

<b>Policy name</b>	Complaints, Suggestions and Compliments, Complaints Policy & Procedure		
<b>Review date</b>	Feb 2026	<b>Next review</b>	Jan 2027

### Purpose

Kentish Homes Ltd is committed to providing the best possible service for everyone who we work with. We recognise that the way we manage and respond to complaints, compliments and suggestions is an important part of this. By receiving feedback from the people who use our services, we can make sure that we did the best we can. And if we've done something not as well as they would have liked, we need to know that too. Only then can we learn and improve.

### Definitions

- a **compliment** is an expression of praise concerning a service received.
- a **suggestion** is a comment for how a service can be improved.
- a **complaint** is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting a resident or group of residents
- a **service request** is a request from a tenant to Kentish Homes Ltd requiring action to be taken to put something right.

A service request is a request from a resident to Kentish Homes Ltd requiring action to be taken to put something right. Service requests are recorded, monitored, and reviewed regularly. A complaint should be raised when the resident raises dissatisfaction with the response to their service request.

For further guidance on how to decide whether the approach is a service request or a complaint, see our flow charts in Appendix A.

## Who can make a service request or a complaint?

The policy and procedure apply to all tenants of Kentish Homes Ltd.

If a tenant makes a complaint, they shall not be treated differently during or after the complaint.

If someone makes a complaint who is not included in this group they will be responded to separately and outside of this procedure, but in line with stage 1 of the policy. Advice from a Senior Management Team member must be obtained.

### **A Service Request**

A service request is an opportunity to raise a concern without having to make a formal complaint. Anyone wishing to make a service request about Kentish Homes Ltd's services should in the first instance speak to a member of staff.

A complaint can be made without first making a service request, or a service request can be escalated to a complaint at any point. The complainant decides.

### **How to handle a service request**

Staff members must ensure that anyone making a service request receives a first point of contact within 3 working days to resolve the issue by the staff member. If the service request cannot be resolved at the first contact point the staff member must investigate and respond with a resolution within 10 working days.

Any Service Request that cannot be resolved within the timeframe must be escalated to a formal complaint and notification sent to the person who made the Service Request.

If a staff member receiving a service request considers it to be of a serious nature the complaint must be immediately escalated to a Formal Complaint and the person making the request informed.

All service requests will be recorded and reviewed daily by the Complaints Manager to ensure requests are appropriately recorded and outcomes logged.

The Complaints Manager and Board of Directors review the Service Request Report on a quarterly basis to identify any patterns or themes which require addressing to improve service delivery and quality.

## **Complaints**

Complaints can be received by:

- Telephone
- Letter

- Email to [info@kentishhomes.co.uk](mailto:info@kentishhomes.co.uk),
- Kentish Homes Ltd website page
- Telling a Kentish Homes Ltd member of staff
- Representation from an advocate acting on behalf of the person such as the Citizens Advice Bureau, MP, friend, or family member.

Reasonable adjustments - Reasonable adjustments will be made for residents with protected characteristics, this may mean allowing additional time to provide information in response to enquiries etc (part of The Equality Act 2010).

Complaints that cannot be accepted - Kentish Homes Ltd will accept all complaints unless there is a valid, fair, and reasonable reason to exclude the complaint:

- The complaint has been already considered under the complaints policy.
- The complaint occurred more than twelve months ago; therefore the matter cannot be investigated.
- The complaint concerns insurance claims, ongoing legal action (including rent arrears) or criminal actions, ongoing court proceedings.
- Matters concerning staff dealt with through the disciplinary code or through staff management or performance procedures.
- A first request for service, information or an explanation of our policies and procedures.
- Reported cases of neighbour disputes, anti-social behaviour, hate crime or domestic abuse, unless you are complaining about how we have handled your reports.
- A complaint about a Subject Access Request (SAR). This is dealt with under our SAR policy.
- Your complaint is not about us or our contractors but about another organisation.
- Feedback given through surveys is not considered a formal complaint. However, residents should be given information on how to file a complaint if desired.

