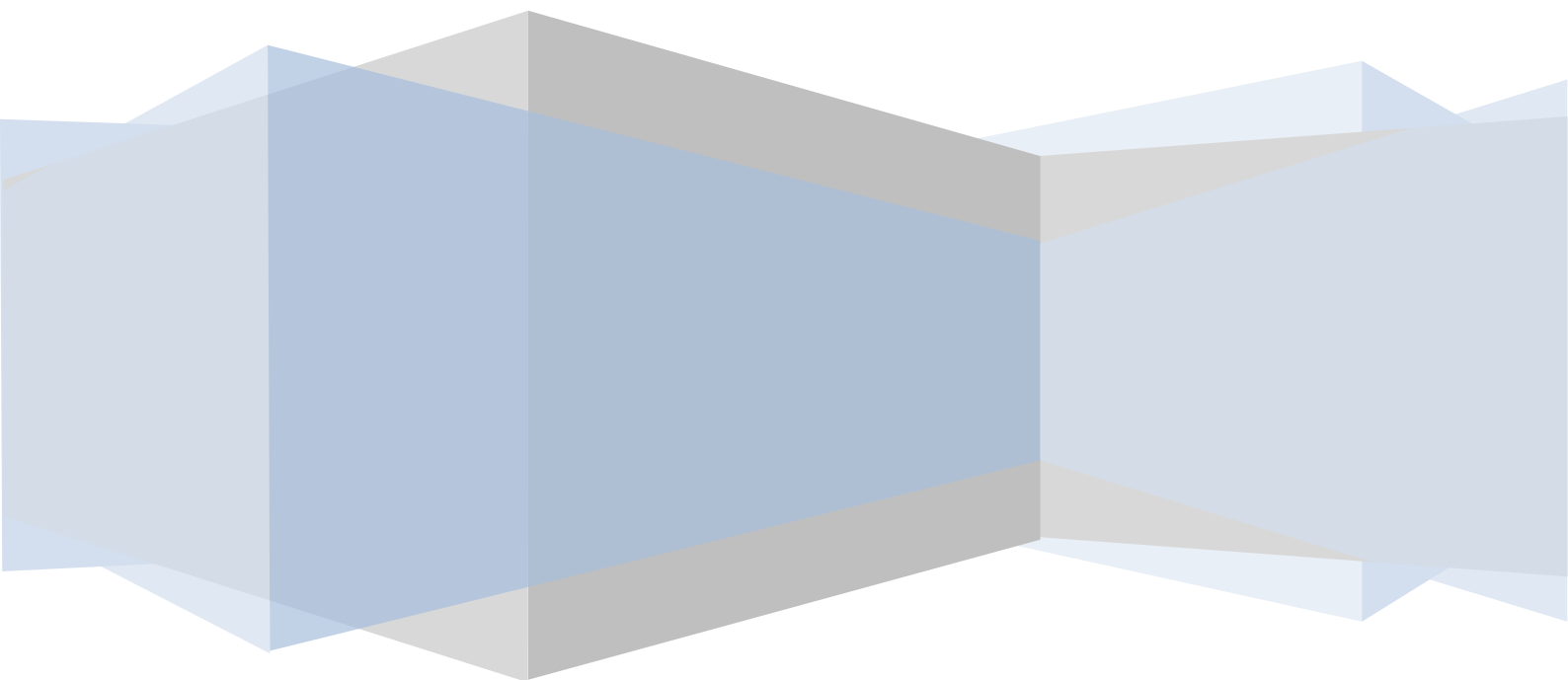




COMPLAINTS POLICY

December 2025



All Policies are available on tape, in braille, and in translation into most languages. Please ask a member of staff if you would like this policy in a different format

Date of Policy Review: December 2025
 Date of Committee Approval: 16 December 2025
 Date of Next Review: December 2028

