

Complaints

Document Control:

Policy Reference:	KCICCOMS01
Version Number:	03
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Date of Last Review:	May 2023
Date of Next Review:	May 2025

Revision History:

Version Number	Version Date	Nature of Change	Date Approved
01	April 2021	Original policy	Apr 2021
02	May 2023	Updated policy to current branding & BCP	May 23
03	June 2024	Update policy in line with Housing Ombudsman	June 2024
04	November 2024	Amended contact details, added additional definition to investigations at stage 2 and defined Keystage Housing investigating on behalf of KCIC	November 2024

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1. **Introduction**

- 1.1. The purpose of this policy is to provide Keystage CIC employees with the information they need to ensure that Keystage CIC meets or exceeds the requirements of:
 - 1.1.1. The Local Authority
 - 1.1.2. The Care Act 2014
 - 1.1.3. The Landlord and Tenant Act 1985
 - 1.1.4. Complaint Handling Code 2024 - The Housing Ombudsman
- 1.2. It sets out how Keystage CIC manages, responds to and learns from complaints made about our services. The management of all complaints, investigations and responses will be conducted to the timescales set out in these regulations.
- 1.3. Keystage CIC is committed to providing high quality services and will strive to ensure that all comments, compliments, concerns and complaints are addressed, resolved and shared as quickly as possible. Potential lessons will be shared within the organisation to promote learning and improve quality and safety of care.
- 1.4. Complaints will be dealt with on an individual basis and will be investigated fully, transparently and impartially. When something has gone wrong it is vital to establish the facts about what happened in a systematic manner. Most complaints will be investigated by someone from the service or division involved, but for serious complaints it may sometimes be necessary to involve an independent investigator or the Ombudsman. Complaints will remain confidential and only shared with those that are required to be in the know.
 - 1.4.1. Section 11 sets out how we aim to make things right.
- 1.5. Where appropriate and under the Equality Act 2010, reasonable adjustments will be made and a record kept of any agreed as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.
- 1.6. Principles of Complaint Handling:
 - 1.6.1. We must get things right the first time, meeting all our legal and regulatory responsibilities, with clear leadership from the Service Manager and Senior Management Team. We must have clear and strong governance arrangements with unambiguous roles and responsibilities so that everyone in our organisation understands the importance of managing the concerns of our service users.
 - 1.6.2. By being service user-focused, we will have a complaints procedure that is straightforward, and outcome driven. Wherever possible, we will endeavour to satisfy the person who has made the complaint. We will listen to what our service users say and deal with complaints promptly and with sensitivity.



- 1.6.3. We will be open and accountable, explaining how a complaint can be made and how to proceed if the person who has made the complaint feels that our response is unsatisfactory. We will provide information about how independent conciliation services and other advice can be obtained.
- 1.6.4. By acting fairly and proportionately, we will treat the person who has made a complaint impartially and fairly, striving to investigate matters thoroughly and to reach conclusions quickly. We will also treat any staff member who has been complained about equitably.
- 1.6.5. Putting things right – acknowledging our mistakes and apologising where we need to – will be a key part of any remedy required. Our responses will be prompt, appropriate and proportionate.
- 1.6.6. By seeking continuous improvement, using the feedback and the lessons arising from complaints, we will improve service design and delivery. We will have systems in place to record, analyse and regularly report on what we have learnt. Where appropriate, we will tell the person who has made a complaint about these lessons and what changes we have made to prevent similar things happening again.
- 1.7. Keystage CIC does not view high volumes of complaints as negative, but rather as the result of an accessible complaints process. Low volumes are potentially a sign that residents are unable to complain, and therefore Keystage CIC will regularly review the accessibility of the complaints policy and process.
- 1.8. Keystage CIC will endeavor to publicise and make the complaints policy and process accessible in the following ways:
 - 1.8.1. publicised on the Keystage CIC website
 - 1.8.2. a hardcopy will be available in all services and upon request
 - 1.8.3. posters presenting an outline of the complaints process will be available in all services
 - 1.8.4. an easy guide of the complaints process will be provided to all service users.
 - 1.8.5. section __ outlines the publicising dates set by Keystage CIC.
- 1.9. Complaints made to Keystage CIC will be managed by Keystage Housing, on behalf of Keystage CIC.

