



## **Complaints Policy**

**Approval date – March 2016**  
**Review date – March 2019**

## This policy applies to

- |                                                |                                                  |                                                   |                                                   |
|------------------------------------------------|--------------------------------------------------|---------------------------------------------------|---------------------------------------------------|
| <input checked="" type="checkbox"/> Link Group | <input checked="" type="checkbox"/> Link Housing | <input type="checkbox"/> Link Living              | <input checked="" type="checkbox"/> Link Property |
| <input checked="" type="checkbox"/> Horizon    | <input checked="" type="checkbox"/> Larkfield    | <input checked="" type="checkbox"/> West Highland | <input checked="" type="checkbox"/> Lintel Trust  |

## Policy Summary

This policy sets out how we handle complaints and positive customer feedback.

## Equalities

This policy fully complies with Link's Equality and Diversity Policy.

## Privacy

This policy fully complies with Link's Data Protection Policy, the Data Protection Act 1998 Act and good practice.

## Policy Owner

Director of Human Resources and Business Support

## Approved by

Link Group Board

## 1. INTRODUCTION

This policy has been devised to show how Link responds to complaints and other customer feedback.

## 2. PRINCIPLES

The following principles govern the operation of this policy:

- Customer feedback about the service we provide is welcomed, noted, acknowledged and reviewed
- Feedback received about policies, service quality and procedures is taken into account at the next relevant review
- Front line employees are encouraged to offer and implement immediate responses to complaints where appropriate and meeting the reasonable expectations of the customer

## 3. OBJECTIVES

The objectives of this policy are to ensure that:

- Wherever practical, complaints are resolved informally by front line employees
- People providing feedback know that their comments will be used to evaluate the quality of our services and to influence reviews
- Where complaints are referred to external agencies we are able to provide records of each case to assist further investigation
- We produce clear and accurate final decisions on complaints
- People making complaints are advised clearly about the process and their opportunities to escalate the case to independent authorities

## 4. APPROACH AND METHOD

The Link Group Board in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of the Link group of companies. All relevant employees have a responsibility to ensure that this policy is applied as instructed.

The policy will be implemented using the following approaches:

- We shall devise systems and procedures for compliance with the policy

- We shall record positive feedback, constructive criticism and complaints impartially
- We shall review procedures at least every three years and implement measures to improve efficiency and customer satisfaction
- Complaints will be processed in accordance with the Model Complaints Handling Procedure issued by the Scottish Public Services Ombudsman [SPSO] and adopted as the Link Group Complaints Handling Procedure [CHP]
- We shall provide training, information and support to staff to build confidence and skill in implementing the CHP

## 5. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

The following areas will be subject to monitoring:

- Provision of training and/ or information to staff
- The need for review of procedures
- Feedback will be analysed for trends in the nature and frequency of subjects mentioned
- Number of complaints, numbers resolved at each stage, numbers referred to the Ombudsman or other external agencies, and any unresolved at the time of reporting
- Assessment of the extent to which complaints are resolved at each stage to the satisfaction of the complainer

SPSO has powers to monitor the operation of the CHP. Specific questions in annual returns made to the Scottish Housing Regulator will provide data for the SPSO.

Internally, operation of the CHP and compliance with this policy will be monitored by appropriate Managers within each company and/ or function, and reported to the relevant Director. If any significant issues of concern arise these will be dealt with by the Director who will report such matters to his/ her Board and/ or the Link Group Board.

Any matter which demonstrates a serious failure of internal controls should also be reported immediately to the Chief Executive.

Actions may be taken against employees or Board members who act in contravention of this policy in the performance of their duties or decision making on behalf of Link. Actions could be measures to improve the individual's work performance, or disciplinary action, or other measures. Contravention of this policy should be understood to include contravention or disregard of any associated procedures and other guidance.

Audits of policy compliance may be conducted by the Internal Auditor and/ or the Strategy and Business Support Team. Audit results will be reported to the Audit Committee.

## **6. COMPLAINTS AND APPEALS**

In accordance with the CHP, if after making a complaint to Link a complainer remains dissatisfied he/ she may be able to refer the matter to the Scottish Public Services Ombudsman. Link will advise complainers on the conclusion of a Stage 2 investigation that it is their right. Link will also advise the complainer if a service other than the Ombudsman would be more appropriate to consider the case.

## **7. REPEATED COMPLAINTS AND COMPLAINTS MADE IN AN UNACCEPTABLE MANNER**

A small minority of complaints may not be accepted. This will be the case when the same complaint has been addressed and we have given a final decision at the end of stage 2 of the CHP. We may also decline to consider complaints in which no clearly identifiable issue can be determined, or where the complaint continually raises new issues following completion of our investigations, or where the complainant's expectations are disproportionate to the issue raised.

## **8. POLICY AVAILABILITY**

This policy is available on request free of charge from Link Group. A summary of this policy can be made available in a number of other languages and other formats on request.

## **9. POLICY REVIEW**

Link Group undertakes to review this policy regularly, at least every three years, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

The review will be coordinated by Link Group's Strategy & Business Support Team.