

Doc Number: TBC	Lead: Manager, Operational Support	Last Full Review: November 2025
Tick one of the below for review/changes made : <b>Full review and changes made</b> <input checked="" type="checkbox"/> (add changes summary to table below)  <b>Full review, no changes made</b> <input type="checkbox"/> <b>Changes made but no full review</b> <input type="checkbox"/> (add changes summary to table below)		Reviewer / Editor: CR – Manager, Operational Support  Changes Approved By: JR – Chief Experience and Transformation Officer  <hr/> Reviewed and edited in-line with the Beacon? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

# Have Your Say: Complaints Policy

## Document Change Details

Date	Summary of Changes Made
November 2025	Full re-write of the Complaints Procedure (output of the Complaints project) New name - Have Your Say: Complaints Policy

### 1.0PURPOSE

#### Have Your Say and Our Approach to Complaints

**Have Your Say** is our way of giving people the opportunity to tell us what they think—whether that’s sharing something they’re unhappy with, highlighting something they’ve appreciated, or making a complaint.

This policy sets out our approach to **complaints**. It aligns with a number of regulatory standards, including the Housing Ombudsman’s Complaint Handling Code, NHS Complaints Standards and CQC

We welcome complaints because they help us improve. When someone takes the time to tell us something hasn’t gone well, it gives us a chance to put things right—not just for them, but for others too. Complaints help us identify where things may not be working as they should, and they support us in learning, growing, and delivering better services.

However, we also recognise that not everyone wants to make a complaint. In cases where someone expresses dissatisfaction but clearly states they do not wish to make a complaint, we will still do our best to understand what went wrong and try to resolve the issue.

That’s why we **capture, record, and respond to all expressions of dissatisfaction**, whether or not the person wants their concern treated as a complaint.

For guidance on how to manage expressions of dissatisfaction that are **not** being dealt with as complaints, please refer to the **Frequently Asked Questions** section of the Complaints Procedure.

## 2.0 SCOPE

Complaints are '*Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Southdown, our staff or those acting on our behalf*'.

### THIS DOES INCLUDE

- Any expression of dissatisfaction made by:
    - Our clients, tenants, families and advocates (including MPs) about their counterparts, our staff, buildings and services, contractors and partner organisations
    - Our staff about contractors and partner organisations
    - Contractors about clients, tenants, families and advocates, our staff, buildings and services, and other contractors
    - Partners about our staff, services and buildings, and contractors
    - Members of the public about our clients and tenants, staff, buildings, contractors and services.
  
  - Dissatisfaction expressed relating to:
    - The way the complainant has been treated
    - There's something we didn't deliver on something that we said we would
    - There's something we could've done better
    - The way we responded to a service request
    - A data protection complaint
- 

### IT DOES NOT INCLUDE

- Any expression of dissatisfaction made by:
  - Our staff about clients, tenants, families, colleagues, the service or our buildings
  - Partners (e.g., SPFT) about clients, tenants or families
  - Contractors and the public about partner organisations
  - Commissioners
  
- Service Requests
  
- Complaints raised more than 12 months after the issue occurred, unless:
  - there is good reason for the delay (e.g. a client was in hospital for a prolonged period) OR
  - the complaint is about a recurring issue and some instances occurred more than 12 months ago OR
  - the complainant has only just become aware of the issue
  
- Building repairs

- Where the complainant has already started legal proceedings to address the issues being complained of - the issue will be dealt with as part of the legal process.
- Where the issue being complained about has already been investigated and responded to via both stages of our Complaints Procedure and there are no material changes that suggest that the matter is substantially different to the original complaint.
- Where the complaint is the first report of anti-social behaviour relating to a Southdown property or tenant. Complaints which relate to Southdown's handling of previous reports of anti-social behaviour are deemed to be within scope of the complaints process, subject to the above exclusions.

## SURVEYS

Our client and tenant surveys will include:

- information on how to complain
- how someone can ask for issues they raise via the survey to be raised as a complaint.

