

# LHP

## Complaints Policy

2026-2028

## Complaints Policy

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<b>Review Period: Next</b>	Biannual – if regulations are amended, then changes need to be made immediately.
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<b>Contact Officer:</b>	Executive Director of Customers
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<b>Policy Links:</b>	Equality and Diversity Policy  Limited Contact Policy Reasonable  Adjustments Policy  Code of Conduct for Colleagues, Board Members, and Involved Customers  Anti-Social Behaviour Policy  Performance Management & Assurance Framework

### **Brief Policy Summary:**

LHP considers that the way in which complaints are handled performs an important strategic role for the organisation, providing valuable intelligence regarding the Companies health, performance, and reputation. LHP promotes the continuous use of complaints providing a high-level framework to support effective handling and prevention in conjunction with learning and development.

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## Purpose

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1. The purpose of the complaints policy is to enable LHP to resolve complaints raised by our customers and stakeholders quickly and to use learning from complaints to drive service improvements.
2. It is further intended to create a positive complaint handling culture amongst colleagues, customers, and stakeholders.
3. In setting out LHP's commitment to providing an efficient, straightforward, and easy to access complaints process, we intend to:
  - Ensure that any complaint can be resolved before it escalates.
  - Empower our colleagues to make decisions to resolve complaints without fear of blame.
  - Inform the wider business of emerging trends.
  - Use the complaints process to promote a positive relationship based on trust between landlord and customer.
  - Address complaints in confidence, be fair, polite, and transparent, impartial, and consistent in our approach and in our feedback.
  - Recognise where we have got things wrong, apologise, explain, and put it right.
  - Use learning from complaints to improve our service offer to our customers.
  - Ensure that our customers are aware that they can escalate a complaint through our process and contact the Housing Ombudsman Service at any time.
  - Inform our customers regarding what we have learnt from complaints, what has changed as a result and how the customer journey has improved.
  - Comprehensively advertise how to make a complaint through all our access channels.
  - Seek insight into our complaint handling and performance from involved customers as part of our engagement work.
  - Monitor and report performance of the complaints service to our colleagues and Board of Directors.

## Objectives

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4. This policy is intended to provide a clear and straight forward explanation of the complaints process.
5. That making a complaint is straight forward and simple and that a complaint can be made through all our access channels in any format.
6. That the process itself and how to access the service is comprehensively advertised through all our customer contact mechanisms.

## Scope

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7. The complaints process is available to every customer and anyone who receives a service or comes into contact with LHP.
8. This includes tenants, leaseholders, contractors, housing applicants and anyone else affected by LHP's activities.
9. Examples of issues that can be raised through the complaints process are listed below however this list is not exhaustive.
  - Any service provided by LHP
  - The way that colleagues have behaved
  - The way a repair has been handled
  - The way requests for information have been managed
  - The way a housing application has been managed
10. Any report from a customer (or third party on their behalf) concerning damp, mould, or an emergency hazard (a risk of imminent and significant harm to a customer's health or safety) will be treated as a high priority under Awaab's Law timeframes. Investigations will be undertaken before establishing the cause of the hazard and the course of action to rectify. Our primary focus is the health and safety of our customers, considering individual circumstances, age and health conditions, which may classify an issue as an emergency hazard.
11. For complaints regarding damp, mould, or other significant hazards, we follow the specific procedures and mandatory timeframes as detailed in our dedicated Repairs and Maintenance Policy and Damp and Mould Policy, in line with Awaab's Law. These timeframes supersede the standard repair periods to ensure urgent resolution of health and safety issues. Any failure to meet these timeframes can be escalated through this Complaints Policy.

## Definition of a Complaint

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12. A complaint is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by LHP, its colleagues or those acting on behalf of LHP, affecting an individual resident or customer or group of residents or customers.
13. This means that anyone in receipt of a service from LHP or in receipt of a service made on behalf of LHP (for example a contractor installing new windows) can make a complaint if they are not happy about the service that they have received.
14. A complainant does not have to use the word complaint when they contact LHP for their expression of dissatisfaction to be treated as a complaint and LHP's colleagues will recognise the difference between a service request, feedback from surveys and a formal complaint and will take the appropriate steps to resolve the complaint for the customer as quickly as possible.

