

Complaints Policy and Procedure



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Policy Author	Peter McEleavey
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Version	Date	Changes	Approver
1.0	October 2026	Full rewrite and alignment with statutory Housing Ombudsman Complaint Handling Code, revised RSH requirements and STAIRs	Harbour Light Board
1.1	8th October 2026	Clarified staff training, standard complaint objectives, MRC access, survey feedback, Code publicity, complaints email and THM07 letter template controls.	Harbour Light Board

Relevant National Standards or Regulations	• Housing Ombudsman Service – Complaint Handling Code 2024 (Statutory Code); • Housing Ombudsman Scheme, as amended, including revisions effective from 1 October 2026; • Regulator of Social Housing – Transparency, Influence and Accountability Standard, revised standard effective from 1 October 2026; • Regulator of Social Housing – Consumer Standards Code of Practice, revised version effective from 1 October 2026; • Regulator of Social Housing – Tenant Satisfaction Measures Technical Requirements and applicable Direction to registered providers; • Social Tenant Access to Information Requirements (STAIRs) Policy Statement, including Chapter 1 requirements effective from 1 October 2026; and • Housing Ombudsman guidance on remedies, complaint handling and compliance, as updated.
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Relevant Legislation	• Housing Act 1996, section 51 and Schedule 2, as amended; • Housing and Regeneration Act 2008, as amended; • Social Housing (Regulation) Act 2023; • Equality Act 2010; • Data Protection Act 2018; and • UK General Data Protection Regulation.
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Complaints Policy and Procedure

1. Purpose

Harbour Light Assisted Living CIC (“Harbour Light”) aims to provide good-quality landlord services and to resolve problems promptly when things go wrong.

This policy explains how tenants and other eligible complainants can raise concerns about Harbour Light's landlord services and how Harbour Light will investigate, respond to and learn from complaints.

Harbour Light recognises complaints as an important source of information about the quality of its services. Complaints will not be treated as a negative reflection on a tenant or as an inconvenience. A positive complaints culture enables Harbour Light to identify mistakes, put matters right, improve services and identify wider or recurring problems.

This is a **statutory and regulatory policy**. It is intended to comply with the statutory Housing Ombudsman Complaint Handling Code and the Regulator of Social Housing's consumer standards and Tenant Satisfaction Measure requirements.

Harbour Light will:

- make it straightforward for tenants to complain;
- recognise complaints regardless of whether the word “complaint” is used;
- deal with complaints fairly, openly and on their individual merits;
- make reasonable adjustments and take account of communication and support needs;
- operate no more than two complaint stages;
- provide clear reasons for decisions;
- offer proportionate remedies where something has gone wrong;
- maintain appropriate complaint records;
- monitor the completion of agreed actions;
- identify trends, risks and service improvements arising from complaints; and
- provide appropriate Board oversight and public reporting of complaint performance.

2. Scope

This policy applies to complaints about Harbour Light's housing and landlord services, including the actions or omissions of:

- Harbour Light employees;
- Board members acting on behalf of Harbour Light;
- Maintenance Operatives;
- contractors and agents;
- Support Companies where they are carrying out a landlord or housing-management function on Harbour Light's behalf; and
- any other person or organisation acting on Harbour Light's behalf in delivering a landlord service.

The policy applies principally to Harbour Light tenants and groups of tenants. A tenant may make a complaint personally or through an authorised representative, advocate, family member, Support Worker, solicitor or other person acting on their behalf.



Complaints Policy and Procedure

Harbour Light may also use this procedure, where appropriate, to consider complaints from applicants, neighbours or other people affected by a Harbour Light service. Their entitlement to external redress through the Housing Ombudsman may differ from that of a Harbour Light tenant.

