



GROUP COMPLAINTS HANDLING POLICY

This document can also be provided in large print, braille, audio or other non-written format, and in a variety of languages



Last reviewed – month/year: August 2026

Version: 2.2

Approval body	Group Governing Bodies
Date of approval	May 2019
Date of next policy review	August 2029
Customer engagement required (Yes/No)	No
Your Voice engagement required (Yes / No)	No
Equality Impact Initial Assessment completed (Yes / No)	Yes
Full Equality Impact Assessment required (Yes / No)	No
Data Protection Risks Assessed (Yes / No / N/a)	Yes
Health and Safety Risks Assessed (Yes / No / N/a)	N/A
Sustainability Impacts Assessed (Yes / No / N/a)	N/A
Procedures Updated (Yes / No)	Yes
Date Procedures Last Reviewed	August 2026
Data Impacts / IT System Changes Assessed (Yes / No)	No
Training Needs Assessed (Yes / No / N/a)	No
Previous Policy Version	2.1
New Policy Version	2.2

Equality Impact ~ Initial Assessment

1. People responsible for carrying out this assessment			
Policy Owner:	Executive Director of People & Governance		
EQIA Assessor(s):	Governance Officer		
Name of Policy:	Group Complaint Handling Policy		
Date of last EQIA:	29/08/23		
2. Purpose, aim(s) and expected outcomes (including who will benefit):			
To establish a fair, accessible and effective framework for handling complaints and learning from customer feedback.			
3. Is there a direct impact on people, or how the service is delivered?			
Yes - Policy acknowledges adoption of SPSO model CHP and provisions outlined therein.			
4. Potential impact on diverse communities, customers or groups?			
CHP outlines support that can be provided to assist customers in making a complaint, however: - Information about our approach to complaints handling is predominantly available online. Not all customers will have access to, or the skills to fully access the information they need / to send an email / complete an online form. - Whilst customers will be welcomed at any of our offices, customers may not live close enough to visit an office or be able to visit / visit at a time when one is open. - Socio-economic factors may lead to differing levels of understanding in relation to the information that we generically provide. - Customers with disabilities and additional needs may need reasonable adjustments in relation to policy / procedure provisions. This could include for example, changes to timescales and communication methods.			
5. Is there a Positive or Negative impact?			
Positive	☐	Which groups does it impact?	All
Negative	☐		
Neutral	☒		
6. Details of any engagement activities carried out			
Review our approach to interpretation and translation services, and how customers who need them are identified, directed, and responded to. Review how information is provided to customers, and whether it is easy to understand when factors such as disability or literacy levels are considered.			
7. Overall Impact Rating			
Material impact		☐	Non-material impact ☒
8. Initial Assessment Findings and Recommendation			
Initial Assessment Only		☒	Full EQIA Required ☐
9. Reason(s) for Recommendation			
The policy promotes accessibility, equality of access, translation services, alternative formats and support for vulnerable customers.			
Date of Initial Assessment		25 August 2026	



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1.0 Introduction

1.1 Purpose of the Policy

1.1.1 The Caledonia Group, comprising Caledonia Housing Association and its constitutional partner Cordale Housing Association, is committed to valuing complaints and using them as an important source of customer feedback and organisational learning. This policy provides the framework for complaints handling across the Group and supports the consistent implementation of the Scottish Public Services Ombudsman's (SPSO) Complaints Handling Procedure (CHP). It ensures complaints are managed effectively, fairly, and transparently while driving continuous service improvement.

1.1.2 The Group recognises that complaints provide valuable insight into customer experiences and support our guiding principles of:

- Keep it Simple
- Keep it Personal
- Make it Right

1.2 Scope of the Policy

1.2.1 This policy applies across the Caledonia Group. It applies to:

- Tenants
- Housing and homeless applicants
- Owners, shared owners and factored owners
- Other customers, service users and members of the public
- Employees involved in complaints handling
- Governing Body members involved in complaint oversight

2.0 Principles, Aims and Objectives

2.1 Policy Objectives

2.1.1 The objectives of this policy are to:

- Ensure compliance with the SPSO Complaints Handling Procedure.
- Provide a clear, accessible and customer-focused complaints process.
- Resolve complaints as early as possible

- Ensure complaints are investigated fairly, consistently and proportionately.
- Promote learning from complaints and service improvement.
- Support effective governance and performance monitoring.
- Ensure customers have access to independent review and redress where appropriate.

