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**Title:** Complaints - Housing and Support Policy

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

**Author:** Head of Case Resolution

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

**Authorised by:** Executive Committee

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

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

1.2 In line with the Housing Ombudsman's Complaint Handling Code (2020), Sanctuary defines a complaint 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 resident or group of residents.*

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

- accepting complaints in any format, including verbal, written and online;
- making reasonable adjustments to so customers can access the process;
- giving customers opportunities to share evidence and suggest solutions;
- using records and evidence to inform decisions rather than speculation;
- and
- signposting customers to other organisations for support where needed.

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

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

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

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

## 2. Roles and responsibilities

- 2.1 The Group Director - Housing is responsible for ensuring adoption of, and adherence to, this policy across Sanctuary.
- 2.2 This is supported by the Head of Case Resolution, who provides guidance and support to staff and maintains independent oversight of all complaints handled through this policy. Additionally, the Head of Case Resolution is responsible for ensuring that complaints are used to inform service delivery and that action is taken in response to lessons learned.
- 2.3 Managers have day to day responsibility for the implementation of the policy and associated procedure in practice. They are responsible for ensuring:
- communication to all staff;
  - suitable and sufficient training and instruction is provided;
  - adherence to the policy by all staff; and
  - the provision of the necessary equipment, resources, and records to make sure that compliance is achieved.
- 2.4 Communication with customers is centred around the concept that all enquiries are resolved at the first point of contact wherever possible. Therefore, all staff, particularly those who may interact with customers and receive complaints must:
- be aware of, understand and implement this policy and associated procedure;
  - support resolution of complaints and concerns at the first point of contact;
  - provide assistance to colleagues handling complaints where requested;
  - participate in any training that Sanctuary Group makes available; and
  - communicate any issues with implementing this policy to their line manager and identify any areas for continuous improvement promptly.

## 3. References and sources

- [Housing Ombudsman Service](#)
- [Homes and Communities Agency](#)
- [Disability Discrimination Act 1995](#)
- [Data Protection Act 2019](#)
- [Human Rights Act 1998](#)
- [Equality Act 2010](#)

## 4. Impact on diversity

- 4.1 This policy applies to Sanctuary, as outlined above.
- 4.2 Sanctuary Group demonstrates its commitment to diversity and promoting equality by ensuring that this policy is applied in a manner that is fair to all sections of the community, with due regard to the protected characteristics identified under the [Equality Act 2010](#) and in accordance with its [Fairness for All](#) Single Equality Scheme.

- 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 reflects the expectations that customers have shared with staff through various channels including:
- STAR (Survey of Tenants and Residents) results;
  - complaints received about housing and maintenance services; and
  - Resident Scrutiny Panel feedback when discussing Sanctuary's Service Offers.

## **6. Monitoring and compliance**

- 6.1 This policy, and associated procedures, will be monitored through regular review by the Head of Case Resolution. Case Resolution and Group Customer Services will ensure compliance with the policy across operations by maintaining independent oversight of action taken under this policy.
- 6.2 The Housing Ombudsman Service ensure compliance with the policy where individual complaints are referred to it for consideration.
- 6.3 Period of review
- 6.3.1 Until a new policy is formally adopted this document will remain in force and operational.
- 6.3.2 This policy will be reviewed in accordance with the policy review programme agreed by Executive Committee.
- 6.3.3 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 Group Director - Housing or Group Director - Corporate Services will initiate an immediate review.
- 6.3.4 Where appropriate, key stakeholders, residents and interested parties will be consulted as part of any review of this policy.

## 7. Approval

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

## 8. Operational arrangements

8.1 This policy must be used in conjunction with the [Complaints - Housing and Support Procedure](#) and associated guidance documents.

### 8.2 Raising complaints

8.2.1 Sanctuary operates a two-stage complaints procedure in which the first stage, Front Line Resolution (FLR) focusses on front line staff taking swift action to resolve customers' concerns effectively. The second stage, Investigation, focusses on providing an independent investigation into customer concerns and providing a full written report of their findings.