2. **Scope**

- 2.1. This policy applies to the management of comments, compliments, concerns or complaints in all accommodation services provided by Keystage CIC staff in England and Wales.
- 2.2. Keystage CIC employees have a responsibility to ensure that anyone who makes a comment or gives a compliment receives the appropriate response. Anyone who raises a concern or complaint should be treated with compassion, dignity and respect. Regular updates and communications will also be provided.
- 2.3. All anonymous complaints will be investigated in accordance with this Policy, providing that there is sufficient detail to do so. If it is possible to verify a complaint, the appropriate remedial actions will be taken and a record maintained.
- 2.4. There will be some complaints that cannot be dealt with under the scope of this policy. Examples are:
 - 2.4.1. A complaint made by one external organisation about another organisation.
 - 2.4.2. A verbal complaint which has been resolved to the person's satisfaction not later than the next working day.
 - 2.4.3. A complaint, the subject of which has previously been investigated under this policy
 - 2.4.4. A complaint which is being investigated by any of the Ombudsman services.
 - 2.4.5. A complaint made by a staff member about any matter relating to their employment.

2.5. Any complaint or concern raised that relates to an issue of abuse (or suspected abuse) must be dealt with immediately following the guidance in the Keystage CIC Adult Safeguarding Policy.

3. **Definitions**

3.1. Comment:

3.1.1. A comment is a statement (made either verbally or in writing) to any Keystage CIC staff member. A comment is an expression of a personal opinion or attitude, with no expectation from the person making the comment that any action is required.

3.2. Compliment:

3.2.1. A compliment is an expression of satisfaction about a service the customer has received. Compliments are positive feedback received either verbally or in writing. They can include expressions of praise, admiration, or congratulation and provide valuable information and provide encouragement and a feeling of staff satisfaction. Local arrangements can be established to recognise and capture compliments and share the learning from good individual or team practice. Keystage CIC will log details of all compliments into its divisional operational reporting systems. It is good practice to thank the customer for their positive comments if the situation makes this a practical option.

3.3. Concern:

3.3.1. A concern is an issue of interest, importance or unfavourable experience raised with any member of Keystage CIC staff, who can immediately respond, answer any questions and resolve issues by clarification with the person. For example, by talking with the customer, or by providing an explanation or supporting information. A concern does not need to be recorded as a complaint via operational reporting systems but should be reported to the receiving employees line manager in the first instance.

3.4. Complaint:

3.4.1. A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents. Complaints may be made in a variety of ways including but not limited to:

3.4.1.1. verbally (in person or by phone)

3.4.1.2. in writing

3.4.1.3. electronically, for example, via email or text message

3.4.1.4. via online feedback channels.

3.4.2. the word "complaint" does not have to be used when a resident expresses dissatisfaction, they must be given the choice to make the expression a complaint.

3.4.3. Keystage CIC will log details of all complaints.

3.5. Service Request

3.5.1. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.

3.5.1.1. A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains

3.6. Customer:

3.6.1. For the purposes of this policy, a customer is defined as someone who receives care, support or related services provided by Keystage CIC in any location. The term customer encompasses all the various descriptions used in Keystage CIC divisions, for example 'service user', 'resident', 'patient' or 'client'.

3.7. Working days:

3.7.1. For the purpose of this Policy:

3.7.1.1. 'Working days' mean only weekdays i.e., Monday to Friday.

4. **Confidentiality**

4.1. Complaints will be handled in the strictest confidence, in accordance with Keystage CIC's policies concerning confidentiality. Arrangements will be made for the handling of all confidential information (customarily called 'patient-identifiable information'), in compliance with the Data Protection Act 1998 and to meet the general principles set out in the Caldicott Report.

4.2. Only those managers who are leading, or staff who are in other ways involved in the management of the complaint, will have access to details of the case. Anyone disclosing information to others who are not directly involved could be subject to disciplinary proceedings.

