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1. Document Overview

| Purpose | To set out Thrive's approach to handling complaints. |
|---------------------|---|
| Audience | Colleagues, Contractors Customers of Thrive Homes and non- Thrive Customers. |
| Data Classification | For internal and external use. |
| Review Cycle | 12 months or in the case of changes to the Housing Ombudsman's Complaint Handling Code. |
| Next Review | March 2026 |

2. Document Version History

| Version | Date | Authors | Reviewer | Changes & Additions |
|---------|------------|-------------------------------------|------------------------|---|
| V1 | 12.03.2024 | Victoria Bolton & Lydia Usher | CWG EMT | Created |
| V2 | 14.01.2025 | Leah Thompson | Anne Bijum, CWG, | Amendments to include regulation changes for high rise buildings, to clarify compliance relating to customer requests to extend a complaint, that Thrive accepts complaints about staff behaviour as per HO report recommendation and to highlight accessibility options available. |

3. Scope and objectives

We're committed to providing a fair deal for customers. Sometimes, things can go wrong, and it's important that our customers are able to let us know so that we can put things right.

This policy clearly sets out Thrive Homes' approach to handling complaints effectively in line with the Housing Ombudsman's Complaint Handling Code and Thrive's service offer as outlined in the Thrive Deal available at: thrivehomes.org.uk/thrivedeal

The policy relates to any Thrive customers or their elected third parties who wish to raise a complaint. It also relates to any colleague of Thrive Homes or case handler investigating a complaint.

The Housing Ombudsman requires customers to make landlords aware of any service failures within 12 months. After then, we won't be able to accept the complaint. When raising a complaint, we need to understand:

- What the customer is unhappy about?
- When the problem started?
- The names of anyone they have spoken to at Thrive about the issue, and when
- What the customer would like Thrive to do to resolve the problem.

4. The Policy

4.1 Definition of a complaint

A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a group of residents.

If a resident or group of residents is dissatisfied with the service, safety, actions, or inactions of the landlord or their staff, they can raise a complaint. This also covers concerns about staff behaviour and how they address residents' support needs.

All Thrive colleagues have personal objectives set in relation to effective complaint handling ensuring that we:

- have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments
- take a collective responsibility for any shortfalls identified through complaints, rather than blaming others; and
- act within the professional standards for engaging with complaints as set by any relevant professional body.

4.2 Definition of a service request

A service request is when a customer asks Thrive to put something right. Service requests are not complaints. Service requests are recorded, monitored, and reviewed regularly. All requests are to be met in line with the service standards outlined in the Thrive Deal and customers will be given clear timescales for when the request will be resolved. An example of a service request could be reporting something that had been missed on as part of a communal cleaning visit or reporting anti-social behaviour.

If a customer is unhappy with a response to a service request, even if our attempts to resolve the request are still ongoing, we will raise the matter as a complaint. During this time, we will continue our efforts to resolve the service request as quickly as possible.

4.3 Definition of a service failure

A service failure is when we have failed to meet regulatory standards, our policies, procedures, or service standards as set out in the Thrive Deal.

4.4 Definition of a 'relevant' building safety complaint

A relevant complaint is defined as being a safety issue with a building, or how well Thrive and its accountable person responsible for the safety of the building is performing in line with regulations.

4.5 Customer satisfaction surveys

There may be occasions when customers are invited to take part in surveys to give feedback about our services. Where a customer has expressed dissatisfaction as part of a survey, it will not be recorded as a complaint, but they will be given guidance on how to raise it as one.

4.6 Exclusions

We will always look to resolve stage 1 and stage 2 complaints, but there may be occasions when we aren't able to find a solution. Before any decision is made, we assess each case on its own merits. If we're unable to accept a complaint, we'll write to the customer and explain why. Customers have the right to take this decision to the Housing Ombudsman who may not agree that the exclusion has been fairly applied.