SCOTTISH HOUSING REGULATOR STANDARDS	<p>STANDARD 1: The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.</p> <p>STANDARD 2: The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users, and stakeholders. And its primary focus is the sustainable achievement of these priorities.</p> <p>STANDARD 4: The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisations purpose.</p> <p>STANDARD 5: The RSL conducts its affairs with honesty and integrity.</p> <p>STANDARD 6: The governing body and senior officers have the skills and knowledge they need to be effective.</p>
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1 Policy Statement

- 1.1 We aim to deliver high quality, responsive services to all our customers, but there may be times when we do not provide the level or quality of service that we have promised or that customers can reasonably expect.
- 1.2 We aim to deal fairly and effectively with anyone complaining about any of our decisions or activities, in line with the Scottish Public Service Ombudsman's (SPSO) Model Complaints Handling Procedure (MCHP) for registered social landlords.
- 1.3 Our **Complaints Handling Procedure** gives clear details of who can raise a complaint, what steps will be taken to resolve issues and what we will do to ensure we use complaints information to improve services for the longer term.

2 Scope of the Policy

- 2.1 Cathcart & District Housing Association's (CDHA's) definition of a complaint is *"an expression of dissatisfaction by one or more members of the public about CDHA's action or lack of action, or about the standard of service provided by or on behalf of CDHA"*.
- 2.2 Our Complaints Handling Procedure (CHP) provides examples of what a complaint may relate to and explains what a complaint is not.
- 2.3 Our complaints procedure has two stages. We expect the majority of complaints will be handled at stage 1. If the customer remains dissatisfied after stage 1, they can request that we look at it again, at stage 2. If the complaint is complex enough to require an investigation, we will put the complaint into stage 2 straight away and skip stage 1.
- 2.4 If the customer remains dissatisfied with our final decision, they can ask the SPSO to consider it. There are some complaints that have an alternative route for independent review such as factoring complaints and data protection complaints.
- 2.5 Complaints about neighbours are dealt with under our separate Neighbour Relations Policy. However, if the complaint is about the way in which the dispute or neighbour complaint has been handled, then it is appropriate to complain under this Complaints Policy. Please note that target timescales and template letters for anti-social behaviour complaints will differ from those outlined in this policy.

3 The Complaints Handling Procedure

3.1 The Complaints Handling Procedure explains to staff how to handle complaints. The CHP consists of:

- Overview and structure ([part 1](#))
- When to use the procedure ([part 2](#)) – guidance on identifying what is and what is not a complaint, handling complex or unusual complaint circumstances, the interaction of complaints and other processes, and what to do if the CHP does not apply
- The complaints handling process ([part 3](#)) – guidance on handling a complaint through stages 1 and 2, and dealing with post-closure contact
- Governance of the procedure ([part 4](#)) – staff roles and responsibilities and guidance on recording, reporting, publicising and learning from complaints
- The customer-facing CHP ([part 5](#)) – information for customers on how we handle complaints.

3.2 When using the CHP, please also refer to the [SPSO Statement of Complaint Handling Principles](#).

4 Child Friendly Complaints Handling Procedure

4.1 The [Child Friendly Complaints Handling Procedure](#) is intended to ensure that all complaints are handled in a manner that respects and promotes children's rights under the United Nations Convention on the Rights of the Child (the UNCRC). It is underpinned by the [Child Friendly Complaints Handling Principles](#).

4.2 For the purposes of this procedure, a child is defined as “anyone under 18”. The word child is used in the procedure to mirror the language of the UNCRC and is intended to refer to any child or young person under the age of 18.

4.3 The process should be used whenever a child is involved in a complaint. This is when:

- A child raises a complaint directly.
- An adult raises a complaint at the request of a child.
- An adult raises a complaint about all matters which affect a child.

5 Principles

- 5.1 We aim to provide high quality, responsive services. Complaints are only one way of receiving feedback on our services. We conduct regular customer satisfaction surveys, encourage customer engagement in improving our services, and actively seek customer feedback on our performance in key areas.
- 5.2 However, there will be occasions when a customer is not happy with the level or quality of service. We recognise that complaints provide an opportunity for us to improve our services and actively promote this to employees and customers.
- 5.3 All employees are aware that customers have the right to complain. Any employee who receives and deals with a complaint should do so in a positive manner, whatever their initial view about the validity of the complaint.

