

Control Information	
Policy Title	Complaints Policy
Group Directorate	Operations
Directorate	Resident Operations
Policy Owner	Chief Operating Officer
Approval Group	Oak Housing Board
Date First Approved	January 2020
Date Last reviewed	September 2026
Date of Next review	September 2028 (24 months)

Version Control

Version	Date	Author	Reason for New Version
V2	August 2024	Chief Operating Officer	Review cycle
V3	November 2024	Chief Operating Officer	Review as part of our complaint handling code self-assessment submission
V4	April 2025	Chief Operating Officer	Policy review
V5	September 2026	Christopher Gunton - CEO	Review and update following recommendations by the Housing Ombudsman Service

Contents

1. Purpose	2
2. Scope	2
3. Legislation, Regulation Guidance & Best Practice	4
4. Introduction	4
5. Leadership, Roles & Responsibilities.....	6
6. Operations.....	6
7. Definition	7
8. Unacceptable Resident Behaviour.....	12
9. Quality	13
10. Risk management	13
11. Competence & Training	13
12. Awareness	13
13. Data Protection	14
14. Record Management.....	14
15. Monitoring	14
16. Breach of Policy	15
17. Continuous Service Improvement.....	15
18. Alternative Support Agencies.....	16

1. Purpose

- 1.1.** This policy sets out Oak Housing's approach to complaint handling and is designed to promote a positive complaint handling culture. It recognises the value of effective dispute resolution and uses complaints to identify service failures, put things right and improve services.
- 1.2.** We will follow this policy and the Housing Ombudsman's statutory Complaint Handling Code when dealing with complaints. Where individual circumstances require flexibility, we may use discretion where this is fair, reasonable and consistent with the Code. Any departure from our normal process will be explained to the resident and recorded. Complaints will be progressed through the complaints procedure as far as possible to maximise the opportunity to resolve the dispute.
- 1.3.** Factors such as risk, the complexity of the complaint and whether the resident is vulnerable will be considered as early as possible in the complaints procedure. We aim to resolve complaints promptly whenever possible and will provide the resident with an explanation, apology or resolution where appropriate.

2. Scope

- 2.1.** We have a well-defined complaints procedure, which is implemented throughout our organisation. Complaints handling is the responsibility of every member of staff and forms part of staff induction training as well as annual appraisals. We set targets for managing our complaints procedure and to all complaints, which are monitored monthly. In this way we can identify service failings and address them in real time.
- 2.2.** We will accept a complaint from anyone who is in receipt of a service from us or is affected by a service provided by Oak Housing. We will only accept a complaint from someone potentially receiving services from us if it relates to the way we have handled their request.
- 2.3.** We will accept a complaint from an advocate or representative acting on behalf of our resident who is authorised to make a complaint on their behalf. We will require written permission from them. The advocate or representative can also represent or be present at any meetings with us if this is required.
- 2.4.** Group complaints or petitions will be treated as one complaint and dealt with in line with the procedure set out in this policy. Residents will be required to nominate a lead person who will act as the main point of contact. All our correspondence will be with them. Residents included in a group complaint

or petition will be required to provide consent that they give permission to be represented in the handling of that complaint.

