

---

# Sanctuary Group

---

**Title:** **Complaints - Housing and All Supported Living Policy**

**Business Function:** **Sanctuary Housing  
Sanctuary Property Services  
Sanctuary Supported Living**

**Author:** **Customer Relations Operations Manager**

**Other Contributors:** **Housing Services Senior Management  
National Resident Scrutiny Panel**

**Authorised by:** **Executive Committee**

---

**Sanctuary Group:**  
Sanctuary Group is a trading name of Sanctuary Housing Association,  
an exempt charity, and all of its subsidiaries.

Uncontrolled copy if printed

## 1. Policy statement

### 1.1 Purpose

1.1.1 Sanctuary Housing and Sanctuary Supported Living (Sanctuary) aims to provide good quality homes and deliver high quality services to customers and stakeholders. However, it is recognised that there may be times when something goes wrong, or customers are not happy with the services provided. When this occurs, Sanctuary actively encourages customers to contact staff so that action can be taken.

1.1.2 This policy sets out Sanctuary's commitment to valuing complaints, where our aims are to:

- ensure complaints are effectively identified and recorded;
- act responsibly and fairly when things go wrong;
- put things right quickly for customers; and
- learn from complaints to improve services.

### 1.2 What is a complaint?

1.2.1 Sanctuary's definition of a complaint is in line with the Housing Ombudsman's Complaint Handling Code (2022). Sanctuary's definition of a complaint is:

*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.*

1.2.2 There are some circumstances when it is not appropriate to record a complaint because there is another process which is better suited to resolving the problem. Therefore, Sanctuary will not consider the following under this complaints policy:

- Issues that occurred more than six months ago, unless there is evidence that this has been raised to staff and no action has been taken.
- An initial request for service when a customer informs us of a problem for the first time. For example, if the word complaint is used during an initial report of a repair that has not yet been notified to Sanctuary.
- Initial contact from a customer to chase up a service request, for example a missed appointment that can be resolved there and then with an apology and the provision of a new appointment. However, if a satisfactory resolution cannot be offered to the customer at the time of the contact or if the customer asks, a complaint must be logged.
- Matters that have already been dealt with by the Housing Ombudsman Service or have already exhausted Sanctuary's Complaints Process.
- Where legal proceedings have started for example, a matter being reviewed by the Small Claims Court, or First Tier Tribunal.
- Reports about the behaviour of tenants or their households; these are handled in line with the Antisocial Behaviour - Housing and Support Policy and Housing Procedure.

- Dissatisfaction with a Sanctuary policy or procedure where there has not been a service failure; these are recorded as policy feedback and passed to the policy owner to be considered in the next review.
- Disagreement with a decision where there is another procedure to appeal the outcome, such as a dispute about service charges, succession, or home improvements.
- Personal injury claims or claims for damaged items valued at over £5,000; these will be assessed and usually passed to Sanctuary's insurers.
- Enquires or expressions of dissatisfaction from members of the public will be sent directly to the Head of Service in line with the Customer Contact - Housing Procedure.

### 1.3 Who can make a complaint?

#### 1.3.1 Sanctuary will accept and investigate complaints in line with this policy from:

- any of our customers who fall in scope of this policy including tenants, shared owners or leaseholders for whom we provide a service;
- former customers;
- a registered applicant for a Sanctuary property; and
- anyone acting as a representative of a customer where permission has been given by the customer (including family members, Members of Parliament, Councillors, or third-party organisations).

#### 1.3.2 Correspondence sent to Sanctuary Executives will be directed to the most appropriate team to respond to. Where the contact relates to dissatisfaction, the issue will be investigated as a new complaint in line with this policy or will be included as further information in a complaint that is already being investigated.

### 1.4 Sanctuary's complaints process

#### 1.4.1 When handling complaints, Sanctuary commits to putting customers at the heart of the process by:

- accepting complaints in any format, including verbally, written and online;
- making reasonable adjustments so all customers can access the process;
- giving customers opportunities to share evidence and suggest solutions;
- using records and evidence to inform decisions rather than speculation;
- ensuring the process remains focussed on identifying a resolution to the issues raised where this is possible; and
- signposting customers to other organisations for support where needed.