| What isn't a complaint? | Who should I contact? |
|---|---|
| The first time you ask for a service e.g. reporting a repair or requesting information. This is known as a 'service request'. | To raise a new service request, contact us by: web chat at thrivehomes.org.uk/talktous emailing enquiries@thrivehomes.org.uk on the myThrive Hub calling 0800 917 6077. |
| Lettings decisions | Your local authority. You can find out who your local authority is at www.gov.uk/find-local-council |
| Environmental Health Notices, Housing Health and Safety Rating Notices (HHSRS) | speak to us on web chat at thrivehomes.org.uk/talktous email enquiries@thrivehomes.org.uk on the myThrive Hub call 0800 917 6077. |
| General correspondence from councillors and MPs not generally related to a complaint | www.qov.uk/housing/tribunals or: speak to us on web chat at thrivehomes.org.uk/talktous email enquiries@thrivehomes.org.uk on the myThrive Hub call 0800 917 6077. |
| External appeals process e.g. First Tier Tribunal or decisions made in a court of law | speak to us on web chat at thrivehomes.org.uk/talktous email enquiries@thrivehomes.org.uk on the myThrive Hub call 0800 917 6077. |
| Leaseholder consultation observations | homeownership@thrivehomes.org.uk or speak to us on web chat at thrivehomes.org.uk/talktous email enquiries@thrivehomes.org.uk on the myThrive Hub call 0800 917 6077. |
| Appeals | speak to us on web chat at thrivehomes.org.uk/talktous email enquiries@thrivehomes.org.uk on the myThrive Hub call 0800 917 6077. |

| Anti-Social Behaviour (ASB) | This will be handled through the ASB process. Customers can report ASB on the myThrive hub at thrivehomes.org.uk/mythivehub For more information, visit thrivehomes.org.uk/ASB | | | |
|--|---|--|--|--|
| Criminal matters | These need to be reported to the police on 999 for emergencies, or 101 for non-emergencies. | | | |
| Anything that is subject to court proceedings. | Our complaint process doesn't operate the same way as a court and is unable to make legal decisions. We wouldn't make findings on matters such as negligence, liability or discrimination and we do not make orders of compensation in the way that a court may order a payment of damages. | | | |
| | For more information: speak to us on web chat at thrivehomes.org.uk/talktous by emailing enquiries@thrivehomes.org.uk on the myThrive Hub calling 0800 917 6077. | | | |
| Insurance claims | We do not look at claims the way an insurance provider would, or award financial redress for damage to items which should be covered by insurance via our complaint process. Any such matters would need to go through our insurance team. For more information: | | | |
| | speak to us on web chat at thrivehomes.org.uk/talktous by emailing enquiries@thrivehomes.org.uk on the myThrive Hub calling 0800 917 6077. | | | |
| The matter occurred over 12 months ago | Where the issue took place over 12 months ago, and we've had no contact on the matter since then, we would not be able to investigate the complaint. | | | |
| | However, if the issue took place over 12 months ago, and there's reasonable evidence to suggest that the customer only recently became aware of the issue, we would still consider taking this through the complaint process at our own discretion. | | | |
| Where we've already ssued a final response to the matter in a previous | The customer would then need to refer this matter to the Housing Ombudsman. | | | |
| complaint. | Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/ Phone: 0300 111 3000 Email: info@housing-ombudsman.org.uk Postal address: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ | | | |
| the matter in a previous | Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-complaint/ Phone: 0300 111 3000 Email: info@housing-ombudsman.org.uk Postal address: Housing Ombudsman Service, PO | | | |

5. Accessibility and awareness

5.1 Making a complaint

We want to make it easy for customers to tell us when something is wrong. Customers can make complaints via the following channels:

- Emailing complaints@thrivehomes.org.uk or enquiries@thrivehomes.org.uk
- Calling us on **0800 917 6077**
- Using our live chat on our website thrivehomes.org.uk/talktous
- Via myThrive hub (our online portal for customers) thrivehomes.org.uk/mythrivehub
- Using our online complaints form at thrivehomes.org.uk/complaints
- Writing to us at:

Thrive Homes
Westside
London Road Hemel Hempstead
HP3 9TD

- Via social media (please be aware, we will always protect customers' privacy. Where
 we receive a complaint via social media, we will take the discussion offline and contact
 customer's directly to acknowledge, investigate and respond to complaints).
- In addition to the above, customers can raise complaints with any member of Thrive or via our contractors. In these circumstances, these complaints will be passed directly to the complaints team within 1 working day of being received so that they can be logged and handled in line with our process.

5.2 Accessibility

If there's anything that you're unsure of within our policy, you can contact Thrive for clarification.

