

W13

Complaints & Feedback Policy

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Legislation or regulatory guidance that impact on this policy:	• The Housing Ombudsman's Complaints Handling Code. • The Supported Accommodation (England) Regulations 2023. • Data (Use & Access) Act 2025.
Next review date due:	May 2029

1. Centrepont policy

- 1.1 Centrepont is regulated by a number of regulating authorities and follows their relevant guidance; including but not limited to; the Housing Ombudsman's Complaint Handling Code, Charity Commission, Ofsted, The Supported Accommodation (England) Regulations 2023, and Common Principles for a Child Friendly Complaints Process.
- 1.2 Centrepont as a registered charity and housing provider for young people, takes all complaints and feedback from the young people we work with and support as well as all other internal and external stakeholders seriously and believes that young people's complaints and feedback should be greeted positively and considered an opportunity for Centrepont to improve the quality of the services being provide.
- 1.3 Centrepont has a zero-tolerance stance on any young person being subjected to any reprisal or detriment for making a complaint or for expressing dissatisfaction of the services we provide.
- 1.4 Everyone should have the opportunity to complain or offer feedback about Centrepont business.

2. Purpose

- 2.1 The purpose of this policy and procedure is to provide clear guidance to enable Centrepoint staff to resolve any complaints raised as quickly as possible and to ensure that all complaints are handled fairly, consistently, and wherever possible resolved to the complainant's satisfaction in a timely manner.
- 2.2 To comply with the Ofsted Supported Accommodation Regulations and specifically the Leadership and Management Standard.

3. Scope

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

4. Definitions

- 4.1 The definitions listed below are set out by the Housing Ombudsman in Complaints Handling Code.
- 4.2 **A complaint must** be defined as:
 - **'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 a resident or group of residents.'**
 - A complainant does not have to use the word 'complaint' for it to be treated as such. Whenever a young person expresses dissatisfaction, Centrepoint as a landlord will give the young person the choice to make complaint.
 - Any complaints submitted via a third party or representative must be handled in line with this policy.
- 4.3 **A service request is:**
 - A request from a young person living in Centrepoint's services requiring action to be taken to put something right.
 - Service requests are not complaints, but must be recorded, monitored, and reviewed regularly.
- 4.4 **An expression of dissatisfaction:**
- 4.5 For services, where an expression of dissatisfaction has been identified via a survey or feedback forms, these are not defined as a complaint, although wherever possible, the young person completing the survey should be made aware of how they can log a complaint should they wish to.
- 4.6 Wider feedback from young people may be requested through surveys and feedback forms to enable us to gather information about their experiences within Centrepoint's services and how they feel they are being supported.
- 4.7 Centrepoint understands the importance of feedback as well as complaints and therefore will provide details of how young people can log a complaint should staff become aware the young person may feel dissatisfied with the services being received.

5. Key responsibilities

- 5.1 The Compliance Team will monitor the complaints@centrepoint.org email inbox on a daily basis for any new complaints raised and any open complaints will be monitored closely till they have been resolved. The Compliance Team will ensure a weekly 'Open Complaints Report' is sent to all services to highlight all complaints that need to be resolved.

- 5.2 The Head of the Compliance will act as Centrepoint's Complaints Officer, with oversight of the complaints handling process. The Complaints Officer is responsible for providing senior management and the board through the Audit and Risk Committee with regular reports on Centrepoint's complaints handling performance.
- 5.3 The Member Responsible for Complaints (MRC) is a member of Centrepoint's board who is responsible for ensuring the governing body receives regular information on complaints that provides insight on Centrepoint's complaint handling performance.
- 5.4 All complaints will be directed to the appropriate teams for formal acknowledgement and investigation, where appropriate.
- 5.5 Centrepoint has a responsibility to ensure everyone has access to the complaints process and will make all reasonable adjustments necessary to ensure it meets this responsibility.