#### 1.4.2 Sanctuary operates a two-stage complaints procedure in which the first stage, focusses on staff taking swift action to resolve customers' concerns effectively.

#### 1.4.3 The second stage focusses on providing more detailed independent investigation into customer concerns and providing a full written report of their findings.

- 1.4.4 Sanctuary will aim to acknowledge complaints within three working days of receiving the complaint. When acknowledging a complaint Sanctuary will confirm the scope of the complaint and the understanding of outcomes the customer expects to ensure expectations are clear.
- 1.4.5 Sanctuary will attempt to contact customers to discuss the outcome of both Stage 1 and Stage 2 complaint investigations and to explain our decision before we confirm this in writing.
- 1.4.6 Sanctuary will confirm in writing the outcome of all stages of this complaints process, including any findings, proposed actions to put things right, and will provide customers with information about what options they have if they remain unhappy, including contact details for the Housing Ombudsman.
- 1.4.7 Where Sanctuary decides not to accept a complaint, this will be explained to the customer, setting out the reasons why the matter is not suitable for the complaints process. They will be advised of their right to contact the Housing Ombudsman Service to challenge this decision.
- 1.4.8 Sanctuary aims to acknowledge Stage 1 complaints within three working days and to respond to Stage 1 complaints within ten working days.
- 1.4.9 Customers have the right to request that their complaint is escalated to Stage 2 of the complaints process if they remain unhappy with the response at Stage 1. Customers will be asked to explain what they remain unhappy with, and what outcome they would like within 10 working days of the response. The aim of the second stage of the process is to resolve the complaint through robust investigation of the issues by an independent person, not involved in the complaint at Stage 1.
- 1.4.10 Sanctuary aims to respond to Stage 2 complaints within 20 working days of the complaint being escalated.
- 1.4.11 There are times when complaint investigations are more complex or need a longer timeframe to provide a customer with a full response. If this is the case, Sanctuary may extend the timeframe to respond to a complaint at Stage 1 or Stage 2 by 10 working days. Sanctuary will contact the customer to discuss this and explain the reasons for the extension and confirm any extension to the above timescales in writing.
- 1.4.12 If a customer remains unhappy following Sanctuary's Stage 2 response, they are encouraged to contact their complaint handler to share why they remain unhappy, provide any additional evidence which has not been considered, and to explain what they are looking for to resolve the complaint, within 10 working days of the initial response.
- 1.4.13 Once this has been provided, Sanctuary will review any additional information and provide a final response to the customer, and this will explain Sanctuary's position and the customer's rights should they wish to pursue their complaint further.

1.4.14 In all instances, this will involve a referral to the Housing Ombudsman Service, but other agencies may be signposted, should this be appropriate.

## 1.5 Managing challenging or unacceptable behaviours

1.5.1 Whilst staff do understand that there are times that customers may become upset, frustrated, or anxious and will endeavour to respond positively and sensitively, there are occasions that customers behave in ways that are challenging or unacceptable.

1.5.2 Where customers behaviour prevents staff from carrying out their duties effectively or is rude, abusive or threatening, Sanctuary will take action in line with the Managing Challenging and Unacceptable Behaviour - Housing Policy and Procedure.

## 1.6 External review

1.6.1 Whilst Sanctuary always aims to resolve concerns through the internal complaints process, customers do have the right to refer their complaint to the Housing Ombudsman Service should they remain unhappy with the final response.

1.6.2 The complainant may approach the Housing Ombudsman Service or Local Government and Social Care Ombudsman directly once their complaint has exhausted Sanctuary's complaint process.

1.6.3 Sanctuary will direct customers to the appropriate Ombudsman Service within any responses provided at Stage 1 or Stage 2 of the complaints process.

## 1.7 Putting things right - compensation/redress

1.7.1 Sanctuary will investigate any requests for compensation associated with a complaint, in line with this policy.

1.7.2 Staff may offer financial compensation or an alternative goodwill gesture, within the guidelines of Sanctuary's Compensation Guidance, which gives advice on appropriate redress based on the circumstances involved.

## 1.8 Learning from complaints

1.8.1 Sanctuary uses all customer feedback, including complaints to inform service delivery and has put the following measures in place to ensure that lessons are learned from customers' experiences:

- National Resident Scrutiny Panel review and scrutinise activities;
- records of any service failures and the actions taken in response;
- feedback opportunities given to complainants to assess the process;
- regular reports detailing performance to relevant management teams; and
- annual performance update and lessons learned shared with customers.

