

# W13 Complaints & Feedback Policy

<b>Policy title:</b>	<b>Complaints &amp; Feedback Policy for Young People and internal and external stakeholders (non-contractual)</b>
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<b>Related policies and/or procedures:</b>	<ul style="list-style-type: none"> <li>• Safeguarding Children and Adults Policy</li> <li>• Safeguarding Children and Adults Procedure</li> <li>• Bullying &amp; Harassment Policy</li> <li>• Whistleblowing Policy</li> <li>• Health &amp; Safety policy</li> <li>• Complaints and Feedback Policy (General)</li> </ul>
<b>Legislation or regulatory guidance that impact on this policy:</b>	<a href="#">The Housing Ombudsman's Complaints Handling Code.</a>
<b>Next review date due:</b>	November 2023

## 1. Centrepont policy

- 1.1 Centrepont acknowledges the Housing Ombudsman's Complaint Handling Code and takes all complaints and feedback from young people and all other internal and external stakeholders seriously. We believe that young people and complaints should be greeted positively and considered an opportunity to improve. All people should have the opportunity to complain or offer feedback about Centrepont business. Centrepont defines a complaint as any expression of dissatisfaction with Centrepont, with a member of staff or with a service that requires a formal response.

## 2. Purpose

- 2.1 The purpose of this policy and procedure is to offer guidance to enable Centrepont staff to resolve complaints raised as quickly as possible and to ensure that all complaints are handled fairly, consistency and wherever possible resolved to the complainant's satisfaction. For general complaints see Complaints and Feedback Policy (General).

## 3. Scope

- 3.1 This policy covers the handling of complaints and feedback from young people and non-contractual internal and external stakeholders. The policy is aimed at young people, staff, including interim staff, locum, volunteers and trustees.

## 4. Definitions

### 4.1 Complaint

4.2 A complaint shall be defined as 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 young person or internal/external stakeholder (non-contractual).

### 4.3 Non-contractual stakeholders

4.4 Includes, but is not limited to:

- Neighbours of a Centrepoint Service
- Visitors to a Centrepoint Service
- Members of the public affected by a Centrepoint Service or Young person

4.5 Internal and external stakeholders, where there is a contractual arrangement, should use the protocols in such contracts for any complaint.

### 4.6 Feedback

- Feedback may be a comment, criticism or compliment, but which has not caused dissatisfaction or requires a response.

## 5. Key responsibilities

5.1 The Compliance team will monitor the [complaints@centrepoint.org](mailto:complaints@centrepoint.org) email address on a regular basis for any complaints and will act as Complaints Officer. All complaints will be directed to the appropriate teams for formal acknowledgement and investigation, where appropriate.

## **6. Ineligible Complaints**

- 6.1 Centrepoint will accept a complaint unless there is a valid reason not to do so. Such as, but not limited to:
- Legal proceedings have been started. Landlords should take steps to ensure that residents are not left without a response for lengthy periods of time, for example, where a letter before action has been received or issued but no court proceedings are started or settlement agreement reached.
  - Matters that have already been considered under the complaints policy
  - The issue giving rise to the complaint occurred over six months ago. Where the problem is a recurring issue, Centrepoint will consider any older reports as part of the background to the complaint if this will help to resolve the issue for the Complainant.
- 6.2 If Centrepoint decides not to accept a complaint a detailed explanation should be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process.
- 6.3 The complainant has the right to challenge this decision by bringing their complaint to the Ombudsman. Where appropriate the Ombudsman will instruct the landlord to take on the complaint.
- 6.4 For the avoidance of doubt, no exclusions will be made to complaints and or concerns relating to, but not limited to, safeguarding or health and safety issues.

## **7. Risk factors**

- 7.1 There are several risk factors to be aware of when handling complaints. Some of these risks can include, but not limited to, the following:
- Inconsistency in the way complaints are captured and categorised throughout our organisation;
  - Senior managers being unaware of other contributing factors to complaints;
  - A failure to conduct a thorough investigation;
  - Failure to satisfy expectations could lead to negative media or social media reviews.
  - Inaccurate reporting;
  - Lack of confidentiality and data breaches.