- 2.5.** This policy applies to all contractors and other parties providing services on our behalf and we expect them to work with us in an effective manner to resolve complaints. Third party contractors are responsible for the provision of information to support Oak Housing complaint investigations within our policy timescales. All communication associated with the complaint will come from Oak Housing.
- 2.6.** We operate a 2 stage complaints procedure, and residents can escalate their complaint to a senior manager at stage 2, if they are not satisfied with the response at stage 1. Beyond this if still not satisfied with the complaint handling residents can refer the matter to the Housing Ombudsman Service.
- 2.7.** We will accept a complaint unless there is a valid reason not to do so. If we decide not to accept a complaint, we will be able to evidence our reasoning. Each complaint will be considered on its own merits and we will not take a blanket approach to exclusions.
- 2.8.** This policy sets out below circumstances in which a matter may not be considered as a complaint or escalated. These exclusions will be applied fairly and reasonably and with regard to the individual circumstances of each case:
 - Legal proceedings relating to the same subject matter do not automatically prevent Oak from considering a complaint about its service, actions or omissions. Where legal proceedings have started, defined as the Claim Form and Particulars of Claim having been filed at court, we will consider on a case-by-case basis whether any part of the complaint should be excluded from the complaints procedure. Where appropriate, we will continue to consider aspects of Oak's service that can reasonably be addressed through the complaints procedure.
 - Services for which Oak Housing is not responsible, for example local authority decisions about housing benefit or nominations. These should be directed to the responsible local authority.
 - Anti-Social Behaviour (ASB) – Reports of ASB will not normally be managed through the complaints procedure and will instead be managed through our ASB procedure. We will only investigate a complaint about ASB if it relates to the way we handled the matter.
 - Complaints relating to the level of service charges or their reasonableness. These are generally matters for the First-tier Tribunal (FTT), although we will try to resolve concerns where we can. We will accept a complaint about our administration or processes relating to service charges, or the standard of a service being delivered. Information about the FTT is available at www.gov.uk/housing-tribunals.

- We will accept complaints made within 12 months of the issue occurring or the resident becoming aware of the issue. We will consider exercising discretion to accept a complaint outside this period where there are good reasons for the delay.
- A claim for damages, such as a personal injury or third-party liability claim, may need to be referred to our insurers. The existence of an insurance claim does not automatically prevent Oak from considering a complaint about its service, actions or omissions. We will consider on a case-by-case basis which matters are appropriate for the complaints procedure and which should be dealt with through the insurance process. Any insurance claim should be referred to info@oakhousing.org.

- 2.9.** Where we do not accept a complaint, we will provide the resident with a clear written explanation setting out the specific exclusion relied upon and why the matter is not suitable for our complaints procedure. The decision will be evidenced and recorded. We will tell the resident that they have the right to ask the Housing Ombudsman Service to consider our decision.
- 2.10.** When we advise a resident that we are not accepting a complaint, we will inform them of their right to refer that decision to the Housing Ombudsman Service and, where relevant, signpost any other appropriate external route.

3. Legislation, Regulation, Guidance and Best Practice

- 3.1.** This policy reflects the Housing Ombudsman's statutory Complaint Handling Code and the Regulator of Social Housing's consumer standards, including the Transparency, Influence and Accountability Standard. The revised Transparency, Influence and Accountability Standard takes effect on 1 October 2026.
- 3.2.** This policy incorporates the key elements of the following statutory and regulatory requirements.
- Housing Ombudsman Complaint Handling Code (statutory from 1 April 2024)
 - Transparency, Influence and Accountability Standard (Regulator of Social Housing)
 - General Data Protection Regulation 2018
 - Equality Act 2010

4. Introduction

- 4.1.** At Oak we welcome complaints and will take all resident complaints and feedback seriously. We view these as a vital part of our service offer and seek to address specific service failings as and when they occur. We believe that all resident interactions provide an opportunity to improve our services. It is therefore important that complaints are managed in a fair, impartial and

transparent way and responded to in a timely manner. Clear communication is central to this: from the outset, we will explain what residents can expect from us and what we expect from them. We provide a range of ways for residents to make complaints. Managing expectations is only one part of the process; delivering on our commitments is crucial to providing a high-quality resident experience.

- 4.2.** Our complaints policy is published on our website in a clear and accessible format. We publicise the two-stage complaints process, response timescales, the Housing Ombudsman Service and the statutory Complaint Handling Code through appropriate resident communications and channels.
- 4.3.** We aim to deliver excellent resident service in line with our corporate plan and our values, which put our residents at the centre of everything we do. If we fail to do this, we will:
 - Apologise
 - Acknowledge where things have gone wrong
 - Put things right when they are in our control
 - Provide an explanation and reasons
 - Re-consider or change a decision
 - Amend a record or add a correction or addendum
 - Change a policy, procedure or practice
 - Wherever possible, we will resolve an initial service request at the point of contact. If a resident expresses dissatisfaction with our response to, handling of, or outcome of that service request, we will give them the choice to make a complaint and will handle any complaint in accordance with this policy.
 - Ensure residents are kept informed, provide clear timescales and manage expectations effectively
 - Identify residents who are vulnerable and take account of any specific requirements when handling their complaint
 - Safeguard the rights of residents to confidentiality, having a duty of care towards their information and comply with the General Data Protection Regulations
- 4.4.** In certain circumstances we may consider paying compensation as part of the complaint resolution. This will be calculated on a case-by-case basis to ensure that each complaint is considered on its merits and that any impact caused to our resident is assessed appropriately.
- 4.5.** Any remedy offered will reflect the impact on the resident because of any fault or service failure identified. Any offer of financial redress will be based on our Compensation & Remedies Policy supported by the Housing Ombudsman best practice remedy guidance.
- 4.6.** Complaints can be resolved in several ways. Oak records complaint decisions using the following outcome categories:

