



# **COMPLAINTS POLICY**

**Effective from:  
18 June 2025**

## APPLICATION OF THIS POLICY

YMCA St Paul's Group is committed to ensuring that there are effective means to review, respond and act on complaints in relation to its service delivery. The Policy applies to all legal entities within the Group. This Policy links to the Charity's obligations under the Housing Ombudsman's Complaint Handling Code and the Tenant Satisfaction Measures.

## OBJECTIVE

1. We are committed to providing services that meet the standards agreed with customers (including residents, service users, young people and stakeholders). Through the implementation of this policy, we aim to address situations where we do or do not meet expectations and need to understand, learn and identify how we can improve our service.
2. When considering feedback, we will consider whether it is either:
  - a) A Service Request, or
  - b) A Complaint
3. These terms are defined below and the Complaint Handling Code (for complaints in relation to our landlord duties) and wishes of the Customer will be considered when deciding which category is appropriate.
4. Where we can, we will seek to avoid matters escalating by simply understanding and putting in place simple remedies.

## POLICY STATEMENT

5. The aims of the Policy are to:
  - a) Ensure customers have open and fair access to the complaints process
  - b) Manage complaints effectively and efficiently
  - c) Operate a prompt, fair complaint escalation and review process
6. As an integral part of the review process we will engage with customers in the review of this Policy.

## EQUALITY IMPACT ASSESSMENT

7. We are committed to treating everyone fairly, recognising the protected characteristics set out in the Equalities Legislation. We will act sensitively towards the diverse needs of individuals and communities and will take positive action where appropriate.
8. We make appropriate arrangements where necessary to ensure that customers with distinct communication needs are not unreasonably and disproportionately affected. This could involve providing communications in alternative languages or formats or providing interpretative or transcription assistance where appropriate.
9. We will ensure that anyone living with us, and in particular those under the age of 18, is supported to make a complaint and ensure that they are not subject to any reprisal or detriment for making a complaint or representation.

## DEFINITIONS

10. Customer: Refers to all service users whether they be residents in our accommodation (including young people aged 16-17 and anyone living within our supported living and supported lodgings schemes), young people in our clubs, children or family members who use our facilities or members of the community who hire a room or use any of our community facilities.
11. Service Request: A service request in the context of this policy is a request from a customer requiring action to be taken by the Charity to put something right. A complaint should be raised when the customer raises dissatisfaction with the response to their service request. Service requests will be recorded, monitored and reviewed regularly.
12. Complaint: An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the Charity, its own staff, or those acting on its behalf, affecting an individual customer or group of customers. A customer does not have to use the word 'complaint' for it to be treated as such.
13. Where dissatisfaction is expressed about a service and we have been unable to remedy the situation to the customer's satisfaction, and the customer chooses to formalise the matter, a complaint should be lodged within 12 months of the occurrence which is being complained about.
14. A complaint may be made by a current or former customer, a prospective customer, a third party affected by our actions, or an MP, Councillor or third party acting on their behalf with their permission. Compliments, complaints and suggestions may also be raised via our different social media platforms. See exclusions section.
15. Suggestion: We recognise that sometimes customers put forward a suggestion as to how we can improve our service without making a complaint. We will actively encourage people to make suggestions for improvement. This includes:
  - a) Talking to customers while they are on the premises
  - b) Monitoring social media and online forums
  - c) Asking employees about customer feedback
  - d) Reading online reviews by customers
  - e) Customer feedback surveys and suggestion forms
  - f) Mystery Shopping
16. We recognise that suggestions may be things that take a longer time to respond to (as they may include suggestions of significant change to service or property standards). As such we will try to respond to suggestions, but this response will be on a more bespoke timeline. From time to time we will publish "you said, we did" information in our various sites and services in order to demonstrate how customers' comments have been taken on board.