If a complaint cannot be accepted a written detailed explanation will be provided. Before you let a complainant know Kentish Homes Ltd will not accept their complaint, please gain written confirmation first from a member of the Senior Management Team. This decision can be challenged by bringing the complaint to the Ombudsman.

## Dealing with complaints

We will listen to the complaint and carefully consider the client expectations and desired outcomes.

- All staff and residents must distinguish between a service request and a complaint. It is important to note that a resident does not need to explicitly use the term 'complaint' for their issue to be treated as such. Any expression of dissatisfaction regarding the standard of service, actions or lack of action by Kentish Homes Ltd will be considered a complaint and addressed accordingly.
- We will aim to resolve the complaint as quickly as possible. Where possible complaint responses will be made via your preferred method, followed by a written response. The written response will detail any follow up actions that are required to resolve the complaint and a timescale given for when these are expected to be complete. Written responses can be translated into a preferred form or language on request.
- At any stage during the complaint, the resident can approach the Housing Ombudsman (or other relevant Ombudsman) for independent advice around your complaint. Once the complaint has exhausted our internal procedure, you can contact the Ombudsman for a further investigation should you remain unhappy.
- We are committed to ensuring that our staff are treated with respect. To protect our staff, we will not engage with any threatening or abusive behaviour. We will deal with any unacceptable behaviour under the relevant policies.
- A copy of this complaint procedure will be on display in all the schemes.

All complaints will be investigated by a person not related to the immediate source of the complaint.

- Complaints will be recorded centrally within the Kentish Homes Ltd computer system.
- All complaints will be recorded on a complaint log for monitoring and auditing purposes.

All complaints will be reviewed quarterly by Management and the Board.

- Where the complaint gives rise to concerns regarding the safety and/or wellbeing of one or more clients, due to the staff members' direct or indirect actions; a complaint may be raised alongside resulting HR processes being instigated such as an investigation.

## Serious allegations against staff

- Employees who are the subject of a serious complaint/allegation may be asked not to communicate directly with the complainant unless accompanied by a senior member of staff.
- Complaints/allegations resulting in potential criminal action being taken should follow the safeguarding policy, files being immediately quarantined and staff either being removed from current duties or being suspended.
- Any internal investigation will be put on hold until directed by either the safeguarding lead or the police to start or restart the internal investigation.
- Depending on the result of the external investigation Kentish Homes Ltd may be required to report such investigation to the DBS.

At Kentish Homes Ltd we have a two stage complaints process.

### Stage 1

When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure **within five working days of receipt**

The acknowledgement will set out to the complainant the name of the staff member who will oversee the complaint and the date a response can be expected. It will also briefly set out the complaint to ensure we have identified the complaint correctly. A response should be provided to the complainant **within 10 working days** of acknowledgement.

A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.

If the resident raises additional complaints during an ongoing investigation, these must be incorporated into the Stage 1 response if they are related and the Stage 1 response has not yet been issued. If the stage 1 response has already been issued, or if the new issues are unrelated to the current investigation or would unreasonably delay the response, the new issues must be logged as a separate complaint.

The Complaint and actions taken will be logged.

If it is not possible to complete the investigations within 10 working days, the complainant is informed and provided with a date for a response - this should not exceed 10 working days. If a timeframe is exceeded, regular updates will be provided to the complainant.

A Stage 1 Complaint response will address the following areas:

- The complaint will be titled “Complaint Stage 1 Reference No”
- the outcome of the complaint
- the reasons for the decisions made
- the details of any remedy offered to put things right
- details of any outstanding actions

Usually, stage 1 of the complaint will be dealt by a Staff Member.

Closing a stage 1 complaint - The closing paragraph to a stage 1 complaint will be as follows: “If however you wish to pursue the matter further, you may request that your complaint be referred to Stage 2.

Following the internal complaints process being completed, if the complainant is still unhappy with the outcome of the investigation, they have the right to refer the complaint externally.

If a complaint concerns housing, it should be referred to the Housing Ombudsman.