- **Not Upheld** – This means following our investigation of your complaint we do not consider there has been any service failure identified
- **Partially Upheld** – This means following our investigation of your complaint we have identified some failings in our service offer but not all
- **Upheld** – This means following our investigation of your complaint we consider that there are failings by us in the delivery of our service offer

5. Leadership, Roles and Responsibilities.

- 5.1.** The Chief Operating Officer is responsible for supporting the delivery of this policy through Oak's people and systems.
- 5.2.** The Board has delegated responsibility to the Chief Executive Officer for overall performance of complaint handling.
- 5.3.** The Oak Housing Board will appoint a member of the governing body as the Member Responsible for Complaints (MRC). The MRC has lead responsibility for complaints and supports a positive complaint handling culture. The MRC will have access to suitable information and staff and will ensure the governing body receives regular information on complaint volumes, categories, outcomes, performance, themes and trends, Housing Ombudsman investigation outcomes and progress with relevant orders, and the annual complaints performance and service improvement report.
- 5.4.** Responsibility for day-to-day operational management lies with the Chief Operating Officer, supported by the Complaints Officer. The Complaints Officer is responsible for complaint handling oversight, liaison with the Housing Ombudsman and ensuring complaints information is reported to the Board. The Complaints Officer will have appropriate access, authority and autonomy to facilitate prompt and fair resolution.
- 5.5.** The allocated lead investigator is responsible for ensuring the complaint is robustly investigated and responded to within timescales.

6. Operation

- 6.1.** We have a clear distinction between a request for a service (service request) and a complaint about a service.
- 6.2.** 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 they will be recorded, monitored and reviewed regularly. Examples include an initial request for a repair or an initial report of anti-social behaviour.

Whenever a resident expresses dissatisfaction, Oak will give them the choice to make a complaint. Where a resident expresses dissatisfaction with the response to, handling of, or outcome of a service request, Oak will raise a complaint even if the related service request remains ongoing. Raising a complaint will not delay or stop Oak's efforts to resolve the service request.

- 6.3.** As a service request is not a complaint, Oak will not issue a complaint response when a service request is resolved. Service requests will nevertheless be recorded, monitored and reviewed regularly.

An expression of dissatisfaction with services made through a survey is not defined as a complaint. Wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to. Where Oak asks for wider feedback about its services, it will also provide details of how residents can complain.

7. Definition

- 7.1.** A complaint is defined as "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."
- 7.2.** A resident does not have to use the word "complaint" for it to be treated as such. Whenever a resident expresses dissatisfaction, Oak will give them the choice to make a complaint. A complaint submitted through a third party or representative will be handled in line with this policy.
- 7.3.** This Policy covers instances where residents:
- Are dissatisfied with any aspect of our service provision.
 - Are dissatisfied with the standard of services provided by our staff or someone acting on our behalf – this includes professionalism or conduct.
 - We have failed to follow our policy and procedures.

7.4. Complaints Procedure

- 7.4.1.** A complaint can be made by the following methods:

- Post: Oak Housing Limited, Here East, Queen Elizabeth Olympic Park, Plexal, London E15 2GW
- Email: complaints@oakhousing.org
- Telephone: 020 8988 4781
- In person during inspections or home visits
- Visiting our office at Plexal, Here East, Queen Elizabeth Olympic Park, London E15 2GW
- To any member of staff and through any of the channels above.
- Through a third party, e.g. an advocate, staff member, support worker, MP or Councillor
- Support or assistance in making a complaint can be provided on request.
- This complaints policy and information about how to complain will be made available in a clear and accessible format for all residents, with reasonable adjustments, translation or advocacy support provided where required.