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 twelve months ago.
 - Where the problem is a recurring issue, Centrepoint will consider any previous 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 will be provided to the complainant setting out the reasons why the matter is not suitable for the complaints process and alternative routes such as referring the complaint to the Housing Ombudsman, should be considered where relevant.
- 6.3 Centrepoint will exercise discretion and consider historic complaints where it is reasonable to do so, particularly where the complainant is vulnerable, the issue is ongoing, or there is evidence of service failure.
- 6.4 The complainant has the right to challenge this decision by bringing their complaint to the Housing Ombudsman. Where appropriate the Housing Ombudsman will instruct Centrepoint or landlord to take on the complaint.
- 6.5 For the avoidance of doubt, no exclusions will be made to the complaints or concerns relating to, but not limited to, safeguarding or health and safety issues.

7. Data Protection Complaints

- 7.1 From 19th June 2026 Centrepoint has introduced a new complaints process to deal with data protection complaints as required to meet the requirements of Data (Use and Access) Act 2025, which has amended the Data Protection Act 2018.

8. Risk factors

- 8.1 There are several risk factors to be aware of when handling complaints. Some of these risks can include the following:
- Inconsistency in the way complaints are captured and categorised throughout Centrepoint.
 - Unconscious bias during the complaint handling.
 - Discrimination brought against any person/s making a complaint, including reprisal or detrimental treatment as a result.

- Person/s subject to the complaint being involved in the consideration or investigation of the complaint, including any supervising managers.
- Senior managers being unaware of other contributing factors to complaints.
- A failure to conduct a thorough investigation.
- Failure to satisfy expectations of the complainant could lead to negative media or social media reviews.
- Inaccurate reporting.
- Lack of confidentiality and data breaches.

9. Participation statement

- 9.1 Centrepont 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 consult and involve young people/ stakeholders to consider their views.
- 9.2 We ensure this policy and accompanying procedure is made available to every young person through the Young Person's Guide.

10. Psychologically Informed Environment (PIE)

- 10.1 Centrepont 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 Centrepont, emphasising an evidence-based approach to understanding psychological well-being, developing positive supportive relationships, and providing physical environments that positively impact on young people.
- 10.2 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. Centrepont policies and procedures will reflect and embed PIE principles and practice.
- 10.3 Where a complainant is identified as vulnerable or has additional needs, Centrepont will take a flexible and supportive approach to complaint handling, including adjusted communication, advocacy support, and extended timescales where appropriate.

11. Commitment to equity and inclusion

- 11.1 Centrepont is committed to creating an organisation where people flourish. By establishing trust and challenging 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 Centrepont to be a welcoming environment where individual difference is celebrated in the spaces where we live and work.

12. Commitment to review

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

Accompanying Procedure

Procedure title:	Complaints & Feedback Procedure for Young People, and internal and external stakeholders (non-contractual)
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Supporting documents:	- Complaints and feedback leaflet (W13 SD1) - Complaints and feedback form (W13 SD2) - Complaint acknowledgement letter (W13 SD3) - Centrepont Appeal Form (W13 SD4) - In-Form guidance: Recording complaints - Young Person's Guide - Data Protection Complaints Process
Training that supports the application of these procedures:	- Induction - Handling complaints workshop
Next review date due:	May 2029

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1. Procedure summary

- 1.1 Upon receiving correspondence to the complaints inbox, Centrepoin't's Compliance Team will take several considerations into account prior to beginning an investigation which would include checks to identify if the matter raised is a complaint, feedback, or an expression of dissatisfaction.
- 1.2 Depending on the category the correspondence falls under, the complaint will be passed to the relevant team to acknowledge and investigate the matter raised.
- 1.3 Centrepoin't operates on a two-stage process when handling complaints from young people or external stakeholders about a service, and each category of complaint has a defined response time. These stages have been developed in order to set out the clear guidelines for staff to follow when a complaint is received.
- 1.4 All service staff should be empowered to handle complaints from young people, and internal / external stakeholders where the complaints is about the service in the first instance.
- 1.5 All complaints must be dealt with and look to be resolved within the response times set out in the Complaints Handling Code by the Housing Ombudsman.
- 1.6 This procedure outlines the two stages involved when handling these types of complaints, who is involved and their responsibilities.
- 1.7 This procedure does not cover:
 - **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.
 - **Complaints made by volunteers** - Volunteers can refer to the Volunteer Policy.
 - **Complaints for Fundraising** - Please refer to the Complaints Procedures for Fundraising.