5. **Investigations**

5.1. When conducting any complaints investigation Keystage CIC will establish the facts in a systematic way, collecting and assessing evidence, conducting interviews, referring to customer records and documents and taking expert advice as required.

5.2. Once the evidence has been gathered, it will need to be assessed in order to decide what is fair and reasonable in the circumstances of each complaint.

5.3. If the investigation into a complaint, results in a disciplinary procedure then the complaints process will be continued to its conclusion. The person who has made a complaint will be informed that their complaint has led to the disciplinary procedure being started but will not be given details of the outcome or ongoing investigation.

6. **Responsibilities**

6.1. The Complaints Investigator:

6.1.1. The person nominated as the Complaints Investigator is responsible for completing Stage 2 of the complaints process. They will contact the person who has made a complaint to agree on the issues to be investigated and the timescale for responding.

6.2. Managers:

6.2.1. Managers have a responsibility to read and understand this policy and its importance regarding the service they manage. If immediate resolution to the satisfaction of the person raising the concern is not possible, the issue raised should be dealt with as a complaint by the service manager or person in charge at the time. Service managers are to ensure that details of all complaints arising in their service are recorded on the Regional Operation Complaints Record.

6.3. All Keystage CIC Staff:



- 6.3.1. All staff have a responsibility to read and understand this policy and its importance regarding their area of work.
- 6.3.2. Staff should respond appropriately to a concern or complaint to try to achieve immediate resolution to the satisfaction of the person making the complaint. If this is not possible, staff are to escalate the customer's complaint to their Service Manager or the person in charge at the time.

7. Who can make a complaint?

- 7.1. Complaints can be made by any person who has come, or encounters; has been, is, or is likely to be affected by; has been, or is aware through direct experience or observation, of an action, omission or decision of Keystage CIC.
- 7.2. Complaints can be made on behalf of service users but must be made with their full consent. This is to comply with the Data Protection Act 1998 and Caldicott requirements.
- 7.3. If a complaint is raised by a relative or friend, the customer must provide written consent, unless the person who has made a complaint is the parent or guardian of a child under the age of legal capacity, to whom the complaint refers.
- 7.4. If a customer is unable to consent, due to physical incapacity or lack of capacity within the meaning of the Mental Capacity Act 2005, consent is not required. Consent will, in these cases, need to be agreed on an individual basis by the Director with responsibility for managing complaints.
- 7.5. Consent from the customer must be received before the response to the complaint can be provided. If the consent form is not returned within 20 working days, a reminder will be sent. If this is not received by 28 working days of the original complaint date it will be accepted that the customer does not give consent and the person who has made a complaint will be sent written confirmation that their complaint is being closed and the reason why.
 - 7.5.1. The initial complaint and also the lack of consent received will be recorded.
- 7.6. In the event that our stakeholders ask for details of a complaint or to be informed of progress of a particular complaint, consent is not required from the person who has made a complaint since the role of regulator allows such information to be conveyed. However, they should be advised that information is being passed to the commissioner or regulator.
- 7.7. Residents will be given the opportunity to have a representative to deal with their complaint on their behalf and to be represented and accompanied at any meeting held in relation to the complaint.
 - 7.7.1. Written consent and confirmation of the representative must be given, unless, due to physical incapacity or lack of capacity within the meaning of the Mental Capacity Act 2005 consent is not required. Consent will, in these cases, need to be agreed on an individual basis by the Director with responsibility for managing complaints.

8. How to make a complaint

- 8.1. Fundamental principles:
 - 8.1.1. Keystage CIC always welcomes the opportunity to be the first point of contact, receiving compliments and comments, as well as concerns and complaints. Keystage CIC monitors, reviews and analyses the information we receive, with the aim of learning lessons and continuously improving the quality and safety of our services. However, at any point during the management of a complaint, or if the person is dissatisfied with the initial response from us, or remains dissatisfied once our complaints process is exhausted, the



person can approach any of the appropriate regulatory, professional or supervisory bodies with regards to their complaint, including the Ombudsman, the details of which will be provided to the resident.

8.1.2. Where appropriate, we encourage all concerns to be resolved immediately by a member of our staff or management team of the particular service or facility.