Examples of matters that may be considered under this policy include:

- the standard, quality or timeliness of a landlord service;
- failure to provide a service or take agreed action;
- repairs and maintenance;
- communication or failure to provide information;
- the conduct of Harbour Light staff, contractors or others acting on Harbour Light's behalf;
- the way Harbour Light has handled anti-social behaviour, neighbour disputes or other tenancy-management matters;
- the way Harbour Light has applied a policy or made a decision affecting a tenant;
- unreasonable delay;
- failure to make or implement an agreed reasonable adjustment; and
- dissatisfaction with Harbour Light's response to a previous service request.

This policy does not replace specialist procedures where another legal or regulatory process must be followed, including:

- safeguarding referrals;
- subject access requests and other data protection rights;
- employment grievances or disciplinary matters; or
- the separate STAIRs review procedure described in section 5.17.

Where an issue includes both a complaint and another type of matter, Harbour Light will identify the correct routes and explain this to the person concerned. The existence of another process will not automatically prevent Harbour Light from considering those parts of the matter that properly fall within this complaints procedure.

3. Responsibilities

3.1 Harbour Light Board

The Board is responsible for:

- approving this policy;
- promoting a positive complaint-handling culture;
- appointing a Board member as the Member Responsible for Complaints;
- receiving sufficient information to scrutinise complaint performance, trends and outcomes;
- considering the annual Complaints Performance and Service Improvement Report;
- reviewing and approving Harbour Light's annual self-assessment against the Housing Ombudsman Complaint Handling Code; and
- providing and publishing the governing body's response to the annual complaints report.

3.2 Member Responsible for Complaints

The Board will appoint a **Member Responsible for Complaints (MRC)**.



Complaints Policy and Procedure

The MRC provides governance oversight and does not normally investigate individual complaints.

The MRC will have access to the relevant complaint-handling information and to the staff needed to carry out effective scrutiny and oversight.

The MRC will ensure that the Board receives appropriate information about:

- the volume and categories of complaints;
- complaint outcomes;
- response-time performance;
- recurring issues and trends;
- complaints that Harbour Light has declined to accept;
- learning and service improvements;
- relevant Housing Ombudsman findings and orders; and
- Harbour Light's annual Complaints Performance and Service Improvement Report.

3.3 Chief Executive

The Chief Executive is the senior person accountable for Harbour Light's complaint handling arrangements.

The Chief Executive will:

- promote effective complaint handling across Harbour Light;
- ensure sufficient arrangements exist for complaints to be identified, recorded and responded to;
- consider themes, trends, systemic risks and required service improvements;
- ensure significant complaint-handling issues are reported to the Board; and
- normally determine complaints at Stage 2.

The Chief Executive must not determine a Stage 2 complaint where they dealt with the complaint at Stage 1, are the subject of the complaint, have had material prior involvement that could affect their independence, or there is another actual or perceived conflict of interest.

In those circumstances, a suitably independent Board member who was not involved at Stage 1 will determine the Stage 2 complaint.

3.4 Complaints Officer

Stage 1 complaints will be handled by a designated Harbour Light **Complaints Officer**, normally the Property Manager responsible for the relevant property or service.

The Complaints Officer will have access to relevant staff and records and sufficient authority to investigate complaints and propose appropriate remedies.

The Complaints Officer may obtain information or assistance from other staff, contractors, Support Companies or third parties, but remains responsible for ensuring that the Stage 1 complaint is handled in accordance with this policy.



Complaints Policy and Procedure

3.5 All Harbour Light Staff

All Harbour Light staff must:

- recognise an expression of dissatisfaction which may amount to a complaint;
- give the tenant the opportunity to have it dealt with as a complaint;
- accept complaints made through any reasonable communication method;
- promptly pass the complaint to the appropriate Complaints Officer;
- co-operate with complaint investigations;
- provide complete and accurate information;
- identify any reasonable adjustment or communication needs of which they are aware; and
- support the implementation of remedies and service improvements.

A tenant must not be disadvantaged or treated less favourably because they have made a complaint.

Harbour Light will provide suitable complaint-handling training to relevant employees, including staff who receive, investigate, respond to or oversee complaints. Training will reflect their responsibilities, the statutory Complaint Handling Code and tenants' communication and accessibility needs.