1.8.2 More broadly, Sanctuary looks for opportunities to work with the wider sector to identify, share and embed best practice through:

- actively engaging with the Housing Ombudsman Service and using its regular insight reports to review and improve services as required;
- taking part in recognised training and development activities, where appropriate; and
- participating in sector-wide reviews, assessments, and feedback activities, wherever the opportunity arises.

## 2. Roles and responsibilities

2.1 The Director - Customer Experience and Engagement is responsible for ensuring adoption of, and adherence to, this policy across Sanctuary.

2.2 This is supported by the Customer Relations Operations Manager, who provides guidance and support to staff and maintains independent oversight of all complaints handled through this policy. Additionally, the Customer Relations Operations Manager is responsible for ensuring that complaints are used to inform service delivery and that action is taken in response to lessons learned.

2.3 Managers have day to day responsibility for the implementation of the policy and associated procedure in practice. They are responsible for ensuring:

- communication to all staff;
- suitable and sufficient training and instruction is provided;
- adherence to the policy by all staff; and
- the provision of the necessary equipment, resources, and records to make sure that compliance is achieved.

2.4 Communication with customers is centred around the concept that all enquiries are resolved at the first point of contact wherever possible. Therefore, all staff, particularly those who may interact with customers and receive complaints must:

- be aware of, understand and implement this policy and associated procedure;
- support resolution of complaints and concerns at the first point of contact;
- provide assistance to colleagues handling complaints where requested;
- participate in any training that Sanctuary Group makes available; and
- communicate any issues with implementing this policy to their line manager and identify any areas for continuous improvement promptly.

## 3. References and sources

- [Housing Ombudsman Service](#)
- [The Regulator of Social Housing](#)
- [Disability Discrimination Act 1995](#)
- [Data Protection Act 2019](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)
- [The Localism Act 2011](#)

## 4. Impact on diversity

- 4.1 This policy applies to Sanctuary, as outlined above.
- 4.2 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with its [Inclusion for all Equality, Diversity and Inclusion Strategy 2021 - 2024](#).
- 4.3 Sanctuary recognises that some customers have disabilities or communication needs, which may make it difficult for them to express themselves or communicate clearly; especially when they are anxious or upset.
- 4.4 Where Sanctuary is made aware that a customer is disabled or has particular needs, staff will make reasonable adjustments to meet their needs. Examples of adjustments that may be made include (but are not limited to):
- using different ways to communicate with a customer;
  - arranging for translation services, large print or braille where required; and
  - signposting customers to advocacy or mediation services if appropriate.

## 5. Resident consultation

- 5.1 The policy has been created and supported by the Complaints Community of Interest and using resident feedback and input and reflects the expectations that customers have shared with staff through various channels:
- Complaints Improvement survey
  - Complaints Improvement webinars and focus groups
  - STAR (Survey of Tenants and Residents) results
  - complaints received about housing and maintenance services.

## 6. Monitoring and compliance

- 6.1 This policy, and associated procedures, will be monitored through regular review by the Customer Relations Operations Manager, who will ensure compliance with the policy across operations by maintaining independent oversight of action taken under this policy.
- 6.2 The Housing Ombudsman Service ensure compliance with the policy where individual complaints are referred to it for consideration.
- 6.3 Complaint performance information and compliance with the Housing Ombudsman Complaint Handling Code will be reported regularly to management teams, Executive Committee, Group Housing Board and Group Board.

## 6.4 Period of review

- 6.4.1 Until a new policy is formally adopted this document will remain in force and operational.
- 6.4.2 This policy will be reviewed in accordance with the policy review programme agreed by the Executive Committee.
- 6.4.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Director - Customer Experience and Engagement will initiate a review.
- 6.4.4 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy.

## 7. Approval

- 7.1 This policy is approved by Sanctuary Group's Executive Committee.

## 8. Operational arrangements

- 8.1 This policy must be used in conjunction with the Complaints - Housing and All Supported Living Procedure and associated guidance documents.
- 8.2 Guidance and information is available to internal teams through Solis and KnowledgePoint.