8.2. Complaints can be made in several ways:

8.2.1. verbally (in person or by phone)

8.2.2. in writing, via the complaints form <https://forms.gle/iHf4SQTb95jkLy4M8>

8.2.3. electronically, for example, via email or text message

8.2.4. via online feedback channels- where possible.

8.3. People who make a complaint by any of these methods will receive an acknowledgement not later than five working days after the day on which the complaint is received.

8.4. Keystage CIC understands that not all complaints will be made within a service or facility, some may be made via online feedback channels, whilst others may arrive via one of the Keystage CIC supporting offices. All complaints, regardless of where they are received, will be handled appropriately and following the process set out in this policy.

8.5. The Keystage CIC Complaints Process is set out in Section 10.

9. Non-Acceptance of, and Defining Complaints

9.1. Keystage CIC encourages feedback on the services provided to our residents, and does so through different surveys, including the Tenant Satisfaction Measure, and the New Home Satisfaction Survey.

9.1.1. Expressions of dissatisfaction made through a survey, is not defined as a complaint, although the resident should be made aware of how they can pursue a complaint if they wish.

9.2. Keystage CIC will accept a complaint unless there is a valid reason not to do so. If a complaint is not accepted, evidence of the reasoning will be provided to the resident, setting out the reasons why the matter is not suitable for the complaints process. Each complaint will be considered on its own merits

9.2.1. The resident will also be informed of their right to take the decision to the Ombudsman and will provide the resident with the contact details.

9.2.2. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may make the decision the complaint is to be taken on.

9.3. Any restrictions placed on contact due to unacceptable behaviour is to be proportionate and show regard for the provisions made in the Equality Act 2010.

10. Concern and Complaints Process

10.1. (Local resolution),

10.1.1. The aim for an initial concern raised with a member of staff or service manager is for it to be resolved prior to it becoming a complaint. Where the concern is resolved immediately to the satisfaction of the person raising it, the details of the concern should be logged in the relevant care or patient records. Where possible local analysis should be conducted and any learning shared within the service and/or division.

10.1.2. Where a concern is not able to be resolved immediately, the member of staff should raise this as a complaint with the service manager or person in charge at the time.

10.2. Stage 1

- 10.2.1. People who wish to make a complaint should normally do so within twelve months of becoming aware of the event or issue. Where a complaint is made after this period the decision to investigate will be at the discretion of the Director with responsibility for managing complaints. The service manager or the person in charge at the time a complaint is received should therefore discuss any complaints received after this period with the Director with responsibility for managing complaints prior to starting an investigation.
- 10.2.2. An acknowledgement should be made within 5 working days of receipt of the complaint and should include:
- 10.2.2.1. acknowledgement of the complaint and outlining which aspect(s) of the complaint they are, and are not responsible for and clarify any area where this is not clear.
 - 10.2.2.2. their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification.
 - 10.2.2.3. an opportunity to discuss:
 - 10.2.2.3.1. how the complaint will be investigated
 - 10.2.2.3.2. how long the investigation is likely to take
 - 10.2.2.3.3. when to expect a response
- 10.2.3. Where this acknowledgement takes the form of a phone call, the details of this acknowledgement should be noted in the complaint record, including the date and time of the phone call, and should be followed up with written confirmation of the areas discussed with the complainant.
- 10.2.4. Following an investigation, a written response should be sent to the complainant which includes the following information:
- 10.2.4.1. The complaint stage
 - 10.2.4.2. The complaint definition
 - 10.2.4.3. A summary of each element of the complaint.
 - 10.2.4.4. Details of policies or guidelines followed.
 - 10.2.4.5. A summary of the investigation, including key facts and issues.
 - 10.2.4.6. Conclusions of the investigation including determining if there was an error, omission or shortfall.
 - 10.2.4.7. Providing an apology and explanation of what happens next.
 - 10.2.4.8. The details of any remedy offered to put things right
 - 10.2.4.9. Details of any outstanding actions
 - 10.2.4.10. Any wider learning or wider service changes that will take place as a result of the complaint.
 - 10.2.4.11. Information on what the person complaining should do if they are still unhappy and how to escalate to stage 2 if the individual is not satisfied with the response
- 10.2.5. Where possible, complaints should be responded to as early as possible and those requiring further investigation should be noted. There should be consideration of complexity and whether the resident is vulnerable or at risk.
- 10.2.6. In most cases resolution and response should be sought within 10 working days of receipt of the complaint.