15. Service requests will be logged on LHP customer management system and reported on, this data will be utilised for service improvement, analysis of themes and scrutiny from engaged customers.
16. There are some instances where an initial enquiry will not be treated as a complaint. These include, but are not limited to:
  - Where the issue giving rise to the complaint occurred over twelve months ago. Where this is a recurring issue, LHP will consider older reports as part of the background to the complaint in order to resolve the issue for the customer. This time limit will not apply where the complaint concerns safeguarding or health and safety issues.
  - Where legal proceedings have been started. In such cases, the Legal Team will provide updates regarding progress as appropriate.
  - Liability issues that are subject to an insurance claim
  - Claims for compensation, as these are addressed through the Compensation for Service Failure Policy.
  - Where anonymous complaints are received and it is clear that a thorough investigation is not possible, or where there are no details of the complainant and LHP is therefore unable to respond. In these circumstances, LHP reserves the right not to investigate.
  - Where a complaint has previously been investigated, responded to, and the complaint process has been exhausted.
  - Where an issue is not accepted as a complaint, LHP will explain the reasons to the complainant and offer alternative solutions where appropriate.
  - Complainants have the right to challenge this decision by raising concerns with the Housing Ombudsman, who may require LHP to address the issue as a complaint.

## The Complaints Process

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17. LHP have a Two Stage Complaint Process

### **Stage 1**

18. If a stage 1 complaint is required, this will be logged, defined, and acknowledged, within 5 working days of receipt.
19. We will also contact the complainant within 2 working days of acknowledgement to ensure that we understand the complaint definition and clarify the outcomes being sought.
20. We will then thoroughly investigate the complaint and respond with the stage 1 decision in 10 working days from the date of acknowledgement. Should this not be possible, we will explain why to the complainant and advise the date that a full response will be received which will be no longer than a further 10 working days.
21. Extension of the investigation timescales will only be done with good reason,

including:

- A delay by a third party, over which a landlord has no control, in providing information.
  - Requiring further time to undertake investigations due to no engagement from the complainant.
  - Needing longer to acquire all the information from multiple sources to properly investigate complex cases.
22. This will be assessed on a case-by-case basis, and customers will be kept informed in writing, and where an extension is applied the customer will be provided with the details of the Ombudsman.

## **Stage 2**

23. If LHP have not resolved the complaint to the complainant's satisfaction the complainant may request to escalate the complaint to Stage 2.
24. LHP will review the request for escalation and if agreed, the complaint will be logged, defined, and acknowledged within 5 working days.
25. We will also contact the complainant within 2 working days of acknowledgement at stage 2 to ensure that we understand the complaint definition and clarify the outcomes being sought.
26. The complaint will be a review of the stage 1 complaint, and considering any new related points made. A written response will be issued within 20 working days of acknowledgement.
27. Should this not be possible and an extension is required, we will explain why to the complainant and advise the date that a full response will be received which will be no longer than a further 20 working days.
28. This completes LHP complaints process.
29. If LHP have not been able to satisfy a complaint the complainant can raise their complaint with the Housing Ombudsman who's contact details will be provided in all correspondence regarding the complaint.
30. The complainant has the right to contact the Housing Ombudsman at any time in the complaints process. The Housing Ombudsman can assist customers through the life of the complaint and provides the opportunity to engage with the Housing Ombudsman's dispute support advisors.
31. The complainant may escalate their complaint to the Housing Ombudsman if they are not satisfied with the outcome and have exhausted the LHP complaints process.

## **Escalating a Complaint**

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32. LHP will not unreasonably refuse to escalate a complaint through the stages of the complaint's procedure.