Relevant employees and third parties involved in handling complaints will have a standard complaint-handling objective appropriate to their role, supporting collaborative working, collective responsibility for service failures and professional standards. This may be reflected in staff objectives and relevant third-party arrangements.

3.6 Support Companies

Support Companies provide support services independently from Harbour Light but frequently assist tenants to communicate with Harbour Light.

Support Companies should:

- assist a tenant to make a complaint where the tenant wants their help;
- promptly pass landlord complaints to Harbour Light;
- provide relevant information requested as part of a Harbour Light complaint investigation, subject to lawful information-sharing requirements; and
- assist with communication or reasonable adjustments where appropriate and agreed with the tenant.

A tenant does not have to complain to or through their Support Company before approaching Harbour Light.

Support Companies do not determine Harbour Light complaint outcomes or decide whether a landlord complaint should be accepted.

4. Legislation and Regulations

Harbour Light will comply with the statutory Housing Ombudsman Complaint Handling Code.



Complaints Policy and Procedure

The Code requires Harbour Light to operate an accessible two-stage complaints process, respond within specified timescales, make reasonable adjustments, keep appropriate records, provide remedies where things have gone wrong and use complaints to support service improvement.

The Housing Act 1996 and Social Housing (Regulation) Act 2023 provide the statutory framework for the Housing Ombudsman Scheme and the statutory Complaint Handling Code.

As a registered provider of social housing, Harbour Light must also meet the Regulator of Social Housing's Transparency, Influence and Accountability Standard. Harbour Light must ensure that complaints are addressed fairly, effectively and promptly and that communication and landlord services are accessible and appropriate to tenants' diverse needs.

Harbour Light will collect and publish complaints information in accordance with the Regulator of Social Housing's Tenant Satisfaction Measure requirements, including:

- **CH01 – Complaints relative to the size of the landlord; and**
- **CH02 – Complaints responded to within Complaint Handling Code timescales.**

Harbour Light will have regard to its duties under the Equality Act 2010, including the duty to make reasonable adjustments for disabled people.

Personal information obtained through the complaints process will be handled in accordance with the Data Protection Act 2018, UK GDPR and Harbour Light's information-governance policies.

5. Procedures

5.1 Definition of a Complaint

Harbour Light adopts the Housing Ombudsman's definition of a complaint:

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 person does not need to use the word “complaint”.

Where a tenant expresses dissatisfaction, Harbour Light will give them the choice to have the matter dealt with as a complaint.

Complaints will be considered on their merits. Harbour Light will not require a tenant to prove their complaint before it is accepted for investigation.

5.2 Service Requests and Complaints

A **service request** is a request asking Harbour Light to take action to put something right. Examples include reporting a repair for the first time or asking Harbour Light to provide information that has not previously been requested.



Complaints Policy and Procedure

A service request is not initially a complaint and will be recorded and managed through the relevant service process.

However, where a tenant expresses dissatisfaction with Harbour Light's response to a service request, Harbour Light will offer to record a complaint even where work to resolve the original service request is still continuing.

Harbour Light will not stop or delay action on the underlying service request simply because a complaint has been raised.

Where appropriate, the complaint and the outstanding service action will therefore proceed at the same time.

Where a tenant expresses dissatisfaction through a survey, Harbour Light will not automatically treat the survey response as a formal complaint. Wherever possible, it will provide information explaining how the tenant can pursue a complaint if they wish.

5.3 Who May Make a Complaint

A complaint may be made by:

- a Harbour Light tenant;
- a group of Harbour Light tenants;
- an authorised representative acting for a tenant;
- a formally appointed person acting for the tenant; or
- another person affected by a Harbour Light service where Harbour Light considers use of this procedure appropriate.

A tenant may be supported or represented by a:

- Support Worker;
- advocate;
- family member or friend;
- solicitor or advice agency;
- councillor;
- Member of Parliament; or
- other authorised representative.