- 10.2.7. Where a complaint or investigation is complex or delays occur which require a longer period of time, the resident should be informed of the expected timescale for response. Any extension must be no more than 10 working days without good reason which must be clearly explained to the resident. The resident must also be provided with the Ombudsmans contact details.
- 10.2.8. If an additional complaint is raised by resident during the investigation, this must be incorporated into the stage 1 response if they are related, and if the stage 1 response has not been issued.
- 10.2.8.1. If the stage 1 response has been issued; the new issues is unrelated to the issues already being investigated; or it would unreasonably delay the response, the new issue will be logged as a new complaint.
- 10.3. Stage 2 (Escalation):
- 10.3.1. Where a complainant remains unhappy with the outcome of a Stage 1 complaint investigation the complaint should be escalated to a complaints investigator, via the Director with responsibility for managing complaints, the person considering the complaint at stage 2 must not be the same person who considered the complaint at stage 1. The complaints investigator will then contact the complainant to inform them of the next steps in the process and the timescale within which this is likely to be completed.
- 10.3.1.1. In the case that the Senior Manager has completed the stage 1 investigation, stage 2 will either be allocated to either:
- 10.3.1.1.1. The CEO
 - 10.3.1.1.2. External third party, commissioned by the organisation
- 10.3.2. Requests for Stage 2 complaints must be acknowledged, defined and logged within 5 working days of the escalation request being received.
- 10.3.3. There must not be refusal to escalate a complaints procedure unless there are valid reasons to do so, which must be clearly set out and explained to the resident.
- 10.3.4. when contacting the complainant, the complaints investigator will provide the complainant with a written response outlining:
- 10.3.4.1. acknowledgement of the complaint and outlining which aspect(s) of the complaint they are, and are not responsible for and clarify any area where this is not clear.
 - 10.3.4.2. their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification.
- 10.3.5. It is the responsibility of the complaints investigator to review the investigation undertaken at stage 1, conduct any additional investigation deemed necessary and work with the complainant to attempt to reach a mutually agreeable resolution.
- 10.3.6. Following the review and further investigation a written response should be sent to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. The actions must still be tracked and actioned. The written response should include the following information:
- 10.3.6.1. The complaint stage
 - 10.3.6.2. The complaint definition
 - 10.3.6.3. A summary of the review and any further investigation including key facts and issues.

- 10.3.6.4. Conclusions of the review and any further investigation including determining if there was an error, omission or shortfall.
 - 10.3.6.5. Details of policies or guidelines followed.
 - 10.3.6.6. A summary of the investigation, including key facts and issues.
 - 10.3.6.7. Conclusions of the investigation including determining if there was an error, omission or shortfall.
 - 10.3.6.8. Providing an apology and explanation of what happens next.
 - 10.3.6.9. The details of any remedy offered to put things right
 - 10.3.6.10. Details of any outstanding actions
 - 10.3.6.11. Any wider learning or wider service changes that will take place as a result of the complaint.
 - 10.3.6.12. Information on what the person complaining should do if they are still unhappy and details of how to escalate the matter to the Ombudsman service if the individual remains dissatisfied.
- 10.3.7. In most cases resolution and response should be sought within no more than 20 working days of receipt of the escalated complaint.
- 10.3.8. Where a complaint or investigation is complex or delays occur which require a longer period of time this should be agreed with the complainant and regular updates given. In the event of contractual or service-level agreements stipulating specific timescales for complaints resolution which are different from 20 working days, the timescales stated in those agreements should be adhered to.
- 10.3.8.1. Any extension must be within good reason and the reason must be explained to the resident. The resident must also be provided with the contact details of the Ombudsman.
- 10.4. Meeting with people who have made a complaint:
- 10.4.1. Where a person who has made a complaint wishes to attend a meeting for feedback this will be offered as part of the process. Responsibility for arranging and documenting meetings rests with the person investigating the complaint at that time.
 - 10.4.2. A minimum of two Keystage CIC representatives will be present of which one will be the person investigating the complaint. The person who has made a complaint must be advised that they can be accompanied to a meeting as long as the companion is not acting in any legal capacity. The person investigating the complaint may terminate the meeting if it becomes apparent that the companion is acting in a legal capacity.
 - 10.4.3. Occasionally, people who have made a complaint ask to have the meeting recorded. This may be helpful in certain circumstances, but only if staff involved give their consent beforehand. The request may be declined or the meeting cancelled if agreement cannot be reached.
- 10.5. External Resolution of Complaints:
- 10.5.1. Where Keystage CIC fails to resolve the complaint, the complainant has the right to request external resolution by the appropriate Ombudsman or other supervisory service, the resident will be provided contact details of the Ombudsman.

