

Complaints Policy

Everyone representing Legal & General Affordable Homes is committed to providing a good level of customer service and we will always try to do our best, but we recognise that we don't get things right every time and it is our intention to minimise any issues you have by addressing the problem promptly.

If you are dissatisfied with any services provided by us or any of our partners, we would like to hear your feedback and resolve the matter quickly to restore your trust in us and to help us improve our work.

1. Who Does This Apply To?

- Any current Legal & General Affordable Homes customer (tenant, shared owner or household member) living in a Legal & General Affordable Homes home.
- A prospective Legal & General Affordable Homes Customer.
- People living near a Legal & General Affordable Homes property who may be impacted by the activities of our staff and/or our partners.
- Someone acting on behalf of one of the above, for example a carer or family member.

2. The Aim of the Policy

We are committed to providing a service to the highest standard, however we are aware that sometimes things can go wrong. Where this happens we and our partners will:

- Investigate all complaints and respond promptly to any customer dissatisfaction
- Seek to resolve customer dissatisfaction by providing at least the same standard of service as initially promised.
- Take ownership of any action through to resolution, making it easy for you to get a fair outcome.

3. Housing Ombudsman Complaint Handling Code

The Housing Ombudsman is a Government body, appointed to review complaints about Registered Providers of social housing. Legal & General Affordable Homes is a member of the Housing Ombudsman's complaint scheme. Their service is free, independent and impartial.

From April 2024, the Housing Ombudsman Service launched an updated Complaint Handling Code, setting out good practice on how landlords can effectively and fairly respond to complaints.

Legal & General Affordable Homes has adopted this Complaint Handling Code and will make sure its principles are part of how we effectively handle complaints from customers.

As part of the code, we are required to complete an annual self-assessment to ensure our complaints process meets the Housing Ombudsman Code. A copy of our self-assessment is available on our website, and for further information on the Housing Ombudsman Service please visit www.housing-ombudsman.org.uk

4. Definition of a Complaint

Legal & General Affordable Homes uses the Housing Ombudsman's definition of a complaint:

An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.

5. What the policy does not cover

The following categories of complaint are not covered under this policy:

- Where the issue is part of any ongoing legal action.
- Where an issue has already been handled under the policy.
- 12 months has passed since the issue occurred which is the reason for the complaint.
- Complaints of anti-social behaviour by another individual, will be handled under the terms of our anti-social behaviour policy. We will however deal with complaints where you feel we have not followed our anti-social behaviour policy of process correctly.
- Complaints relating to General Data Protection Regulation (GDPR) legislation.
- Any expression of dissatisfaction which is outside of our responsibilities (for example, a customer may complain to us or one of our partners about a service offered by another organisation, such as a local authority). In those circumstances we will help you to direct your complaint to the right organisation.
- A general service request which is asking us to take action to put something right. This will be passed to the relevant team to address as part of our service commitments.

All complaint cases will be considered on their individual circumstances, and if an exclusion is relevant, you will be given a clear explanation why and your Management Provider will be able to advise you how your issue can be resolved.

In general if a case falls under the categories set out in this section then LGAH will not agree to escalating the case through all stages of its complaints procedure.

Otherwise, LGAH will act reasonably in seeking to escalate your complaint through all stage of its policy if you so wish.

6. Making a Complaint

When the level of service we have provided has fallen short, we want you to let us know so that we can make every effort to resolve things.

You can make a complaint to Legal & General Affordable Homes directly or via one of our partner organisations. We publicise our complaint policy on our website and you are able to raise a complaint in the following ways:

- By post - in writing to our office Legal & General Affordable Homes, 12 Red Lion Buildings, London EC1A 9BU
- Over the telephone - by contacting your Management Provider if you have already moved into your home
- By email - you can contact us at taskforce@landgah.com or directly emailing your Management Provider
- In person - by visiting your Management Provider if you have already moved into your home

We will always provide opportunity for you to have a representative deal with your complaint on your behalf, and to be represented or accompanied at any meeting.