Harbour Light may need to confirm the tenant's authority before disclosing confidential information to a representative. This will be dealt with proportionately and must not create an unnecessary barrier to making a complaint.

5.4 How to Make a Complaint

A complaint may be raised **in any reasonable way and with any Harbour Light member of staff**.

Complaints can include those made:

- verbally;



Complaints Policy and Procedure

- by telephone;
- by email;
- in writing;
- in person;
- through an advocate or representative; or
- with assistance from a Support Worker.

The following routes are available:

Email: complaints@harbourlight.org.uk

Complaints sent to another Harbour Light email address, including hello@harbourlight.org.uk, or raised with any member of staff will also be accepted and routed appropriately.

Telephone: 0151 909 5919

Post:

Harbour Light Assisted Living CIC
71 Linacre Road
Litherland
Merseyside
L21 8NP

A tenant does not need to complete a particular form or use particular wording. However, where possible, tenants and those acting on their behalf are encouraged to state clearly when they wish to make a formal complaint. This helps Harbour Light recognise and record the complaint promptly and reduces the risk of misunderstanding. Harbour Light remains responsible for identifying expressions of dissatisfaction that may constitute a complaint, even where the word 'complaint' is not used.

Where a tenant has difficulty making a complaint, Harbour Light will provide reasonable assistance.

5.5 Complaints Involving Support Companies or Other Third Parties

Harbour Light and the Support Company perform different functions.

Where a complaint is solely about a Support Company's independent support service or the conduct of its staff while providing that independent service, Harbour Light will explain that the matter is for the Support Company's own complaints procedure and, where appropriate, help the complainant identify the correct route.

However, Harbour Light will accept and investigate a complaint where it concerns:

- a landlord or housing-management service provided by Harbour Light;
- Harbour Light's own action or failure to act;
- Harbour Light's handling of an issue involving a Support Company;
- a Support Company carrying out a Harbour Light landlord function on Harbour Light's behalf; or



Complaints Policy and Procedure

- another contractor or third party carrying out a landlord service on Harbour Light's behalf.

Where somebody acts on Harbour Light's behalf in delivering a landlord service, Harbour Light remains responsible for ensuring that the complaint is handled through this two-stage procedure. A tenant will not be required to complete a separate third-party complaints process before Harbour Light deals with the landlord complaint.

Where a complaint contains both support-service and landlord-service matters, Harbour Light will explain which organisation is responsible for each element and co-ordinate with the Support Company where appropriate.

5.6 Matters That May Be Excluded

Harbour Light will accept a complaint unless there is a fair and reasonable reason not to do so.

Possible grounds for exclusion include where:

1. the issue giving rise to the complaint occurred more than 12 months ago and there is no good reason to exercise discretion to accept it;
2. legal proceedings about the same matter have started, meaning a Claim Form and Particulars of Claim have been filed at court; or
3. the same matter has previously completed Harbour Light's complaints procedure and there is no materially new issue or evidence requiring consideration.

Harbour Light will accept complaints made within 12 months of the issue occurring **or the tenant becoming aware of the issue**, unless another valid exclusion applies.

Harbour Light may accept an older complaint where there are good reasons to do so. This may include circumstances where vulnerability, disability, ill health, communication difficulties or other circumstances affected the person's ability to complain earlier.

Pre-action correspondence, a threat of legal action or the seeking of legal advice does not by itself mean that legal proceedings have started.

A general suggestion that Harbour Light should change a policy may be treated as feedback rather than a complaint. However, where a tenant is dissatisfied with how a policy has been applied to them, or with a service or decision arising from that policy, this may be dealt with as a complaint.

No blanket exclusions will be applied.

Where Harbour Light decides not to accept or escalate a complaint, it will:

- consider the individual circumstances;
- keep a record of the decision and reasons;
- explain the decision clearly in writing;
- identify the exclusion relied upon; and
- tell the person that they may ask the Housing Ombudsman to consider whether the exclusion has been applied fairly.