This policy is available on our website, where accessibility tools can convert text to speech, provide reading support, and offer translation. You can also request a printed copy to be sent to you by post, including options for large print or braille. More information can be found at **thrivehomes.org.uk/accessibility**

We consistently provide access to our complaints policy in our newsletters and customer communications. Additionally, we ensure that customers are informed about the location of policy details during the complaint process and in feedback surveys. Our communications always encompass details about the Housing Ombudsman and the Complaint Handling Code, which are thoroughly outlined in section 5.3 of our policy, titled 'Taking a complaint to the Housing Ombudsman'.

5.3 Taking a complaint to the Housing Ombudsman

If at any point during the complaint process a customer is unhappy with how the complaint is being handled, they can let us know by contacting the complaints team on **0800 917 6077** or by emailing **complaints@thrivehomes.org.uk.**

Customers can contact the Housing Ombudsman at any time for guidance, information, and support.

The Housing Ombudsman Service's contact details are as follows:

Online complaint form: www.housing-ombudsman.org.uk/residents/make-a-

complaint/

Phone: 0300 111 3000

Email: info@housing-ombudsman.org.uk

Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston PR2 0ET

The assistance the Housing Ombudsman can offer will depend on whether and when we've sent our final response to the complaint. Once customers have received a final response from us, they can ask the Housing Ombudsman Service to investigate further if they are not satisfied with the outcome.

Our written responses will be clearly labelled and will confirm in writing that it is the final response.

The Housing Ombudsman Code is embedded into our Complaints Policy and process and our case handlers are trained specifically on how to follow the code.

We regularly quality check the responses being sent to customers to make sure that the investigations and responses meet the standard we expect.

In addition to this, we carry out a self-assessment against the code at least once a year to make sure our policies, process and practices align with it. Customers can find out more about our recent self-assessment at **thrivehomes.org.uk/complaints**

5.4 Complaints relating to higher risk buildings

Complainants who are dissatisfied with our handling of safety concerns in higher-risk buildings (defined as those with 7 storeys or at least 18 metres in height, as per the Building Safety Act 2022) may refer their complaint to the Building Safety Regulator (BSR). This applies to issues that could result in structural failure or the spread of smoke or fire within the building. Complainants may contact the BSR only after our complaints process has been fully exhausted. The BSR will then investigate the safety aspect of the complaint.

If a complainant is dissatisfied with our handling of the complaint itself, they may also refer the matter to the Housing Ombudsman.

Details of how to contact the building safety regulator can be found at: https://www.gov.uk/guidance/contact-the-building-safety-regulator

Telephone: 0300 790 6787

5.5 Appointing a third party

A customer can appoint a third party to act as their representative for their complaint by completing a 'third party authorisation' form. This must be completed and sent to us by the customer.

This form can be completed at: thrivehomes.org.uk/contact-us/request-to-add-a-third-party-contact/

A paper version of this form is also available via the above link, and can be sent back to us by post to:

Thrive Homes
Westside
London Road
Hemel Hempstead

HP3 9TD

A printed copy of the form can be requested by contacting Thrive on **0800 917 6077** or by emailing **complaints@thrivehomes.org.uk**.

A complaint submitted by an appointed third-party representative will still be dealt with in line with Thrive's complaint policy and procedure.

5.6 Non-Thrive customers

We welcome feedback from everyone, whether or not they are a Thrive customer. We are particularly interested in hearing from those who have experienced any dissatisfaction with our service or have concerns about the safety of our buildings.

If the person making the compliant is not, or has never been a Thrive customer, the way we handle their complaint will still be in line with our complaint process. However, they may not be able to refer the matter to the Housing Ombudsman.

5.7 Reasonable adjustments

Under the Equality Act 2010 we will always make appropriate reasonable adjustments. For example, we can arrange a translator if the complainant's first language is not English. We will keep a record of any reasonable adjustments that have been agreed, as well as any disabilities disclosed by customers. The agreed adjustments will be kept under regular review.

5.8 Equality, Diversity and Inclusion

Our complaints process aims to be fair and is open to all and customers can read more about our approach to inclusivity in our Equality, Diversity & Inclusion Statement of Intent which can be found on our website at: thrivehomes.org.uk/about-us/equality-and-diversity/equality-diversity-and-inclusion-statement-of-intent/

6. Complaint handling process

6.1 The team

We have a team that are trained to handle complaints in accordance with the Thrive Policy and the Housing Ombudsman Complaint Handling Code. The team work closely with all areas of the business at all levels to resolve complaints as quickly as possible.

The case handler who investigates the stage 2 complaint will not be the same person that handled the stage 1 complaint.

