



# Complaints Policy

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## 1. Purpose

- 1.1 To detail Loreburn's Complaints Handling Procedure and demonstrate our commitment to valuing complaints. Our aim is to resolve customer dissatisfaction as close as possible to the point of service delivery and to conduct thorough, impartial and fair investigations of customer complaints.
- 1.2 To empower staff to positively embrace complaints and use the learning opportunities as a means of continuous business improvement to ensure we deliver the best possible outcomes for our customers.
- 1.3 Loreburn H A will promote good practice and partnership working in relation to the safety relating to asbestos and the associated risks.

## 2. Legislative Background and Guidance

1.1 In preparing this policy we have taken account of:

- Public Services Reform (Scotland) Act 2010 This Act places a statutory duty on social landlords to comply with the SPSO Model Complaint Handling Procedure published for the housing sector.
- The Property Factors (Scotland) Act 2011 This Act places a duty on property factors to comply with the Code of Conduct Complaints Handling Procedures introduced by the SPSO.
- Data Protection Act 1998 This Act includes provision for the regulation of the processing of information relating to individuals, including the obtaining, holding, use or disclosure of such information. It gives data subjects rights such as the right to a copy of their own information and the right to prevent processing which may cause damage or distress (with exceptions). It also provides legal gateways for organisations to disclose personal data in certain circumstances, for example in section 29 for the purposes of prevention and/or detection of crime.
- Scottish Public Services Ombudsman (SPSO) Model Complaint Handling Procedure for Registered Social Landlords and the Property Factors Code of Conduct procedures.
- SPSO Statement of Complaints Handling Principles' and best practice guidance on complaints handling from the Complaints Standards Authority (CSA) at the SPSO. The CSA website is: [www.valuingcomplaints.org.uk/](http://www.valuingcomplaints.org.uk/)

### Associated Policies

- Information Sharing Policy
- Data Protection Policy
- Unacceptable Actions Policy
- Accident & Incident policy

### 3. Aims of this Policy

- 3.1 Early Resolution – a clear complaints handling process which supports early resolution by capable, well trained staff. **Complaint are investigated by the person who it is made against.**
- 3.2 Customer Focussed – a positive complaints culture where we welcome the opportunity to turn negative experiences into positive outcomes for all customers through identifying learning outcomes which will provide valuable information to help shape service improvements, prevent recurrence and improve customer satisfaction.
- 3.3 Accessible – this policy & associated guidance will be well publicised, easy to understand and available to all customers.
- 3.4 Well managed – we will ensure our complaints handling process is a positive experience for customers where we will demonstrate we have listened, understood and considered all the facts by managing all complaints fairly, sensitively and timeously.
- 3.5 Ownership – staff will have access to the appropriate tools and training in order to be empowered to take ownership of complaints.

### 4. What is a Complaint?

- 4.1 Loreburn's definition of a complaint is: 'An expression of dissatisfaction by one or more members of the public about Loreburn's action or lack of action, or about the standard of service provided by or on behalf of Loreburn.'
- 4.2 A complaint may relate to:
  - failure to provide a service
  - inadequate standard of service
  - dissatisfaction Loreburn policy
  - disagreement with a decision where the customer cannot use another procedure (for example an appeal) to resolve the matter
  - treatment by or attitude of a member of staff
  - Loreburn's failure to follow the appropriate administrative process
  - delays in responding to enquiries and requests.
  - unfairness, bias or prejudice in service delivery
  - failure to follow procedures
  - lack of provision, or the provision of misleading, unsuitable or incorrect advice or information
  - a repair that has not been carried out properly
  - unacceptable behaviour by a member of staff, a committee member or a contractor.
- 4.3 A complaint is **not**:
  - a routine first-time request for a service
  - a request for compensation only

- issues that are in court or have already been heard by a court or a tribunal
- an appeal against a decision where there is an established appeal route; these should be heard through the appropriate appeal process
- an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our **final** decision.

The above issues should not be treated as complaints, and customers should instead be directed to the appropriate procedure.

## **5. Who can make a complaint?**

- 5.1 Anyone who receives, requests or is affected by our services can make a complaint. It also includes a member of the public who could have access to or be affected by our services, including our anti social behaviour/ neighbour nuisance services.
- 5.2 Sometimes a customer may be unable or reluctant to make a complaint on their own. We will accept complaints brought by third parties as long as the customer has given their personal consent. These complaints are treated in the same way as any other, regardless of who has brought the complaint.

## **6. What if the Customer does not want to complain?**

- 6.1 If a customer has expressed dissatisfaction in line with our definition of a complaint but does not want to complain, it should be noted Loreburn H A consider all expressions of dissatisfaction, as customer complaints as they offer us an opportunity to improve services where things have gone wrong.
- 6.2 If, however, the customer insists they do not wish to complain, record the issue as an anonymous complaint. This will ensure that the customer's details are not recorded on the complaints database, and that they receive no further contact about the matter. It will also help to ensure the completeness of the complaints data recorded and will still allow us to fully consider the matter and take corrective action where appropriate.

## **7. Handling Anonymous Complaints**

- 7.1 Loreburn HA values all complaints. This means that all complaints including anonymous complaints are treated seriously and will take action to consider them further, wherever this is appropriate.
- 7.2 Generally, Loreburn consider anonymous complaints if there is enough information in the complaint to enable us to make further enquiries. If, however, an anonymous complaint does not provide enough information to enable us to take further action, we may decide not to pursue it. If an anonymous complaint makes serious allegations, it will be referred to a Manager or Director immediately. Any decision not to pursue an anonymous complaint must be authorised by a Director or Manager.

## **8. Complaints involving more than one service or organisation**

- 8.1 If a complaint relates to the actions of two or more of our services, customers should be advised who will take the lead in dealing with the complaint, and explain that they will receive one response covering all issues raised.
- 8.2 If a customer complains about the service of another agency or public service provider, and Loreburn HA has no involvement in the issue, they should be advised to contact that organisation directly.
- 8.3 If the complaint relates to a Loreburn H A service and includes one or more contractors, we will usually deal with the complaint, however, depending on circumstances it may be the contractor who will take the lead. Where this happens Loreburn will work with the contractor to investigate all the matters simultaneously. Again, it is important to inform the customer who will take the lead in dealing with the complaint, and explain that they will receive only one response covering all issues raised.
- 8.4 If it is necessary to make enquiries to an outside agency in relation to the complaint Data Protection Legislation and internal guidance on handling customers' personal information should always be considered. The Information Commissioner has detailed guidance on data sharing and has issued a data sharing code of practice.

## 10. Supported Housing and Care related complaints

- 10.1 In addition to the general complaints guidance, anyone receiving care or housing support services from Loreburn H A has the right to either complain direct to the Care Inspectorate or to us.
- 10.2 Customer who receive care or support from other agencies under a contract linked to or with Loreburn HA may complain about these services either to LHA (just like complaints about any of our other services) or directly to the Care Inspectorate.

The Care Inspectorate's contact details can be found on their website:

<http://www.scswis.com/>

Or:

telephone 0845 600 9527

fax 01382 207 289

complete an online complaints form at <http://www.scswis.com/>, or

email [enquiries@careinspectorate.com](mailto:enquiries@careinspectorate.com)

## 11. Significant performance failures

11.1 The Scottish Housing Regulator (SHR) has a duty to consider issues raised with them relating to 'significant performance failures'. A significant performance failure is defined by the SHR as something that a landlord does or fails to do that puts the interests of its tenants at risk, and which the landlord has not resolved. This is something that is a systemic problem that does, or could, affect all of a landlord's tenants. A significant performance failure happens when:

- a landlord is not delivering the outcomes and standards in the Scottish

Social Housing Charter over a period of time; or

- a landlord not achieving the regulatory standards on governance or financial management

## **12.1 Complaints Handling Procedure**

12.1 Our aim is to provide a quick, simple and streamlined process for resolving complaints early and locally by capable, well-trained staff.

12.2 Our complaints process provides two opportunities to resolve complaints internally:

- frontline resolution, and
- investigation

12.3 For clarity, the term 'frontline resolution' refers to the first stage of the complaints process. It does not reflect any job description within Loreburn but means seeking to resolve complaints at the initial point of contact where possible. See **Appendix One model framework**.