Complaints Policy and Procedure

5.7 Accessibility, Vulnerability and Reasonable Adjustments

Harbour Light provides supported accommodation to tenants who may have disabilities, mental health needs, learning disabilities, autism, communication difficulties or other additional support needs.

Harbour Light will therefore take a flexible and individual approach to accessing the complaints procedure.

Harbour Light will:

- consider reasonable adjustments proactively;
- accept verbal complaints;
- provide information in alternative or accessible formats where reasonably required;
- use plain language;
- allow additional communication time where appropriate;
- communicate through an authorised representative or advocate where requested;
- permit a tenant to be accompanied at meetings;
- take account of known communication preferences;
- involve a Support Worker where the tenant wants this assistance; and
- consider whether any disability, vulnerability or additional support need affects how the complaint should be investigated or resolved.

Harbour Light will keep an appropriate record of reasonable adjustments that have been agreed and any disability information disclosed for that purpose. Agreed adjustments will be kept under review.

Harbour Light does not require a separate Equality and Diversity Policy before making a reasonable adjustment. Its duties arise directly from the Equality Act 2010 and applicable regulatory requirements.

5.8 Principles Applying at Both Complaint Stages

At both stages, the person handling the complaint must:

- deal with the complaint on its merits;
- approach the matter with an open mind;
- act independently;
- give the complainant a fair opportunity to explain their position;
- consider all relevant information and evidence;
- address any actual or perceived conflict of interest;
- identify what the complaint is about;
- identify the outcome the complainant is seeking;
- clarify anything that is unclear;
- explain which matters Harbour Light is responsible for and any matters it is not responsible for;
- provide clear reasons for decisions; and
- consider an appropriate remedy where something has gone wrong.



Complaints Policy and Procedure

A complaint response will be issued when Harbour Light knows the answer to the complaint. It will not be delayed simply because all resulting actions have not yet been completed.

Any outstanding actions will be recorded, monitored and completed promptly, with appropriate updates provided to the complainant.

5.9 Stage 1

Stage 1 will normally be handled by the designated Harbour Light Complaints Officer, usually the relevant Property Manager.

Acknowledgement

Harbour Light will acknowledge, define and log the Stage 1 complaint within **5 working days** of receiving it.

The acknowledgement will, where appropriate:

- confirm the complaint reference;
- set out Harbour Light's understanding of the complaint;
- identify the outcome being sought;
- clarify any unclear points;
- identify any matters Harbour Light is not responsible for;
- confirm any agreed reasonable adjustments; and
- explain the expected response timescale.

Investigation and Response

Harbour Light will issue its full Stage 1 response within **10 working days of the complaint being acknowledged**.

Where additional time is required because of the complexity of the complaint, Harbour Light will inform the complainant of the reason and expected response date.

Any extension will normally be no more than a further **10 working days** unless there is good reason for a longer period.

Where an extension is required, Harbour Light will also provide the Housing Ombudsman's contact details and agree appropriate intervals for keeping the complainant updated.

Additional Issues

Where a complainant raises additional matters during the Stage 1 investigation, Harbour Light will include them in the existing response where they are related and doing so will not cause unreasonable delay.

A separate complaint may be opened where:

- the new issue is unrelated;



Complaints Policy and Procedure

- the Stage 1 response has already been issued; or
- including the new issue would unreasonably delay the existing complaint.

Stage 1 Response

The written Stage 1 response will clearly state:

1. that it is the Stage 1 response;
2. the complaint definition;
3. Harbour Light's decision;
4. the reasons for the decision;
5. any remedy offered;
6. any outstanding actions and how they will be monitored; and
7. how the complainant can request Stage 2 if they remain dissatisfied.

5.10 Stage 2

Where all or part of the complaint remains unresolved to the complainant's satisfaction, it will progress to Stage 2.