Whilst the complaint is being referred to the Ombudsman if appropriate Kentish Homes Ltd can continue to work with the client to resolve the complaint. If Kentish Homes Ltd managers or senior managers are uncertain, they can contact the Ombudsman service for advice.

The Housing Ombudsman Service - The contact details are:

Housing Ombudsman  
service PO Box 152,  
Liverpool L33 7WQ Tel:  
0300 111 3000  
E-mail: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

Web: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

## Stage 2

Acknowledgement of the Stage 2 complaint is issued within 5 working days of being received. It will also briefly set out the complaint to ensure the response is correct. If the Stage 2 complaint is received by telephone, the acknowledgment will need to include what the complaint is, and what the complainant's expected outcomes are. Kentish Homes will make every reasonable effort to understand why the Complainant is not satisfied.

The acknowledgement will set out to the complainant the name of the staff member who will oversee the Stage 2 complaint and the date a response can be expected, which will be **20 working days** of acknowledgement.

The complaint will be investigated by the appropriate member of the Senior Management Team who will be independent of the Stage 1 investigation. This where possible it will include an interview with the complainant, either in person or over the telephone, or Zoom / Microsoft Teams (or other means where both parties can connect).

The investigation and written response to the complainant will be completed within 20 working days of acknowledgement of the Stage 2 complaint being made.

A Stage 2 response will address the following areas:

- The complaint will be titled "Complaint Review Reference No" • the outcome of the review.
- the reasons for the decisions made.
- the details of any remedy offered to put things right and apology if appropriate.
- details of any outstanding actions.

If it is not possible to complete the investigation within 20 working days, the complainant will be informed and provided a new response date. Any extension should not exceed an additional [20](#) working days without good reason. If a timeframe is exceeded, regular updates will be provided to the complainant.

A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident.

Kentish Homes Ltd hopes all complaints are resolved, however if a resident remains dissatisfied after exhausting the policy, they can ask for a review of the case by the Housing Ombudsman Service or if it relates to care services delivered by Kentish Homes Ltd it can be referred to the Local Government and Housing Ombudsman.

Closing as stage 2 complaint - The closing paragraph to a stage 2 Housing Complaint will be as follows:



“I trust we have now addressed all the points you have raised in your correspondence.” If however, you are not satisfied with our response you can contact the Housing Ombudsman

Housing Ombudsman  
service PO Box 152,  
Liverpool L33 7WQ Tel:  
0300 111 3000

You can also contact the Housing Ombudsman via [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk) for further assistance.

The Ombudsman Service is free, independent and impartial.”

### **Follow up**

Following the internal complaints process being completed, if the complainant is still unhappy with the outcome of the investigation, they have the right to refer the complaint externally.

If a complaint concerns housing, it should be referred to the Housing Ombudsman.

Whilst the complaint is being referred to the Ombudsman if appropriate Kentish Homes Ltd can continue to work with the client to resolve the complaint. If Kentish Homes Ltd managers or senior managers are uncertain, they can contact the Ombudsman service for advice.

The Housing Ombudsman Service - The contact details are:

Housing Ombudsman service  
PO Box 152, Liverpool L33  
7WQ Tel:  
0300 111 3000  
E-mail: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

Web: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

### **Vexatious Complaints**

**Dealing with abusive, harassing, persistent, or vexatious complaints and complainants**

It is considered that all complainants have the right to have their concerns examined in line with the relevant complaint procedure. In most cases, dealing with complaints will be a straightforward process; however, in a minority of cases, the complainant may act in a manner that is deemed unacceptable. Those identified as abusive, persistent and/or vexatious complaints will be treated consistently, honestly and proportionately while ensuring that Kentish Homes Ltd suffer no detriment

Complainants may act in a way that is considered abusive, harassing unreasonably persistent or vexatious and by doing so it may hinder the Kentish Homes Ltd.'s ability to investigate their complaint or the complaints of others. This behaviour may occur at any time before, during or after a complaint has been investigated.