## **8. Participation statement**

- 8.1 Centrepoint is committed to involving young people and key stakeholders in how we manage and improve our direct services. When this policy or procedure is reviewed, we will endeavour to consult and involve young people/ stakeholders to consider their views.

## **9. Psychologically Informed Environment (PIE)**

9.1 Centrepoint is committed to working towards creating psychologically informed environments (PIE) for young people. A PIE aims to provide psychological safety and security for young people at Centrepoint, emphasising an evidence based approach to understanding psychological well-being, developing positive supportive relationships and providing physical environments that positively impact on young people. Staff training and reflective practice also provides staff with knowledge and skills, a space to process and discuss issues, and a structure to formulate and develop future actions, improving the responsiveness of our services for young people. Centrepoint policies and procedures will reflect and embed PIE principles and practice

## **10. Commitment to equity and inclusion**

10.1 Centrepoint is committed to creating an organisation where people flourish. By establishing trust and challenging with bias, both conscious and unconscious; we are committed to promoting equity, diversity and transparency in all of our day-to-day actions endorsing inclusive process, practice and culture. We want Centrepoint to be a welcoming environment where individual difference is celebrated in the spaces where we live and work.

## **11. Commitment to review**

11.1 This policy, its accompanying procedures and any supporting documents will be reviewed every 3 years or sooner where any changing legislation has an impact.



## B) Accompanying procedure

<b>Procedure title:</b>	<b>Complaints &amp; Feedback Procedure for Young People, and internal and external stakeholders (non-contractual)</b>
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<b>Issue date:</b>	March 2001
<b>Version:</b>	8.0
<b>Date of last full review:</b>	November 2021
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<b>Approved by:</b>	Director of Support and Housing
<b>Supporting documents:</b>	<ul style="list-style-type: none"> <li>• Complaints and feedback leaflet (W13 SD1)</li> <li>• Complaints and feedback form (W13 SD2)</li> <li>• Complaint acknowledgement letter (W13 SD3)</li> <li>• Centrepont Appeal Form (W13 SD4)</li> <li>• In-Form guidance: Recording complaints</li> </ul>
<b>Training that supports the application of these procedures:</b>	<ul style="list-style-type: none"> <li>• Induction</li> <li>• Handling complaints workshop</li> </ul>
<b>Next review date due:</b>	November 2023

1. Procedure summary.....	6
2. How to can make a complaint or give feedback .....	7
3. Stages of complaints .....	9
4. Further Complaint (options): .....	11
5. Complaints about owning Registered Providers (and/or maintenance issues) .....	12
6. Complaints involving allegations about Staff .....	12
7. Complaints made by neighbours.....	13
8. Complaints made using aggression .....	13
9. Managing unreasonable complaints .....	14
10. Appropriate remedy.....	15
11. Reporting complaints to Local Authority/Registered Providers .....	15
12. Complaints and monitoring satisfaction levels .....	15
13. Compensation.....	16
14. Good practice guidance: handling complaints .....	16
15. Training requirements .....	16
16. Governance requirements .....	17

### 1. Procedure summary

- 1.1 Centrepont will take several considerations into account prior to beginning an investigation of a compliant. There are two stages involved when handling complaints from young people or external stakeholders about a service, and each has a defined response time. These stages have been developed in order to set out clear guidelines to be followed when a complaint is received.