The complainant **does not have to provide reasons or justify why they want the complaint escalated.**

Harbour Light may ask what remains unresolved so that this can be properly addressed, but this will not be used as a condition for accepting the Stage 2 request.

Stage 2 Decision-Maker

Stage 2 will normally be considered by the **Chief Executive**, provided the Chief Executive:

- did not determine the Stage 1 complaint;
- is not the subject of the complaint;
- has not had material prior involvement that would compromise independence; and
- has no other actual or perceived conflict of interest.

Where the Chief Executive cannot act independently, Stage 2 will be considered by a suitably independent Harbour Light Board member who was not involved at Stage 1.

The Stage 2 decision-maker will not be the same person who determined Stage 1.

Acknowledgement

Harbour Light will acknowledge, define and log the Stage 2 complaint within **5 working days** of receiving the escalation request.

Final Response

Harbour Light will issue its final Stage 2 response within **20 working days of the Stage 2 complaint being acknowledged.**



Complaints Policy and Procedure

Where more time is required because of complexity, Harbour Light will explain the reason and expected response date.

Any extension will normally be no more than a further **20 working days** unless there is good reason for a longer period.

Where an extension is required, the complainant will be given the Housing Ombudsman's contact details and Harbour Light will agree appropriate intervals for providing updates.

The Stage 2 response is Harbour Light's final response and will involve all relevant staff needed to reach a proper conclusion.

The written response will state:

1. that it is the Stage 2 final response;
2. the complaint definition;
3. Harbour Light's decision;
4. the reasons for the decision;
5. any remedy offered;
6. any outstanding actions and how they will be monitored; and
7. how the complainant can take the matter to the Housing Ombudsman Service if they remain dissatisfied.

5.11 Housing Ombudsman Service

The Housing Ombudsman Service is independent of Harbour Light and is free for residents to use.

A tenant may contact the Housing Ombudsman during Harbour Light's complaints process for information and assistance.

Once Harbour Light has issued its Stage 2 final response, a tenant who remains dissatisfied may ask the Housing Ombudsman Service to consider the complaint in accordance with the Housing Ombudsman Scheme.

A person may also approach the Ombudsman where Harbour Light has refused to accept or escalate a complaint and they believe the exclusion has not been applied fairly.

Current contact details are:

Housing Ombudsman Service

Online complaint form: available through the Housing Ombudsman Service website

Telephone: **0300 111 3000**



Complaints Policy and Procedure

Post:
Housing Ombudsman Service
PO Box 1484
Unit D
Preston
PR2 0ET

Harbour Light will keep the Ombudsman's contact information under review and update published information if the Service changes its contact arrangements.

5.12 Putting Things Right and Remedies

Where Harbour Light identifies that something has gone wrong, it will acknowledge this and consider what action is needed to put matters right.

Possible remedies include:

- an apology;
- acknowledgement of what went wrong;
- an explanation or further assistance;
- completing an outstanding action;
- taking action following a delay;
- reconsidering or changing a decision;
- correcting or adding an addendum to a record;
- carrying out work;
- providing a financial remedy where appropriate;
- reviewing a procedure or working practice;
- changing a policy; or
- taking wider action to prevent the same problem happening again.

A remedy will take account of the actual impact of the identified failure on the complainant.

Harbour Light will have regard to current Housing Ombudsman remedies guidance when considering an appropriate remedy.

Where a remedy or action is promised, the response will state what will happen and, wherever possible, by when.

Outstanding remedies and actions will be monitored through to completion.

5.13 Unacceptable Behaviour and Contact

Harbour Light recognises that people may be upset, frustrated or distressed when making a complaint. Challenging Harbour Light, making repeated contact or seeking an outcome that Harbour Light cannot provide will not, by themselves, be treated as unacceptable behaviour.

However, Harbour Light may need to manage contact where behaviour has a serious and disproportionate impact on staff, other tenants or Harbour Light's ability to provide services.