Thrive has a suitably senior lead person to oversee its complaint handling performance who assesses any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.

In addition to this, a member of the governing body (or equivalent) has lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints (The Member).

The Member is responsible for ensuring the governing body receives regular information on complaints that provides insight on the Thrive's complaint handling performance and has access to suitable information and staff to perform this role and report on their findings.

All Thrive colleagues are trained twice a year, or following any change in process, on identifying and resolving complaints. This will also form part of the onboarding process for all new starters during their induction to Thrive.

6.2 Complaint stages

We have a two-stage complaint process. We will look to resolve things at stage 1. If this isn't possible, the complaint will be escalated stage 2. Customers are not required to explain their reasons for requesting an escalation to stage 2. However, if we receive a request to escalate and any aspect of the complaint is unclear, we will contact the complainant to seek clarification.

Where the customer raises additional complaint points during the stage 1 investigation that are related to the existing issue, these will be added into the open complaint. If the new points raised are unrelated to the complaint being investigated, or would unreasonably delay the response, they will be logged as a new complaint.

At each stage of the complaint process, we will:

- a) deal with complaints on their merits, act independently, and have an open mind
- b) give the customer a fair chance to set out their position
- c) take measures to address any actual or perceived conflict of interest; and
- d) consider all relevant information and evidence carefully.

We will keep a full record of the complaint and the outcomes reached at each stage. The record will include the original complaint and the date it was received, all correspondence with the resident and other relevant third parties, and any relevant supporting documents such as reports and surveys.

6.3 Timescales

We always look to resolve complaints as quickly as possible. Where we can identify a solution without the need for a full stage 1 investigation, we will confirm this with the customer. As part of this, we will agree what action we are taking to put things right, how we've learnt from their complaint and advise their referral rights. An early resolution will not prevent or delay a customer's right to escalate the complaint to stage 2 if they so choose.

We will acknowledge stage 1 and stage 2 complaints within five working days of receiving them. The acknowledgment will confirm which parts of the complaint we are responsible for and clarify any unclear or unrelated areas. We will then inform the customer of our plan to investigate and resolve the complaint.

Customers can expect to receive a response within 10 working days from acknowledgement for a stage 1 complaint, and within 20 working days from acknowledgement for a stage 2.

If an extension is needed, it will be no longer than 10 working days for a stage 1 complaint and 20 working days for a stage 2 complaint. Thrive will agree this with the customer and confirm the new deadline. Customers can also request an extension, for example, if they are going on holiday. If this means the complaint is addressed outside the usual timescales, it will still be considered on time as long as it adheres to the agreed response date.

All extensions will be confirmed to customers in writing and include:

- the reason for the extension
- contact details for the Housing Ombudsman
- · when they can expect further updates from us.

We will prioritise complaints that involve an immediate building safety risk outside of our timescales as part of the Building Safety Act 2022. This includes structural failures or issues that could cause the spread of smoke or fire. These complaints will also be escalated to our building safety team for immediate investigation.

6.4 Our responses

We will address all points raised in the complaint and provide clear reasons for our decisions with reference to the relevant laws, policies and good practice.

In our response, we will include the following:

- a) the complaint stage
- b) what the complaint is about
- c) the decision on the complaint
- d) the reasons for any decisions made
- e) the details of how we will put things right
- f) any learning from the complaint
- f) details of any outstanding actions.

For stage 1 complaints we will also include details of how to escalate the matter to stage 2 if the customer is not satisfied with the response. For stage 2 complaints we will also include details of how to escalate the matter to the Housing Ombudsman if the customer remains dissatisfied.

All responses will be reviewed by an appropriate member of the relevant business area before being sent to customers to ensure accuracy and accountability.

6.5 Putting things right

From the moment our customers tell us they're unhappy, we will look to identify and use a variety of appropriate remedial action.

Any action that we agree to take to put things right will be monitored and delivered in an agreed timeframe. We'll provide the customer with regular updates until all actions are completed. On their completion, we'll contact the customer to confirm what action has been taken and resolve any outstanding queries. Action we may take includes:

- apologising
- · acknowledging where things have gone wrong
- providing an explanation, assistance or reasons
- acting if there has been delay
- reconsidering or changing a decision
- amending a record or adding a correction or addendum
- providing a financial remedy in line with our compensation policy which can be found here: thrive-deal/tenants/your-home/statement-of-compensation/schedule-of-compensation/
- changing policies, procedures, or practices.