## ESCALATION

Southdown will indicate in Stage 2 response letters that, should the complainant remain unhappy, they have recourse to the relevant external body, for example (list not exhaustive):

- [The Housing Ombudsman](#) – tenancy related issues
- [CQC](#) – for Learning Disability services
- [Parliamentary and Health Service Ombudsman](#) - for NMHT or NHS commissioned MHHS services.
- [The Information Commissioner's Office](#) – for data protection related issues
- [Ofgem, the energy regulator](#) - where a complaint relates to the provision, or billing, of energy, heating or hot water to a household and Southdown are deemed to be the energy supplier (e.g. due to the provision of a communal heating and/or hot water serving the tenanted area)
- The relevant commissioning body – where there is no appropriate external regulator (for example some mental health or housing support services)

## 3.0 DEFINITIONS

<b>Complainant</b>	The person making the complaint, i.e. raising an expression of dissatisfaction using any method (e.g. direct to staff, via our web form, via social media etc).
<b>Complainant Advocate</b>	Someone making a complaint on someone else's behalf (with that person's consent) and/or supporting a Complainant as needed.
<b>Complaint</b>	An expression of dissatisfaction, however made, about: <ul style="list-style-type: none"> <li>• The standard of service</li> <li>• Actions or lack of action by Southdown, its own colleagues or those acting on its behalf.</li> </ul> This may relate to dissatisfaction with how a Service Request was handled.

<b>Complaint Handler</b>	<p>Accountable for all activity with a Stage 1 Complaint.  Accountable for tracking, logging and ensuring all improvement actions related to Stage 1 findings.  The Complaint Handler may also be the Complaint Recipient. Usually, this will be one of the following:</p> <ul style="list-style-type: none"> <li>• Team Manager (MHHS)</li> <li>• Co-ordinator (MHSS)</li> <li>• Service Manager/ Deputy Manager (LD)</li> <li>• Manager, Housing Services</li> <li>• Manager, Property Services</li> <li>• Partnership Leads (for complaints received from partnership sub-contractors, grantees and/or their clients)</li> </ul> <p>... unless it requires subject matter expertise from a central services manager.</p>
<b>Complaint Recipient</b>	<p>The person to whom a complaint is initially raised.  This could be any member of staff and raised to them in any way.  If a complaint is raised via the web form the Complaints Administrators will act as Complaints Recipient.  If a complaint is made via social media, a member of the Communications Team will act as Complaint Recipient.</p>
<b>Complaints Administrators</b>	<p>Staff fulfilling this role provide central administrative services for complaints as described in the procedure.</p>
<b>Have Your Say Portal</b>	<p>The IT system we use to record, track, and report on complaints and related improvement actions is the Have Your Say portal. The portal can also capture other expressions of dissatisfaction, where the person raising the issue does not wish to make a complaint.</p>
<b>Have Your Say Form</b>	<p>Online form available to clients, tenants, and the public on our website, and to colleagues via our intranet. The form can also capture other expressions of dissatisfaction, where the person raising the issue does not wish to make a complaint.</p>
<b>Reasonable Adjustments</b>	<p>In accordance with the Equality Act 2010, we must keep a record of any reasonable adjustments agreed. These might be communication preferences, Easy Read versions, differently coloured paper etc. Any agreed reasonable adjustments must be kept under active review.</p>
<b>Service Request</b>	<p>A request that the organisation provides or improves a service, fixes a problem or reconsiders a decision  Service Requests are NOT complaints; however they could become a complaint if someone is not happy with the way the service request was handled.</p>
<b>Stage 1</b>	<p>A complaint that is made and resolved to the satisfaction of the complainant, with actions, where relevant, discussed and agreed with them.</p>
<b>Stage 2</b>	<p>A complaint that has <i>not</i> been resolved to the complainant's satisfaction at Stage 1, and so requires further investigation by an Investigating Manager (IM)</p>
<b>Stage 2 Investigator</b>	<p>Manages a Stage 2 Complaint. Must be Grade 8 or above. Typically, Manager, Operations, Manager, Housing Services; and Manager, Property Services.</p>

## 4.0 ROLES AND RESPONSIBILITIES

Role	Responsibilities
<b>C-Suite</b>	Overall accountability for the implementation of organisational policies
<b>Operational Performance Group</b>	Responsible for: <ul style="list-style-type: none"> <li>Ensuring the organisation has appropriate policies, procedures, standard operating procedures (SOP) and guidelines in place for the safe and effective running of the business</li> <li>Ensuring policies, procedures, SOPs and guidelines remain in date and holding owners to account where this is not the case</li> <li>Overseeing the work of the Policies Group</li> </ul>
<b>Policies Group</b>	Responsible for: <ul style="list-style-type: none"> <li>Reviewing new, or major revisions to policies and procedures</li> <li>Ensuring the content is workable and proportionate</li> <li>Supporting the author in implementation and communication</li> <li>Ensuring policies and procedures align to the Beacon</li> </ul>
<b>Service Quality Committee</b>	Board sub-committee with delegated responsibility for the oversight of complaints. Receive reports on complaints at each meeting.
<b>Operational Performance Group</b>	Ensuring this policy is followed by colleagues
<b>Head of LD, Head of MHHS, Director of Housing and Assets, Head of Partnerships</b>	Approving the extension of Stage 1 or Stage 2 investigation timescales (this should be in extremely rare circumstances only). Allocating Stage 2 Investigator via the Portal Accountability for meeting timescales and ensuring changes to policy, procedure and practice as a result of complaints are implemented.
<b>All Managers</b>	Ensuring all colleagues are aware of, and follow, this procedure, and that they understand the definition of a complaint and the difference between a complaint and a service request.
<b>Partnership Leads</b>	Acting as Complaints Handler for complaints from or about partnership sub-contractors, grantees and/or their clients
<b>All colleagues</b>	Being aware of this policy and the associated procedure. Following this policy. Receive and respond to any complaint appropriately, in accordance with this policy.
<b>Manager, Operational Support</b>	Complaints Lead for the organisation. Owner of this policy and the associated procedure. Managing the team covering Complaints Administrator duties. Reporting on complaints to the Operational Performance Group and Service Quality Committee. Leading the Complaints Review Group.
<b>Bell Lane Reception Team</b>	Responsible for Complaints Administrator activities, which include: <ul style="list-style-type: none"> <li>Allocating complaints raised via the central web form.</li> <li>Responding to administrative queries from staff, complaints handlers.</li> </ul>