### **12.4 Stage one: frontline resolution**

12.4.1 Frontline resolution aims to quickly resolve straightforward customer complaints that require little or no investigation. Any member of staff may deal with complaints at this stage.

12.4.2 The main principle is to seek early resolution, resolving complaints at the earliest opportunity and as close to the point of service delivery as possible.

12.4.3 In practice, frontline resolution means resolving the complaint without lengthy investigation and within **5 days**. This may mean asking colleagues for information to facilitate this. However, it is the responsibility of the staff member who received the complaint to respond to the customer.

12.4.4 An enhancement to frontline resolution is First Time Resolution. This is where a representative from Loreburn HA has settled the complaint by providing an on-the-spot apology where appropriate, or explaining why the issue occurred and, where possible, what will be done to stop this happening again. The representative may also explain that, as an organisation that values complaints, we may use the information given to review service standards.

12.4.5 It is important to be clear whether it was a First Time Resolution or a Frontline Resolution as Loreburn H A are committed to resolving more complaints on the spot.

12.4.6. A customer can make a complaint in writing, in person, by telephone, by email or online using our website or social media pages, or by having someone complain on their behalf. Loreburn H A will always consider frontline resolution, regardless of how we have received the customer's complaint.

### **12.5 What to do when a complaint is received**

12.5.1 On receipt of a complaint, the recipient must first decide whether the issue can indeed be defined as a complaint. The customer may express dissatisfaction about more than one issue. This may mean

you should treat one element as a complaint, while directing the customer to pursue another element through an alternative route. Details of the complaint should be recorded on Aaeron QL CRM system. (see **Appendix 2**).

- 12.5.2 If a complaint constitutes an accident, incident or near miss, or presents a risk to others you must refer to the Accident & Incident Policy and follow the steps outlined there. In accordance with the Accident & Incident Policy you must also inform your Line Manager and the Health & Safety Co-ordinator.
- 12.5.3 A decision should be made on whether or not the complaint is suitable for frontline resolution or first time resolution. Some complaints will need to be fully investigated before the customer can receive a suitable response. Those complaints must be escalated immediately to the investigation stage.
- 12.5.4 When frontline resolution is appropriate, four key questions should be considered:
- What exactly is the customer's complaint (or complaints)?
  - What does the customer want to achieve by complaining?
  - Can I achieve this, or explain why not?
  - If I can't resolve this, who can help with frontline resolution?

**What exactly is the customer's complaint (or complaints)?**

It is important to be clear about exactly what the customer is complaining of. You may need to ask the customer for more information and probe further to get a full picture.

**What does the customer want to achieve by complaining?**

At the outset, clarify the outcome the customer wants. Of course, the customer may not be clear about this, and you may need to probe further to find out what they expect, and whether they can be satisfied.

**Can I achieve this, or explain why not?**

If you can achieve the expected outcome by providing an on-the-spot apology, or explain why you can't achieve what the customer wants, you should do so. If you consider an apology is appropriate, you may wish to follow the SPSO's guidance on the subject:

[SPSO guidance on apology](#)

The customer may expect more than we can provide. If so, you must tell them as soon as possible. An example would be where the customer is so dissatisfied with a kitchen refurbishment that they demand a new kitchen, but we are only willing to repair any broken units.

You are likely to have to convey the decision face to face or on the telephone. If you do so face to face, by telephone or by email, you are not required to write to the customer as well, although you may choose to do so or the customer may ask you to. It is important, however, to keep a full and accurate record of the decision reached and passed to the customer.

**If I can't resolve this, who can help with frontline resolution?**

If you cannot deal with the complaint because, for example, you are unfamiliar with the

issues or area of service involved, you should be able to pass details of the complaint immediately to someone who can attempt to resolve it.

## 12.6 Timelines

12.6.1 First Time Resolution is completed on the spot at source.

12.6.2 Frontline resolution should be completed within **five working days**, although in practice we would often expect to resolve the complaint much sooner.

12.6.3 The member of staff may need to get more information from other services to resolve the complaint at this stage. However, it is important to respond to the customer within **five working days**, either resolving the matter or explaining that their complaint is to be investigated.

## 12.7 Extension to the timeline

12.7.1 In exceptional circumstances, where there are clear and justifiable reasons for doing so, Loreburn H A representatives may agree an extension of no more than an additional five working days with the customer. This must only happen when an extension will make it more likely that the complaint will be resolved at the frontline resolution stage.

12.7.2 Before requesting an extension authorisation should be sought from the appropriate senior manager, who will decide whether or not an extension is necessary to effectively resolve the complaint. Examples of when this may be appropriate include staff or contractors being temporarily unavailable. If, however, the issues are so complex that they cannot be resolved in five days, it may be more appropriate to escalate the complaint straight to the investigation stage. Customers should always be kept informed of the reasons for the delay, and when they can expect your response.

12.7.3 If the customer does not agree to an extension but it is unavoidable and reasonable, a senior manager should decide on the extension. The customer must be kept informed about delays and reasons explained for the decision to grant the extension.

12.7.4 It is important that such extensions do not become the norm, the timeline at the frontline resolution stage should be extended only rarely. All attempts to resolve the complaint at this stage must take no longer than **ten working days** from the date you receive the complaint. The proportion of complaints that exceed the five-day limit will be evident from reported statistics and are reported to the management team on a quarterly basis. **Appendix 3** provides further information on timelines.

## 12.8 Closing the complaint at frontline resolution stage

12.8.1 You can write, telephone or e mail the customer with the outcome which should include Loreburn H A's response to all areas that we are responsible for and explains the reasons for decisions. It is also important to keep a full and accurate record of the outcome and decisions made and given to the customer. The complaint should then be closed and the complaints system updated accordingly.

## 12.9 When to escalate to the investigation stage

12.9.1 An investigation aims to establish all the facts relevant to the points made in the complaint and to give the customer a full, objective and proportionate response which sets out Loreburn H A's final position. A complaint should be escalated to the investigation stage when:

- A frontline resolution was tried but the customer remains dissatisfied and requests an investigation into the complaint. This may be immediately on communicating the decision at the frontline stage or could be some time later.
- The customer refuses to take part in the frontline resolution process.
- The issues raised are complex and will require detailed investigation
- The complaint relates to serious, high risk or high profile issues.

12.9.2 As closed cases cannot be re-opened on the CRM system all stage 1 complaints should be left open for a period of **3 months** from resolution to allow for escalation to stage 2 if necessary. It is important to take care to identify complaints that might be considered serious, high risk or high profile, as these may require particular action or raise critical issues that need senior management's direct input. The SPSO defines potential high risk or high profile complaints as those that may:

- involve a death or terminal illness
- involve serious service failure
- generate significant and ongoing press interest
- pose a serious risk to our operations
- present issues of a highly sensitive nature, for example concerning:
  - immediate homelessness
  - a particularly vulnerable person
  - child protection.

## 12.10 Stage two: Investigation

12.10.1 Not all complaints are suitable for first time or front line resolution and not all complaints will be satisfactorily resolved at that stage. Complaints handled at the investigation stage are typically complex or require a detailed examination before a position can be stated. Those complaints may already have been considered at the frontline resolution stage, or they may have been identified from the start as needing immediate investigation.

12.10.2 An investigation aims to establish all the facts relevant to the points made in the complaint and to give the customer a full, objective and proportionate response that represents our final position.

## 12.11 What to do when you receive a complaint for investigation

12.11.1 It is important to be clear from the start of the investigation stage exactly what is being investigated, and to ensure that both the customer and service understand the investigation's scope. It may be helpful to discuss and confirm these points with the customer at the outset, to establish why they are dissatisfied and whether the outcome they are looking for sounds realistic. In discussing the complaint with the customer, three key questions should be considered:

- What specifically is the customer's complaint or complaints?
- What does the customer want to achieve by complaining?
- Are the customer's expectations realistic and achievable?

12.11.2 It may be that the customer expects more than Loreburn H A can provide, where that is the case, the position should be made clear to the customer as soon as possible, with where possible any additional information needed to investigate the complaint. The customer may need to provide more evidence to help Loreburn H A reach a decision.

12.11.3 Details of the complaint must be recorded on the complaints system, which is done as a continuation of the frontline resolution action. The details must be updated when the investigation ends.

12.11.4 If the investigation stage follows attempted frontline resolution, the case notes and associated information should be passed to the officer responsible for the investigation, and the action recorded.