8.2.2 Complaints will be accepted from residents and applicants with whom Sanctuary has a formal contract. Concerns or dissatisfaction from members of the public will be handed in line with the [Customer Contact - Housing Procedure](#).

8.2.3 There are circumstances in which it is not appropriate for a complaint to be raised because there is another process which is better suited to resolving the problem. These are:

- Issues that occurred more than six months previously, unless there is evidence that this has been raised to staff and no action has been taken.
- Concerns that have already been investigated through Sanctuary's complaints policy and a final response has been given.
- Matters that are being considered through the relevant legal process such as a disrepair claim, Small Claims Court, or First Tier Tribunal.
- Complaints about the behaviour of tenants and their households; these are handled in line with the [Antisocial Behaviour - Housing and Support Policy and Procedure](#).
- Dissatisfaction with Sanctuary's policy or procedure; these are recorded as policy feedback and passed to the policy owner to be considered in the next review.
- Personal injury claims or claims for damaged items valued at over £5,000; these will be assessed and usually passed to Sanctuary's insurers.

8.2.4 Where Sanctuary decides not to raise a complaint, this will be explained to the customer and they will be advised of their right to contact the Housing Ombudsman Service to challenge this decision.

### 8.3 FLR - the first stage

8.3.1 In most cases, FLR complaints are undertaken by the member of staff who receives the complaint. Staff are empowered to undertake the activity they feel is appropriate to achieve resolution, in consultation and agreement with the customer.

- 8.3.2 Staff aim to acknowledge FLR complaints within five working days and to provide a written response within 10 working days, although this is often sooner. The response will explain whether the complaint is upheld and what action will be taken to resolve the situation moving forwards.
- 8.3.3 Where customers are unhappy with the proposed action, they have the right to escalate their complaint to the second stage and in order to do so, they should explain to the person handling the FLR complaint why they remain unhappy and what they are looking for in order to resolve the complaint.
- 8.4 Investigation - the second and final stage
- 8.4.1 The aim of the second stage of the process is to resolve the complaint through robust investigation of the issues by an independent and objective team or suitably senior manager.
- 8.4.2 Sanctuary aims to respond to all Investigation stage complaints within 20 working days, and will ensure that customers are informed whether their complaint has been upheld and what action will be taken to resolve the situation.
- 8.4.3 If a customer is unhappy with the outcome of their Investigation complaint, they are encouraged to make contact with the complaints handler and to share why they remain unhappy, provide any additional evidence which has not been considered, and to explain what they are looking for to resolve the complaint.
- 8.4.4 Once this has been provided, staff will provide a final response to the customer and this will explain Sanctuary's position and the customer's rights should they wish to pursue their complaint. In all instances, this will involve a referral to the Housing Ombudsman Service, but other agencies may be signposted, should this be appropriate.
- 8.5 External referrals
- 8.5.1 Whilst Sanctuary always aims to resolve concerns through the internal complaints process, customers do have the right to refer their complaint should they remain unhappy with the final response.
- 8.5.2 In line with Democratic Filter, set out in the Government's Localism Act 2011, customers will be referred a 'Designated Person' once they complete Sanctuary's internal complaints process. This is to encourage resolution of complaints before they are taken up by the Housing Ombudsman Service.
- 8.5.3 A 'Designated Person' can be an MP, a local councillor, or a recognised tenant panel. The 'Designated Person' may help resolve the complaint directly, may refer the complaint to the Housing Ombudsman Service, or may decline doing either.
- 8.5.4 The complainant may also approach the Housing Ombudsman Service or Local Government and Social Care Ombudsman directly if more than eight weeks have elapsed since the completion of Sanctuary's internal complaints

## 8.6 Managing challenging or unacceptable behaviours

8.6.1 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.

8.6.2 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](#).