2. Identifying the category of "matters raised" in the first instance

- 2.1 When matters are raised and sent to the complaints@centrepoin't.org inbox, The Compliance Team are notified and check the details of the matters raised to confirm they fall under the correct category when logged on In-Form by the investigating team.
- 2.2 The Compliance Team check the details of the complaint and will monitor the actions taken to ensure the complaint has been acknowledged within 5 days of being received.
- 2.3 Matters raised can vary and depending on the content received, Centrepoin't will address these within the set timeframes and will look to resolve the matter as swiftly as possible.
- 2.4 **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.
- 2.5 **Where a complaint concerns the discrimination, harassment or bullying of individuals** or raises a safeguarding concern, please seek the advice from the Specialist Safeguarding Manager, The Compliance Team and or see:
 - Safeguarding Young People and Adults Policy.
 - Safeguarding Young People and Adults Procedure.
 - Bullying & Harassment Policy.
 - Whistleblowing Policy.
 - Health & Safety Policy.
- 2.6 Staff can request a copy of the Policies and Procedures listed above by contacting the Compliance Team or can find a copy on Sharepoint.

3. How to make a complaint or provide feedback

- 3.1 We want the complaints and feedback procedure to be accessible and open to all young people, and those affected by a service so they can make a complaint or provide feedback in any format. Complaints posters should be displayed in all services, and information available to all young people.
- 3.2 Complaints can be made in person or by someone acting on their behalf in any of the following ways:
- **Verbally** - By talking to staff/volunteers:
 - Young person talks to the manager, staff member or volunteer who then uses the **Complaints and Feedback form** to make a brief note of the complaint, and updates In-Form. (See section 6 for complaints regarding staff).
 - **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.
 - Complaints brought to a residents' meeting should only refer to the service or housing management e.g. building or health and safety concern.
 - 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.
 - **Written** - Complainants can make use of the **Complaints and feedback form**.
- 3.3 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.
- 3.4 Staff must disclose where they have written the complaint on a young person's behalf and this should only be done where a learning difficulties have been identified and must be signed by the complainant. (See section 6 for complaints regarding staff).
- 3.5 A 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."
- 3.6 Staff should attach the written complaint to Centrepoin'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.
- 3.7 The Complaints Officer will receive a notification each time via the Complaints@centrepoin.org inbox when a complaint is logged on In-Form.
- 3.8 **Young Persons' Portal** – Centrepoin is committed to improving the digital accessibility for all Young People, submitting a complaint or feedback in this way can be done via our portal on the Young Persons website.
- 3.9 A staff member will generate a user account for young people as they sign up for a service, allowing them to access the portal - <https://www.my.centrepoin.org.uk/>.
- 3.10 **The Portal** can be used to submit feedback or a complaint for the service they receive.
- 3.11 **Email** – The complaints@centrepoin.org email inbox is currently managed by the Head of Compliance who is acting as Centrepoin's Complaints Officer who will oversee the complaint logged to the relevant manager/ operations manager or team for investigation.
- 3.12 **Website** - Centrepoin is committed to providing the highest quality of service to all young people we support, internal / external stakeholders and welcome all comments, suggestions, feedback, or complaints. If you would like to provide feedback or make a complaint you can do this on our website under the complaints section.