## 12.12 Timelines

12.12.1 The following deadlines apply to cases at the investigation stage:

- Complaints must be acknowledged within **three working days**
- A full response should be provided to the complaint as soon as possible but no later than **20 working days** from the time you received the complaint for investigation.

## 12.13 Extension to the timeline

12.13.1 Not all investigations will meet those deadlines, for example, some complaints are so complex that they require careful consideration and detailed investigation beyond the 20-day limit. However, these would be the exception and you must always try to deliver a final response to a complaint within 20 working days.

12.13.2 If there are clear and justifiable reasons for extending the timescale, senior management will set time limits on any extended investigation, as long as the customer agrees. The customer must be kept updated with reasons for the delay and notified of the revised timescale for completion. If the customer does not agree to an extension but it is unavoidable and reasonable, then senior management should consider and confirm the extension. The reasons for an extension might include the following:

- essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff, customers or others but they cannot help because of long-term sickness or leave
- essential information cannot be accessed within normal timescales
- operations are disrupted by unforeseen or unavoidable operational circumstances, for example industrial action or severe weather
- or the customer has agreed to mediation as a potential route for resolution.

12.13.3 These are only a few examples, and each case will be assessed in relation to the complaint. However, an extension is the exception and the key objective should always try to deliver a final response to the complaint **within 20 working days**.

12.13.4 As with complaints considered at the frontline stage, the proportion of complaints that exceed the 20-day limit will be evident from reported statistics. The statistics go to our management team on a quarterly basis. **Appendix 3** provides further information on timelines.

## 12.14 Mediation

12.14.1 Some complex complaints, or complaints where customers and other interested parties have become entrenched in their position, may require a different approach. Where appropriate, it may be necessary to consider mediation or conciliation using suitably trained and qualified mentors to try to resolve the matter, and to reduce the risk of the complaint escalating further.

12.14.2 Mediation may help both parties to understand what has caused the complaint, and so is more likely to result in mutually satisfactory solutions.

12.14.3 If mediation is agreed, revised timescales will need to be discussed.

## 12.15 Closing the complaint at the investigation stage

12.15.1 The customer must know the outcome of the investigation, in writing or by their preferred method of contact. Loreburn H A's response to the complaint must address all areas that we are responsible for and explain the reasons for our decision. Decisions must be recorded on the electronic system with details of how it was communicated to the customer.

12.15.2 The customer should also be made aware of:

- their right to ask the SPSO to consider the complaint
- the time limit for doing so, and
- how to contact the SPSO.

## 12.16 Independent external review

12.16.1 Once the investigation stage has been completed, the customer has the right to approach the SPSO if they remain dissatisfied.

12.16.2 The SPSO considers complaints from people who remain dissatisfied at the conclusion of our complaints procedure. The SPSO looks at issues such as service failure and maladministration (administrative fault), as well as the way we have handled the complaint.

12.16.3 The SPSO recommends that organisations use the following wording in informing customers of their right to ask SPSO to consider the complaint. The SPSO also provides a leaflet **The Ombudsman and your organisation** which you may find helpful in deciding how and when to refer someone to the SPSO.

### **Information about the SPSO**

The Scottish Public Services Ombudsman (SPSO) is the final stage for complaints about public services in Scotland. This includes complaints about Scottish housing associations or co-operatives. If you remain dissatisfied with a housing association or co-operative after its complaints process, you can ask the SPSO to look at your complaint. The SPSO cannot normally look at complaints:

- where you have not gone all the way through the housing association's or co-operative's complaints handling procedure
- more than 12 months after you became aware of the matter you want to complain about, or
- that have been or are being considered in court.

The SPSO's contact details are:

SPSO  
4 Melville Street  
Edinburgh  
EH3 7NS

SPSO  
Freepost SPSO

Freephone: 0800 377 7330  
Online contact [www.spsso.org.uk/contact-us](http://www.spsso.org.uk/contact-us)  
Website: [www.spsso.org.uk](http://www.spsso.org.uk)  
Mobile site: <http://m.spsso.org.uk>

## 12.17 Factoring complaints

12.17.1 The Homeowners Housing Panel will try to resolve complaints and disputes between home owners and property factors. If a factoring customer is still dissatisfied after the investigation stage, they can go to the Homeowners Housing Panel, contact details are set out below.

### Homeowners Housing Panel

Europa Building  
450 Argyle Street  
Glasgow  
G2 8LH

Tel: 0141 242 0175

## 13. Governance of the Complaints Handling Procedure

### Roles and responsibilities

Overall responsibility and accountability for the management of complaints lies with the Chief Executive, the Executive Management Team and the Management Committee.

Once the final position on the complaint is signed off by an appropriate senior manager the customer will be informed of the outcome. This approach reassures the customer that their concern has been taken seriously.

**13.1 Management committee:** As the governing body with responsibility for overseeing Loreburn H A, the Management Committee provides leadership and

strategic guidance. It also has overall control of the organisations affairs and ensures compliance with policies and procedures.

**13.1.1** Particularly important is the Management Committee's role in developing and fostering a culture that values complaints. The Executive Management Team ensure that recording and reporting of complaints is thorough and effective, so that reports to Management Committee reflect a true picture of all complaints.

**13.1.2** The Management Committee values complaints and will:

- support all staff in resolving complaints locally, quickly and effectively, to reduce the potential for a complaint to escalate
- encourage frontline staff to be 'active listeners' and to understand and act on the information they receive
- set out how complaints data will be reported and used to promote continual improvement
- ensure that tenants and other customers are kept informed about how feedback has been used to improve services.

**13.2 Chief Executive:** The Chief Executive provides leadership and direction in ways that guide and enable the organisation to perform effectively across all services. This includes ensuring that there is an effective complaints handling procedure with a robust investigation process that demonstrates how Loreburn HA learn from complaints. The Chief Executive may take a direct role in all or some complaints, or may delegate responsibility to the EMT. Regular management reports assure the Chief Executive of the quality of complaints performance.

**13.3 Executive Management Team and Management Team:** On the Chief Executive's behalf, they may be responsible for:

- managing complaints and the learning from them
- ensuring that recording and reporting of complaints is thorough and effective
- overseeing the implementation of actions required as a result of a complaint
- investigating complaints
- Deputising for the Chief Executive on occasion.

13.3.1 Management Team may decide to delegate some elements of complaints handling (such as investigations and drafting of response letters) to other senior staff. Where this happens, Management Team should retain ownership and accountability for the management and reporting of complaints. They may also be responsible for preparing and signing decision letters to customers, so they should be satisfied that the investigation is complete and their response addresses all aspects of the complaint.

**13.4 Customer Engagement Officer:** Will oversee the investigation at stage 2. They will be involved in co-ordinating all aspects of the response to the

customer. This may include preparing a comprehensive written report, including details of any procedural changes in service delivery that could result in wider opportunities for learning across the organisation. Working alongside the Customer Engagement Manager and Head of Business Improvement they will identify learning opportunities and develop an action plan for service improvement.

**13.5 All staff:** A complaint may be made to any member of our staff. So all staff will be aware how to handle and record complaints at the frontline stage. They should also be aware of who to refer a complaint to, in case they are unable to personally handle the matter. We encourage all staff to try to resolve complaints early, as close to the point of service delivery as possible, and quickly to prevent escalation.

#### **14. Complaints about Senior Staff**

Complaints about senior staff or committee members can be difficult to handle, as there may be a conflict of interest for the staff investigating the complaint.

When serious complaints are raised against senior staff or committee members, it is particularly important that the investigation is conducted by an individual who is independent of the situation. The Scottish Housing Regulator specifies that a serious complaint against senior staff or the governing body of an RSL is a 'notifiable event', and as such the regulator must be informed immediately. It has also drawn up 'regulatory expectations' for the handling of serious complaints against the Chief Executive. This specifies that we must seek independent, professional advice to support us in handling, and in some cases investigating, the complaint.

The SHR's expectations also specify that strong governance arrangements must be in place that set out clear procedures for handling such complaints, including the governing body's role in such cases. Our processes specify the measures in place to ensure this is achieved, and the types of complaints Loreburn HA consider 'serious'.

HA also have arrangements for handling minor complaints against the Chief Executive and for complaints against other senior staff and the governing body. These arrangements take account of the need to ensure that the final decision is fair, objective and impartial.