## REPORTING AND MONITORING

17. We will use complaints as an opportunity to learn and implement remedies to prevent future reoccurrences where appropriate. When closed, complaints will be analysed to:
  - a) Assess whether the service standards set out in this policy have been met;
  - b) Assess quality of response to complaints;
  - c) Assess that appropriate action has been taken within reasonable response times;
  - d) Assess whether the policy has been applied fairly and consistently;

- e) Identify any lessons to be learnt and service improvements made;
  - f) Decide on any necessary communication to staff and customers;
  - g) Identify any required amendments to procedures;
  - h) Report on the number of complaints made by young people (aged 16-17) living in our properties;
  - i) Report on the number of complaints that have been handled via our unacceptable behaviour processes or ones that are repetitive.
18. We will routinely monitor our performance in implementing this policy and report outcomes to the Board, the Member Responsible for Complaints, Resident Representative Panel (RRP) and Executive Team.
19. We will endeavour to ensure we maintain a collaborative and cooperative approach to the handling and response to any complaints, taking collective responsibility for any shortfalls identified.
20. The Board will consider the impact of very serious complaints on the risk register.
21. We will conduct regular customer satisfaction surveys that will enable customers and the Charity to provide feedback on complaints handling to ensure that customers feel able to complain and are confident that their complaint will be dealt with in a positive manner. Customers who express dissatisfaction will be provided with details of our complaints process and the details of the Housing Ombudsman if their complaint is in relation to our landlord duties.
22. The Board will review this Policy every year to ensure it is effective and complies with current legislation and good practice. Any changes that are required will be progressed as necessary.
23. OFSTED 16/17 accommodation: We will ensure that a record is made of any complaint or representation, the action taken and the outcome of any investigation as it relates to young people aged 16-17 that live in our OFSTED registered schemes. We will provide (where requested) a statement containing a summary of any complaints or representations made during the 12 months preceding the date of the request and the action that was taken in response to each complaint or representation to OFSTED as required for monitoring and reporting purposes.

## EXCLUSIONS

24. The following type of complaints cannot be pursued through the Complaints process where the issue:
- a) Has already been raised through our complaints process and matters have previously been considered and concluded under the complaints policy.
  - b) Is, has or should be handled through legal action and where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
  - c) Is an internal complaint raised by a member of staff or volunteer (which should instead be treated in line with the grievance or whistleblowing policies).
  - d) Is raised anonymously or without any means of speaking to the complainant in order to substantiate their complaint.
  - e) The issue giving rise to the complaint occurred over twelve months ago. Discretion will apply here e.g. individual personal circumstances e.g. bereavement/illness; vulnerabilities; where a resident has not been aware of the issue and could not be expected to bring the complaint forward sooner.

25. Where a complaint cannot be pursued through our complaints process, we will provide the customer with an explanation setting out the reasons why the matter is not suitable for the complaints process and the right to take our decision to the Housing Ombudsman if their complaint is in relation to our landlord duties or OFSTED if it is in relation to one of our OFSTED registered services. If the Ombudsman/ OFSTED does not believe that the exclusion has been fairly applied, they may tell us to take on the complaint.

### MAKING A COMPLAINT

26. A complaint can be raised in any way and with any member of staff. Ways of raising complaints will include:
- a) Completing a complaint form and handing it in at a reception in one of the YMCA SPG sites
  - b) By email to [complaints@ymcaspg.org](mailto:complaints@ymcaspg.org)
  - c) By letter to the Complaints Officer, YMCA St Paul's Group, 49 Victoria Road, Surbiton, KT6 4NG
  - d) Completing the complaint form on the YMCA St Paul's Group website
  - e) Verbally to a member of staff who will support the complainant to complete a complaint form
  - f) Where a complaint or service request is raised via social media, it will be treated in line with the complaints policy and process. Where it is identified as a specific complaint then the complainant will be contacted directly via social media to progress this further, where it is a service request then the Charity will decide whether to publish a public or private response.
27. A summary, step by step guide to the complaints policy will be made available in plain, easy read English at key points around our sites and on our website. Where a customer might require assistance in completing a form, assistance can be provided by a member of staff or by a third party such as the Citizens Advice Bureau.
28. A summary of this policy and a full copy will be made available on our website.
29. Where the complaint concerns a Safeguarding issue relating to people in the care of YMCA, then YMCA's Safeguarding Policy will apply.
30. The officer reviewing the complaint will also consider whether the seriousness of the matter triggers any regulatory reporting requirements. If there are any questions over the most appropriate steps to take, then the advice of the Company Secretary will be sought.
31. The Charity is committed to ensuring that there are fair, proportionate and consistent outcomes to any compensation claims. Please see our separate Customer Compensation Claim Policy & Procedures for further information.