4. Owning Landlord further options:

- 4.1 Where Centrepont is not the owning landlord in the property or service, Centrepont will re-direct young people to the owning Registered Provider or Local Authority Commissioning team as complaints are handled by the property owner.
- 4.2 Centrepont staff will encourage and support young people to raise a complaint with the relevant owning Registered Provider or Local Authority Commissioning team to help resolve the issues the young person may be experiencing.
- 4.3 A space is provided on the back of the complaints leaflet to write in the landlord's details.
- 4.4 Young people should be encouraged to inform Centrepont staff when they are making a direct complaint to a Registered Provider so that Centrepont can monitor and improve partner services.
- 4.5 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.
- 4.6 Procedures for doing this should be made clear to young people. Contact details can be inserted on the back of the complaints leaflet.
- 4.7 For services where staff are not on site (e.g. Floating Support and Housing Support Services), complaints and feedback can be received via the complaints section on the Young Person's Portal, on regular visits to the service, young people can be encouraged to use the digital complaints email address or contact the lead worker or manager.
- 4.8 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.
- 4.9 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 HOMES.

5. Stages of complaints

- 5.1 Centrepont operates a two-stage complaints process and aims to resolve complaints quickly and fairly, providing a summary of the actions taken to resolve matters raised.
- 5.2 A complaint can be escalated, should the complainant not be satisfied with the actions taken to resolve the issue, or if the issue is still not resolved.
- 5.3 At no point during the investigation (if warranted) should any named persons be involved in investigating the matter, only the complaint handler is able to carry out a full and fair investigation.

6. Detailed Procedure - Stage One complaints

- 6.1 Where a complaint raises immediate concerns for an individual's safety, please consider calling the emergency services on 999 and informing the Service Manager and/or On Call Manager to ensure safety.
- 6.2 Once a complaint is received, the complaint should be acknowledged in writing and saved on In-Form within **5 working days**. Please use the **Complaint Acknowledgement Letter template**.
- 6.3 Where complaints are 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, a record **MUST** still be made of the complaint along with details of the resolution which is logged on In-Form.
- 6.4 A written record can be made on the **Complaints & Feedback form**.
- 6.5 Where the complaint is major, the staff member receiving the complaint should escalate the complaint to their Line Manager, in the first instance, and/or an Operations Manager for advice.

- 6.6 **All** complaints must be logged on In-Form and ‘Submitted for Approval’ to the line manager for sign off. (See section 6 for complaints regarding staff).
- 6.7 Where complaints cannot be immediately resolved, the complaint must be resolved within **10 working days** from the complaint being acknowledged – if this is not possible, a written explanation with an extension date by when the stage one response should be received must be provided to the young person. Managers **MUST** provide the young person with the details of the **Housing Ombudsman Service**.
- 6.8 Managers should meet the complainant to discuss the complaint and agree a way forward.
- 6.9 They should **agree if the complaint has been resolved** or if further action is required.
- 6.10 Following this meeting, the manager can either write a response on the reverse side of the **Complaints and Feedback form** or confirm the response in writing using Centrepont headed paper or via email if the complainant prefers.
- 6.11 The response **must be** given in writing to confirm either a resolution, or where further investigation is required, and a copy must be saved as an attachment on In-Form.
- 6.12 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.
- 6.13 All follow up actions/ responses given or taken by a staff member or manager must also be logged on In-Form and the relevant section(s) should be completed where resolved.
- 6.14 If the complainant is a young person who has left the service, the manager should try to contact them by telephone, email, or post. Again, it is important to confirm that the matter has been resolved with the young person.
- 6.15 All stage one complaints must be resolved within **10 working days** of the complaint being acknowledged.
- 6.16 Throughout all stages, forms/letters/emails/documents/responses relating to the complaint should be saved to In-Form where required so that the service and the complainant have copies of all appropriate documentation.
- 6.17 Managers/key workers **MUST** update In-Form with the outcome of stage one complaints; either resolved or moved to stage two and re-assign the complaint to an Operations Manager.
- 6.18 **NB:** All staff with access to In-Form 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.
- 6.19 The Compliance Team monitors the complaints on a regular basis and will follow-up with the complaint handler for updates to ensure complaints are being dealt with within the timeframes set out in the complaints handling code.
- 6.20 Our complaints performance is shared with Trustees quarterly through the Audit & Risk Committee.
- 6.21 Managers also have access to Complaints reports on In-Form. All complaints received about a Centrepont service from an external person, should follow the same procedures as above.
- 6.22 **Stage two complaints** – Stage 2 represents Centrepont’s final response under the complaints process. After this stage, the complainant has the right to contact the Housing Ombudsman.
- 6.23 At stage two, complaints are investigated by someone outside the service that the complaint relates to and is responded to by the relevant Operations Manager.
- 6.24 The Operations Manager should acknowledge the complaint at stage two within **5 working days** from when it was requested to be escalated. A copy of the acknowledgement letter should be saved as an attachment on In-Form.

