

Equality Impact Assessment Stage Three Telling the Story

Name of service area/policy/strategy reviewed

Complaints Policy

What were the issues?

The aim of the Complaints Policy is to provide an effective, fair and responsive mechanism for customers or their representatives to complain about services provided by Cosmopolitan Housing Association. The Association is committed to ensuring that the Complaints policy assists accountability and supports future development of services to address disproportionate or unfavourable treatment.

This review was carried out to assess how effective our complaints policy and procedures were, how we could improve access, and how the Association could learn lessons for the future.

Consultation undertaken & who was engaged:

- Previous Complainants – general feedback & specific survey
- Complaints reaching the 3rd stage in the Association's complaints process to trial a new option for review at stage 3 to remove some of the formality
- Staff – general feedback
- Tenants' Forum
- Performance statistics and closed complaints

Key issues

- Whilst this function is aimed at all residents, existing and potential users or their representatives, not all individuals are able to exercise their rights to raise concerns or complain.
- Data collection relating to customer profile of complainants has not been comprehensive which has hindered our ability to recognise differential treatment or perceptions holistically.
- Through feedback from equality and diversity KPIs, analysis of overall complaints trends with associated actions to improve performance, fill gaps has not been consistent.
- BME people generally are under represented in making complaints especially those who do not have sufficient language skills to access or engage with the process.
- Vulnerable or marginalised communities may be less likely to complain because there are concerns around recrimination or harassment.
- Lack of formalised compensation policy has led to discrepancies with compensation awarded.
- Poor performance in the management of complaints and low levels of satisfaction with the service
- Complaints not always responded to on time, or to a high standard

Actions identified

1. Change the review process, providing impartial reviews so that disadvantaged people are given equal treatment in this area.
2. Improved monitoring across the complaints service to include all seven equality strands.
3. Establish new review process with impartial representation on panel, reasonable adjustments and support to enable vulnerable or disabled people to be involved
4. Ensure staff are aware of new procedure and internal reporting structures through training and briefings.
5. Introduce a Tenants' Complaints Review Team to review performance, review complaints received, identify service improvements and monitor implementation of improvements identified.
6. Work towards resolving complaints at stage 1, and repeat complaints by early intervention and analysis of trends with actions taken.
7. Publish results of actions taken from learning from complaints
8. Review the policy and procedure so that customers find it easier to make a complaint and for us to respond more effectively to sort out issues.
9. Ensure that the Policy takes into account the TSA standard for Tenant Involvement and Empowerment and the expectations from the regulator relating to complaints

Outcomes for customers

- A clearer accessible process for making complaints with additional support and signposting to other services.
- Improved confidence and opportunities to shape the way that services are delivered in the future.
- More focused publicity, and wider promotion of the service
- Greater use of tenant profiles which will allow officers to ensure they are capturing any potential underlying issues
- Tenants able to shape and influence services and hold the Association to account
- Tenants empowered to scrutinise performance and assist the Association to identify and action service improvements.

Conclusion

The assessment has enabled CHA to look closer at its policy on Complaints and how best to provide a service which is accessible to all.

Areas of action identified through the assessment will be incorporated into the wider CHA Service Improvement Plan.