management

- 13.2 Regular reports will be presented to the Senior Leadership Team, Governance Committee, and Board. These reports will highlight trends, lessons learned, and actions taken to improve service delivery.

- 13.3 In addition, the organisation will:

- Publish an annual complaints performance report
- Complete and publish an annual Housing Ombudsman Complaint Handling Code self-assessment
- Demonstrate how complaints have led to service improvements

14.0 Possible Further Action

- 14.1 If a complainant remains dissatisfied after completing Stage 2 of the complaints process, they have the right to refer their complaint to appropriate external body.
- 14.2 For residents within our Housing Services this is the Housing Ombudsman Service. Residents can contact the Housing Ombudsman at any stage for advice, and after Stage 2 for formal investigation.
- Website: www.housing-ombudsman.org.uk
 - Telephone: 0300 111 3000

14.3 YMCA Black Country Group will cooperate fully with the Housing Ombudsman and comply with any determinations or recommendations issued.

14.4 For our Early Years Services, complainants can escalate their concerns to Ofsted.

- Email: enquiries@ofsted.gov.uk
- Telephone: 0300 123 4666.

15.0 Storage

15.1 All documentation relating to each compliment, comment or complaint will be kept electronically in a Central File on the Executive Team SharePoint, together with the Compliment, Comments and Complaints Log.

15.2 Departments may keep copies of compliment, comments and complaints received and response made, for inspection purposes in accordance with governing body guidelines.

15.3 Any personal data included as part of a compliment, comment or complaint is to be handled in accordance with the Association's Data Protection Policy.

16.0 Equality Impact Assessment

16.1 YMCA BCG is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, disability, sex (gender), sexual orientation, religion or belief, gender reassignment, marriage and civil partnership or pregnancy and maternity. All YMCA BG's policies are subject to periodic review under the equality impact assessment process.

17.0 Publicity

17.1 A copy of YMCA Black Country Group's Compliments, Comments and Complaints Policy is available on our website: www.ymcabc.org.uk

17.2 In addition, a copy of YMCA Black Country Group's Housing Ombudsman Complaints Handling Self-Assessment can be found on our website: <https://www.ymcabc.org.uk/>

17.3 Posters will be displayed around projects notifying customers how to make a complaint, and information will be made available to residents of our Housing Services at point of induction into their accommodation.

18.0 Review

18.1 This policy and procedure will be scrutinised by the Governance Development Committee and approved by the Board every year, or more regularly as required.

Summary of amendments from V6 to V7

- Policy restructured to align fully with the Housing Ombudsman Complaint Handling Code, including clearer separation of sections (e.g. Complaint Handling Process, Accessibility, Exclusions, and Governance).
- Strengthened complaint handling process by introducing a clearly defined two-stage process, including:
 - Stage 1 (10 working day response)
 - Stage 2 (20 working day response)
 - Formal acknowledgement timescales (5 working days at each stage)
- Introduced early resolution approach, confirming that complaints will be resolved at the earliest opportunity while maintaining access to the formal process.
- Enhanced complaint logging requirements, with explicit wording that all expressions of dissatisfaction meeting the definition must be recorded as a complaint at the earliest opportunity.
- Clarified service request vs complaint distinction, including requirement to escalate to a complaint where dissatisfaction is expressed.
- Strengthened accessibility provisions, confirming:
 - Complaints can be made via any channel (including social media)
 - No requirement to complete a specific form
 - Availability of advocacy, representation, and reasonable adjustments
- Introduced named contact requirement to ensure complainants have a clear point of contact throughout the complaint.
- Updated timescale extension rules, including:
 - Maximum extension of 10 working days
 - Requirement to agree extensions with the complainant where necessary
- Strengthened Stage 1 and Stage 2 response content, including:
 - Clear outcomes (upheld/partially upheld/not upheld)
 - Actions to put things right
 - Lessons learned and service improvements
 - Clear escalation guidance
- Clarified complaint closure, confirming Stage 2 responses represent the final decision and closure of the complaint.
- Enhanced Housing Ombudsman access wording, confirming residents can:
 - Contact the Ombudsman at any stage for advice
 - Escalate after Stage 2 for formal investigation
- Improved social media handling, ensuring complaints raised via social media are logged and handled without requiring form completion.
- Added provision for managing unreasonable or unacceptable behaviour, including reference to a separate policy and assurance that this will not prevent complaints being investigated.
- Strengthened governance and oversight arrangements, including clearer roles for Board, Governance Committee, and Complaints Officer in monitoring compliance and performance.

Minor drafting and consistency updates, including formatting corrections, removal of duplication, and clearer terminology throughout.