



Scrutiny Panel Report – Complaints Process JUNE 2023

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Appendixes

- A: PHA Compliments, Complaints & Comments Policy**
- B: Presentations on Complaints Performance**
- C: Extract from the [SPSO] Complaints Improvement Framework**

1. Scope and Objectives

Objective: To work on behalf of tenants and in partnership with staff to ensure that the services provided by Paragon are tenant focused and delivered to a high standard and represent value for money.

Scope: At the first meeting of the review group the panel agreed that they would:

- Examine current policies, procedures and working practices
- Look at Customer Feedback
- Consider Performance against targets.
- Look at the 6 areas of the Scottish Public Service Ombudsman (SPSO) Complaints Improvement Framework.
 - Organisational Culture
 - Process & Procedure
 - Accessibility
 - Quality
 - Learning from Complaints
 - Complaints Handling Performance

2. Methodology of Review of Complaints Process.

The Association follows the Scottish Public Ombudsman's Model Complaints Handling Process. The Association has a Compliments, Complaints and Comments Policy adopted in 2021.

The Panel used a variety of methods to gather a range of information in relation to the complaints process. These included:

- Review of Policy and Procedures
- Review of Customer Information Leaflets and Service Standards
- Review of information available on the website
- Panel members' experiences on the Complaints process
- Analysis of complaint information
- Discussion with staff on the Association's approach to complaint management
- Review of the complaints paperwork and sample complaints.
- Consideration of the SPSO Complaints Improvement Framework initially completed by the Housing Manager.

3. The Panel's Findings

3.1 Overview of findings

The Panel found that the process of making a complaint was straight forward and well publicised. However, there were some concerns about following up on complaints. It was noted that these concerns seemed to be consistent with two areas of complaint: complaints about reactive repairs and complaints about Estate Management.

There was also a discussion around whether the Association was sometimes too quick to uphold a complaint, although it was noted that the addition of the resolution category was a positive step.

The panel made 8 recommendations for consideration by the Management Team and Committee, and these are detailed below.

The report is broken down into the six areas identified in the SPSO Complaints Improvement Framework where strengths and areas for improvement with the Repairs service have been identified. Recommendations for service improvement are detailed in each section.

3.2 Organisational Culture

Strengths:

- The overall attitude towards complaints is positive with all staff spoken to being aware the process.
- Staff were quick to identify complaints and give this the priority warranted.
- The panel welcomed the idea of 'you said we did' as a way of feedback to wider tenant base how complaints had been used to improve service delivery.

Weaknesses.

- Sometimes a complaint was taken where it was clear that the 'complainant' was not looking to make a complaint, simply deal with an outstanding issue. However, the panel agreed better to take 1 too many complaints rather than miss one.
- In some instances, staff told the panel they were unsure whether they should be dealing with a frontline complaint or passing it on to someone else and if the latter how they should be feeding this back to the tenant.
- The panel felt that individual complainants would sometimes appreciate contact in a 'you said we did' context.

Recommendations:

1. There should be a document clearly outlining roles & responsibilities in handling / managing complaints.
2. Consideration should be given to resurrecting and updating the Complaints Handling Toolkit to reflect changes to the Model Complaints Handling Process.
3. Consideration should be given to how the Association provides feedback to individual complainants that action has been taken as a result of their complaint and how services have been improved.

3.3 Process & Procedure

Strengths

- All staff members spoken to were aware of the process and procedure for taking a frontline [stage 1] complaint.
- Paperwork was completed accurately and timeously and in the case of Stage Complaints signed off by a senior staff member.
- There are standard templates for forms and for acknowledgement etc. There are template response letters for stage 2 responses.

Weaknesses

- Whilst it is difficult to assess the standard of response to a stage 1 complaint as many are verbal decisions, it was felt that there was a wide variation in the level of detail / standard of information communicated to tenants.

Recommendations

4. Where the Association has an email address for a complainant, consideration should be given to following up a verbal response with an email confirmation.
5. Similarly, if there is no email address, but the complaint is not resolved (e.g., Not Upheld or Upheld) and is more complex then consideration should be given to providing a written summary of the verbal response.