When you make a complaint, we will share the Complaints Policy with you, so you know what to expect.

6.1 Expressions of Dissatisfaction

Legal & General Affordable Homes and our partners aim to make it easy for you to let us know when you are dissatisfied.

When we are made aware of dissatisfaction we will discuss this with you to assess if we can put things right quickly. All expressions of dissatisfaction will be logged on our system, including any resolution actions agreed.

If at the review stage of a dissatisfaction case, it is clear that a further review is needed, in agreement with you, we will raise this as a formal complaint as set out in 6.2 below.

It is important for us to ensure that failures in our service can be rectified as soon as possible, so we will continue to progress any steps which are already in place to address your areas of dissatisfaction.

The person contacting you about the complaint will also discuss the case with other people who may be involved to avoid any duplication of work and to agree who is leading the issue through to resolution.

6.2 Stage 1 – Formal Complaint

If you want to make a formal complaint, this will be logged and dealt with under our Stage 1 complaint process. Complaints should be raised within 12 months of an issue occurring, however we will use some discretion where there are good reasons for accepting a complaint outside of this time limit.

In recognition of our service structure, Stage 1 complaints will usually be handled by your Management Provider, however they could be handled by a member of our team where the direct responsibility for addressing any service failure falls to us.

When dealing with the complaint:

- We will acknowledge and log the complaint **within five working days**.
- Where possible, ahead of the investigation, any services which you should have received and haven't, will be provided as soon as possible. The case of any service failure will be established afterwards.
- Investigations into a complaint will be the most important task of the complaint owner and will be completed in a professional way as soon as possible and with your agreement.
- At the point at which we have fully investigated your complaint, we will discuss the outcome with you and the steps that will be taken if something needs to be put right. If for any reason the investigation takes longer, we will let you know why and how much more time is needed.
- The outcome of the investigation and a formal response will be issued **within ten working days of the complaint being acknowledged**.
- If an extension is required and agreed, it must be **no more than ten working days**. We will provide you with the reason why we have requested an extension. We will also provide you with the contact details of the Housing Ombudsman at this point in case you are dissatisfied.
- All formal complaint investigations, correspondence and outcomes will be reviewed by a relevant Legal & General Affordable Homes Service Manager. This is to ensure that the speed and quality of the investigation are acceptable, and that the resolution proposed to you is in line with this policy.
- A complaint response will be provided when the answer to the complaint is known, not when outstanding work required to resolve issues is completed. Our complaint response will also include details of the Housing Ombudsman Service and how you can contact them.

- If you are unhappy with our stage 1 response, you can request that the complaint be escalated to our stage 2 process for review.
- Where you raise additional complaints during the investigation period we will seek to include these into the stage 1 response if they are related and the stage 1 response has not been issued.
- Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues will be logged as a new complaint.

6.3 Stage 2 – Formal Complaint

When a Stage 1 complaint is answered and you are not satisfied with the all or part of the outcome you will be given the option to escalate the matter to Stage 2.

Stage 2 complaints will be handled by a member of the Legal & General Affordable Homes team. If the Stage 1 complaint was handled by a Legal & General Affordable Homes staff member, the stage 2 complaint will be escalated to a different member of the team.

- We will acknowledge and log the stage 2 complaint **within five working days**.
- We will contact you to discuss the complaint to ensure we address any ongoing concerns. We will not require you to explain your reasons for requesting a stage 2 consideration.
- The person considering your stage 2 complaint will not be the same person that considered the complaint at stage 1.
- The stage 2 response will be sent **within twenty working days**, unless we have your agreement to extend this timescale.
- If an extension is required and agreed, it must be **no more than twenty working days**. We will provide you with the reason why we have requested an extension. At this point we will also provide you with the details of the Housing Ombudsman in case you are dissatisfied with the extension.
- A complaint response will be provided when the answer to the complaint is known, not when outstanding work required to resolve issues is completed.
- All formal complaint investigations, correspondence and outcomes will be reviewed by a relevant Legal & General Affordable Homes Head of Service/Director. This is to ensure that the speed and quality of the investigation are acceptable, and that the resolution proposed to you is in line with this policy.