The time spent on dealing with all complaints should be proportionate to the nature of the complaint and consistent with the outcome that is being sought being realistic and achievable.

### **How is unreasonable complaint behaviour defined?**

Kentish Homes Ltd has adopted the Local Government Ombudsman's definition and the identified characteristics for unreasonable or unreasonably persistent complainants *"For us, unreasonable and unreasonably persistent complainants are those complainants who, because of the nature or frequency of their contacts with an organisation, hinder the organisation's consideration of their, or other people's, complaints"*.

Examples of unreasonably persistent behaviour:

(this list is not exhaustive, nor does one single characteristic on its own imply that the person will be considered as being in this category)

- Refusing to specify the grounds of a complaint, despite offers of help.
- Refusing to cooperate with the complaint's investigation process.
- Refusing to accept that certain issues are not within the scope of Kentish Homes Ltd.'s jurisdiction or within the scope of a complaints procedure.
- Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Making unjustified complaints about staff who are trying to deal with the issues and seeking to have them replaced.
- Changing the basis of the complaint as the investigation proceeds.
- Denying or changing statements made at an earlier stage.
- Introducing trivial or irrelevant new information at a later stage.
- Raising many detailed but unimportant questions, and insisting they are all answered.
- Submitting falsified documents from themselves or others.

- Adopting a 'scatter gun' approach: pursuing parallel complaints on the same issue with various members of staff and/or organisations.
- Making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous Kentish Homes staff, or detailed letters every few days, and expecting immediate responses.
- Submitting repeat complaints with minor additions/variations, which the complainant insists make these 'new' complaints.
- Refusing to accept the decision; repeatedly arguing points with no new evidence.

#### Examples of abusive, harassing and/or vexatious complainants

Kentish Homes Ltd will take steps to protect its staff from members of the public and service users who are behaving in a way which is considered abusive, harassing and/or vexatious

This may include physical or verbal abuse and could include the following (however this list is not exhaustive):

- Speaking to the member of staff in a derogatory manner which causes offence.
- Swearing, either verbally or in writing despite being asked to refrain from using such language.
- Using threatening language towards Kentish Homes Ltd staff which provokes fear.
- Making unwarranted or disparaging remarks about a member of staff.
- Repeatedly contacting a member of staff regarding the same matter which has already been addressed.

#### Managing unreasonable complainant behaviour

Types of actions Kentish Homes Ltd may take:

- Where the complainant tries to reopen an issue that has already been considered through one of Kentish Homes Ltd.'s complaints procedures, they will be informed in writing that the procedure has been exhausted and that the matter is now closed
- Where a decision on the complaint has been made, the complainant should be informed that future correspondence will be read and placed on file, but not acknowledged, unless it contains important new information
- The complainant will be limited to one type of contact (e.g. letter, email, etc.)
- Limits will be placed on the number and duration of contacts with staff per week or month
- The complainant will be informed that any contact will take place with a specific, named member of staff and if they do not keep to these arrangements, any further correspondence that does not highlight any

significantly new matters will not necessarily be acknowledged and responded to, but will be kept on file

- One member of staff will be assigned to read the complainant's correspondence, to ensure appropriate action is taken
- A restricted time slot will be offered for necessary calls to specified dates and times
- Kentish Homes Ltd staff will end any meeting with a complainant if the complainants conduct or behaviour becomes disrespectful or aggressive

### **Matters to consider before taking actions**

Before taking a decision to invoke this policy, consideration should be given to whether any further action is necessary, such as:

- Consideration about whether it is appropriate to convene a meeting with the complainant and a senior member of staff to seek a mutually agreeable resolution
- If it is known or suspected that the complainant has any special communication needs then consider offering an independent advocate, who may assist the complainant with their communication with Kentish Homes Ltd.
- Where more than one department is being contacted by the complainant, agree a cross departmental approach; and designate a lead officer to coordinate Kentish Homes Ltd.'s response.

Staff must be satisfied before taking any action as defined by this policy that the complainant's individual circumstances have been considered including such issues as age, disability, gender, race and religion or belief.