3.4 Accessibility

Strengths

- Details of how to complain are easy to find on the website.
- Staff are quick to tell customers about the complaints process.
- Good use is made of interpreters and other accessibility tools.

Weaknesses

- Little use of social media etc to promote complaints process.
- Could make better use of newsletters to promote right to complaint.

Recommendations

- 6 Consideration should be given to including a leaflet / fact sheet in sign up packs outlining the complaints process.
- 7 Use you said we did articles in newsletters to promote the complaints process.

3.5 Quality

Strengths

- All complaints are fully recorded along with evidence to back up decisions.
- Stage 2 complaints are clarified with complainants, and this usually happens within 5 days.

- The Association responds openly to complaints and is quick to escalate where appropriate,

There are no recommendations to make in this section.

3.6 Learning from Complaints

Strengths

- Good use of Learning outcomes sheet to document each frontline complaint.
- Regular sessions with staff to look at complaints received.

Weaknesses

- Other than Charter returns little if any benchmarking with other organisations.
- Other than you said we did little record of how learning outcomes are implemented and used to improve the service.

Recommendations

- 8 The Association should consider exploring opportunities for benchmarking and exploring what others do.
- 9 It is recommended that better use is made of the complaint form to record follow up actions and give this a date for completion. These should be recorded on the complaint's spreadsheet.

3.7 Complaints handling performance.

Strengths

- Strong performance against target response times
- Relatively low conversion rate – Frontline to Stage 2
- Very Low engagement with SPSO

Weaknesses

- There is little qualitative data to document how easy the customer found the complaints process to be.

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Recommendations

- 10 Consideration should be given to how qualitative data might be collected – for example a post complaint transactional survey. Additional consideration should be given to the use of texts for transactional surveys / post complaint feedback.

4. Conclusions

The Tenant Scrutiny Panel found that the Complaints Process was well documented and easy to follow. Whilst not undertaking a formal grading of the complaints process the panel acknowledges the good [self-assessment]

performance in the Complaints Improvement Framework and agrees with the self-assessment score as outlined in Appendix C.

The panel found that customers were actively encouraged to make a complaint and that in general complaints were [well] responded to in the specified timescales.

One area where the panel felt the Association could strengthen its response was following the conclusion of Frontline complaints. In some instances, customers were not always contacted to confirm that proposed resolution has in fact taken place. In other instances where a change to working practice was suggested or promised as an outcome of the complaint individuals were not contacted to confirm that this has happened.

5. Thanks, from the Tenant Scrutiny Panel

The Panel wishes to express its thanks to all those staff members who have supported and assisted with this Scrutiny Review.

6. Summary of Recommendations

In total the Tenant Scrutiny Panel has made 10 recommendations, and these are detailed below. The panel has chosen not to grade these recommendations in terms of priority and believes all should be treated as suggested improvements rather than critical requirements.

1	There should be a document clearly outlining roles and responsibilities in handling and managing complaints
2	Consideration should be given to resurrecting and updating the Complaints Handling Toolkit to reflect changes to the Model Complaints Handling Process.
3	Consideration should be given to how the Association provides feedback to individual complainants that action has been taken as a result of their complaint and how services have been improved
4	Where the Association has an email address for a complainant, consideration should be given to following up a verbal response with an email confirmation.
5	Similarly, if there is no email address, but the complaint is not resolved (e.g., Not Upheld or Upheld) and is more complex then consideration should be given to providing a written summary of the verbal response.
6	Consideration should be given to including a leaflet / fact sheet in sign up packs outlining the complaints process.
7	Use you said we did articles in newsletters to promote the complaints process
8	The Association should consider exploring opportunities for benchmarking and exploring what others do.
9	It is recommended that better use is made of the complaint form to record follow up actions and give this a date for completion. These should be recorded on the complaints spreadsheet.
10	Consideration should be given to how qualitative data might be collected – for example a post complaint transactional survey. Additional consideration should be given to the use of texts for transactional surveys / post complaint feedback.