11. Acknowledgement When Something Has Gone Wrong

- 11.1. When something has gone wrong KCIC as the landlord must acknowledge this and set out the actions it has already taken or intends to take to put things right, this may include:



- 11.1.1. Apologising
- 11.1.2. Acknowledging where things have gone wrong
- 11.1.3. providing an explanation, assistance of reasons
- 11.1.4. taking action if there has been a delay
- 11.1.5. reconsidering or changing a decision
- 11.1.6. amending a record or adding a decision
- 11.1.7. providing a financial remedy
- 11.1.8. changing policies, procedures or practice

12. Cooperation with external agencies

- 12.1. As part of the external body investigation Keystage CIC have a responsibility to provide all information requested within the required timescales. The Directors with responsibility for managing complaints should be notified of all complaints referred to an external body such as an Ombudsman service.
- 12.2. Landlords must provide residents with information on their right to access to Ombudsman service and how the individual can engage with the Ombudsman about their complaint

13. Providing advice and support to people who wish to make a complaint

- 13.1. Principles for offering apologies to customers who have made a complaint.
 - 13.1.1. All complaints must be taken seriously by all staff and treated with compassion and understanding at all times. Poor communication can make it more likely that a customer will pursue a complaint or that a complaint becomes a claim. It is vital that a meaningful apology is not delayed and that any apology is based only on the facts at that current time. Apologising – saying sorry – for the fact that a customer has felt the need to make a complaint does not constitute an admission of personal or organisational legal liability. It is simply the right thing to do.
 - 13.1.2. As part of the organisational response to a complaint (at either Stage 1 or Stage 2 of the Keystage CIC complaints process), if the findings of investigations warrant doing so, this response should include a sincere expression of sorrow or regret for the incident or issue giving rise to the complaint. This apology must be clear and unambiguous and may be given verbally in addition to the written apology within the resolution letter. If a complaint has been upheld at Stage 2, it is good practice to offer both a verbal and written apology.
- 13.2. Access to Conciliation, Independent Complaints Advisory Services and Statutory Advocacy Services
 - 13.2.1. People who have made a complaint should, at the earliest opportunity, be provided with information about the availability of independent support and advice and the possible use of conciliation services. This course of action may help and be agreeable to both parties. Conciliation is a voluntary process which seeks to resolve, for example, a complaint at local level. It can enable both parties to address the issues in a non-confrontational manner with the aim of reaching an agreement.
 - 13.2.2. The services listed below are some of those offered, but is not an exhaustive list. Local advocacy services can be obtained for people who have made a complaint in most counties.
 - 13.2.3. The Citizens Advice Bureau (CAB) offers free and independent advice throughout the United Kingdom. Local contact details can be found at: <http://www.citizensadvice.org.uk/>

13.2.4. PohWer Advocacy Services- <https://www.pohwer.net/>

14. Providing support to staff involved in complaints

14.1. All Keystage CIC divisions have arrangements in place to support staff who are involved in and/or are the subject of a complaint - a situation which could cause the individual/s concerned undue stress and anxiety.