- 1.2 All service staff should be empowered to handle complaints from young people, and internal and external stakeholders and complaints about the service in the first instance and within defined response times. The table below outlines the stages involved when handling these types of complaints, who is involved and responsibilities.
- 1.3 **This procedure does not cover:**
- 1.4 Complaints made by staff. Staff (including apprentices) should see Human Resources (HR) policies and procedures such as the Grievance, Whistleblowing Policy and/or seek advice from the Human Resources Team.
- 1.5 Complaints made by volunteers. Volunteers can refer to the Volunteer Policy.
- 1.6 Complaints for Fundraising. Please refer to the Complaints Procedures for Fundraising.
- 1.7 A first request for action, e.g. a request for a repair. If a first request for action is received then this should be discussed with the appropriate team and actioned. For complaints about housing issues that are for the owning landlords to address, these complaints should be made directly to the landlord at stage one or two. See section 2.14.
- 1.8 Where a complaint concerns the discrimination, harassment or bullying of individuals or raises a safeguarding issue please seek the advice of the Safeguarding Lead and or see:
- Safeguarding Children and Adults Policy
  - Safeguarding Children and Adults Procedure
  - Bullying & Harassment Policy
  - Whistleblowing Policy
  - Health & Safety Policy
- 1.9 Service staff can request contact details directly from these partners, or access via HOMES on SharePoint and advise young people appropriately.

## 2. How to can make a complaint or give feedback

- 2.1 We want the complaints and feedback procedure to be accessible and open to all young people, and those affected by the service so they can make a complaint or give feedback in any format. They can do this in person or by someone acting on their behalf in any of the following ways:
- 2.2 **Verbally**
- 2.3 By talking to staff/volunteers;
- Young person talks to the manager, staff member or volunteer who then uses **Complaints and Feedback form** (W13 SD2) to make a brief note of the complaint, and updates In-Form. All complaints regarding staff should be reported via email at [complaints@centrepoin.org](mailto:complaints@centrepoin.org).
- 2.4 By taking the issue to a 'residents' meeting;

- Young people can give feedback at meetings and staff attending can give an immediate response where possible. This can be noted in the minutes of the meeting and recorded on In-Form once the meeting is over.
- 2.5 Complaints brought to a residents' meeting should only refer to the service or housing management e.g. building or health and safety concern.
- 2.6 It is important to recognise that young people may persist with a complaint at a meeting, particularly if they are not happy with the response given. Where this happens, the staff member or manager should encourage them to do this outside of the meeting.
- 2.7 **Written**
- 2.8 Complainants can make use of the **Complaints and feedback form** (W13 SD2). A member of staff or volunteer may offer to help young people complete a written complaint but they should use the young person's words and not lead the complaint. Staff must enclose where they have written the complaint on a young person's behalf and this should only be done where a learning difficulty has been identified and must be signed by the complainant.
- 2.9 Any form of written complaint can be handed to a staff member and a complainant should never be asked to re-submit using the "correct paperwork". Staff should attach the written complaint to Centrepoint's own **Complaints and feedback form** and complete any required fields in case they need to ask for further information from the young person to help log the complaint on In-Form.
- 2.10 **Email:**
- 2.11 [complaints@centrepoint.org](mailto:complaints@centrepoint.org).
- 2.12 This email inbox is currently managed by the Complaints Officer who will forward complaints to the relevant /manager/ operations manager or team for investigation.
- 2.13 **Website**
- 2.14 Centrepoint is committed to providing the highest quality of service to all Young People, internal and external stakeholders and welcome all comments, suggestions or complaints. If you would like to provide feedback or make a complaint you can do this on our website under the complaints section.
- 2.15 **Owning Landlord further options:**
- 2.16 Young people are encouraged to contact the owning Registered Provider or a Local Authority commissioning team directly;
- Where Centrepoint is not the owning landlord in the property or service, young people must be made aware of where complaints can be sent. A space is provided on the back of the complaints leaflet to write in the landlord's details. Young people should be encouraged to inform Centrepoint staff when they are making a direct complaint to a Registered Provider so that Centrepoint can monitor and improve partner services.

- Where a service is funded by a Local Authority, young people have the right to contact the commissioning team to make a complaint about Centrepont and procedures for doing this should be made clear to young people. Contact details can be inserted on the back of the complaints leaflet.
- 2.17 For services where staff are not on site (e.g. Floating Support and Housing Support Services), complaints and feedback can be received on regular visits to the service, or young people can be encouraged to use the digital complaints email address or contact the lead worker or manager.
- 2.18 Where the complaint is not in the direct control of the manager receiving it (e.g. another service within Centrepont would need to contribute to a response), the manager will receive and log the complaint on In-Form and then contact the relevant manager to discuss the content of the complaint and formulate a response.
- 2.19 Any translated versions of these documents can be used. Further requests for other preferred options for receiving the information (e.g. other languages, BRAILLE, tape etc.) can be submitted via the Quality & Contracts team.

