
Sanctuary Group

Title: Complaints - Housing and All Supported Living Policy

Business Function: Sanctuary Housing (England)
Sanctuary Property Services
Sanctuary Supported Living

Author: Head of Complaints

Other Contributors: Head of Building Safety and Homes
Customer Relations Manager
Director - Customer Care
Performance and Compliance Director - Sanctuary
Supported Living
Resident Scrutiny Panel

Authorised by: Executive Committee

Sanctuary Group:
Sanctuary Group is a trading name of Sanctuary Housing Association,
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1. Policy statement

1.1 Purpose

1.1.1 Sanctuary Housing (England) 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 Service's (HOS) Complaint Handling Code (2024). 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 landlord, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.

1.2.2 Sanctuary will recognise a complaint regardless of whether the word 'complaint' is explicitly used and will distinguish between service requests and complaints. A service request will become a complaint when a resident expresses dissatisfaction with a response received. Sanctuary will also investigate complaints relating to Building Safety in line with the [Building Safety - Group Policy](#) should these be raised.

1.2.3 Sanctuary's definition of a building safety complaint is in line with the [Building Safety Act 2022](#). Sanctuary's definition of a building safety 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, in relation to a higher-risk building, a building safety risk, or the performance of an accountable person in relation to their duties or responsibilities under the Building Safety Act 2022. A building safety risk is defined as a risk to the safety of people in or around the building that arises from either the spread of fire or partial full structural failure.

A high-rise residential building has at least:

- Seven storeys or is at least 18 metres high.
- Two residential units.

1.2.4 Sanctuary will accept and recognise complaints unless there is a valid reason not to do so, as outlined in the HOS' Complaint Handling Code 2024. Sanctuary considers complaints on their merits and any exclusions must be fair and reasonable.

1.2.5 There are some circumstances when it is not appropriate to accept 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 12 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 HOS, or have already exhausted Sanctuary's Complaints Process.
- Matters that have already been dealt with by the Building Safety Regulator (BSR).
- 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](#), and [Antisocial Behaviour \(ASB\) - Sanctuary Supported Living \(SSL\) Procedure](#), as appropriate.
- 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](#).
- Complaints relating to data protection matters, including concerns about the handling, processing, and sharing of personal data, data breaches, or responses to individuals' rights requests, fall outside the scope of this Group Complaints Policy. These complaints are managed separately by the Data Protection team in accordance with the [Data Protection - Group Policy and Procedure](#).

1.2.6 Complaints relating to SSL can be managed via a number of different routes depending on the nature of the issue: the [Local Government and Social Care Ombudsman](#); [Care Quality Commission \(CQC\) Regulation 16](#); [Ofsted Regulation 31 Complaints](#); and [Children's social care services; raising concerns with Ofsted](#).

1.2.7 Complaints relating to relating to the sales process or defects in relation to homes constructed or on behalf of Sanctuary (including Beech Grove and NU Living properties) are managed under the [Customer Care Commitment NU Living](#) and [Customer Care - Beech Grove Homes Complaints Handling 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 Accessibility and awareness

1.4.1 Customers can make a complaint by any of the following methods:

- By telephone to our Customer Hub on 0800 131 3348
- By visiting our website [Complaints | Sanctuary](#)
- By email to complaints2@sanctuary.co.uk
- In person to any staff member
- In writing to Sanctuary House, Chamber Court, Castle Street, Worcester, Worcestershire, WR1 3ZQ.

1.4.2 Sanctuary's complaint policy, as well as information about the HOS and the Complaint Handling Code, can be found on our website [Complaints | Sanctuary](#).

1.5 Sanctuary's two stage complaints process

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

- dealing with complaints on their merits, acting independently, and having an open mind
- making reasonable adjustments so all customers can access the process;
- giving customers opportunities to share evidence and suggest solutions;

- take measures to address any actual or perceived conflict of interest;
 - 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.
- 1.5.2 Complaints will be acknowledged, defined, and logged promptly, with acknowledgement responses provided within five working days of the complaint being received.
- 1.5.3 At each stage Sanctuary will address all points raised, provide clear reasons for decisions, and provide suitable remedies where necessary
- 1.5.4 Sanctuary follows a two stage complaints procedure only. Early resolution is encouraged at Stage 1 via an initial response, in which we have ten working days to respond following acknowledgment.
- 1.5.5 Customers have the right to request that their complaint is escalated to Stage 2 if they remain unhappy with the response at Stage 1. The Stage 2 investigation will be separate of the Stage 1 investigation and a different complaint manager will take ownership.
- 1.5.6 The second stage focusses on investigating into customer concerns and providing a full written report of their findings, in which we have twenty working days to respond.
- 1.5.7 Sanctuary will attempt to contact customers to discuss the outcome at both stages of the complaint investigations to explain our decision before we confirm this in writing.
- 1.5.8 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 HOS. For building safety complaints, including contact details for the BSR.
- 1.5.9 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 HOS to challenge this decision. For building safety complaints, they will be advised of their right to contact the BSR to challenge this decision.
- 1.5.10 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 by 10 working days or Stage 2 by 20 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.