- Note: we have access to translation and advocacy service to assist those whose first language is not English to complain and feedback to us

7.4.2. A resident can contact the Housing Ombudsman Service at any point during the complaints procedure for advice. The Housing Ombudsman Service will not usually investigate the complaint until it has exhausted our internal complaints procedure. Details of the Housing Ombudsman Service can be found on our website and on page 11 of this policy document.

7.5. Complaint Handling

7.5.1. When we receive a complaint, our Complaints Officer will:

- Record, define and log the complaint and acknowledge it within five working days of receipt.
- Set out Oak's understanding of the complaint (the complaint definition), the outcomes the resident is seeking, and the aspects of the complaint for which Oak is and is not responsible. If any aspect is unclear, Oak will ask the resident for clarification.
- Confirm the lead officer assigned to investigate your complaint.
- Identify any vulnerabilities, disabilities or needs relevant to resolving the complaint; agree and record any necessary reasonable adjustments in accordance with the Equality Act 2010; record any disability disclosed by the resident where appropriate; and keep agreed reasonable adjustments under active review throughout the complaint.
- Give the resident a fair chance to set out their position
- Take measures to address any actual or perceived conflict of interest and consider all relevant information and evidence carefully.
- Ensure the complaint handler provides a clear point of contact for the resident and has the knowledge, authority and access to staff needed to resolve the complaint promptly and fairly.
- Maintain clear record keeping and accurately log the complaint capturing all relevant information, ensuring all decisions made including compensation offers are noted
- Where appropriate, issue compensation fairly and promptly and in line with our Compensation & Remedies Policy
- Issue the complaint response when the answer to the complaint is known. Any outstanding actions will be recorded and tracked through to completion, with appropriate progress updates provided to the resident. Oak will confirm with the resident when the outstanding actions have been completed.
- Record all lessons learnt so we can continually improve our services

7.6. Complaints Procedure

7.6.1. Stage 1

Oak will acknowledge, define and log the complaint at Stage 1 within five working days of receipt. The written acknowledgement will set out Oak's understanding of the complaint (the complaint definition), the outcomes the resident is seeking, and the

aspects of the complaint for which Oak is and is not responsible. If anything is unclear then Oak will seek to clarify what is unclear and then confirm what we will investigate.

Where a resident raises additional complaints during the Stage 1 investigation, Oak will incorporate them into the Stage 1 response where they are related and the Stage 1 response has not yet been issued. Unrelated new issues, issues raised after the Stage 1 response has been issued, or issues that would unreasonably delay the Stage 1 response will be logged as a new complaint.

Oak will issue its full Stage 1 response within ten working days of acknowledging the complaint. Where the complexity of the complaint means an extension is needed, Oak will inform the resident of the expected response date and clearly explain the reason. Any extension will be no more than a further ten working days without good reason.

When Oak extends a Stage 1 timescale, it will provide the resident with the Housing Ombudsman Service's contact details and agree suitable intervals for keeping the resident informed. If, exceptionally, the response will fall outside the extended timescale set out in the Complaint Handling Code, Oak will agree with the resident suitable intervals for updates until the response is issued.

The Stage 1 response will be issued when the answer to the complaint is known and will not be delayed until all outstanding actions have been completed. Any outstanding actions will be tracked and completed promptly, and the resident will receive appropriate progress updates. The written response will address all points in the complaint definition and give clear reasons for decisions, referencing relevant policy, law and good practice where appropriate.

The Stage 1 response will clearly confirm in plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for decisions; details of any remedy offered to put things right; details of any outstanding actions; and how to escalate the matter to stage 2 if the resident is not satisfied.

This may include acknowledging where things have gone wrong, providing an explanation, apologising, taking action to correct the issue, offering compensation, and using the feedback to inform improvements or changes to our services.

As part of our investigation and where necessary we may need to visit you or send our Housing Officer, Repairs Operative or Contractors to your home. We will let you know if this is the case and arrange a mutually agreeable time to attend.