### 3. Stages of complaints

#### 3.1 Stage One complaints

- 3.2 Where a complaint raises immediate concerns for an individual's safety, please consider calling the emergency services on 999 informing the Service Manager and/or On Call Manager to ensure safety.
- 3.3 Once a complaint is received, the complaint should be acknowledged in writing and saved on In-Form within five working days. Please use the **Complaint Acknowledgement Letter template** (W13 SD3)
- 3.4 Where complaints are fairly minor, the staff member or manager should try to give an immediate response or solution, where appropriate. If this happens, the complaint is considered resolved, however, a written record **MUST** still be made of the complaint and the resolution and the complaint logged on In-Form. The written record can be made on the **Complaints & Feedback form**.
- 3.5 Where the complaint is fairly major, the service manager or staff member receiving the complaint should escalate the complaint to an Operations Manager for advice.
- 3.6 **All** complaints must be logged on In-Form and 'Submitted for Approval' to their line manager for sign off.
- 3.7 Where complaints cannot be immediately resolved, then the complaint must be resolved within 10 working days from receipt of complaint – if this is not possible, an explanation and a date by when the stage one response should be received.
- 3.8 If the complainant is unsatisfied with the initial response, and has articulated why their complaint has not been adequately addressed, and further action or investigation is required to resolve a complaint at stage one, this should be done within 10 working days of receipt of the complaint.

- 3.9 Managers should meet complainant to discuss the complaint and agree a way forward. They should **agree if the complaint has been resolved** or if further action is required. The manager should confirm with the complainant that they feel the matter is resolved and if discussions/actions are sufficient or indicate where further investigation is required.
- 3.10 Following this meeting, the manager can either write a response on the reverse side of the **Complaints and Feedback form** (W13 SD2) or confirm the response in writing using Centrepoint headed paper. The response **must be** given in writing to confirm either a resolution, or where further investigation is required.
- 3.11 Even where a matter is resolved verbally in the meeting, it must be confirmed in writing to the complainant as good practice and evidence that an appropriate response was given.
- 3.12 All follow up actions/ responses given or taken by a staff member of manager must also be logged on In-Form and the relevant section(s) should be completed where resolved.
- 3.13 If the complainant is a young person who has left the service, the manager should try to contact them by telephone or post. Again, it is important to confirm that the matter has been resolved with the young person. All stage one complaints must be resolved within 10 working days of receipt.
- 3.14 Throughout all stages, forms/letters/documents/responses relating to the complaint should be copied where required so that the service and the complainant have copies of all appropriate documentation.
- 3.15 Managers/key workers **MUST** update In-Form with the outcome of stage one complaints; either resolved or moving to stage two and 're-assign' to an Operations Manager.
- 3.16 **NB:** All staff can review current complaints status using a summary report in In-Form (see In-Form guidance: Complaints for what is available). These can be used or printed on a weekly basis to check that complaints are being managed effectively and records updated on In-Form. Our complaints performance is shared with Trustees quarterly through the Audit & Risk Committee.
- 3.17 Managers also have access to Complaints reports on In-Form.
- 3.18 All complaints received about a Centrepoint service from an external person, should follow the same procedures as above.
- 3.19 **Stage two complaints:**
- 3.20 Stage two complaints are investigated by someone outside the service that the complaint relates to and responded to by the relevant Operations Manager
- 3.21 The Operations Manager should acknowledge the complaint at stage two within 20 working days from request to escalate – if this is not possible an explanation and a date when the stage two response will be received. This should not exceed a further 10 working days without good reason.