The SHR's Regulatory Expectations on serious complaints against a Chief Executive can be found on the SHR's website.

#### **15. Recording, reporting, learning and publicising**

Complaints provide valuable customer feedback. One of the aims of the complaints procedure is to identify opportunities to improve services across our business. Loreburn H A must record all complaints in a systematic way so that the complaints data can be used for analysis and management reporting. By recording and using complaints information in this way, Loreburn H A can identify and address the causes of complaints and, where appropriate, identify training opportunities and introduce service improvements.

## 16. Recording complaints

To collect suitable data it is essential to record all complaints in line with SPSO minimum requirements, as follows:

- the customer's name and address
- the date the complaint was received
- the nature of the complaint
- how the complaint was received (for example by email, post etc)
- the service the complaint refers to
- the date the complaint was closed at the frontline resolution stage (where appropriate)
- the date the complaint was escalated to the investigation stage (where appropriate)
- action taken at the investigation stage (where appropriate)
- the outcome of the complaint at each stage
- the date the complaint was closed at the investigation stage (where appropriate)
- the underlying cause of the complaint and any remedial action taken.
- whether the customer was satisfied with the outcome of their complaint

Loreburn HA has structured systems for recording complaints, the outcomes and any resulting action. These provide a detailed record of services that have failed to satisfy customers.

All complaints will be recorded on the Aaeron QL CRM system and must include all the data detailed above; full guidance on how to do this is shown in Appendix 5.

## 17. Reporting of complaints

Complaints details are analysed monthly by the Customer Engagement Manager & Officer and the Business Improvement Team to identify trends and service failures and to ensure appropriate action is taken. Action plans for service improvement are developed to address the failures and trends. Monthly briefings on the analysis of complaints information helps to inform staff of services that need to improve. It will also help reporting efficiently on the Annual Return on the Charter (the ARC).

Complaints performance is reported quarterly to Executive Management Team and Management Committee. Complaints performance is also reported annually as part of the ARC.

Loreburn HA publish on a quarterly basis in the Newsletter, on our website and social media the performance of complaints and the action taken in response to complaints in the form of " You Said We Did". This demonstrates the improvements resulting from complaints and shows that complaints can influence and improve service

delivery. It also helps ensure transparency in complaints handling service and will demonstrate to our customers how complaints are valued.

Loreburn HA:

- Publicise on a quarterly basis complaints outcomes, trends and actions taken
- Use case studies and examples to demonstrate how complaints have helped improve services.

This information is reported regularly (and at least quarterly) to Executive Management Team.

## **18. Learning from complaints**

At the earliest opportunity after the closure of the complaint, the complaint handler liaises with the Customer Engagement Officer to discuss the findings of the complaint and any recommendations.

Monthly management meetings will review the information gathered from complaints and consider whether our services could be improved or internal policies and procedures updated.

As a minimum, Loreburn HA must:

- use complaints data to identify the root cause of complaints
- take action to reduce the risk of recurrence
- record the details of corrective action in the complaints file
- systematically review complaints performance reports to improve service delivery.

Where Loreburn HA have identified the need for service improvement:

- the action needed to improve services should be authorised by the Business Improvement Manager and relevant Director.
  - a staff member (or team) must be designated as the 'owner' of the issue, with responsibility for ensuring the action is taken, with support from the Business Improvement Team.
  - a target date must be set for the action
  - the Business Improvement Team must follow up to ensure that the action happens within the agreed timescale
  - where appropriate, performance in the service area must be monitored to ensure that the issue has been resolved
  - we must ensure that staff and management committee members all learn from complaints.

## **19. Publicising complaints performance information**

Loreburn HA also reports performance in handling complaints to the SHR, through the ARC. This includes performance statistics showing the volumes and types of

complaints and key performance details, for example on the time taken and the stage at which complaints were resolved. Quarterly statistics will also be publicised on the Loreburn website, social media, in Loreburn Living alongside a You Said, We Did section on learning & recommendations.

## **20. Maintaining Confidentiality**

Confidentiality is important in complaints handling. This includes maintaining the customer's confidentiality and explaining to them the importance of confidentiality generally. Loreburn HA must always bear in mind legal requirements, for example, data protection legislation, as well as internal policies on confidentiality and the use of customers' information.

## **21. Managing unacceptable behaviour**

People may act out of character in times of trouble or distress. The circumstances leading to a complaint may result in the customer acting in an unacceptable way. Customers who have a history of challenging or inappropriate behaviour, or have difficulty expressing themselves, may still have a legitimate grievance.

A customer's reasons for complaining may contribute to the way in which they present their complaint. Regardless of this, Loreburn HA must treat all complaints seriously and properly assess them. However, It is important to recognise that the action of customers who are angry, demanding or persistent may result in unreasonable demands on time and resources or unacceptable behaviour towards staff. Loreburn HA will, therefore, apply policies and procedures to protect staff from unacceptable behaviour such as unreasonable persistence, threats or offensive behaviour from customers.

Where Loreburn H A decide to restrict access to a customer under the terms of our Unacceptable Actions Policy. Loreburn HA have a procedure in place to communicate that decision, notify the customer of a right of appeal, and review any decision to restrict contact. Loreburn HA will allow the customer to demonstrate a more reasonable approach later and make clear to the customer that they can still request other services such as repairs while their access is restricted.

## **22. Supporting the customer**

All members of the community have the right to equal access to our complaints handling. Customers who do not have English as a first language may need help with interpretation and translation services, and other customers may have specific needs that Loreburn H A will seek to address to ensure easy accessibility.

Loreburn H A must always take into account our commitment and responsibilities to equality. This includes making reasonable adjustments to the service to help the customer where appropriate.

Several support and advocacy groups are available to support customers in pursuing a complaint and customers should be signposted to these as appropriate.

- Dumfries & Galloway Citizens Advice Service (incorporating Welfare Rights, Citizens Advice and Housing Advice services)
- People's Advocacy & Support Service (PASS Direct)
- Solicitors
- Law Centres
- Registered Tenant Organisations

## **23. Time limits for making complaints**

There is a time limit of six months from when the customer first knew of the problem, within which time they may ask Loreburn HA to consider the complaint, unless there are special circumstances for considering complaints beyond this time.

Loreburn HA will apply this time limit with discretion. In decision making take account of the Scottish Public Services Ombudsman Act 2002 (Section 10(1)), which sets out the time limit within which a member of the public can normally ask the SPSO to consider complaints. The limit is one year from when the person first knew of the problem they are complaining about, unless there are special circumstances for considering complaints beyond this time.

If it is clear that a decision not to investigate a customer's complaint will lead to a request for external review of the matter, Loreburn HA may decide that this satisfies the special circumstances criteria. This will enable Loreburn HA to consider the complaint and try to resolve it.

## **24. Staff training and development**

- 24.1 The successful implementation of the Complaints Policy and supporting procedures depend on the knowledge and skills of staff implementing it.
- 24.2 Regular training will be provided to relevant staff to ensure a consistent approach and ensure they are carry out the roles and duties linked to the application of this policy.
- 24.3 Regular quality audits will be in place to check the effectiveness of the training and to ensure that procedures are followed consistently and fairly by all staff.

## **25. Complaints**

- 25.1 Loreburn H A operates a Complaints Procedure that is available to any customer who is not satisfied with the way their case has been dealt with.
- 25.2. Details of the complaints procedure are detailed in Loreburn H A's Complaints Procedure leaflet that is available from the website of any office.
- 25.3. Loreburn H A's takes the learning from complaints to ensure when possible service improvements are made. Any complaints relating to asbestos will be used to monitor and improve the service.
- 25.4 If the customer is not satisfied with the outcome of their complaint and have exhausted the complaints process above, they have the right to refer the matter to the Scottish Public Services Ombudsman.

## **26. Measuring performance**

- 26.1 Performance monitored through Loreburn H A's Performance Management Framework using the Scottish Housing Regulator Annual Return Indicators and Loreburn H A's Strategic Performance Indicators and operational performance indicators.

- 26.2. Annual targets for collection are set based on the Scottish Housing Regulators' ARC national performance data, HouseMark peer benchmarking and internal results.
- 26.3 Loreburn H A will consult customers, stakeholders and other agencies in order to continually measure good practice.
- 27.4 This policy will adhere to Loreburn H A's commitment to Continuous Improvement and Value for Money.

