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Tick one of the below for review/changes made :		Reviewer / Editor: CR – Manager, Operational Support	
Full review and changes made ☐		Changes Approved By: CR – Manager, Operational Support	
(add changes summary to table below)			
Full review, no changes made ☐			
Changes made but no full review ☒		Reviewed and edited in-line with the Beacon? ☒ Yes ☐ No	
(add changes summary to table below)			

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
March 2026	- Updated the section on advocacy to include the requirement for consent. - Added a new section describing how we publicise our policy. - Included details of additional ways to make a complaint, alongside our Have Your Say form. - Added information about our two-stage complaints process. - Updated the acknowledgement timescales for Stage 1 and Stage 2 complaints from 3 working days to 5, in line with the Housing Ombudsman Code. - Updated the section on third-party complaints to clarify who will lead the investigation. - Added a new section outlining the role of the Housing Ombudsman and the Housing Ombudsman Code. - Updated the section on reasonable adjustments to explain how we record and review agreed adjustments.

1.0 PURPOSE

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.

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

In some limited circumstances we may not deal with a complaint via our Complaints Procedure. These circumstances include but are not limited to:

- 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
- Service requests, where someone is requesting action to resolve an issue but is not expressing dissatisfaction.
- 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

- Court and tribunal proceedings, where the complainant seeks to overturn, vary or review a court or tribunal decision. Where legal proceedings have commenced (i.e. a claim has been lodged), we will not investigate matters under consideration by the court or tribunal. Where possible, we will accept and investigate elements of the complaint that are separate from the legal proceedings, provided this does not prejudice proceedings.
- Repairs or maintenance, unless the complaint is about a repair or maintenance issue that has previously been reported to us
- 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.

We will consider each complaint on its own merits and will not take a blanket approach to excluding complaints. If we cannot accept all or part of a complaint, we will explain our reasons clearly, set out what we can consider (if anything), and, for cases related to our landlord function, advise tenants on how to contact the Housing Ombudsman about our decision.

3.0 DEFINITIONS

Complainant	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).
Complainant Advocate	Someone making a complaint on someone else's behalf (with that person's consent) and/or supporting a Complainant as needed.
Complaint	An expression of dissatisfaction, however made, about: • The standard of service

	• Actions or lack of action by Southdown, its own colleagues or those acting on its behalf. This may relate to dissatisfaction with how a Service Request was handled.
Complaint Recipient	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.
Stage 1 Investigator	Manages a Stage 1 Complaint. They Complaint Handler may also be the Complaint Recipient. Usually, this will be one of the following: • Team Manager (MHHS) • Co-ordinator (MHSS) • Service Manager/ Deputy Manager (LD) • Manager, Housing Services • Manager, Property Services • Partnership Leads (for complaints received from partnership sub-contractors, grantees and/or their clients) ... unless it requires subject matter expertise from a central services manager.
Complaints Administrators	Staff fulfilling this role provide central administrative services for complaints as described in the procedure.
Have Your Say Portal	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.
Have Your Say Form	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.
Reasonable Adjustments	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.

Service Request	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.
Stage 1	A complaint that is made and resolved to the satisfaction of the complainant, with actions, where relevant, discussed and agreed with them.
Stage 2	A complaint that has <i>not</i> been resolved to the complainant's satisfaction at Stage 1 and so requires further investigation.
Stage 2 Investigator	Manages a Stage 2 Complaint. Must be Grade 8 or above. Typically, Manager, Operations, Manager, Housing Services, Manager, Property Services, and Heads of Service or equivalent.

4.0 ROLES AND RESPONSIBILITIES

Role	Responsibilities
C-Suite	Overall accountability for the implementation of organisational policies
Operational Leadership Team	Responsible for: - Ensuring the organisation has appropriate policies, procedures, standard operating procedures (SOP) and guidelines in place for the safe and effective running of the business - Ensuring policies, procedures, SOPs and guidelines remain in date and holding owners to account where this is not the case
Policies Group	Responsible for: - Reviewing new, or major revisions to policies and procedures - Ensuring the content is workable and proportionate - Supporting the author in implementation and communication - Ensuring policies and procedures align to the Beacon
Service Quality Committee	Board sub-committee with delegated responsibility for the oversight of complaints. Receive reports on complaints at each meeting.
Operational Leadership Team	Ensuring this policy is followed by colleagues

Head of LD, Head of MHHS, Director of Housing and Assets, Head of Partnerships	Approving the extension of Stage 1 or Stage 2 investigation timescales (this should be in extremely rare circumstances only). Accountability for meeting timescales and ensuring changes to policy, procedure and practice as a result of complaints are implemented.
All Managers	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.
All colleagues	Being aware of this policy and the associated procedure. Following this policy. Receive and respond to any complaint appropriately, in accordance with this policy.
Manager, Operational Support	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 Leadership Team and Service Quality Committee.
Bell Lane Reception Team	Responsible for Complaints Administrator activities, which include: • Allocating complaints raised via the central web form. • Responding to administrative queries from staff, complaints handlers.
Systems Development Specialist	Maintaining the Have Your Say Portal – functionality, access rights, dashboard etc.