33. When escalating a complaint LHP will review:
  - What the escalation review will be about, why the resident remains dissatisfied and whether any part of the complaint has been unresolved
  - Who will undertake the review
  - Who will be kept informed
  - What evidence needs to be gathered
34. Should LHP decide not to escalate a complaint, LHP will provide an explanation to the customer and will make clear that the previous response was the final response and provide information on the referral to the Housing Ombudsman.
35. Reasons for not escalating a complaint will meet one of the following criteria:
  - The issues raised do not fall within the remit of the complaints policy.
  - The issues raised are not within LHP's power to investigate, change or influence.
  - The basis of the complaint has changed or there are subsidiary issues subsequently raised which are not part of the initial complaint. Subsidiary issues will be addressed as a new complaint.
  - A complainant's refusal to accept documented evidence as factual.
  - That a final response has been provided.
36. Should a complainant not be satisfied with the complaint's response at any stage, they should contact the Housing Ombudsman Service.
37. LHP will act on any recommendations that are made as a result of complaints reviewed by either a designated person (Councillor/MP) or a recognised Tenant Panel or the Housing Ombudsman or will provide robust valid reasons as to why they are unable to act.
38. LHP will provide advice and support to a complainant about the options available to them.

## **Communicating with Customers, Residents, and other Stakeholders**

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33. LHP will ensure that there are no barriers to accessing the Complaints Process and how to access it using all its customer communication channels including but not limited to:

The LHP Website Leaflets

Social Media Channels

Newsletter

Annual Report

## Translation Services

34. LHP will communicate with our customers, residents and stakeholders using plain language appropriate to them.
35. All points raised within a complaint will be addressed and LHP will provide clear reasons for any decisions taken and will reference policy, good practice, and the law as appropriate.
36. At the completion of each stage of the complaints process, LHP will write to the complainant advising them of the following:
  - the complaint stages
  - the complaint definition
  - the decision on the complaint
  - the reason for any decisions made
  - the details of remedy or offer to put things right
  - The details of any outstanding actions
  - the details of how to escalate the matter if dissatisfied with the outcome
37. LHP will provide the complainant with the opportunity to:
  - Set out their position
  - Comment on any adverse findings before a final decision is made
38. Whilst at least adhering to the response timelines, LHP will respect and follow any agreed different arrangements made with the customer that better meets their needs regarding the frequency and method of communication.
39. LHP will keep customers regularly updated and informed regarding their complaint even should there be no new information to provide.

## Fairness in Complaint Handling

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40. LHP will operate and deliver a customer-focussed complaints process ensuring that complainants are provided with the opportunity to explain their point of view and the outcome that they are seeking before a decision is reached.
41. Complainants' expectation of outcomes will be clearly managed from the outset of the complaint being raised and LHP will be clear where a desired outcome is unreasonable or unrealistic.
42. LHP will support complainants to have a representative deal with their complaint on their behalf and to be both represented and accompanied at any meeting where this has been offered or requested and where this is reasonable. If someone is acting on behalf of a friend or family member, LHP will need to seek permission for

them to do this from our customer whose data we hold so that we ensure that private information is not shared without agreement.

43. Where areas of a complaint relate to the party's legal obligations, LHP will clearly set out its understanding of the obligations of both parties and seek clarification before doing so where this is not initially clear.
44. Complaint investigations will be conducted in an impartial manner, seeking sufficient reliable information from both parties so that fair and appropriate findings and recommendations can be made.
45. Complaint investigations will be fair and to achieve this the Customer Experience Team will:
  - Deal with a complaint on its merits
  - Act independently and have an open mind
  - Take measures to address any actual or perceived conflict of interest
  - Consider all information and evidence carefully
  - Keep the complaint confidential as far as is possible, with information only disclosed where necessary to properly investigate the matter.
46. LHP's assessment of the complaint will include:
  - What the complaint definition is
  - What evidence is needed to fully consider the issues
  - What risks the complaint raises for LHP
  - What outcome would resolve the matter for the customer
  - Any urgent action that LHP needs to take
47. LHP's Customer Experience Team will endeavour to resolve a complaint at the earliest opportunity.
48. The complainant and any applicable colleague who is subject of the complaint will be provided with the opportunity to:
  - Set out their position
  - Comment on any adverse findings before a final decision is made
49. There may be circumstances where LHP could exercise discretion in its response to a complaint. These will always be discussed with the Executive Director of Customers and where discretion is used, LHP will provide a full explanation to the customer and maintain a log of the use of discretion and the circumstances in which it was used.
50. LHP recognises that complainants may pursue a complaint in a way that may impede the investigation of a complaint.
51. LHP is committed to resolving complaints fairly and quickly and has therefore