<b>Systems Development Specialist</b>	Maintaining the Have Your Say Portal – functionality, access rights, dashboard etc.
<b>Complaint Review Group</b>	Manager, Operational Support, Complaints Administrator, and Subject Matter Experts, clients and tenants meet quarterly to review complaints, exploring themes, learnings, and process developments.

## 5.0 GENERAL PRINCIPLES

As well as aligning to the requirements of our regulators, our approach to complaints is psychologically informed, underpinned by the Beacon framework.

Communications with complainants must be:

- Timely
- Transparent
- Tailored
- Using an appropriate tone

A complainant may have an advocate managing the complaint on their behalf and be represented or accompanied during any meeting regarding the complaint.

Where we allocate someone to investigate a complaint, we expect all Southdown colleagues and contractors to support the investigation by:

- Answering questions openly and honestly
- Treating anything related to the complaint as a priority
- Respecting the authority of the individual investigating, regardless of organisational hierarchy

People who use our services can be confident that raising a complaint will not affect the support or service they receive. If anyone feels that their support or service has been negatively affected by making a complaint, they should contact our Complaints Admin team at [feedback@southdown.org](mailto:feedback@southdown.org), who will ensure the concern is passed to the appropriate person for review and action.

## 5.1 ADDITIONAL SCENARIOS

### ***Adding to a Complaint***

Where a complainant raises additional complaints during an investigation, these will be incorporated into the Stage 1 response if related and that response has not been issued. Where the Stage 1 response has been issued, or the new issues are unrelated to those already being investigated, or it would unreasonably delay the response, the new issues must be logged as a new complaint.

### ***Complaints About Staff Working within Southdown Services but Employed By Another Organisation***

Where a complaint is about a Southdown service but involves a 3<sup>rd</sup> party – for example part of the complaint is about someone who works within a Southdown service but is employed by a partner organisation – Southdown will lead on the complaint and not ask the complainant to raise two separate complaints.

### ***Complaints About Staff or Services Who are Part of a Neighbourhood Mental Health Team***

Staff should follow the process set out in the NMHT standard operating procedures.

## **6.0 COMPENSATION**

Where relevant, complaints investigations may include an assessment of whether a complainant has been left unfairly out of pocket as a result of actions taken by Southdown. Where there is evidence, this may be the case, we will consider a financial remedy.

## **7.0 ACCESSIBILITY**

We are committed to ensuring that everyone can access the complaints process. We will:

- Accept complaints in any format (oral, written, by email, by phone, via an advocate)
- Make all reasonable adjustments where possible (e.g. easy-read format, translator, sign language interpreter)

## **8.0 LEARNING and SHARING**

We record and monitor all complaints centrally.

The Operational Heads of Service / Director of Housing & Assets review all complaints relating to their teams and share learning as appropriate.

Each month the Operational Performance Group reviews live and recently closed complaints.

The Complaints Review Group, whose membership comprises of Southdown staff, clients and tenants, review complaints and related actions at each meeting.

The Service Quality Committee has Board responsibility for the oversight of all complaints and the Manager, Operational Support reports on complaints at each meeting.

The Chair of that committee is the Member Responsible for Complaints.

Actions taken because of complaints are shared via our website, and via our annual Tenant and Impact reports.

## **9.0 RECORD KEEPING**

Complaints will be retained in line with our Records Retention Policy.

## **10. 0 ASSOCIATED POLICIES AND PROCEDURES**

1.10b Complaints Procedure  
NMHT Standard Operating Procedure