Outstanding actions arising from a stage 1 response will be tracked on Arthur through to completion and residents will receive appropriate updates. The complaint response itself will not be delayed while those actions are completed.

As guidance, residents should request escalation within 28 calendar days of the Stage 1 response wherever possible. This is not a cut-off for escalation. Requests received after 28 calendar days will be considered individually, taking account of the resident's circumstances and the reasons for any delay.

7.6.2. Stage 2 - Final Response

We will escalate a complaint to stage 2 once stage 1 has been completed where all or part of the complaint remains unresolved to the resident's satisfaction and the resident requests escalation. Stage 2 is our final response.

Residents who remain unhappy with all or part of the stage 1 response should let us know and we will escalate the complaint to stage 2. We will not refuse escalation unless there is a valid reason that complies with the exclusions set out in this policy and the Housing Ombudsman's Complaint Handling Code. We will not refuse escalation solely because the outcome sought is outside our power to provide. If we decline an escalation request, we will explain our reasons in writing and advise the resident of their right to ask the Housing Ombudsman Service to consider that decision.

Oak will acknowledge, define and log the Stage 2 escalation within five working days of receiving the escalation request. The written acknowledgement will set out Oak's understanding of the complaint (the complaint definition), the outcomes the resident is seeking, and the aspects of the complaint for which Oak is and is not responsible. If anything is unclear, Oak will ask the resident for clarification. Residents will not be required to explain their reasons for requesting Stage 2, although Oak will make reasonable efforts to understand why the resident remains dissatisfied as part of its Stage 2 response.

An officer who did not consider the complaint at stage 1 will consider the complaint at stage 2, supported by the Complaints Officer. The review will consider the complaint definition and all relevant information and evidence. New unrelated issues may be logged as a new complaint so that they can be investigated properly without delaying the stage 2 response.

The Stage 2 officer will make contact within three working days from the date of being assigned the stage 2 review. The Stage 2 officer will be responsible for:

- Understanding the issues and the outcome being sought.
- Reviewing the stage 1 investigation and actions to assess whether we have met our responsibilities.
- Identifying any additional actions that may be required to ensure that the complaint can be resolved.

Oak will issue its final Stage 2 response within 20 working days of acknowledging the escalation request. Where the complexity of the complaint means an extension is needed, Oak will inform the resident of the expected response date and clearly explain the reason. Any extension will be no more than a further 20 working days without good reason.

When Oak extends a Stage 2 timescale, it will provide the resident with the Housing Ombudsman Service's contact details and agree suitable intervals for keeping the resident informed. If, exceptionally, the response will fall outside the extended timescale set out in the Complaint Handling Code, Oak will agree with the resident suitable intervals for updates until the final response is issued.

The Stage 2 response will be issued when the answer to the complaint is known and will not be delayed until all outstanding actions have been completed. Any outstanding actions will be tracked and completed promptly, and the resident will receive appropriate progress updates. The final response will address all points in the complaint definition and give clear reasons for decisions, referencing relevant policy, law and good practice where appropriate.

The stage 2 response will clearly confirm in plain language: the complaint stage; the complaint definition; the decision on the complaint; the reasons for decisions; details of any remedy offered to put things right; details of any outstanding actions; and how to refer the matter to the Housing Ombudsman Service if the resident remains dissatisfied.

Stage 2 is Oak Housing's final complaint response and will involve all suitable staff members needed to issue that response.

Where the decision is that no further action is required, and that all reasonable and appropriate measures have been taken, the resident will be informed that they have reached the end of the complaints procedure and advised of the next available steps.

Our stage 2 response will confirm that the resident has reached the end of our internal complaints procedure and explain how to refer the matter to the Housing Ombudsman Service if they remain dissatisfied.

7.7. Next Steps

We are committed to resolving complaints locally, but residents can contact the Housing Ombudsman Service at any time during our complaints process for advice about complaint handling. If a resident remains dissatisfied after our stage 2 final response, they can refer the complaint to the Housing Ombudsman Service for consideration.

The Housing Ombudsman Service will usually require Oak Housing's stage 2 final response before investigating the complaint. Residents should normally refer their complaint to the Ombudsman within 12 months of the stage 2 response.