- 1.5.11 If a customer remains unhappy following Sanctuary's Stage 2 response, they are made aware, again of their right to contact the HOS. For complaints relating to SSL customers, they are made aware of their right to contact Local Government and Social Care Ombudsman, CQC, and Ofsted. Sanctuary do not operate a third stage in their complaints process. Information on the right to contact the HOS is included at both Stage 1 and Stage 2 of Sanctuary's complaint process. For building safety complaints, information on the right to contact the BSR is included at both Stage 1 and Stage 2 of the complaint process.
- 1.5.12 A full record of the complaint investigation will be retained in line with data retention guidelines, including the outcomes at each stage.
- 1.6 Managing challenging or unacceptable behaviours
- 1.6.1 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.
- 1.6.2 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](#).
- 1.7 External review
- 1.7.1 Whilst Sanctuary always aims to resolve concerns through the internal complaints process, customers do have the right to refer their complaint to the HOS should they remain unhappy with the final response. For Building Safety Complaints, customers have the right to refer their complaint to the BSR. For complaints relating to SSL customers have the right to refer their complaint to Local Government and Social Care Ombudsman, CQC, Ofsted, and Local Government.
- 1.7.2 The complainant may approach the HOS or Local Government and Social Care Ombudsman directly once their complaint has exhausted Sanctuary's complaint process. For Building Safety complaints, the complainant may approach the BSR.
- 1.8 Putting things right - compensation/redress
- 1.8.1 Sanctuary will acknowledge and rectify any mistakes promptly, offering apologies, explanations, remedies and appropriate compensation/ redress in line with this policy.
- 1.8.2 Compensation/ redress offered will consider the impact on the resident and their individual circumstances and will be agreed upon where appropriate in line with Sanctuary's [Compensation Guidance](#), which gives advice on appropriate redress based on the circumstances involved.

1.9 Learning from complaints/self-assessment and reporting

1.9.1 Sanctuary will produce an annual complaints performance and service improvement report, including self-assessment against the 2024 Complaint Handling Code and any findings of noncompliance by the HOS, which will be published on our website [Complaints | Sanctuary](#). For Building Safety complaints, including any findings of non-compliance by the BSR. For SSL complaints any reports to the Local Government and Social Care Ombudsman, CQC, Ofsted will be included.

1.9.2 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:

- Resident Scrutiny Panel review and scrutinise activities;
- building Safety Community of Interest Group review and scrutinise activities of building safety complaints;
- 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.

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

- actively engaging with the HOS and using its regular insight reports to review and improve services as required;
- actively engaging with the BSR to support the review and improvement of 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 Compliance is responsible for ensuring adoption of, and adherence to, this policy across Sanctuary.

2.2 The Head of Complaints will provide guidance and support to staff and maintains independent oversight. Additionally, the Head of Complaints is responsible for ensuring that complaints are used to inform service delivery, and that action is taken in response to lessons learned.

2.3 The Head of Complaints and Customer Relations Managers have day-to-day responsibility for policy and associated procedure implementation, adherence, communication, training and resource provision.

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](#)
- [Regulator of Social Housing](#)
- [Building Safety Regulator](#)
- [Social Housing \(Regulation\) Act 2023](#)
- [Building Safety Act \(England\) 2022](#)
- [Disability Discrimination Act 1995](#)
- [Data Protection Act 2019](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)
- [Local Government and Social Care Ombudsman](#)
- [Ofsted](#)
- [Care Quality Commission](#)

4. Impact on diversity

- 4.1 Sanctuary will ensure that this policy is applied fairly to all residents, with reasonable adjustments made to meet the needs of individuals with disabilities or communication needs.
- 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 Strategy 2024-2026](#).
- 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 incorporating 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
- Resident Advisory Panel
- Tenant Satisfaction Measures (TSM) results
- Complaints received.

6. Voice of the Customer

6.1 Customer satisfaction is captured and monitored by the Service Improvement team who contact the customer to establish their experience of the complaints process. The customer satisfaction reports will be used to ensure improvements to the complaints process are customer focused.

7. Monitoring and compliance

7.1 This policy, and associated procedures, will be monitored through regular review by the Head of Complaints, who will ensure compliance with the policy across operations by maintaining independent oversight of action taken under this policy.

7.2 The HOS, Local Government and Social Care Ombudsman, CQC, and Ofsted ensure compliance with the policy where individual complaints are referred to it for consideration.

7.3 The BSR ensures compliance with the policy where individual building safety complaints are referred to it for consideration.

7.4 Local Government and Social Care Ombudsman, CQC, and Ofsted ensures compliance with the policy where individual complaints are referred to it for consideration.

7.5 Complaint performance information and compliance with the HOS Complaint Handling Code will be reported regularly to management teams, Executive Committee, Group Housing Board, and Group Board.

7.6 Period of review

7.6.1 Until a new policy is formally adopted this document will remain in force and operational.

7.6.2 This policy will be reviewed in accordance with the policy review programme agreed by the Executive Committee.

- 7.6.3 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 Compliance will initiate a review.
- 7.6.4 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy.

8. Approval

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

9. Operational arrangements

- 9.1 This policy must be used in conjunction with the [Complaints - Housing and All SSL Procedure](#) and associated guidance documents.
- 9.2 For Building Safety complaints, this policy must be used in conjunction with the [Building Safety Complaints Handling - Group Procedure](#), and associated guidance documents.
- 9.3 Guidance and information is available to internal teams through Pulse.