### EXCEPTIONAL VARIATION

32. A tiny minority of customers may account for a disproportionately and unreasonably high volume of complaints, diverting significant time and resource away from other customers. The following are examples where a complainant could be considered to placing an unreasonable demand on the Charity:
- a) Requesting large volumes of information, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another;
  - b) Refusing to accept the answer that has been provided, continuing to raise the same subject matter without providing any new evidence, continuously adding to or changing the subject matter of the complaint;

- c) Refusal to co-operate (e.g. complaining without responding to clear and appropriate requests to clarify the complaint, and or requests for further information to investigate it);
  - d) Verbal abuse, aggression, violence (this is not just limited to actual physical or verbal abuse but can include derogatory remarks, rudeness, inflammatory allegations and threats of violence);
  - e) Overload of letters, calls, emails or contact via social media (this could include the frequency of contact as well as the volume of correspondence received as well as the frequency and length of telephone calls).
33. A member of the Executive Team must confirm that a complainant is acting unreasonably. Where this is so we will:
- a) Provide a single point of contact;
  - b) Limit contact to a single form - i.e., to writing, email or telephone only;
  - c) Limit contact to certain times or to a limited number of times per week or month;
  - d) Decline to give any further consideration to an issue unless any additional evidence or information is provided;
  - e) Only consider a certain number of issues in a specific period.
34. The above course of action will be confirmed in writing to the complainant, alongside an explanation as to why their complaint is considered unreasonable and what action is required to address this. We will review any such decision every 6 months.
35. Any new, unrelated, complaints that are received during this time will be treated on their individual merits and will be dealt with accordingly.

### **SERVICE USER OR EXTERNAL COMPLAINT ABOUT A BOARD / COMMITTEE MEMBER, CHIEF EXECUTIVE OR EXECUTIVE TEAM MEMBER**

36. Where a service user or external complaint is received about the behaviour of a Board / Committee member, Chief Executive or Executive Team member, the investigation will be commissioned by the People & Governance Committee. In commissioning this work, the Committee may choose to bring in an independent person to carry out the investigation if they consider it necessary to do so. Where the complaint is about a member of the People & Governance Committee, then the Chair of Trustees will work with the Company Secretary and Chief Executive to commission an investigation.
37. For the avoidance of doubt, this Complaints Policy is for service users or external complaints. For any internal matters relating to employment, volunteering or contracting concerns, then they should be raised under the Grievance Procedure.

### **DATA PROTECTION AND INFORMATION SHARING**

38. We will share relevant information with appropriate agencies in line with Data Protection Legislation that governs when and how we can share personal information.

### **STAFF TRAINING**

39. We will use anonymised complaints to support staff with training in delivering the Complaints Policy.



## COMPLAINTS HANDLING PROCEDURE

### Stage 1: Complaint

40. A complaint will first be investigated at stage one of the complaints procedure. YMCA will progress a complaint in a fair and transparent manner:
- a) Within **5 working days** we will acknowledge receipt of the complaint and provide an indication of when a substantive response to the complaint might be given. If we consider the matter to be a Service Request rather than a Complaint, then we will confirm that at this stage. The day we receive the complaint is day 0, unless the complaint is received outside of our core working hours (9.00am – 5.00pm). In this instance, the date received will be logged as the following working day and counted as day zero.
  - b) After acknowledging the complaint (above) we will contact the complainant (where appropriate) to arrange to meet and review the complaint and gather further information. We will also meet with members of staff and stakeholders as necessary to agree a response.
  - c) No person who is the subject of a complaint or representation will be asked to take part in any part of the complaint investigation or consideration, except at the informal resolution stage, if it is considered appropriate.
  - a) After arranging to meet the complainant (or acknowledging the complaint if no meeting is proposed) we will write to the complainant setting out our findings and if necessary, offering resolution. We will respond with a decision **within 10 working days** of the complaint being acknowledged. Our response will clearly set out the description of the complaint (the ‘complaint definition’), the decision made (whether it has been upheld/partially upheld/not upheld) and the reasons why, details of any remedies to put things right and any outstanding actions. It will also provide details of how to escalate the matter if unsatisfied.
  - b) If this time limit cannot be met, we will write to the complainant within 10 working days of acknowledgement, explaining the reason for the delay, providing a revised date (which should not exceed a further 10 working days without good reason) and giving details of the Ombudsman or OFSTED (where relevant).
41. If the complainant is not satisfied with the response to the complaint, they will have 14 working days in which to appeal. The procedure for making an appeal will be set out in the complaint response and an appeal must be made within 14 days. If no appeal is forthcoming, then the complaint will be considered to be closed. We will, however, exercise discretion and review requests to escalate after this time on a case-by-case basis.