- 6.25 For complaints of a serious nature, the Operations Manager will involve the Head of Housing, the Director of Progression 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.
- 6.26 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.
- 6.27 Where further mediation or investigation is required, the Operations Manager should aim to resolve the complaint within **20 working days**.
- 6.28 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. The response must be saved as an attachment on In-Form.
- 6.29 The Operations Manager will give a written response on Centrepont letter headed paper or via email if preferred. 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 Centrepont generic Stage 2 Escalation Request Form).
- 6.30 The Operations Manager should give written feedback to the complainant, but where this is not possible, a letter or email can be sent to the complainant. A copy of the letter should be saved to In-Form.
- 6.31 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 10 working days to appeal but in exceptional circumstances appeals will be considered up to 20 working days later. Managers will need to make a judgement on this.
- 6.32 If a request to escalate to stage two is not submitted within 20 working days, the complaint will be deemed as 'resolved at stage two'. Operations Managers **MUST** update In-Form with the outcome of stage two complaints; as either resolved or escalate stage two to the Head of Housing and the Director of Progression Housing.
- 6.33 Any complaint received about a Centrepont service from an external person, should follow the same procedures as above.
- 6.34 If at any stage, the complainant feels the complaints procedure has not been adequately followed, The Compliance Team will review the details of the complaint and escalate the complaint directly to the Head of Housing and the Director of Progression Housing.

7. Responding to Complaints

- 7.1 At the completion of each stage of the complaints process Centrepont should write to the complainant advising them of the following:
- The complaint stage.
 - The complaint definition.
 - The decision on the complaint.
 - The reasons for any decisions made.
 - The details of any remedy offered to put things right.
 - The Details of any outstanding actions.
 - The Details of how to escalate the matter to stage 2 if the individual is not satisfied with the response, and
 - The details of how to escalate the matter to the Ombudsmen Service if the individual remains dissatisfied.

7.2 If the complainant is still dissatisfied with the final decision made by the Operations Manager, Head of Support and Housing (North), Head of Support and Housing (London), Director of Services and the Complaints Officer and feel 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 by:
 - **Completing an online form** on their website: www.housing-ombudsman.org.uk/contact-us page.
 - **Webchat** - visit the webpage above and click on  icon.
 - **In writing by post:**
Housing Ombudsman Service
PO Box 1484
Unit D
Preston
PR2 0ET.
 - Alternatively, you can use the phone line service during the hours below:

Monday, Tuesday, Wednesday & Friday from 9am to 5pm or Thursday from 9am to 3.30pm
by calling **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/>.

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

- 8.1 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.
- 8.2 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.
- 8.3 These complaints can be logged on In-Form so that all complaints are captured.
- 8.4 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.
- 8.5 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.

9. Complaints involving allegations about Staff

- 9.1 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 either take the complainants contact details and state that they will pass it onto the line manager or direct the Young Person to submit a complaint through the young person's portal.
- 9.2 Notification of this request will be received by an impartial person within the Support and Housing Projects team who will establish contact and take the complaint in a confidential way.
- 9.3 Should the line manager be implicated, staff must forward the complainant's details to HR and the relevant Operations Manager for correspondence and investigation. The Safeguarding process remains the same and concerns should be directed to the Specialist Safeguarding Manager, the relevant Manager and/or Operations Manager.