## **27. Policy review**

- 27.1 The policy champion is the Customer Engagement Manager. The policy implementation checklist is set out below as **Appendix two**.
- 11.2 This policy will be reviewed every three years or as required due to legislative or regulatory change. The review will be completed by the Policy Champion and circulated to the Executive Management Team for approval.

## **28. Equality and Diversity**

- 28.1 There are many other reasons why people may have difficulties accessing our services. These may include dyslexia, illiteracy and mental illness. It is the duty of all staff to ensure these issues are taken into account to ensure that information is appropriately communicated in ways those individuals can understand.
- 28.2 Loreburn H A is committed to equality of opportunity and will ensure that policy and procedures will not unfairly discriminate against people on grounds of sex or marital status, racial grounds, disability, age sexual orientation, language or social origin, or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.
- 28.3 Loreburn H A can provide:
- Translation service for those for who English is not their first language.
  - Large text or audio tapes for people who are visually impaired.
  - Assistance for people who are profoundly deaf.
  - Assistance for people who have challenges around literacy and / or numeracy

## **29. Risk Management**

- 29.1 Given the importance of this policy it is recognised that risks have to be effectively managed. This will be achieved through the policy review programme and procedures to ensure compliance with all legislative requirements and regulatory and best practice guidance.

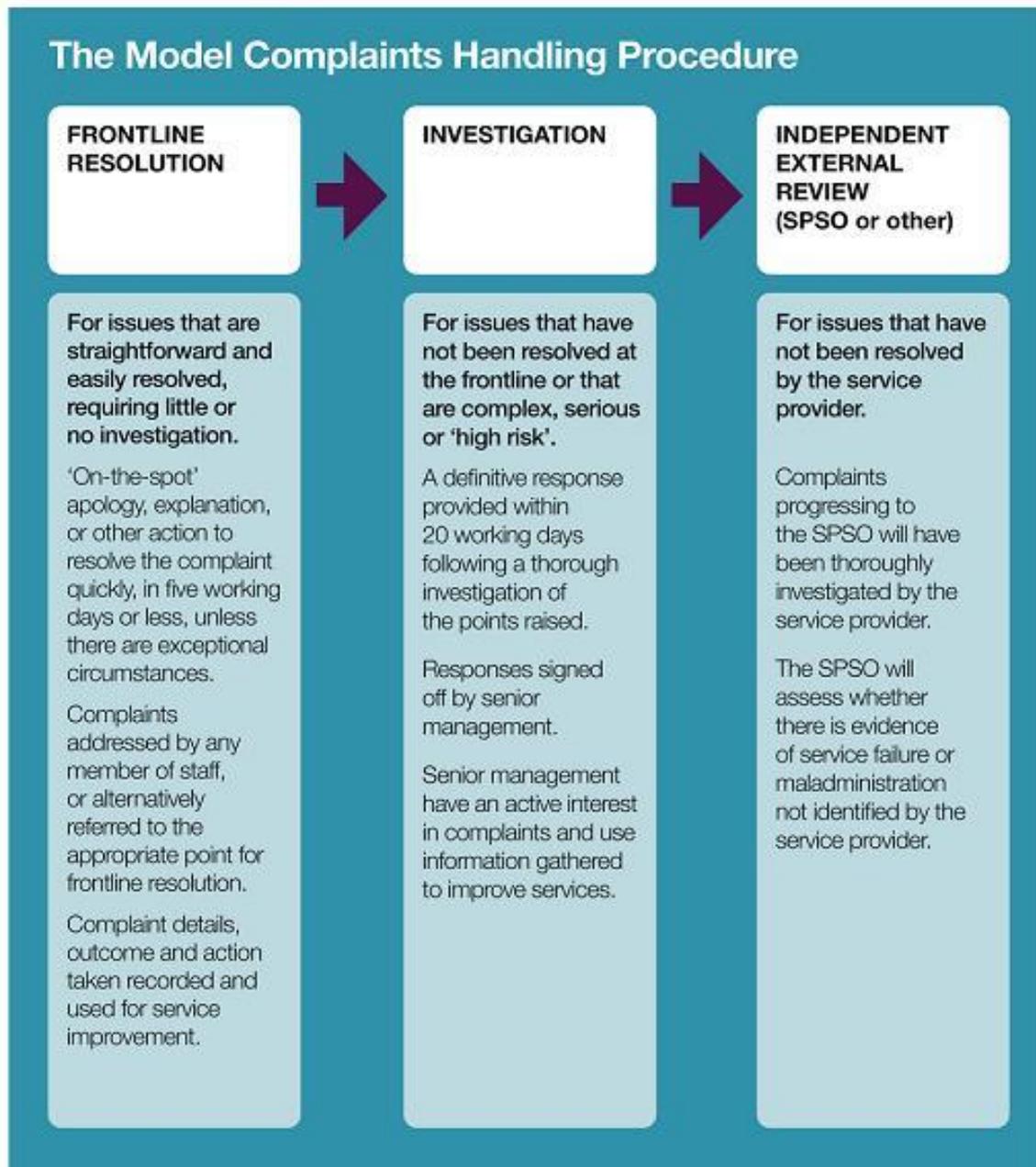
## **30. Responsibilities Chart**

- 30.1 The chart below illustrates the responsibilities of all staff in relation to this policy.

<b>Responsibilities</b>	<b>Board EMT</b>	<b>Management Team</b>	<b>BI Team</b>	<b>Customer Engagement Manager</b>	<b>Customer Engagement Officer</b>	<b>All Staff</b>
To set the policy and direction with regards to Complaints	✓					
Ensure Loreburn H A staff have a robust understanding of complaints and the associated risks		✓				
Take lead on complaints monitoring, make decisions on reporting and update Board quarterly				✓		
Policy Champion				✓		
Ensure effective and clear communication with key stakeholders including customers				✓		
Working with Head of OD & HR ensure staff have appropriate training				✓		
Handling Stage 1 Complaints						✓
Handling Stage 2 Complaints	✓	✓			✓	
Publishing Performance results and information					✓	
Identifying Learning & Business Improvements			✓	✓	✓	
Develop action plans for business improvement			✓	✓	✓	
Approve actions plans for business improvement	✓					
Participate in meetings and provide evidence for investigations as required					✓	
Ensure complaints feedback is used to improve service	✓					
Ensure policy is reviewed annually or as necessary				✓		

Ensure E&D guidance is adhered to				✓		
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## Appendix 1 – Model Complaints Handling Procedure



## Appendix 2 Complaints at frontline resolution

The following tables give examples of complaints that may be considered at the frontline stage, and suggests possible actions to achieve resolution.

Complaint	Possible actions to achieve resolution
<p>The customer complains that her rent payment direct debit has been set up wrongly.</p>	<ul style="list-style-type: none"> <li>• Apologise to the customer and resolve the issue by properly updating the direct debit details.</li> <li>• Record the complaint on CRM</li> </ul>
<p>The customer complains that a worker did not attend to carry out a housing repair as we had agreed.</p>	<ul style="list-style-type: none"> <li>• Speak to the worker, the service or the service manager to explain the customer's complaint and to agree how to resolve the issue, for example by arranging a new time and date to do the repair.</li> <li>• Explain the reasons for the failed appointment and apologise to the customer.</li> <li>• Record the complaint on CRM</li> </ul>
<p>The customer complains that the quality of a repair carried out by us or our contractor is not satisfactory.</p>	<ul style="list-style-type: none"> <li>• Ask the service department to examine the repair to assess whether or not it is acceptable.</li> <li>• If it is not acceptable, agree that the service department should do more work to resolve the matter.</li> <li>• Explain and apologise to the customer.</li> <li>• Record the complaint on CRM</li> <li>• Obtain a report from the service or contractor to confirm that the repair is now complete.</li> <li>• Feed back the lessons learned from the complaint into a service improvement plan.</li> </ul>

<b>Complaint</b>	<b>Possible actions to achieve resolution</b>
<p>The customer complains that his support worker turned up late and was smoking.</p>	<ul style="list-style-type: none"> <li>• Contact the care service to discuss the matter with a service manager.</li> <li>• The care service checks the timetable for visits and discusses with the home carer the complaint about smoking. The care service should let you know the outcome.</li> <li>• You in turn contact the customer to explain the policy, confirm the timing of visits (for example. between 8am and 12 noon) and where appropriate apologise for the inconvenience.</li> <li>• Record the complaint on CRM</li> </ul>
<p>The customer expresses dissatisfaction in line with the definition of a complaint, but says she doesn't want to complain – just wants to tell us about the matter.</p>	<ul style="list-style-type: none"> <li>• Tell the customer that we value complaints because they help to improve services. Encourage her to submit the complaint.</li> <li>• To improve our service and learn from mistakes, we need to record, evaluate and act upon customer feedback like this. Therefore, if the customer still insists she does not want to complain, record the matter as an anonymous complaint. This will avoid breaching the complaints handling procedure. Reassure the customer that she will not be contacted again about the matter.</li> </ul>
<p>Dissatisfaction with a planned maintenance programme</p>	<ul style="list-style-type: none"> <li>• Take details of the complaint and pass them to the team involved in planned maintenance. Tell the customer about the timescales for planning such work, and that we will take their views into account for future work.</li> <li>• Record the complaint on CRM</li> </ul>

## Appendix 2 - What is not a complaint

A concern may not necessarily be a complaint. For example, a customer might make a routine first-time request for a service. This is not a complaint, but the issue may escalate into a complaint if it is not handled effectively and the customer has to keep asking for service.