15. Complaints involving other providers

15.1. Where a complaint relates to another social care organisation and/or NHS body, including primary care and/or a local authority, the Director with responsibility for managing complaints will link into the relevant agency to ensure that the complaint response is formulated as a joint response.

16. Legal Action

16.1. If at any point during the complaints process the person who has made a complaint states that they have sought, or intend to seek, legal advice in regards to their complaint the details should be passed to the Keystage CIC Legal Team and where appropriate the insurance brokers. The complaint investigation should continue unless otherwise advised by the Keystage CIC Legal Team or insurance brokers.

16.2. If during the investigation the person who has made a complaint decides to take legal action the complaints process may be halted to determine whether continuing with the complaint could prejudice the outcome of legal action.

16.3. The complaints process should only be discontinued if it is reasonable to assume that the complaint will prejudice the outcome of legal action. The decision to discontinue the complaints process lies with the Director with responsibility for managing complaints once all of the information has been made available and advice has been sought from the Legal Team.

17. Habitual or vexatious complainants

17.1. The vast majority of people who raise a complaint about the support or treatment they have received from Keystage CIC act entirely reasonably. However, some people may act inappropriately towards the staff involved in the investigation of their complaint. This can lead to significant staff time and resources being used in the management of that particular complaint.

17.2. There are times when nothing further can reasonably be done to assist the person who has raised the complaint or to rectify a real or perceived problem. We do not expect staff to tolerate unacceptable behaviour, including behaviour which is abusive, offensive or threatening.

17.3. The decision to assess a person as a habitual and/or vexatious complainant rests with the Director or in their absence, their deputy. Where complainants have been identified as habitual or vexatious and after all reasonable measures have been taken to assist the person, the divisional Managing Director has the right to notify the complainant of their decision not to investigate the complaint.

17.4. When all reasonable measures have been taken the Director with responsibility for managing complaints will write to the person informing them that Keystage CIC has responded fully to the complaint they raised and has tried to resolve the matter. The complainant should be informed that there is nothing more that can be added



with respect to that complaint and that the correspondence is now finalised. If the complainant subsequently demonstrates a more reasonable approach, or submits a further complaint for which the normal complaints process appears appropriate, the Divisional Managing Director or in their absence, their deputy, can withdraw the habitual and/or vexatious assessment.

17.5. However, in extreme cases, Keystage CIC reserves the right:

17.5.1. To inform the habitual and/or vexatious complainant that future letters or other communications will be acknowledged but otherwise not responded to.

17.5.2. To take legal action.

18. Self Assessment, Reporting, Compliance and Publicisation of the Complaints Policy.

18.1. Keystage CIC will publicise the complaints policy on the Keystage CIC website, which will be reviewed annually in line with the Complaints Policy Review Dates.

18.2. As per the Housing Ombudsman Complaint Handling Code (2024), Keystage CIC will produce an annual complaints performance and service improvement report which will include:

18.2.1. An annual self-assessment made against the Housing Ombudsman Code to ensure Keystage CIC's complaint handling policy remains in line with the requirements, including:

18.2.1.1. Any findings of non-compliance with the code by the Ombudsman

18.2.2. A qualitative and quantitative analysis of the complaint handling performance, including a summary of the types of complaints Keystage has refused to accept.

18.2.3. Service improvements made as a result of learnings made from complaints

18.2.4. Any annual report about the landlords performance made by the Ombudsman

18.2.5. Any other relevant reports of publications produced by the Ombudsman relating to the work of the landlord.

19. Appendixes

19.1. Complaints Form

19.1.1. To request a form please email

19.1.1.1. housing@keystagehousing.co.uk to request a form or request a callback

19.1.1.2. Call us on 03300945954

19.1.1.3. Complete the 'Get in Touch With Us' form on our website

20. Monitoring and Review

20.1. Line Managers and team leaders will be responsible for general monitoring of these guidelines. Transgression will be reviewed with individual staff members, but in some cases, it may be appropriate to record examples for discussion as part of staff training or discussion at team meetings.

20.2. Significant and/or repeated breaches of this policy will lead to disciplinary action, up to and including dismissal.