7.7.1. The Housing Ombudsman Service

The Housing Ombudsman Service
PO Box 1484
Unit D
Preston PR2 0ET
Telephone: 0300 111 3000

The Housing Ombudsman Service does not accept new complaint enquiries by email. Residents should use the online complaint form, telephone service or post.

Contact information:

<https://www.housing-ombudsman.org.uk/contact-us/>

Online complaint form: <https://www.housing-ombudsman.org.uk/online-complaint-form/>

7.7.2. Members of Parliament (MP) & Councillors

You can also contact your local MP or Councillor for support.

Should we receive communication from an MP or Councillor on a resident's behalf, we will respond within 10 working days. Depending on the nature of the enquiry, our response may sit outside the complaints procedure. If it relates to a specific complaint, it will be dealt with in line with this policy.

Contact details for Ward Councillors can be obtained from the Local Authority, or online at www.gov.uk. Contact details for a Member of Parliament can be found online at www.parliament.uk or by writing to: House of Commons, London SW1A 0AA.

8. Unacceptable Resident Behaviour

We will not discriminate against anyone who makes a complaint, and they will not be treated any differently. We recognise that some residents who are unhappy about an issue may show signs of distress or frustration when reporting a complaint and that such behaviour may be out of character. However, if such behaviour becomes aggressive, abusive, or unreasonable towards our staff we will seek to manage this in line with our Unacceptable Resident Behaviour Policy, whilst dealing with the complaint like any other.

Where a resident or their representative displays aggressive, abusive or unreasonable behaviour, Oak may place proportionate restrictions on the way contact is managed in accordance with its Unacceptable Resident Behaviour Policy. Oak will evidence the reasons for any restriction, take account of the resident's individual circumstances and any reasonable adjustments, and keep restrictions under regular review. Any contact restriction will not prevent the complaint from being considered and answered through the complaints process.

- Treating staff in an aggressive or threatening manner
- Making unreasonable demands (including making serial complaints)
- Making unreasonable levels of contact disproportionate to the issue

Where a decision is made to limit resident contact, the decision will be made and communicated by the Chief Operating Officer. We will ensure that any restrictions placed on residents are proportionate and demonstrate regard for the provisions of the Equality Act.

9. Equality

In line with the Equality Act 2010, Oak will anticipate and consider the needs of residents who may require reasonable adjustments to access the complaints process. Oak will record any disabilities disclosed and any reasonable adjustments agreed and will keep those adjustments under active review.

We will assist all residents that require help when making a complaint, including using our interpreting service. If a resident is unable to make a complaint themselves or would like the support of others, we are happy to receive complaints from a third party on their behalf. Examples include a friend or family member, a carer or support worker, an advocate, an MP or Councillors, a representative from the Citizens' Advice Bureau or other organisation e.g., a residents' association or community group.

10. Risk Management

The handling of complaints is subject to the Regulator of Social Housing's Transparency, Influence and Accountability Standard and the Housing Ombudsman's statutory Complaint Handling Code.

Oak will review this policy against the Housing Ombudsman's Complaint Handling Code and complete the Complaint Handling Code self-assessment at least annually. This annual compliance review is separate from the formal policy review cycle, with the next full policy review scheduled for September 2028. We will also review the policy and self-assessment following any significant restructure, merger, change in procedures or other material change affecting complaint handling.

If exceptional circumstances prevent us from complying with the Complaint Handling Code, we will inform the Housing Ombudsman, provide information to affected residents, publish the position on our website, and set out the timescale for returning to compliance. We will also communicate with the Regulator of Social Housing where a matter represents material non-compliance or potential non-compliance with the consumer standards.

11. Competence and Training

All staff responsible for complaint handling will be suitably trained and have the knowledge, professionalism, authority and support needed to manage complaints and facilitate early resolution. Complaint acknowledgement templates, Stage 1 and Stage 2 response templates, staff guidance and training materials will reflect the requirements of this policy and the Housing Ombudsman's Complaint Handling Code.

Relevant staff and third parties will have a standard objective for complaint handling that promotes a collaborative and co-operative approach, collective responsibility for identified shortfalls, and professional standards when engaging with complaints. Appropriate Housing Ombudsman learning and sector good-practice training will be used to support competence.