Examples may include:



Complaints Policy and Procedure

- threats or violence;
- abusive, discriminatory or seriously offensive language;
- harassment of staff;
- repeated contact at a level that substantially prevents staff from carrying out their work;
- knowingly making malicious or threatening communications; or
- behaviour that creates a significant safety risk.

Restrictions will only be imposed where they are necessary and proportionate.

Before imposing a restriction, Harbour Light will, where reasonably practicable:

1. consider the person's circumstances and any known disability or support need;
2. consider whether a reasonable adjustment would address the problem;
3. explain what behaviour is causing concern;
4. give the person a reasonable opportunity to modify the behaviour; and
5. consider whether a less restrictive measure is available.

Any restriction will:

- be supported by recorded reasons;
- be proportionate to the behaviour concerned;
- specify the nature and duration of the restriction;
- preserve a reasonable way for the person to communicate with Harbour Light;
- have regard to the Equality Act 2010; and
- be reviewed regularly.

Where there is an immediate and serious threat to safety, Harbour Light may introduce restrictions without first giving a warning.

Restrictions on contact will not normally prevent the underlying complaint from being investigated.

5.14 Complaint Records and Confidentiality

Harbour Light will maintain a clear record of each complaint and its outcome.

The record will include, as applicable:

- the original complaint;
- the date received;
- the complaint definition;
- the outcome sought;
- acknowledgements;
- correspondence with the complainant;
- relevant correspondence with third parties;
- investigation notes;
- reports, photographs, surveys or other relevant evidence;
- reasonable adjustments relevant to the complaint;
- decisions and reasons;
- remedies;



Complaints Policy and Procedure

- outstanding actions;
- Stage 1 and Stage 2 responses;
- response dates and any extensions;
- whether the complaint was accepted or excluded;
- the reason for any exclusion;
- Housing Ombudsman correspondence or decisions; and
- evidence that agreed actions have been completed.

Complaint information will be shared only where necessary for the proper investigation, response, safeguarding, legal compliance or other lawful purpose.

Harbour Light will not disclose another person's confidential information to a complainant unless there is a lawful basis for doing so.

Complaint records will be retained and disposed of in accordance with Harbour Light's Data & Document Retention & Disposal Policy and applicable data protection law.

Standard complaint correspondence is supported by the controlled THM07-F01 to THM07-F10 letter templates, with the operational guide THM07-G01 Staff guide to complaint correspondence. These supporting documents are maintained in the SharePoint Complaints folder, under THM07 Word Templates. Staff must select the appropriate template, complete and check all case-specific information, follow the applicable response timescales and retain the issued correspondence and approval evidence in the complaint case record. Templates support this policy; they do not replace it.

Any financial compensation or other financial remedy proposed in complaint correspondence requires Chief Executive authorisation before it is offered. The amount, reasons, approver and authorisation must be recorded. Where the Chief Executive has a conflict of interest, an appropriate independent governance arrangement must be established without compromising the independence of the complaint decision or delaying the response unreasonably.

The template set comprises: F01 Stage 1 acknowledgement; F02 Stage 1 response; F03 Stage 1 response extension; F04 Stage 2 acknowledgement; F05 Stage 2 final response; F06 Stage 2 response extension; F07 decision not to accept a complaint; F08 decision not to escalate a complaint; F09 action and remedy progress update; and F10 action and remedy completion confirmation.

5.15 Learning, Scrutiny and Continuous Improvement

Harbour Light will use complaints as a source of organisational learning.

The Chief Executive and relevant staff will consider whether individual complaints identify:

- recurring service failures;
- weaknesses in procedures;
- communication issues;
- training or competence needs;
- contractor-performance issues;
- equality or accessibility barriers;
- risks affecting more than one tenant;



Complaints Policy and Procedure

- failures to complete promised actions;
- problems with record keeping; or
- policies or practices that require review.

Harbour Light will take proportionate action to address identified issues and monitor completion of agreed improvements.

Relevant learning will be shared with staff, the Board and other appropriate stakeholders.