- Our stage 2 complaint response will make it clear that this is the final response as part of our complaint process. This response will include details of the Housing Ombudsman Service and how you can contact them should you want your complaint to be independently reviewed.

7. Monitoring and Learning

Formal complaints will be reviewed quarterly by our Senior Management Team and a summary of key performance will be published on our website for customers to also review. This will include the types of complaint we have received, timescales for responses and learning outcomes.

Training for LGAH's staff and suppliers forms an important part of its approach to delivering an effective service. Regular training of staff focusses upon ensuring that staff:

- a. deal with complaints on their merits, act independently, and have an open mind;
- b. give the resident a fair chance to set out their position;
- c. take measures to address any actual or perceived conflict of interest; and
- d. consider all relevant information and evidence carefully.

8. Compensation and Goodwill Gestures

We will consider an offer of compensation where you have suffered a material loss or material inconvenience because actions taken by us or our partners, which is not covered through insurance or is the responsibility of a third party.

We may also consider a gesture of goodwill to apologise for any inconvenience caused. Any offer of compensation of goodwill will be made in line with our Compensation Policy. This Policy also aligns to the Housing Ombudsman's remedy guidance and will include a view of the following issues:

- The length of time that a situation has been ongoing
- The frequency of what has occurred
- The severity of any service failure
- The number of different failures
- The overall impact on the customer
- The customer's own personal circumstances

9. Unacceptable Behaviour

We understand that making a complaint can be distressing and you may be frustrated by a lack of service provided. When we are investigating your complaint

we will listen to your concerns, and we will treat you with respect. In return we expect this same treatment of our members of staff.

We take the safety of our staff seriously and have in place a zero-tolerance approach to any unreasonable or threatening behaviour. If a concern is raised by any member of staff, this will be escalated to the relevant Head of Service to investigate and determine next steps in regard to the most appropriate way to manage and conclude the complaint. A copy of our Unacceptable Behaviour Policy can be found on our website.

In addition to unacceptable behaviour, where unreasonable and/or persistent complaints are made these will be handled by the appropriate Head of Service who will investigate the concern. This may lead to a warning letter, restrictions applied on how you can contact us in the future, and a period of how long the restriction will be in place.

We define an unreasonable or persistent complainant as someone who makes excessive demands or continues to raise complaints which impact on the services we can deliver. It is important to note that this does not include those who raise legitimate concerns after making a complaint, such as agreed timescales not being met, or where they have escalated the complaint through the correct process.

Examples of an unreasonable or persistent complaint include (but there may be more scenarios):

- No specified grounds for a complaint but continued expectation for a formal complaint to be raised despite offers of assistance
- Refusing to engage with the complaint investigation process but an expectation for the complaint to be resolved
- Continued complaints being made without the opportunity to address the issue in the relevant service area
- The complainant insisting on the complaint being dealt with in a way which falls outside of this policy, or those set by the Housing Ombudsman Complaint Handling Code.
- An unreasonable number of contacts with us, including new areas added to a current complaint, which significantly changes the investigation and continues to prolong complaint resolution without a justified reason.

10. Equality and Diversity

We will treat all customers and staff with fairness and respect. We value diversity and work to promote equality and make a determined effort to prevent unlawful discrimination.

We are committed to helping you access information about your homes and services in a way that suits your individual needs. This includes supporting vulnerable customers if you need additional support with making a complaint or understanding the outcome.

We define vulnerability as being a condition or circumstance that puts an individual or household at risk of losing their home or risks serious material detriment to their wellbeing. Where this definition applies, LGAH will seek to make reasonable adjustments to its services and processes in order to minimise the risk to the individual or household.

Accountable Director – Operations Director

Approval Date – May 2024

Review Date – May 2025

The Policy and Self-Assessment will be reviewed every 12 months, (or more frequently subject to any changes in regulatory, legislative and/or areas of best practise where a review is required sooner than the planned review date)