2.2 Legislative and Regulatory Context

2.2.1 This policy has been developed in accordance with:

- Public Services Reform (Scotland) Act 2010 and the associated SPSO Model Complaints Handling Procedure for Registered Social Landlords.
- Scottish Social Housing Charter, particularly Outcome 1: Equalities; and Outcome 2: Communication.
- UK GDPR and Data Protection legislation, including Data (Use and Access) Act 2025 requirements relating to data protection complaints.
- Heat Network Consumer Protection Regulations, with reference to Ofgem registration and energy supply complaints.
- Human Rights and Equality legislation, including the Equality Act 2010.

2.2.2 The SPSO provides the final stage of independent complaint review following completion of the Group's complaints process. Complainants who are home owners, that remain dissatisfied at the end of our complaints process also have independent recourse to the First-tier Tribunal for Scotland (Housing and Property Chamber).

3.0 Definitions

3.1 Key Terms

Complaint - an expression of dissatisfaction about the Group's action or lack of action, or about the standard of service provided.

Complaints Handling Procedure (CHP) – the document used to guide handling of complaints, setting out internal processes and key considerations. The Group has adopted the SPSO model complaint handling procedure.

Frontline Resolution – the first stage of the CHP where staff members seek to resolve straightforward complaints quickly and close to the point of service delivery.

Investigation Stage – the second stage of the CHP used for complaints that are complex, serious, high risk or where frontline resolution has not been successful.

SPSO – the Scottish Public Services Ombudsman which provides independent review of complaints after the Group's process has been exhausted.

Redress – action taken to remedy service failure, which may include an apology, corrective action, service improvement or other appropriate remedy.

4.0 Policy Statement

4.1 Core Principles and Standards

4.1.1 The Group has adopted the SPSO Complaints Handling Procedure in full and commits to handling complaints in accordance with the following principles:

- User-focused
- Simple and timely
- Thorough, proportionate and consistent
- Objective, impartial and fair
- Seeking early resolution
- Delivering improvement

4.1.2 The Group will:

- Maintain effective systems for recording, managing and reporting complaints.
- Ensure staff receive appropriate training and support.
- Promote awareness of the right to complain.
- Make complaints processes accessible and inclusive.
- Use complaints information to improve services and customer outcomes.
- Comply with reporting and regulatory requirements.
- Ensure customers are signposted to external review bodies where appropriate.

5.0 Roles and Responsibilities

5.1 Implementation Responsibilities

5.1.1 Group Governing Bodies

The Governing Bodies are responsible for:

- Approving the adoption of the Complaints Handling Procedure.
- Monitoring implementation of this policy.
- Reviewing complaints performance information.
- Ensuring learning from complaints informs governance, policy development and service improvement.

5.1.2 Executive Management Team and Senior Leaders

The Executive Management Team and Senior Leaders are responsible for:

- Providing quality assurance of complaint investigations.
- Supporting the handling of high-risk, high-profile or complex complaints.
- Ensuring organisation wide learning is identified and implemented.

5.1.3 Governance Team

The Governance Team coordinates and manages investigation-stage complaints and supports reporting, quality assurance and compliance arrangements.

5.1.4 Managers and Team Leaders

Managers and Team Leaders are responsible for:

- Monitoring complaints performance within their respective teams and services.
- Identifying themes, trends, root causes and learning.
- Delivering service improvements arising from complaints.
- Supporting staff involved in complaint resolution.

5.1.5 All Employees

All employees are responsible for complying with our CHP with reference to:

- Identifying complaints.
- Handling and responding to frontline complaints where appropriate.
- Recording complaints accurately, including outcomes, learning and resolution actions.