produced a separate policy to support the business to deliver to the above aspirations and manage these circumstances.

## Putting Things Right

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52. LHP is committed to resolving disputes fairly and quickly.
53. Where something has gone wrong LHP will acknowledge this, setting out the actions that it has already taken or intends to take to put things right. These will include:
  - There has been an unreasonable delay
  - Inadequate or inaccurate advice was provided
  - LHP's policies were not followed correctly without good reason
  - There was a factual or legal error that impacted on the outcome for the customer
  - There was unprofessional behaviour by colleagues
54. LHP will acknowledge and apologise for any failure identified, explain and where applicable inform the customers of any changes made or actions taken to prevent the issue from happening again consulting with customers and managing expectations being careful not to promise anything that cannot be delivered or that would cause unfairness to other customers.

## Appropriate Remedy

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55. Where things have gone wrong, LHP will:
  - Acknowledge that something has gone wrong, provide an explanation, assistance, or reasons
  - Apologise
  - Take action where there has been a delay
  - Recognise or change a decision
  - Amend a record
  - Provide a financial remedy or services
  - Change policies, procedures, or practices
  - Provide appropriate training for colleagues
56. Remedies offered will reflect the extent of any service failures and the level of detriment caused to the customer.
57. When offering a remedy, LHP will set out what will happen, by when, agreeing this

with the customer.

58. Agreed remedies will be logged on the performance management system and tracked to completion.
59. Where a remedy is compensation LHP will consider whether there are any statutory payments due, if any quantifiable losses have been incurred in addition to the inconvenience and time a customer has been put to as well as any distress and inconvenience caused.
60. Compensation awards will be informed by the Remedies Guidance provided by the Housing Ombudsman Service to ensure awards are fair and appropriate.

## Legal Liability

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61. In some cases, a customer may have a legal entitlement to redress. Whilst there may be concerns regarding legal liability in this situation LHP will offer a resolution where possible.

## The Housing Ombudsman

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62. When a customer remains dissatisfied at the end of LHP's complaints process, they may bring their complaint to the Housing Ombudsman (HO).
63. LHP will co-operate with the HO requests for evidence and provide this within 15 working days.
64. If a response cannot be provided within this timeframe, LHP will provide the HO with an explanation for the delay and if reasonable the HO will agree a revised date.

## Continuous Learning and Improvement

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65. LHP will proactively use learning from complaints to revise policies and procedures, train colleagues and contractors and to improve communication and record keeping.
66. LHP will ensure that colleagues are supported and have the skills to effectively deliver to the complaints process.
67. LHP will report learning outcomes and improvements to services as a result of customer feedback through the performance framework, website, newsletters, annual report, and customer involvement structures.

## Monitoring and Reporting

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68. LHP will record and monitor every complaint, take ownership of it, and seek to find solutions that meet customer expectations.