5.16 Annual Complaint Reporting and Tenant Satisfaction Measures

Harbour Light will produce an annual **Complaints Performance and Service Improvement Report** in accordance with Housing Ombudsman requirements.

The report will include, as applicable:

- Harbour Light's annual self-assessment against the Complaint Handling Code;
- qualitative and quantitative analysis of complaint handling performance;
- information about complaints Harbour Light declined to accept;
- any Housing Ombudsman findings of non-compliance with the Code;
- learning and service improvements arising from complaints;
- relevant Housing Ombudsman performance information about Harbour Light; and
- other relevant Housing Ombudsman reports or publications.

The report will be presented to the Board for scrutiny.

The Board's response will be published alongside the report and self-assessment as required by the Complaint Handling Code.

Harbour Light will also collect, calculate and publish complaint Tenant Satisfaction Measures in accordance with current RSH requirements, including:

- **CH01 – Complaints relative to the size of the landlord; and**
- **CH02 – Complaints responded to within Complaint Handling Code timescales.**

For these measures, Harbour Light will use the complaint definition, complaint stages and maximum response times specified by the applicable Housing Ombudsman Complaint Handling Code and RSH technical requirements.

Complaint records must therefore be maintained sufficiently accurately to enable Harbour Light to evidence its published complaint performance.

5.17 Social Tenant Access to Information Requirements – Separate Review Route

STAIRs gives Harbour Light tenants separate rights relating to information about the management of social housing.

From **1 October 2026**, Harbour Light must proactively publish the information required by Chapter 1 of the STAIRs Policy Statement.



Complaints Policy and Procedure

Where a tenant believes Harbour Light has failed to publish information that falls within Chapter 1, the matter must be dealt with under Harbour Light's **STAIRs Review Procedure**, rather than through Stage 1 and Stage 2 of this policy.

The statutory Housing Ombudsman Complaint Handling Code does **not** apply to a STAIRs review.

A STAIRs review should normally be completed within **30 calendar days**. Where the tenant remains dissatisfied following that review, they may refer the matter directly to the Housing Ombudsman under the STAIRs provisions of the Housing Ombudsman Scheme.

From **1 April 2027**, the separate STAIRs review route will also apply where a tenant is dissatisfied with the handling or outcome of a direct STAIRs information request.

Where correspondence raises both:

- a complaint about a Harbour Light landlord service; and
- a STAIRs publication or information-access issue,

Harbour Light will identify the separate elements, explain which procedure applies to each and manage them through the appropriate routes.

Using the STAIRs review process does not remove a tenant's right to make a separate complaint about a landlord service where the Complaint Handling Code applies.

5.18 Publication and Awareness

Harbour Light will publish this policy on its website and make tenants aware of how to complain.

Complaint information will also be provided or signposted through appropriate tenant communications, including the Tenant Handbook.

Harbour Light will make reasonable efforts to make complaint information available offline and in accessible formats where required.

Information about the Housing Ombudsman Service and how residents may access it will be publicised alongside Harbour Light's complaints information.

Harbour Light will also publicise the statutory Housing Ombudsman Complaint Handling Code, including information about where tenants can read it, alongside its complaints procedure and the Ombudsman's contact information.

6. Review and Updates

This policy will be formally reviewed at least every three years and sooner where required because of:

- changes to legislation;
- changes to the Housing Ombudsman Scheme or Complaint Handling Code;
- changes to RSH consumer standards or Tenant Satisfaction Measure requirements;



Complaints Policy and Procedure

- changes to STAIRs;
- Housing Ombudsman findings or guidance;
- significant organisational or procedural changes;
- lessons arising from complaints;
- changes in Harbour Light's operating model; or
- identified non-compliance.

Harbour Light will also review its Complaint Handling Code self-assessment at least annually and following a significant restructure, merger or material change to complaint-handling procedures.

Any material amendment to this policy will be subject to the appropriate Harbour Light approval process.