5.2 Monitoring and Enforcement

5.2.1 Complaints performance will be monitored through the Group's performance management framework, including:

- Key Performance Indicators.
- Complaint outcome analysis.
- Trend analysis.
- Root cause analysis.
- Service improvement reporting.
- Regulatory and public reporting requirements.

6.0 Equalities Considerations

6.1.1 We acknowledge the relevance of the CHP to all our tenants and customers, and their respective rights to complain about something we have or have not done; or our standards of service. We will treat all complainants fairly, respectfully and as individuals and, as far as practically possible, accommodate any specific needs they may have.

6.1.2 In accordance with our commitment to equality, diversity and inclusion, we shall ensure our CHP is accessible to everyone who requires to use it and provide appropriate support and assistance to any customer who wishes to make a complaint. As part of this we will:

- Ensure information about our complaints handling procedure is easily and widely available online and in our premises that are open to the public.
- Use our various publications to make tenants and customers aware of their right to complain and publicise arrangements about how to make a complaint.
- Explain our procedure and its application as required.
- Provide our procedure in formats or languages other than written English as appropriate or on request.
- Offer a range of methods of complaining and provide any other practical assistance, such as help with scribing or articulation.

6.1.3 When a complaint involves a child, we will follow the SPSO Child Friendly Complaints Handling Process to guide ownership and ensure an approach that respects and promotes the child's rights.

7.0 Procedures

7.1 Process Overview

7.1.1 The Group operates a two-stage complaints handling process:

Stage 1: Frontline Resolution

- Early resolution at first point of contact where possible.
- Suitable for straightforward complaints.
- Focus on quick and effective outcomes.

Stage 2: Investigation

- Used where complaints are more complex or serious.
- Involves detailed investigation.
- Formal response issued following consideration of all relevant evidence.

7.1.2 Where customers remain dissatisfied after completion of the internal process, they may seek independent review through the SPSO or other relevant bodies. Responses at Stage 2 will advise complainants of their rights in this regard and signpost appropriately.

7.2 Reference to Procedural Documents

7.2.1 This policy is supported by and should be read in conjunction with:

- Group Complaints Handling Procedure for Registered Social Landlords.
- Customer-facing Complaints Handling Procedure.
- Group Redress Policy.
- Notes and guidance on using the Group case management system.

7.2.2 The detailed operational requirements for recording, investigating, escalating and reporting complaints are contained within these procedural documents.

8.0 Compliance and Enforcement

8.1 It is important that all members of staff, in carrying out their duties for the Group, do so in accordance with the Group's policy framework. Our policy framework ensures we comply with laws and regulation, while giving guidance to inform operations and decision-making. Our policies have been designed to be clear and easy to understand and are available on our website

and intranet. If any member of staff is unclear as to their responsibilities under this policy, then they should refer to their line manager and / or the policy author for further guidance. A failure to comply with Group policies can have serious consequences for the Group. Should an employee become concerned about serious non-compliance with the policy, they should speak to their line manager or refer to the guidance set out in the Group Whistleblowing Policy

9.0 Review and Revision

9.1 Review Frequency

- 9.1.1 The SPSO reviews and revises the model Complaint Handling Procedure periodically. The Group will acknowledge and adopt any future procedural changes and amend the Group Complaint Handling Policy accordingly.
- 9.1.2 This policy will be reviewed every three years, or earlier if a review of the model CHP is undertaken. Where flexibility in the model permits, we will seek to engage tenants, tenants groups and other customers in this review work.

9.2 Responsibility for Updates

- 9.2.1 The Executive Director of People & Governance is the Policy Owner and is responsible for ensuring the policy remains current, effective and compliant.

10.0 Approval and Effective Date

10.1 Approval Details

- 10.1.1 This policy was introduced and approved by the Group Governing Bodies in May 2019.

10.2 Effective Date

- 10.2.1 This policy version is effective from August 2026 and supersedes all previous versions of the Group Complaints Handling Policy.