69. LHP will also collect diversity data from our customers at the point of their complaint to enable us to assess the impact of our services, ensure equity of access and equality of outcomes, ensuring no customers are being disadvantaged by LHP services.
70. Feedback will be used to:
  - Engage with and involve customers in shaping services by meeting quarterly with the customer complaints panel
  - Review policies and procedures
  - Develop colleagues
71. LHP will produce an annual complaints performance and service improvement report. This will include the annual self-assessment with the Complaint Handling Code, qualitative and quantitative analysis of complaints handling performance, service improvements because of learning from complaints, annual reports from the Ombudsman and/or any other publications or report from the Ombudsman about LHP's activity.
72. This report will be shared with the Board and Customer Complaint Panel for feedback and comment. The full report plus commentary will be uploaded to the LHP website for customers information as well as submitted to the Housing Ombudsman Service via their portal to demonstrate compliance with the code.
73. Oversight of complaint performance in between assessments will be conducted by the Customer Experience Manager, Corporate Head of Customers and the Board Member Responsible for complaints (MRC) to provide scrutiny of complaint handling.

## Equality and Diversity

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74. Fairness, Respect, Equality, Diversity, Inclusion and Engagement are the responsibility of everyone within LHP.
75. We will monitor the diversity of our customers through the gathering of data on protected characteristics. You can read more about how we do this in the LHP Equality & Diversity Policy.
76. Complaint's themes and trends will be monitored to ensure that there are no systemic issues disadvantaging any protected groups or individuals.

## Review Cycle

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77. This policy will be reviewed biannually in November 2027 or in advance of this date should there be changes to legislation that affect this policy.

# Lincolnshire Housing Partnership (LHP) Equality and Quality Impact Assessment (EQIA)

Title of Policy/Event/Decision: LHP Complaints Policy

Lead Officer(s): Hollie Storr – Customer experience manager Date of

EQIA: 27 November 2025

1. Scope and Purpose	
<b>Briefly describe the policy/event/decision being assessed:</b>	The LHP Complaints Policy against current best practice and guidance from the Housing Ombudsman Service.
<b>What is the aim or purpose of this policy/decision?</b>	The LHP Complaints Policy sets out how LHP will receive, investigate, respond and learn from complaints, in compliance with the Housing Ombudsman Complaint Handling Code
<b>Which departments or groups will be affected by this policy/event/decision?</b>	<ul style="list-style-type: none"> <li>- LHP Customers and stakeholders</li> <li>- Customer experience team</li> </ul>
2. Data Collection and Evidence	

<p><b>What data or evidence have you used to identify how different groups may be affected?</b> (e.g., tenant demographic data, service usage statistics, consultation feedback)</p>	<p>Customer Satisfaction Feedback (via Acuity Surveys) Customer feedback from involved customer complaint panel EDI analysis of 22/23 and 23/24 complaints</p>
<p><b>What does this data tell you about the potential impacts on different equality groups?</b></p>	<p><i>EDI analysis of 22/23 &amp; 23/24 complainants indicated a 36% drop in customers 65+ accessing the complaints process. This insight was discussed with involved customers at the complaint panel in October 2025, and customers suggested that this could be because customers in this age bracket are not digitally aware or able to access digital channels.</i></p> <p><i>The data also shows that men are 6.33% less likely to make a complaint compared to women. This data does not indicate why this may happen.</i></p> <p><i>Analysis also shows that there has been a positive impact on those with childcare responsibilities and care and support responsibilities are making complaints (8.13% &amp; 5.3% respectively).</i></p>

### 3. RAG Impact Assessment on Protected Characteristics

Use the RAG system to assess the level of potential impact for each protected characteristic:

- **Red (High Risk):** Significant potential for negative impact requiring immediate action to mitigate.
- **Amber (Medium Risk):** Some potential for negative impact, which can be mitigated with changes.
- **Green (Low or No Risk):** Little to no negative impact identified.

Ensure that you state reasons (the why) for your justifications.