6 Who Can Make a Complaint?

- 6.1 Anyone who receives, requests or is affected by our services can make a complaint. This includes our tenants and also includes a member of the public who could have access to or be affected by our services, including our anti-social behaviour services. We also accept complaints from the representative of a person who is dissatisfied with our service.
- 6.2 Complaints may be made verbally or in writing, including face-to-face, by phone, letter or email.
- 6.3 Customers will also have the opportunity to offer suggestions, where they do not wish to make a formal complaint.
- 6.4 We recognise that some of our customers may need help or support to make a complaint and will offer guidance and assistance.
- 6.5 All complaints should be treated sympathetically and in confidence.

7 Complaints About Employees

- 7.1 All complaints about employees are processed through the Complaints Policy in the first instance. Where necessary, each party involved may be contacted to find out more information about the issue and to agree on a resolution.

8 Unacceptable Behaviour

- 8.1 We recognise that people may act out of character in times of trouble or distress. Sometimes a health condition or a disability can affect how a person expresses themselves. The circumstances leading to a complaint may also result in the customer acting in an unacceptable way.

- 8.2 Customers who have a history of challenging or inappropriate actions, or have difficulty expressing themselves, may still have a legitimate grievance, and we will treat all complaints seriously. However, we also recognise that the actions of some customers may result in unreasonable demands on time and resources or unacceptable behaviour towards our staff.
- 8.3 We will, therefore, apply our Unacceptable Actions Policy to protect staff from unacceptable actions such as unreasonable persistence, threats or offensive behaviour from customers. Where we decide to restrict access to a customer under the terms of our policy, we have a procedure in place to communicate that decision, notify the customer of their right of appeal, and review any decision to restrict contact with us.

9 Independent Advice

- 9.1 We will always try to resolve problems directly with those who are dissatisfied. However, complainants may feel it is important to get independent advice before deciding to make a complaint. Advice is available from the Citizens Advice Bureau, Law Centres, Solicitors and Tenants' organisations.

10 Data Protection and Confidentiality

- 10.1 All staff should abide by the Association's Data Protection Policy.
- 10.2 All third party requests for personal data about a data subject (for example, a tenant or housing applicant) should be made in writing. Examples of third party requests are those from MPs, Councillors and Solicitors.
- 10.3 Requests should be accompanied by confirmation from the complainant that they consent to the Association disclosing data to a third party.

11 Monitoring, Reporting and Learning

- 11.1 Complaints give us valuable information we can use to improve customer satisfaction. Our complaints handling procedure enables us to address a customer's dissatisfaction and will help to prevent the same problems that led to the complaint from happening again.
- 11.2 For our staff, complaints provide a first-hand account of the service user's views and experience and can highlight problems we may otherwise miss.
- 11.3 Handled well, complaints can give our customers a form of redress when things go wrong, and can also help us continuously improve our services. The detail of complaints is analysed for trend information to ensure we identify any service failures and take appropriate action as soon as possible.

We report on complaints performance as follows:

- Committee meetings – Quarterly performance and analysis
- Published in our newsletters and on our website what actions we are taking as a direct result of our complaints

11.4 In addition, we also report our performance in handling complaints to the Scottish Housing Regulator through the Annual Return on the Charter (ARC). This includes performance information showing the volume of complaints and key performance details, for example, the time taken to resolve complaints at each stage in the procedure. This information is publicly available via the SHR's website.

12 Regulatory and Legislative Requirements

12.1 We adopt and regularly review best practice in the effective management of complaints and ensure our complaints handling procedure complies with legislative requirements.

12.2 We recognise our duty to comply with the Scottish Public Services Ombudsman (SPSO) model complaint handling procedures as outlined in the SPSO Act 2002.