A customer may also be concerned about the various decisions we make. These decisions may have their own specific review or appeal procedures, and, where appropriate, we should direct customers to the relevant procedure. However, if a customer expresses dissatisfaction with the administrative process we have followed to arrive at a decision, we should treat this as a complaint. This distinction is shown in the example below about how an allocations policy applies.

The following paragraphs provide examples of the types of issues or concerns that should not be handled through the complaints handling procedure. This is not a full list, and you should decide the best route for resolution based on the individual case.

### **Example 1: Housing allocation decisions**

Decisions about the allocation of homes follow the Common Allocations Policy, in line with legal requirements. You should steer customers who are dissatisfied with an allocation decision towards the Common Allocations Policy appeals process.

***Customer A complains that they were not given enough priority for housing, given their current housing circumstances and health needs.***

Steer the customer towards the appeals process for allocation decisions.

However, if the customer is dissatisfied about how we applied the policy or administered the process, the complaint can go through this CHP.

***Customer B complains that a home was allocated to someone else, who they knew were in less need than them, and had not been on the waiting list as long.***

Record the customer's complaint. Explain that personal details are not disclosed, so we cannot discuss the other applicant's details. The customer will also need to be clear that we will review the basis for the decision to see if we are at fault.

If we find that the decision was based on sound evidence of need, inform the customer of the outcome. But if there is evidence that there was maladministration (fault) in the process followed to reach our decision, we must take suitable action and inform Customer B.

Update the complaint as appropriate.

Customer B can also request a review of their circumstances or may appeal their points through the appeals process.

### **Example 2: Claims for compensation**

A customer may seek compensation from us if they consider us liable. This includes issues such as personal injury or loss of or damage to property. Claims for compensation only are not complaints, so you should not handle them through the complaints handling procedure. However, where a customer wants to complain about the matter leading to their request for compensation, for example workmen damaging their home, you may consider that matter as a complaint, but deal with the request for compensation separately. You may decide to suspend complaint action pending the outcome of the claim for compensation. If you do this, you should notify the customer and explain that the complaint will be fully considered when the compensation claim has been resolved.

If you receive a compensation claim, you should explain to the customer the process for seeking resolution in line with our policy on these claims.

You can still make 'time and trouble' payments for inconvenience suffered by customers, in line with our policy on such matters. This is distinct from compensation claims.

### **Example 3: Anti social behaviour complaints**

We must respond well to concerns or dissatisfaction about our tenants' behaviour from a neighbour or a member of the public (for example, a home owner living near by). We initially handle such concerns through our Anti-Social Behaviour policy. However, someone may complain about the way we have handled an anti social behaviour complaint.

***Mr A complains that his neighbour has been playing music late at night for the last three nights. This is the first time he has phoned to complain.***

We should handle this through our Anti-Social Behaviour Policy. We should fully explain our process to Mr A, and say what he should do if the situation continues.

***Ms B complains she has reported her neighbour's barking dog several times over the last year, and nothing has been done about it.***

We should handle this as a complaint and pass it to the right team to establish what has happened so far and update Ms B. We should consider whether we applied our policy properly, and whether we could do anything else to resolve the situation. We should record the complaint on the complaints system.

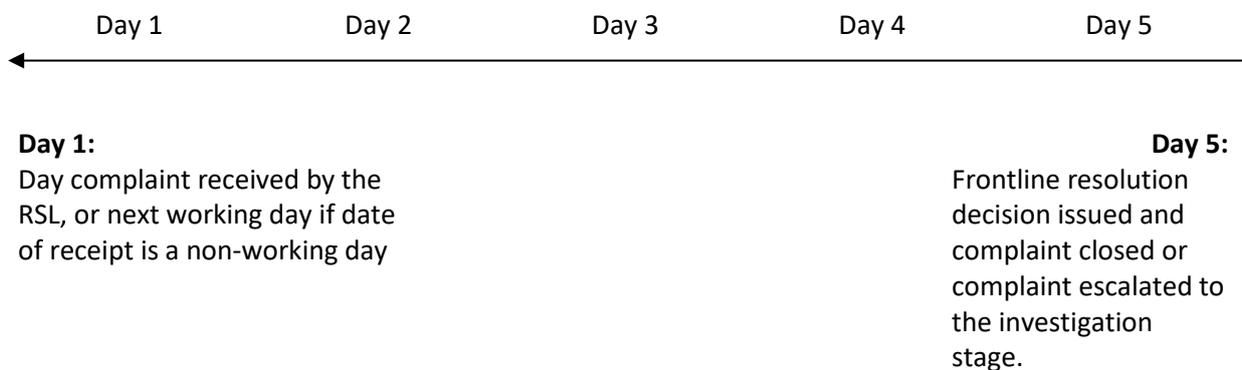
## Appendix 3 – Timelines

### General

Reference to timelines throughout the CHP relate to working days. When measuring performance against the required timelines, we do not count non-working days, for example weekends and public holidays.

### Timelines at frontline resolution

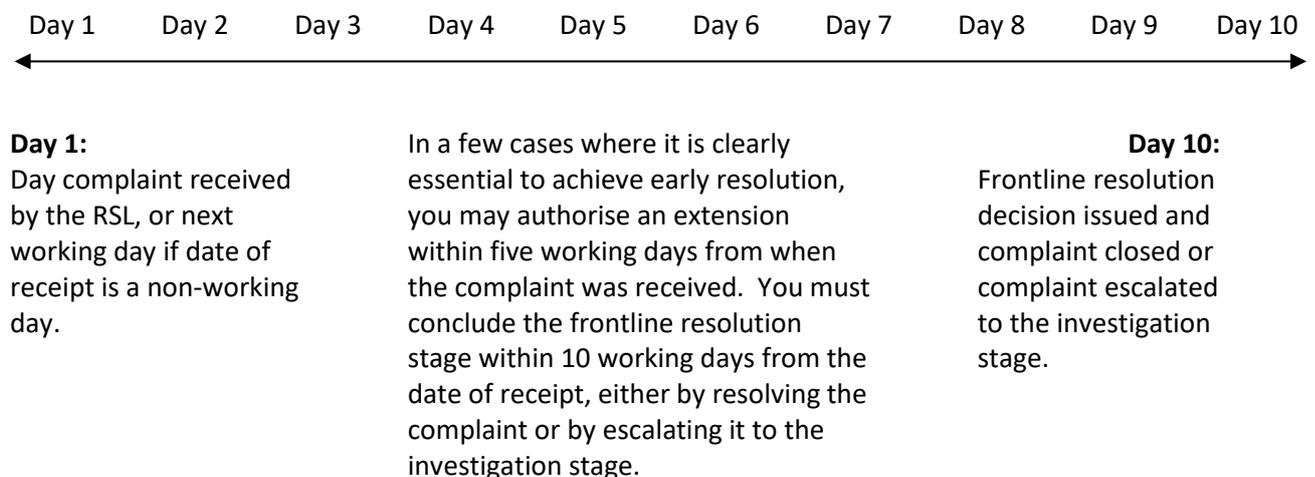
You should aim to achieve frontline resolution within five working days. The day you receive the complaint is day 1. Where you receive it on a non-working day, for example at the weekend or on a public holiday, day 1 will be the next working day.