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 act on their behalf and may be represented or accompanied at any meeting about the complaint. We must confirm that the complainant is happy for that person to act for them. If consent is not provided, we will not be able to proceed with the complaint through that representative.

Complaints will be investigated by managers skilled in handling complaints. When investigating a complaint, the person responsible will:

- Deal with the complaint on its own merits
- Act independently and with an open mind
- Take measures to address actual or perceived conflict of interest
- Consider all information and evidence carefully
- Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter or to resolve issues raised.

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**, who will ensure the concern is passed to the appropriate person for review and action.

6.0 PUBLICISING THIS COMPLAINTS POLICY

We will make this Complaints Policy easy for clients, tenants and members of the public to access and understand. We will:

- Publish the policy clearly on our website and provide printed copies on request.
- Include information about how to make a complaint in key documents and communications for both tenants and clients.
- Ensure everyone using our services knows how to raise a complaint, how it will be handled, and their right to escalate it if they remain dissatisfied.
- Keep our Complaints Policy up to date and ensure it's communicated in a way that's accessible, inclusive and easy for people to understand.

7.0 COMPLAINTS PROCESS

Our Have Your Say form, which is available on our website's 'Contact us' page, is the quickest way to contact us, however there are lots of other ways people can raise a complaint, including:

- Telling a member of staff or manager
- Completing feedback forms in the service
- Emailing us at feedback@southdown.org
- Calling us on 01273 405800
- Writing to us at 2 Bell Lane, Lewes, East Sussex, BN7 1JU
- Filling in our Feedback Form, also available on our website's 'Contact Us' page

There are 2 stages to our complaints process:

Stage 1

We will acknowledge a complaint within five working days. The acknowledgement will confirm the concerns being investigated, provide a reference number, identify the Complaint Handler, and outline the next steps.

The Complaint Handler will review what happened and take appropriate action to try to resolve the issues raised, maintaining a clear record of all activity. Additional information may be requested if required to complete the investigation.

A Stage 1 response will be issued within ten working days of the acknowledgement, setting out the findings and any actions taken or planned. Where additional time is needed, the complainant will be informed and the reasons explained.

If the complainant remains dissatisfied, they may request escalation to Stage 2 within 30 calendar days of receiving the Stage 1 response. and are not required to explain their reasons for doing so.

Stage 2

A senior member of staff will undertake the Stage 2 review. A Stage 2 acknowledgement will be issued within five working days, confirming the concerns to be reviewed, the reference number, the Investigating Manager, and the next steps.

The Investigating Manager will review how the complaint was handled at Stage 1, consider all relevant evidence, and make a decision based on their findings. This includes determining whether they agree with the Stage 1 outcome or whether the outcome should be different, and, if so, what that outcome should be. They will also identify whether further action is required. Additional information may be requested as needed, and all activity will be clearly recorded.

A Stage 2 response will be provided within 20 working days of the acknowledgement, outlining the findings and any actions taken or planned. Where more time is required, the complainant will be informed and the reasons for the extension explained.

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)

8.0 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 relates to a Southdown service but involves a third party, Southdown and the third party will determine who is best placed to lead the complaint, based on the nature of the issues raised. We will 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.

9.0 HOUSING OMBUDSMAN

The Housing Ombudsman is an independent, impartial, and free service for social housing tenants. Tenants can take a complaint about us to the Ombudsman if they have completed our

complaints process and are not happy with how we handled their complaint or the outcome. They can also contact them if we have not responded to a complaint they have made within a reasonable time.

Housing Ombudsman Complaint Handling Code

The Housing Ombudsman's Complaint Handling Code sets the rules all social housing landlords must follow to make sure complaints are handled fairly and consistently. The Code explains what a good complaints process should look like and what information tenants should have access to.

Each year, landlords must complete and publish on their website:

- A self-assessment against the Code
- An annual review of complaints for tenants
- Their Board's response to the self-assessment and annual review

You can find our self-assessment, annual review and Board response on our website on the 'About Us' page, under Openness and Transparency.

10.0 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.

11.0 ACCESSIBILITY

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

- Make all reasonable adjustments where possible (e.g. provide information in an easy read format or a language interpreter), record the agreed adjustments, and keep them under review.

- Adjust our deadlines when someone needs more time because of a disability, ensuring they have the time and support required during the complaints process.

12.0 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.

13.0 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 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.

14.0 RECORD KEEPING

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

15.0 ASSOCIATED POLICIES AND PROCEDURES

1.10b Complaints Procedure