- 3.22 For complaints of a fairly serious nature, the Operations Manager will involve the Head of Support & Housing, the Director of Support & Housing and the Complaints Officer. Once the complaint has been discussed and actions have been decided the Operations Manager will try to resolve the complaint with the complainant.
- 3.23 Where possible, the Operations Manager will arrange a meeting with the complainant and provide feedback face to face to discuss the issue and agree a way forward. They should agree and confirm with the complainant **if the complaint has been resolved** or if further action is required. Where further mediation or investigation is required, the Operations Manager should aim to resolve the complaint within 10 working days of receipt of the stage two complaint.
- 3.24 Even where a matter is resolved verbally in the meeting, it must be confirmed in writing to the complainant as good practice and evidence that an appropriate response was given.
- 3.25 The Operations Manager will give a written response on Centrepoint letter headed paper. The letter should inform the complainant of how to make a further appeal if they are not satisfied with the response given to the complaint at stage two. (Include a copy of Centrepoint generic Appeal Form). The Operations Manager should give, where possible written feedback to the complainant face to face, but where this is not possible, it can be sent to the complainant.
- 3.26 If requested, and where a learning difficulty has been identified, staff should offer to assist the complainant complete an appeal. As an approximate guideline, complainants have 14 calendar days to appeal but in exceptional circumstances appeals will be considered up to 28 calendar days later. Managers will need to make a judgement on this.
- 3.27 If a Complaints appeal is not submitted within 28 calendar days, the complaint will be deemed as 'resolved at stage two'.
- 3.28 Operations Managers MUST update In-Form with the outcome of stage two complaints; as either resolved or escalate stage two to the Head of Support & Housing/Director of Support & Housing.
- 3.29 Any complaint received about a Centrepoint service from an external person, should follow the same procedures as above.

#### **4. Further Complaint (options):**

- 4.1 At the completion of each stage of the complaints process Centrepoint should write to the complainant advising them of the following:
- the complaint stage
  - the outcome of the complaint
  - the reasons for any decisions made
  - the details of any remedy offered to put things right
  - details of any outstanding actions
  - details of how to escalate the matter if dissatisfied.

4.2 If the complainant is still dissatisfied with the final decision made by the Operations Manager, Head of Support & Housing, Director of Support & Housing and the Complaints Officer and feels they have exhausted all internal routes, there are a number of options for them;

- Contact the owning Registered Provider to make a complaint
- Contact the Independent Housing Ombudsman

Contact details: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

Housing Ombudsman Service  
PO Box 152  
Liverpool  
L33 7WQ  
**Tel: 0300 111 3000**

- The complainant also has a right to contact the Local Authority commissioning team directly at any stage should they wish to do so.
- Further information is provided here: <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>.

## 5. Complaints about owning Registered Providers (and/or maintenance issues)

- 5.1 Where Centrepont is **not** the owning landlord of a property or service and the complaint is about the owning Registered Provider or is in relation to a repair that the Registered Provider should complete, the relevant procedures specified by the landlord should be followed. Managers should ask for these from the Registered Provider and communicate them to young people when they move in, explaining which complaints are made to which provider.
- 5.2 These complaints can be logged on In-Form so that all complaints are captured. The manager (or a delegated staff member) can forward the complaint to the relevant Registered Provider to support the young person and advocate on their behalf. They should take a copy before sending.
- 5.3 The manager is also responsible for helping to chase the Registered Provider and for a response, and to support the young person throughout the process.

## 6. Complaints involving allegations about Staff

- 6.1 If a complainant approaches a member of staff to make a complaint about a peer or someone from the management team, the member of staff should take the complainants contact details and state that they will pass it onto a senior manager and the HR department.
- 6.2 The senior Manager is responsible for keeping the complainant informed of progress and will investigate any outstanding aspects of the complaint once these formal processes are complete. All appointed investigating managers should be mindful of staff confidentiality in all communications to the complainant

- 6.3 All staff, whom a complaint has been made about, should be advised that they can seek support from the Employee Assistance Programme and/or Workplace Supporter Scheme such as the Psychologically Informed Team (PIE)