- 9.4 The Investigating 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.
- 9.5 All appointed investigating managers should be mindful of staff confidentiality in all communications to the complainant.
- 9.6 All staff, whom a complaint has been made about, should be advised that they can seek support from the Employee Assistance Programme (EAP) and/or Workplace Supporter Scheme such as the Psychologically Informed Environments Team (PIE).

10. Complaints made by neighbours

- 10.1 Centrepont takes all complaints seriously, including complaints made by neighbours.
- 10.2 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.
- 10.3 When discussing all concerns never:
- Share any personally identifiable information about young people or staff.
 - Admit any fault.

11. Complaints made using aggression

- 11.1 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.
- 11.2 Therefore, it is necessary for the staff member receiving the complaint or feedback to abide by the Housing Ombudsman's Complaint Handling Code.
- 11.3 Staff members are also advised to reassure the complainant, where appropriate that Centrepont take all complaints and feedback seriously.
- 11.4 This could help to de-escalate a situation where a complainant or young person is upset or angry. Please see Behaviour Management Policy.
- 11.5 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.
- 11.6 **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 Behaviour Management Policy).

12. Managing unreasonable complaints

- 12.1 Centrepont takes complaint handling seriously however in a minority of cases complaints can become unreasonable. Unreasonable complaint status does not restrict safeguarding disclosures. When considering whether a complaint is unreasonable, Centrepont will take account of a complainant's circumstances, including disability, trauma, mental health, age, and any identified vulnerabilities.
- 12.2 In exceptional circumstances we may need to take action to limit the interactions of these people with the complaints process.
- 12.3 The decision to designate someone's complaint as unreasonable must be taken carefully and with input from Operations Managers, Head of Housing and Director of Progression Housing.
- 12.4 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.
- 12.5 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.
- 12.6 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.
- 12.7 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.
- 12.8 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.
- 12.9 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 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).

- 12.10 Any appeal to the above process must be received within **10 working days** and considered by the Director of Services or another member of SET.

13. Appropriate remedy

- 13.1 Complaints can be resolved in a number of ways. Centrepoin’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 or adding a correction.
- Providing a financial remedy.
- Changing policies, procedures, or practices.

14. Reporting complaints to Relevant Stakeholders

- 14.1 Some stakeholders that we work with ask to be kept informed about complaints, including but not limited to commissioning teams, Registered Provider partners, and Ofsted.
- 14.2 All communication with such teams or partners relating to complaints will be co-ordinated via the Service Manager, with the help of Centrepoin’s data Protection team dataprotection@centrepoin.org.
- 14.3 Specific requirements for particular stakeholder are outlined below:

Stakeholder	Reporting Requirements	Lead Team/s
Ofsted	Upon request a statement containing a summary of any complaints or representations made during the 12 months preceding the date of the request and the action that was taken in response to each complaint.	Ensure you liaise with service managers, and Support and Housing Projects Team (On behalf of the Registered Service Manager).
Local Authority	Upon request or as per the relevant commissioning contract.	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.
Registered Provider	Upon request or as per the relevant management agreement.	Ensure you liaise with service managers, and Head of Internal Audit.

15. Data Protection Complaints

- 15.1 Individuals may raise a complaint where they believe their data protection rights under UK GDPR have not been upheld, including in relation to access, accuracy, retention, lawful processing, or security. Complaints may cover:

- Access requests (SARs).
- Rectification.
- Erasure.
- Restriction.

- Objection.
- Automated decision-making.

15.2 Centrepont aims to handle all data protection complaints within **30 days**. All data protection complaint timescales are expressed in calendar days unless otherwise stated. Any delays will be communicated in writing to the complainant.