Any remedy that we offer will reflect the impact on the customer because of the service failure that was identified. When deciding on what remedial action to take, we will use the Housing Ombudsman's guidance which can be found here: **housing-ombudsman.org.uk/wp-content/uploads/2023/10/04.-Guidance-Remedies-1.pdf**

7. Compliance

7.1 Self-assessment

Thrive will carry out a self-assessment against the Housing Ombudsman code at least once a year, following any restructuring, merger, change in procedure, or following a Housing Ombudsman investigation. The results will be published on our website. Our most recent self-assessment can be found at **thrivehomes.org.uk/complaints**

Where we have found non-compliance with the code, we'll provide an explanation for this and confirm what action is being taken to ensure future compliance.

7.2 Reporting

Each year, Thrive reports on our performance. This reporting will be available for customers to view. This includes a section on complaint handling performance and service improvements covering:

- a) the annual self-assessment against this Code to ensure our complaint handling policy remains in line with its requirements
- b) a qualitative and quantitative analysis of our complaint handling performance. This must also include a summary of the types of complaints we have refused to accept
- c) any findings of non-compliance with the Code by the Ombudsman
- d) the service improvements made as a result of the learning from complaints
- e) any annual report about our performance from the Ombudsman
- f) any other relevant reports or publications produced by the Ombudsman in relation to the work of Thrive.

These reports will be shared with our governing body and published on our website at **thrivehomes.org.uk/annualreport.** Our governing body will provide a response to the report which will be published alongside it. At a minimum, the governing body will receive:

- **a)** regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance
- b) regular reviews of issues and trends arising from complaint handling
- c) regular updates on the outcomes of the Housing Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings and
- **d)** the annual complaints performance and service improvement report.

7.3 Continuous Learning

Thrive uses complaints as a way to learn about how we can improve our service to prevent similar complaints occurring in the future. This includes Thrive looking beyond the circumstances of individual complaints and considering whether service improvements can be made because of any learning from the complaint.

Each quarter, an analysis is carried out to identify themes and trends on the learning from complaints. The analysis then be shared with the wider business who will agree specific actions to improve the customer experience.

Key learnings will be shared with stakeholders, colleagues, and relevant committees. We will also share with customers on the Thrive website at **thrivehomes.org.uk/feedback**

8. Unreasonable behaviour

Our <u>Equality</u>, <u>Diversity and Inclusion Statement of Intent</u> sets out our expectations of how we want colleagues to treat each other and our customers. The root of this statement is that we will not make assumptions, judgments or decisions based on the way others look, sound or based on someone's beliefs or the way they chose to live their lives. We understand at times that, when things go wrong, it can be distressing, and people can act out of character in times of trouble. Distress and upset can lead to a customer approaching us to get matters resolved.

However, we have a duty to protect our colleagues and will not tolerate unacceptable behaviour or excessive demands on our service that impact the safety of Thrive employees, or that prevents them from carrying out their duties effectively.

It is these behaviours which we aim to manage under our Unacceptable Behaviour Policy which can be found at: **thrivehomes.org.uk/our-relationship/**

9. **Appendices**

This policy links to other polices and documents Thrive has in place, including but not limited to:

- The Thrive Deal
- Homelessness Act 2002
- Housing Act 1985
- Housing Act 1996
- Housing Act 2004
- Housing and Regeneration Act 2008
- Staff Training
- Equality Diversity and Inclusion
- Self-Assessment
- Annual Report for Tenants
- Lessons learned
- Guidance on remedies (housing-ombudsman.org.uk)
- The Building Safety Act 2022

As a business we try hard to keep all these related policies aligned with each other. If you do spot any inconsistency, please do contact our complaints team at your earliest opportunity and make your concerns known. Your support to keep information clear and consistent will always be welcomed.

Policy Approval

As this policy is a core component of how Thrive manages its business the document will be evaluated by the Executive Management Team as part of any review.

10. Support and Further Guidance

This policy has been drafted with input from colleagues across Thrive. If you have any concerns on how to interpret or follow its requirements, it's your responsibility to make your concerns known to your manager or a member of the Customer Engagement and Insights Team.

Each Thrive team member has a responsibility to work in a way that's consistent with the expectations set out in the documents and its implied intent. Should you witness or become aware of anyone consciously or unconsciously not following this policy you must alert your line manager or member of the leadership team as soon as is reasonably practical.