## **7. Complaints made by neighbours**

7.1 Centrepoint takes all complaints seriously, including complaints made by neighbours. We are committed to encouraging and maintaining positive relations with our neighbours and the wider community. In the event of a complaint from a neighbour Managers should follow procedure and also consider doing the following:

- Arrange, where possible, to meet the neighbour to discuss their concerns;
- Gather as much information as possible,
- Report and document all communications with the neighbour,
- Suggest remedies to resolve the complaint(s) at the earliest stage possible,
- Discuss with your Operations Manager whether your commissioner needs to be made aware of these complaints,
- Provide contact details, where appropriate, for reporting any future concerns
- Escalate the complaint to your Operations Manager.

7.2 When discussing all concerns never:

- share any personally identifiable information about young people or staff;
- admit any fault.

## **8. Complaints made using aggression**

8.1 The initial response given to the complainant can often determine or influence the outcome, so it is important to respond well and provide good customer service. Therefore it is necessary for the staff member receiving the complaint or feedback to abide by the Housing Ombudsman's Complaint Handling Code. Staff members are also advised to reassure the complainant, where appropriate that Centrepoint take all complaints and feedback seriously. This could help to de-escalate a situation where a complainant or young person is upset or angry. Please see Managing Conflict Policy.

8.2 Where a complainant communicates their complaint inappropriately or aggressively, the staff member should calmly and constructively challenge unhelpful behaviours, by suggesting that the complainant moves to a more private area where the matter can be discussed.

8.3 NB: Staff should never put themselves at risk and if the complainant is very angry or under the influence of drugs or alcohol, suggest that they return later when they feel less frustrated and the matter can be dealt with. (For more comprehensive guidance on de-escalation refer to W5 De-escalation and Managing Challenging Behaviour Policy and Procedure).

## 9. Managing unreasonable complaints

- 9.1 Centrepont takes complaint handling seriously however in a minority of cases complaints can become unreasonable. In exceptional circumstances we may need to take action to limit the interactions of these people with the complaints process.
- 9.2 The decision to designate someone's complaint as unreasonable must be taken carefully and with input from Operations Managers, and Head of Support & Housing and/or National Head of Support & Housing.
- 9.3 This could include but is not limited to,
- an excessive number of complaints;
  - an unwillingness to engage constructively in solutions;
  - an unwillingness to accept the matter as closed and complaints that are designed to cause disruption or annoyance.
- 9.4 In all cases a senior manager will need to be satisfied that:
- The complaints being made have been dealt with properly
  - Any decision reached is the right one
  - Communication with the complainant has been clear and has thoroughly addressed the concerns raised
- 9.5 If all the points above have been satisfied then we would need to consider whether any further action is necessary prior to designating the complaint as unreasonable. For example, efforts to address barriers to or unmet communication needs will be considered appropriately and sensitively.
- 9.6 When designating a complaint as unreasonable we must write to the complainant outlining the reasons for making the decision and outline the below:
- Why the decision has been made;
  - What action we are taking and the duration of that action;
  - Where the action is time limited and when this will be reviewed (e.g.: 3/6/9 months)In the case of Centrepont Young People, clearly explain that they can continue to talk to staff about different matters that may arise and they will be dealt with accordingly.
- 9.7 **Reviewing a decision:**
- When restrictions have been put in place to manage an unreasonable complaint a review date must be given at the end of this period a review will be carried out by a senior manager;
  - The complainant's behaviour throughout the period will be considered with a view to lifting any restrictions that may have been put in place;
  - We will write to the complainant with the outcome of the review either concluding the matter or offering an extension of the review.

## 9.8 **Options for dealing with unreasonable complainants:**

- Declining further communication about a particular matter;
- Requesting contact in a particular format (phone not email or vice versa);
- All contact can be requested to only occur in the presence of a another member of staff and in a suitable location;
- Asking the complainant to make an agreement about their future contact (e.g.: you may agree to offer specific times to discuss concern/complaints);

9.9 Any appeal to the above process must be received within 10 working days and considered by the Director of Support and Housing or another member of SET.