### **Imposing restrictions**

In the first instance the Board of Directors, in consultation with the Complaints Manager will communicate to the complainant either by phone or in writing to explain why this behaviour is causing concern and ask them to change this behaviour. The Senior Manager will explain what actions Kentish Homes Ltd may take if the behaviour does not change.

If the complainant continues with the unreasonable behaviour the Board of Directors will consult the Complaints Manager about whether it is necessary to take appropriate action by invoking this policy.

When the decision has been taken to apply this vexation policy to a complainant, the Board of Directors will contact the complainant in writing (and/or as appropriate) to explain:

- why this decision has been taken
- what action Kentish Homes Ltd will be taking
- the duration of that action
- the review process of this policy
- the right of the complainant to contact the Local Government Ombudsman about the fact that they have been treated as a persistent/vexatious complainant.

Any restriction that is imposed on the complainant's contact with Kentish Homes Ltd will be appropriate and proportionate and the complainant will be advised of the period the restriction will be in place for. In most cases restrictions will apply for between three and six months but in exceptional cases may be extended. In such cases the restrictions would be reviewed on a quarterly basis.

If the complainant continues to behave in a way which is deemed unacceptable then the Board of Directors, in consultation with the Complaints Manager, may decide to refuse to discuss the complaint any further and cease any investigation into his or her complaint.

Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, Kentish Homes Ltd will consider other options, for example reporting the matter to the Police or taking legal action. In such cases, Kentish Homes Ltd may not give the complainant prior warning of that action. Kentish Homes Ltd may also consider issuing formal warnings to the complainant. In extreme cases Kentish Homes Ltd will issue an eviction notice and may ask the complainant to vacate immediately.

### **New complaints from those who have been treated as being abusive, vexatious and/or unreasonably persistent complainants.**

Any new complaints received from complainants who have come under this policy will be treated on their merits. Kentish Homes Ltd does not support a blanket ban on genuine complaints simply because restrictions may be imposed upon that complainant.

### **Review**

The Board of Directors will review any restrictions which are imposed upon the complainant after three months and at the end of every subsequent three months within the period during which the policy is to apply.

Should the decision be taken to extend the period of restriction, the complainant will be advised in writing how Kentish Homes Ltd plans to go about this and that the decision to restrict contact will be put in place for a further specified period (e.g. six

months). The outcome of any subsequent review will be communicated to the complainant, outlining if the restrictions will continue to apply and if so why.

### **Ceasing Contact with a Complainant**

There may be occasions where the relationship between Kentish Homes Ltd and unreasonably persistent or vexatious complainants breaks down completely. This may even be the case while complaints are under investigation and there is little prospect of achieving a satisfactory outcome. In such circumstances, there may be little purpose in following all the stages of the complaint's procedure. Where this occurs Kentish Homes Ltd will advise the complainant that they may approach the Housing Ombudsman who may be prepared to consider a complaint before the procedure has run its course.

### **Suggestions/Compliments**

Residents can make suggestions and compliments via the following formats

- Kentish Homes Ltd website
- Email
- Telephone
- What's app
- TSM Survey

Staff members will inform their Team Manager about any suggestions or compliment made. The Team Manager will inform the Complaints Manager and Board of Directors of any suggestions from clients that require further discussion and/or approval. Compliments will be recorded on Kentish Homes systems.

### **Record Keeping**

All complaints, compliments and suggestions will be logged in Kentish Homes Ltd system.

A complaint log will be analysed quarterly by the Board of Directors and a report of anonymised information will be shared with the Senior Management Team.

Kentish Homes Ltd will keep a record of all complainants who have been treated as being unreasonably persistent, abusive and/or vexatious in accordance with this policy. This will include details of why the policy was invoked, what restrictions were imposed and for what period.

Please see Appendix 1- Examples of Service Request or Complaint Flowchart. Please note that on the Flowchart the term “Landlord” refers to “Kentish Homes Ltd”.