The date of receipt will be determined by our usual arrangements for receiving and dating of mail and other correspondence.

### Extension to the five-day timeline

If you have extended the timeline at the frontline resolution stage in line with the procedure, the revised timetable for the response must take no longer than 10 working days from the date of receiving the complaint.



## Transferring cases from frontline resolution to investigation

If frontline resolution was tried but the customer remains dissatisfied, they can ask for their complaint to be investigated. This may be immediately on communicating the decision at the frontline stage or could be some time later, in which case the complaint will need to be re-opened on receiving the request for investigation. As soon as this request is received, the complaint should be passed for investigation.

## Timelines at investigation

You may consider a complaint at the investigation stage either:

- after attempted frontline resolution, or
- immediately on receipt if you believe the matter to be sufficiently complex, serious or appropriate to merit a full investigation from the outset.

## Acknowledgement

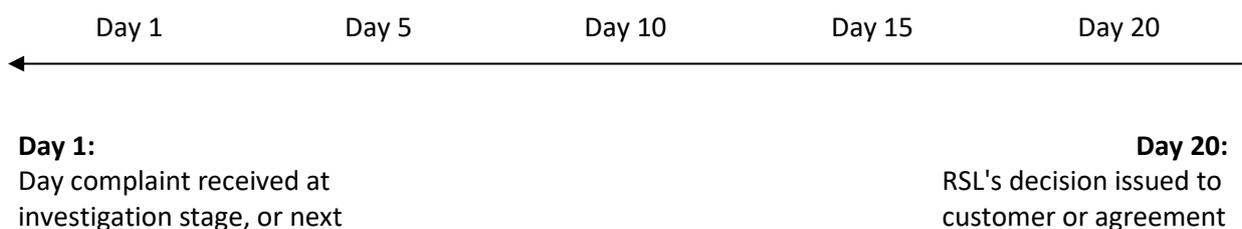
All complaints considered at the investigation stage must be acknowledged within **three working days** of receipt. The date of receipt is:

- the day the case is transferred from the frontline stage to the investigation stage, where it is clear that the case requires investigation, or
- the day the customer asks for an investigation after a decision at the frontline resolution stage. You should note that a customer may not always ask for an investigation immediately after attempts at frontline resolution, or
- the date you receive the complaint, if you think it sufficiently complex, serious or appropriate to merit a full investigation from the outset.

## Investigation

You should respond in full to the complaint within **20 working days** of receiving it at the investigation stage.

The 20-working day limit allows time for a thorough, proportionate and consistent investigation to arrive at a decision that is objective, evidence-based and fair. This means you have 20 working days to investigate the complaint, regardless of any time taken to consider it at the frontline resolution stage.



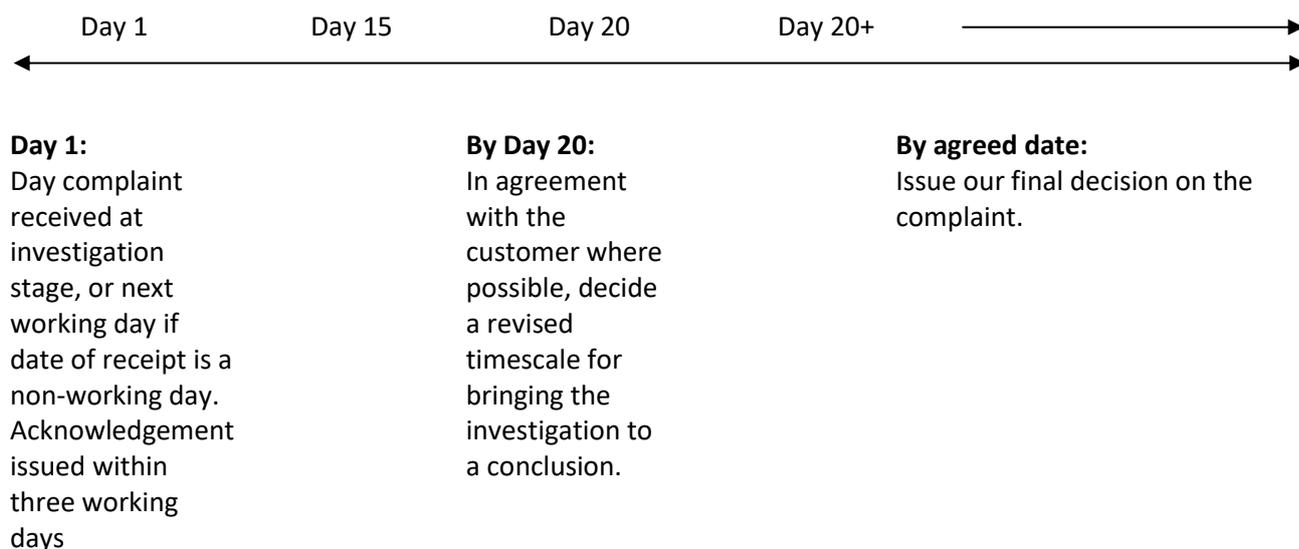
**Day 1:**  
Day complaint received at investigation stage, or next

**Day 20:**  
RSL's decision issued to customer or agreement

working day if date of receipt is a non-working day. Acknowledgement issued within three working days

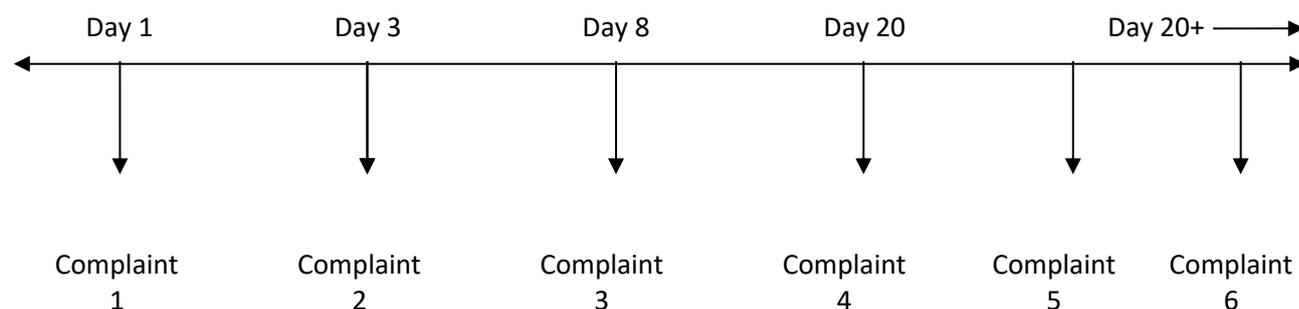
reached with customer to extend timeline.

Exceptionally you may need longer than the 20-day limit for a full response. If so, you should explain the reasons to the customer, and agree with them a revised timescale.



### Timeline examples

The following illustration provides examples of the point at which we conclude our consideration of a complaint. It is intended to show the different stages and times at which a complaint may be resolved.



The circumstances of each complaint are explained below:

**Complaint 1** – is straightforward and we can resolve it by an on-the-spot explanation and, if appropriate, an apology. Such a complaint can be resolved on day 1.

**Complaint 2** – is also straightforward and needs little or no investigation. Resolution is reached at day three of the frontline resolution stage.