12.3 This policy and attached procedures also complies with the Scottish Social Housing Charter outcomes and the Scottish Housing Regulator's Regulatory requirements.

13 Equality Issues

13.1 In accordance with our commitment to equality and diversity, we shall:

- Ensure information about our complaints handling procedure is easily and widely available. This will include using our various publications to make tenants and customers aware of their right to complain. Leaflets and other relevant information will be displayed and freely available in our office reception area and on our website.
- Treat all complainants fairly, respectfully, and as individuals and, as far as practicably possible, accommodate any specific needs they may have.
- Support and assist any customer who wishes to make a complaint. This will include, for example:
 - Explaining our procedure and its application
 - Providing on request, our procedure in formats or languages other than written English
 - Providing other practical assistance, such as help with scribing.

14 Policy Review

- 14.1 We will review this policy every three years. More regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance issued by the SPSO in particular.

Cathcart & District Housing Association
Appendix 1: Equality Impact Assessment

Name of policy to be assessed	Complaints Policy	Is this a new policy or a review?	Review
Person completing the assessment	Grahame Cairns	Date of Assessment	17.11.25

1. Briefly describe the aims, objectives, and purpose of the policy	<p>As a public body, we are required to follow the guidance and procedures set out by the Scottish Public Services Ombudsman (SPSO).</p> <p>The aim of the policy is to ensure that we deal fairly and effectively with anyone complaining about any of our decisions or activities, in line with the SPSO's MCHP for registered social landlords.</p>
2. Who is intended to benefit from the policy? (e.g. staff, applicants, tenants, staff, contractors)	Anyone seeking to engage with the Association will have an interest in the policy. Interested groups would include housing applicants, all tenants, tenant groups, councillors, local employers, community councils, support and advocacy groups for the disabled and elderly.
3. What outcomes are wanted from this policy? (e.g., benefits to customers)	Complaints are a valuable feedback tool which give us an opportunity to improve where customers identify issues with our standards of service. Complaints can be received from a wide range of customers and stakeholders and therefore potentially impact all areas of our work. To ensure that customers have their concerns considered and if necessary, rectified with due redress if appropriate.

<p>4. Which protected characteristics could be affected by the policy (tick all that apply)</p> <p> Minority Ethnic: X Age: </p> <p> Gender: Religion/belief: </p> <p> Disability: X Transgender: </p> <p> Sexual Orientation: Maternity/Pregnancy </p> <p> Marriage/civil partnership: Socio-economic status: </p>		
<p>5. If the policy is not relevant to any of the protected characteristics listed in part 4. State why and end the process here.</p> <p>This policy is equally applicable to all and has no detrimental impact on protected characteristic groups as specified within the Equality Act 2010.</p>		
<p>6. Describe the likely positive or negative impacts the policy could have on the groups identified in part 4.</p>	<p>Positive Impacts</p>	<p>Negative Impacts</p>
	<p>The revised CHP includes a focus on supporting vulnerable customers regardless of their reasons for requiring additional support.</p> <p>The CHP includes signposting to resources for such customers. Customers can make a complaint in whichever way suits them best – we accept complaints in a variety of formats including online, phone, and in person.</p>	<p>Minority Ethnic – In some instances, English may not be the first language of the complainant. We would need to ensure that adequate support is available such as providing translation services to assist the complainant through the process.</p> <p>Disability including mental health – Some people may find it difficult to understand the procedures or to navigate their way through the process. Support may be required to help to ensure the complainer understands the complaints procedure.</p> <p>It may also be difficult for those to follow the process due to a disability. Support and assistance may be required and documentation in large print and braille etc be offered.</p>
<p>7. What actions are required to address the impacts arising from</p>	<p>1. Customers with different physical or mental health needs can choose to make a complaint to us in a variety of ways, including via a third party. The CHP provides links to sources of support.</p>	

this assessment?	2. As with our other corporate policies and resources, we can make the CHP available in other languages on request.
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Signed: Grahame Cairns

Date: 17.11.25