### Stage 2: Appeal Against Decision

42. If the customer is not satisfied with the outcome of Stage 1 of the procedure, or feels that the procedure has not been followed, the next stage is to progress to stage 2.
43. Within **5 working days** we will acknowledge receipt of the stage 2 complaint and provide an indication of when a substantive response to the complaint might be given.

44. Complainants are not required to explain their reasons for requesting a stage 2 consideration. We will, however, make reasonable efforts to understand why a resident remains unhappy as part of our stage 2 process.
45. A review of the decision will be taken by a person who is not involved in the original decision. Where the complaint is about the Chief Executive, an Executive Director or Trustee, then this appeal stage will be coordinated by the People & Governance Committee or Chair of the Board as is necessary and appropriate in the circumstances.
46. We will respond with a decision **within 20 working days** of the stage 2 complaint being acknowledged. Our response will clearly set out the description of the complaint (the 'complaint definition'), the reasons for our decision (whether it has been upheld/partially upheld/not upheld), details of any remedies to put things right and any outstanding actions.
47. If this time limit cannot be met, we will write to the complainant within 20 working days of acknowledgement, explaining the reason for the delay and providing a revised date (which should not exceed a further 20 days without good reason) and providing details for the Housing Ombudsman (where relevant).

### Housing Ombudsman

48. Where the complaint relates to landlord services then complaints may be passed directly to the Ombudsman if the complaint has passed through all the internal procedures for considering complaints against the landlord. Residents can, however, contact the Housing Ombudsman at any point during the complaint process. They cannot investigate the complaint whilst it is going through the internal procedure but they may help facilitate a resolution.

They can be contacted at:

Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

<https://www.housing-ombudsman.org.uk/residents/make-a-complaint/>

### OFSTED: Early Years/ Registered Childcare provision

49. As above, any parent/carer at any time can submit a complaint to OFSTED about any aspect of our registered childcare provision. OFSTED will consider and investigate all complaints received. They can be contacted at:

OFSTED, Piccadilly Gate, Store Street, Manchester M1 2WD

Tel: 0300 123 4666

[enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)

<https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>

### OFSTED: Young People's Supported Accommodation

50. Where the complaint relates to young people's accommodation, complaints can be submitted to OFSTED if they have been through our internal procedures for considering complaints. They can be contacted at:



OFSTED, Piccadilly Gate, Store Street, Manchester M1 2WD

Tel: 0300 123 1231

[enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)

<https://www.gov.uk/government/publications/whistleblowing-about-childrens-social-care-services-to-ofsted/sharing-concerns-and-information-with-ofsted-about-childrens-social-care-services>

## REPORTING RESPONSIBILITIES

51. The Board has appointed a Member Responsible for Complaints (MRC).
52. The MRC will scrutinise and review complaints reports and performance prior to consideration by the Board. They will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the Charity's complaint handling performance and helps create a culture of openness and transparency in this area.
53. The Group Director of Operations will be the lead Executive for Complaints handling. However, each Executive Director will be responsible for responding to complaints in their areas of responsibility.
54. The Group Director of Operations will produce i) an annual complaints report to the MRC, Resident Representative Panel, Performance Committee and Board and ii) a quarterly complaints report to the MRC and Resident Representative Panel. This will sit alongside reporting on Tenant Satisfaction Measures. These documents, together with the Committee's response, will be published on our website.
55. The Executive Assistant to the Group Director of Operations will hold the Complaints Officer designation for the purposes of the Housing Ombudsman Code.
56. The Company Secretary is responsible for liaising with the various nominated individuals, the Chief Executive and the Chair of the Board about reporting complaints to Regulators as prescribed by the Incident Reporting Policy.
57. The Head of Housing Care and Support is the 'Nominated Person' for the purposes of OFSTED young people's accommodation and the Head of Children, Youth & Families is the 'Nominated Person' for OFSTED registered Childcare provision.