Protected Characteristic	Impact (positive, negative, neutral)	RAG rating	Description of potential impact	Mitigation/enhancement actions	Responsible Officer
Age	Negative	Amber	Customers in the 65+ category may not raise their issues via the complaint route, therefore receiving poorer services from LHP.	To create a handbook that can be delivered to all customers to help those who are not digital understand the complaints process and how to access.	Hollie Storr
Disability	Neutral	Green	No evidence of disproportionate impact	N/A	N/A
Gender Reassignment	Neutral	Green	No evidence of disproportionate impact	N/A	N/A
Marriage and Civil Partnership	Neutral	Green	No evidence of disproportionate impact	N/A	N/A
Pregnancy and Maternity	Positive	Green	Complaints from customers with childcare responsibilities rose	The organisation will continue to promote flexible and accessible complaint routes and	Hollie Storr

			<i>by 8.13%. This may indicate improved awareness of, and confidence in, the complaints process among this group.</i>	<i>monitor engagement to ensure this positive trend is maintained</i>	
<b>Race</b>	<i>Neutral</i>	<i>Green</i>	<i>No evidence of disproportionate impact</i>	<i>N/A</i>	<i>N/A</i>
<b>Religion or Belief</b>	<i>Neutral</i>	<i>Green</i>	<i>No evidence of disproportionate impact</i>	<i>N/A</i>	<i>N/A</i>
<b>Sex</b>	<i>Negative</i>	<i>Amber</i>	<i>Men are 6.33% less likely to make complain. This difference may reflect wider societal trends where men are generally less likely to engage with formal complaint processes, potentially due to factors such as perceptions of stigma, differing communication preferences, or lower awareness of available routes to raise concerns. However, no definitive</i>	<i>Review of the handbook would mean more customers will have access to the complaint routes open to them and may encourage more men to let us know their complaints.</i>	<i>Hollie Storr</i>

			<i>conclusions can be drawn from the data alone.</i>		
<b>Sexual Orientation</b>	<i>Neutral</i>	<i>Green</i>	<i>No evidence of disproportionate impact</i>	<i>N/A</i>	<i>N/A</i>
<b>4. Mitigating Negative Impact</b>					
<b>What actions will you take to reduce or mitigate any identified negative impacts?</b> Provide specific mitigation measures for each characteristic where a negative impact (Red or Amber rating) was identified.	<ul style="list-style-type: none"> <li>A full review of the complaint handbook (that was previously shared in 2021) will be undertaken by the customer experience manager and shared for consultation with the complaint panel of involved customers for delivery to customer homes in 2026/2027. This was a recommendation by that same group who feel customer 65+ may struggle to understand the complaints process if they do not have access or use of digital services.</li> </ul>				
<b>Who is responsible for implementing these actions?</b>	Customer Experience Manager – Hollie Storr				
<b>5. Consultation and Engagement</b>					
<b>Have you consulted any stakeholders or equality groups? If so, who and how?</b>	Customer complaint panel were consulted on the previous iteration of the policy following the updated complaint Handling Code when it became statutory in 2024. There are minimal changes to the policy since then as there has been no further change to the code that prescribes how LHP will process its complaints. This policy has already been reviewed by the Customer Forum in December 2025, of whom multiple members attend the complaint panel group.				
<b>What feedback have you received, and how</b>	Feedback was positive and that customers felt the policy was easy to read and understand. Upon this review I have ensured that the process is clear and concise so that customer expectations are met when accessing the complaints service. This then feeds into the new case management model the team are now				

has this influenced your assessment?	delivering to ensure complaints are logged, investigated and responded to in line with this policy and LHP's Values.
<b>6. Decision Making</b>	
How has this EQIA informed or influenced the final decision?	N/A – policy is being reviewed as per the governance timeline
Were any changes made to the policy/decision as a result of the EQIA?	N/A
<b>7. Monitoring and Review</b>	
How will you monitor the actual impact of the policy/decision once it is implemented?	All complaints will continue to be logged on our housing management system and performance reported monthly. Acuity survey feedback will be analysed monthly to check for any signs that customers are struggling to access the complaints process.  Scrutiny will take place by our complaint panel and the Member Responsible for Complaints via quarterly meetings.
When will the policy/decision be reviewed?	November 2027 (ready for approval cycle 2028)
Sign-Off EQIA Completed By: Lead Officer(s) Name(s): Date:	<i>Hollie Storr – customer experience manager – 27/11/25</i>
Approved By: Approval Name: Date:	