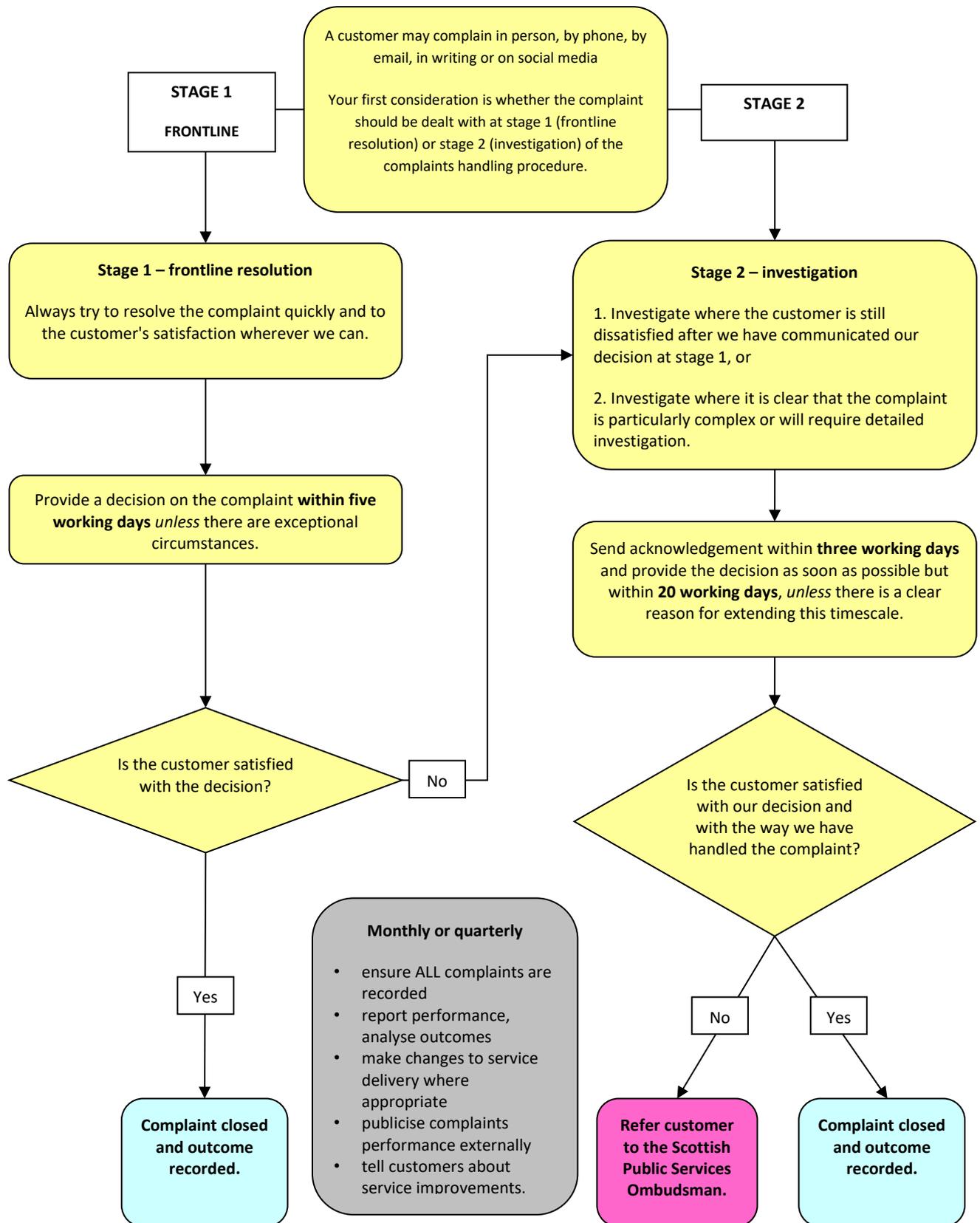
**Complaint 3** – refers to a complaint that we considered appropriate for frontline resolution. We did not resolve it in the required time of five working days. However, we authorised an extension because there was a clear and demonstrable expectation that the complaint would be satisfactorily resolved within a further five days. We resolved the complaint at the frontline resolution stage in a total of eight days.

**Complaint 4** – was suitably complex or serious enough to pass to the investigation stage from the outset. We did not try frontline resolution; rather we investigated the case immediately. We issued a final decision to the customer within the 20-day limit.

**Complaint 5** – we considered complaint 5 at the frontline resolution stage but a 5-day extension was authorised. At the end of the frontline stage the customer was still dissatisfied. At their request, we conducted an investigation and issued our final response within 20 working days. Although the end-to-end timeline was 30 working days we still met the combined time targets for frontline resolution and investigation.

**Complaint 6** – we considered complaint 6 at both the frontline resolution stage and the investigation stage. We did not complete the investigation within the 20-day limit, so we agreed a revised timescale with the customer for concluding the investigation beyond the 20-day limit.

## Appendix 4 - The complaints handling procedure flow chart



## Appendix 5 – Guide to logging complaints on CRM

### Customer makes a complaint which you resolve at first contact

1. Create a **New Contact** in CRM.
2. Fill in the full & brief description on screen of the complaint being made.
3. Classify the type of contact e.g. **Incoming, Phone, Customer**
4. In the **Classification Tree** pick **Complaint**.
5. Then chose the appropriate area of the business the complaint is about e.g. **Repairs, Rents**
6. Then pick **Stage 1** and click on Action Code **COMP18**
7. Click save & close when you have completed all necessary fields. Please then assign the action to yourself. An email will appear on screen, you should send this to the Customer Engagement Officer to advise a new complaint has been received which you are dealing with.
8. On the **Case/Complaints Maintenance** Screen that pops up click in the **Case Stage** drop down box to the right hand side and pick **First Time Resolution**.
9. Click on the **Actions** tab
10. Highlight the action line and press **Compl**
11. In the action comment detail what action you took to resolve at first contact.
12. In the **Action Outcome** pick **Completed**
13. Click **OK**
14. Back in the main screen click **Complete**
15. In the **Completion Outcome** pick whether the complaint was upheld or otherwise, with learning opportunity or without.
16. In the **Comments box**, where learning opportunities have been identified enter what these are in this box.
17. Click **OK**
18. Click **Close**

### Customer makes a complaint which you can resolve within 5 days

1. Create a **New Contact** in CRM.
2. Fill in the full & brief description on screen of the complaint being made.
3. Classify the type of contact e.g. **Incoming, Phone, Customer**
4. In the **Classification Tree** pick **Complaint**.
5. Then chose the appropriate area of the business the complaint is about e.g. **Repairs, Rents**
6. Then pick **Stage 1** and click on Action Code **COMP18**
7. Click save & close when you have completed all necessary fields. Please then assign the action to yourself. An email will appear on screen, you should send this to the Customer Engagement Officer to advise a new complaint has been received which you are dealing with.
8. On the **Case/Complaints Maintenance** Screen that pops up click in the **Case Stage** drop down box to the right hand side and pick **Stage 1 Complaint**.
9. Click on the **Actions** tab
10. **Add** an action/s to show what you have to do/or did to gather information.
11. Highlight the action lines and press **Compl**

12. In the **Action Outcome** pick **Completed**
13. Click **OK**
14. To close complaint – select **Complete** on the main screen
15. In the **Completion Outcome** pick whether the complaint was upheld or otherwise, with learning opportunity or without.
16. In the **Comments box**, where learning opportunities have been identified enter what these are in this box
17. Click **OK**
18. Click **Close**

### Customer makes a complaint which needs investigated

1. Create a **New Contact** in CRM.
2. Fill in the full & brief description on screen of the complaint being made.
3. Classify the type of contact e.g. **Incoming, Phone, Customer**
4. In the **Classification Tree** pick **Complaint**.
5. Then chose the appropriate area of the business the complaint is about e.g. **Repairs, Rents**
6. Then pick **Stage 2** and click on Action Code **COMP00**
7. Click save & close when you have completed all necessary fields. This will then send a workflow & email to Dawn Maxwell asking her to send the complaints acknowledgement letter and instigate the investigation.
8. On the **Case/Complaints Maintenance** Screen that pops up click in the **Case Stage** drop down box to the right hand side and pick **Stage 2 Complaint**.
9. Click **Save & Close**.

### Adding an Action to a complaint

1. You should access details of the complaint via **Current Cases** (bottom right of main screen)
2. Select **Actions** tab
3. Select **Add**
4. Select the appropriate **Action Code** (**this must be prefixed with COMP**) when creating an action in relation to a complaint. For example when creating a File Note Update, code COMP03 should be used.
5. Send to the appropriate member of staff by selecting **User Code**
6. Amend the **Target Date** - only if necessary
7. Complete the **Action Comment** box. Or alternatively select **Notes** (located above this box) and record all comments in there. If doing so, please add a comment into the Action Comment box, similar to 'See Notes for -----'.
8. Click **OK**
9. An automatic workflow task will be sent to the staff member selected in user code.

### Updating an existing Action

1. You should access details of the complaint via **Current Cases** (bottom right of main screen)
2. Select **Actions** tab
3. **Highlight** the action you wish to add a comment/update to
4. Select the **Notes** box

5. Using the chevrons select **Case Notes**, and record your update by clicking in the box below **Add/Append Note**.
6. Click **OK**
7. **Note – there is no limit to the number of individual notes that can be added to an action.**