## 10. **Appropriate remedy**

10.1 Complaints can be resolved in a number of ways. Centrepoint's policy will require that any remedy offered reflects the extent of any and all service failures, and the level of detriment caused to the resident as a result. These shall include:

- acknowledging where things have gone wrong;
- providing an explanation, assistance or reasons;
- apologising;
- taking action if there has been a delay;
- reconsidering or changing a decision;
- amending a record;
- providing a financial remedy;
- changing policies, procedures or practices.

## 11. **Reporting complaints to Local Authority/Registered Providers**

11.1 Some commissioning teams and Registered Provider partners that we work with ask to be kept informed about complaints. All communication with such teams or partners relating to complaints will be co-ordinated via the Service Manager.

11.2 Ensure you liaise with service managers regarding notification to commissioning teams. It is often part of the contract to report complaints within a set timescale (often 24 to 48 hrs) therefore this needs to be tightly managed and monitored.

## 12. **Complaints and monitoring satisfaction levels**

12.1 Young people should be encouraged to make complaints where appropriate and not be put off by having to fill in a form. There should be no disincentives for young people when they want to make a complaint and services should operate to make sure this is the case and to remove any barriers. The most important thing is to listen and give the young person an opportunity to feel that they have been 'heard'.

- 12.2 Managers should seek to understand if young people are satisfied with the way their complaint has been handled and learn from this feedback to continuously improve practice.
- 12.3 A satisfaction feedback form should also be completed to ensure that we monitor levels of satisfaction on how complaints are dealt with, then In-Form can be updated with this information. This data is used to monitor and report satisfaction levels in monthly KPIs.

## 13. Compensation

- 13.1 Compensation can be awarded, in line with Compensating Young People Using Centrepoint Services Procedure. If compensation is awarded at stage one, it is possible for the decision regarding compensation to be appealed and more might be awarded at stage two.

## 14. Good practice guidance: handling complaints

- 14.1 To ensure a comprehensive process when reviewing a complaint, staff must:
- deal with complaints on its merits;
  - act independently and have an open mind;
  - take measures to address any actual or perceived conflict of interest;
  - consider all information and evidence carefully;
  - keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.
- 14.2 **Service Managers and more senior staff should:**
- Ensure staff are aware of how to handle complaints and that information is accessible;
  - Ensure prompt response with target timescales (initial response and resolution);
  - Record and document everything, retain copies;
  - Keep the relevant people informed and communicate well;
  - Young people should be responded to verbally face-to-face, not just through written responses;
  - Confirm that complaints are resolved;
  - Monitor satisfaction on how complaints are handled;
  - Ensure complaints are reported in line with contractual obligations.

## 15. Training requirements

- 15.1 This policy and procedure document should be covered by all managers when inducting new members of staff into Centrepoint procedures.
- 15.2 Staff are encourage to read the Housing Ombudsman’s Complaints Handling Code on a regular basis.

15.3 All staff are encouraged to direct all questions regarding complaints to their line manager in the first instance, if the line manager is not implicated. Further questions can be directed to the Complaints Officer, within the Quality & Compliance team or the HR team.

## **16. Governance requirements**

16.1 In line with the Housing Ombudsman's Complaint Handling Code, the following information should be provided to Trustees, which should be done quarterly through routine reporting to the Audit & Risk Committee, as well as an annual report on complaints to the Audit & Risk Committee:

- Regular updates on the volume, category and outcome of complaints, alongside complaint handling performance including timely compliance with our procedures (and therefore the Ombudsman's orders);
- Annual review of issues and trends arising from complaint handling, including discussion of the Ombudsman's yearly landlord performance report and the inclusion of any organisational learning in the landlord's Annual Report;
- Consideration of individual complaint outcomes where necessary, including findings of severe maladministration or any referrals by it to regulatory bodies, including scrutiny of any subsequent procedural or organisational changes;
- Annual confirmation that the Housing Ombudsman's Complaint Handling Code has been applied.