12. Awareness

Following approval through Oak Housing's governance arrangements, this policy will be published on Oak's website in a clear and accessible format and communicated to residents, staff and relevant third parties. Oak will publicise how to complain, the two-stage process, response timescales, the Housing Ombudsman Service and the Complaint Handling Code.

13. Data Protection

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, personal data and special category data will be handled lawfully, fairly and securely in accordance with our data protection policies.

Staff will only involve other agencies or share information where there is an appropriate lawful basis, including where the resident has given consent or where disclosure is otherwise permitted or required by law.

- Oak Housing is required to do so by law
- The information is necessary for the protection of children
- Any other lawful basis as dictated by the Data Protection Act 2018

14. Record Management

A full record will be kept of each complaint and the outcome at each stage. This will include the original complaint and date received, the complaint definition, all correspondence with the resident and other parties, relevant supporting documents such as reports or surveys, decisions and reasons, remedies and compensation, outstanding actions, and any reasonable adjustments or disabilities disclosed and relevant to complaint handling.

All documents will be kept in accordance with our information retention procedure and in accordance with the relevant regulations.

15. Monitoring

- 15.1.** We monitor the number of complaints and the service areas to which they relate. We also monitor resident satisfaction annually as part of our wider tenant satisfaction surveys.
- 15.2.** All complaints are recorded and used to improve the way we deliver services. We will identify learning opportunities by reviewing complaints individually and by regularly reviewing the wider picture to understand which aspects of our services are complained about most frequently.
- 15.3.** Oak Housing's complaint handling performance will be monitored against the requirements of this policy and the Housing Ombudsman's Complaint Handling Code. Monitoring will include acknowledgement and response times, extensions, escalations, outcomes, remedies, outstanding actions,

reasonable adjustments, refused complaints, complaint themes and trends, and Housing Ombudsman findings.

15.4. Quarterly reports are submitted to the Board to evidence compliance with the Complaints Policy and relevant legislation and regulation.

15.5. An annual complaints performance and service improvement report will be produced for scrutiny and challenge by the Board and published on the complaints section of our website. The Board's response will be published alongside it. The report will include:

1. Housing Ombudsman Complaint Handling Code Self-assessment
2. A qualitative and quantitative analysis of complaint handling performance, including volumes and trends and a summary of the types of complaints we have refused to accept
3. Any finding of non-compliance with the Complaint Handling Code
4. The service improvements made as a result of learning from complaints
5. Any annual report about our performance published by the Housing Ombudsman, together with any other relevant Ombudsman reports or publications relating to Oak Housing
6. The Board's response to the annual complaints performance and service improvement report

The relevant KPIs are:

1. Acknowledgement on time
2. Complaint responses on time
3. Housing Ombudsman findings and outcomes
4. Satisfaction with complaint handling

16. Breach of policy

Any operational departure from this policy must be authorised by the Chief Operating Officer or equivalent, recorded and justified. No departure may override a mandatory requirement of the Housing Ombudsman's statutory Complaint Handling Code unless exceptional circumstances apply and the Code's requirements for reporting non-compliance are followed.

17. Continuous Service Improvement

17.1. Oak Housing will look beyond the circumstances of individual complaints and consider whether service improvements can be made from the learning identified. We will analyse themes and trends, use complaints as a source of intelligence to identify systemic issues and risks, and use learning to improve service design and delivery.

focuses on increasing both the effectiveness and efficiency of the organisation to fulfil its obligations and objectives.

- 17.2.** We will report wider learning and improvements from complaints to relevant stakeholders, including residents, staff and committees. Senior management will review complaint themes and trends, and the MRC and Board will receive regular information on complaint volumes, categories, outcomes, performance, trends, Ombudsman investigation outcomes and progress with relevant orders, as well as the annual complaints performance and service improvement report.

18. Alternative Support agencies

- Citizens Advice www.citizensadvice.org.uk or by phone 0800 144 8848
- Shelter www.shelter.org.uk or by phone 0808 800 4444
- Mind www.mind.org.uk or by phone 0300 102 1234