15.3 Each stage of the data protection complaints process is set out below:

Stage 1	Complaint received by an individual in relation to their data rights and how their personal data has been handled. An acknowledgement is issued to the complainant which should confirm the following: • The complaint has been received. • The complaint is being reviewed.	Centrepont will acknowledge the complaint within 5 days of the complaint being received.
Stage 2	Complaint investigated by a member of the Compliance Team. The investigation will include: • Making all reasonable enquiries. • Updating the complainant on the progress of the complaint. • Considering whether Centrepont breached UK GDPR and/or the DPA 2018.	Centrepont will conclude the investigation within 20 days of the complaint being acknowledged.
Stage 3	Centrepont's Data Protection Officer (DPO) will review the investigation findings.	Centrepont's DPO will complete their review within 3 days of the investigation being completed.
Stage 4	The outcome of the complaint will be communicated to the complainant and will include: • What has been reviewed. • The outcome of the investigation. • Information in relation to the judgement made. • What corrective action (if any) has been taken. • Complainants will be advised to raise their concerns with Centrepont in the first instance. If they remain dissatisfied following completion of Centrepont's data protection complaints process, they may escalate the matter to the ICO directly www.ico.org.uk.	Centrepont will communicate the outcome of the complaint within 2 days of the investigation review being completed.

15.4 Centrepont's Data Protection Officer is independent of operational-decision making in complaints under review and will not be involved in the matter complained about.

16. Complaints and monitoring satisfaction levels

16.1 **Satisfaction levels and feedback** - Young people should be encouraged to make complaints where appropriate and not be put off by having to fill in a form.

16.2 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.'

16.3 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.

16.4 A satisfaction feedback form could 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.

- 16.5 **Monitoring** - This data is used to monitor and report satisfaction levels in monthly KPIs, to be considered when implementing policy change, and when setting service standards. Where service improvements arise from complaints, Centrepont will consider how this learning is shared with complainants and young people.
- 16.6 The Head of Compliance who acts as Centrepont's Complaints Officer will conduct an annual self-assessment of the complaints received and how these are handled.
- 16.7 The self-assessment carried out must be reviewed and approved by the landlord's governing body at least annually.
- 16.8 Once approved, Centrepont will look to publish the self-assessment as part of the annual complaints performance and service improvement report on our website.
- 16.9 The governing body's response to the report must be published alongside this.
- 16.10 Centrepont is required to complete the self-assessment in full and support all statements with evidence and any additional commentary, as necessary.

17. Claiming Compensation

- 17.1 Young people should claim compensation by following Centrepont's Compensating Young People using Centrepont Services Policy.
- 17.2 Managers receiving complaints, which include requests for compensation, should send these to the Director of Services for consideration.
- 17.3 Managers should fully investigate the claim and all relevant circumstances to make recommendations to the Director of Services before any compensation is paid.
- 17.4 In some cases, compensation is not be payable to the young person. This could include instances such as:
- Claims for personal injury.
 - Claims for damage caused by circumstances beyond a landlord's control (e.g. through storm or flooding).
- 17.5 Problems caused by a third party not working for the landlord and problems resulting from lifestyle choice.
- 17.6 Please refer to **the Compensating Young People Using Centrepont Services Policy & Procedure** for full details.

18. Good practice guidance: handling complaints

- 18.1 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.
- 18.2 **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.

19. Recording Complaints

- 19.1 All complaints received regarding Centrepoint's work, and services are recorded and captured on In-Form, Centrepoint's client management system, irrespective of how they are received. Centrepoint has additional internal guides, available to staff, on how to accurately record complaints using the In-Form system.

20. Training requirements

- 20.1 This policy and procedure document should be covered by all managers when inducting new members of staff into Centrepoint procedures.
- 20.2 Staff are encouraged to read the Housing Ombudsman's Complaints Handling Code on a regular basis.
- 20.3 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 Compliance Team or the HR team.

21. Governance requirements

- 21.1 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 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).
 - Periodic compliance checks will be undertaken by the Compliance Team to provide assurance on complaint handling quality, timeliness and learning outcomes.
 - 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. The Complaints Handling Code (CHC) Self-assessment is completed annually against the Housing Ombudsman template and approved by Centrepoint's Board. It is published on Centrepoint's website.

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