Pathways

Complaints Policy

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Scope

This policy applies to all residents, customers, and stakeholders who receive services from Citra Pathways Limited (Pathways), including leaseholders, shared owners, and prospective customers.

Complaints may be raised directly by customers or by an authorised representative, such as a family member, advocate, or third-party agency, provided appropriate consent is given.

Policy statement

Pathways is committed to providing a good service to all our customers. We recognise that sometimes customers will be dissatisfied with our service and will want to make a complaint. The aim and objective of this policy is:

- To provide a clear, accessible process for customers to make complaints
- To ensure compliance with the Housing Ombudsman Service and the Regulator of Social Housing
- To learn from complaints and use them to inform service improvements
- To promote awareness of the complaints process and ensure accessibility for all customers
- To fulfil legal duties under the Equality Act 2010 and make reasonable adjustments for customers.

Our commitment to you:

- We will investigate complaints (and all service requests and contact) based on merit in a confidential and respectful manner, agreeing with you at the start how you wish to be kept informed throughout the process
- Wherever possible we will seek to address any contact and/or service request swiftly achieving a satisfactory outcome for you without the need for a formal complaint
- We will always try to resolve your complaint as swiftly as possible
- We take learning from complaints seriously and will ensure that lessons learned from complaints inform service improvements
- We will ensure that our complaints policy and approach comply with the requirements of the Housing Ombudsman and the Regulator of Social Housing.

What is a complaint?

We regard a complaint as an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Pathways, its own staff, or those acting on its behalf, affecting an individual customer or group of customers. Whenever a resident expresses dissatisfaction, we will give them a choice to make a complaint.

Service request

A day-to-day 'service request' is not a complaint. It is a request from a customer to Pathways or managing agents requiring action, usually but not always limited to repairs and maintenance. This can become a complaint if not dealt with quickly or we don't do as we promised.

This could be a request for a new repair to be completed or a report that the repair did not go ahead as planned for example, a missed appointment. A service request will follow our usual process and not be dealt with as a complaint unless that is what you want. Should the same service request be raised a second time we'd classed it as a complaint unless you prefer not to log it as such.

Logging complaints

A complaint is a grievance raised by the customer that is logged, managed and reported both internally and externally. The Pathways complaints process must be followed. Pathways will seek the customers' permission to log a complaint if the customer has not explicitly expressed their desire to do so.

Where there is a safeguarding risk to the customer, other customers or wider members of the public, Pathways can log and assess a complaint, even if this is against the wishes of the customer. In accordance with legal guidance, Pathways will ensure the identity of the customer remains anonymous during this process.

Exclusion grounds

We will always review a complaint fully and impartially based on merit, before considering it excluded from our policy. Examples where we will not accept a complaint are:

- Where the issue is deemed a service request
- Where the issue occurred more than 12 months ago, or the resident became aware of the issue more than 12 months ago and is being raised for the first time. We will apply our discretion to accept complaints made outside this time limit where there is good reason to do so
- Issues where legal proceedings have commenced e.g. details of the claim have been filed at court (Particulars of Claim and Claim Form)
- Where the complaint has already been considered under this policy

- Matters covered by separate statutory or regulatory processes (e.g., data protection requests, insurance claims, or safeguarding concerns managed under dedicated policies).

If we do not accept a complaint, we will explain the reason, how we propose to address the customer's concerns, and inform them of their right to take the decision to the Housing Ombudsman.

Who can make a complaint?

We accept complaints from:

- A customer (tenant, leaseholder or shared owner)
- Anyone who is in receipt of a service or is affected by a service that we provide
- Anyone who may potentially receive a service from us
- Complaints may be made via an advocate e.g. a friend, relative or an advocacy service, such as, the Citizen's Advice Bureau (with written consent. Consent will be assumed for MPs/ Councillors/ Advocacy Services). A complaint that is submitted via a third party or representative will be handled in line with this policy. An advocate can accompany or represent the customer throughout the complaints process. An advocate must not be a lawyer.

How complaints can be made

Complaints can be made in person, by email, by phone, in writing, or via our website:

- By email hellopathways@lloydsliving.co.uk.
- By phone 0345 030 6546
- In writing to Customer Service Pathways, c/o Lloyds Living, X+Why, 100 Embankment, Cathedral Approach, Salford, M3 7FB
- Online via our website.

Please do not include any sensitive information in your complaint.

Complaints received via social media

Pathways uses social media to stay connected with customers and recognises that complaints may be raised through these channels. Our social media accounts are monitored regularly. Where a complaint is identified, it will be acknowledged and referred to the Pathways Complaints Team to be managed in line with this policy and our standard two stage complaints process.

We will establish the customer's preferred contact method for their complaint or issue to be addressed. We have dedicated and trained staff for handling customer complaints. We will appoint a single person who will manage the case if there are multiple issues.

How complaints will be handled

We have a two-stage complaints process:

Stage 1

When a complaint is made, we will acknowledge, define and log it within five working days of receipt. We will explain what we understand the complaint to be, explaining what elements Pathways are not responsible for where applicable and determine what outcome the customer wants. If needed, we'll ask for more details.

We will reply within 10 working days. Our written response will include:

- What stage the complaint is at
- What the complaint is about
- Our decision
- Why we made that decision
- How we plan to put things right
- Any actions still to be done
- How to move to Stage 2 if you're not satisfied.

In exceptional circumstances, if we need more time to reply, we'll let you know why and when you can expect a response. This extension will not be more than 10 extra days unless there is a good reason.

We will reply to the complaint once the answer to the complaint is known and not when the outstanding actions required to address the issue are completed. We will continue to track outstanding actions and carry them out promptly, providing appropriate updates to the resident.

Additional Complaints

Where a resident raises an additional complaint during an investigation, these must be incorporated into our stage 1 response if the matters are related and the stage 1 response has not already been issued. Where the stage 1 response has been issued, the new matters are unrelated to the issues already under investigation or where it would unreasonably delay the response, the new issues must be logged as a new complaint.

Stage 2

If the customer is not happy with our Stage 1 response, they can ask us to look at the complaint again at Stage 2, unless the complaint is excluded for specific reasons. The escalation will be defined, logged and acknowledged within 5 working days.

A different person will review the Stage 2 complaint.

We will confirm what the complaint is about and what outcome the customer wants. If needed, we'll ask for more details.

We will reply within 20 working days. Our written response will include:

- What stage the complaint is at
- What the complaint is about
- Our decision and reasons
- How we plan to put things right
- Any actions still to be done
- How to contact the Housing Ombudsman if the customer is still not satisfied.

If we need more time, we'll explain why and let the customer know when they can expect to receive a response. This extension will not be more than 20 extra days unless there is a good reason. If we need even more time, we will agree this with the customer or give them the Housing Ombudsman's contact details.

If an extension beyond 20 working days (after the complaint has been escalated) is required to enable us to respond to the complaint fully, we will agree this with the customer. Where agreement over an extension period cannot be reached, we will provide the Housing Ombudsman's contact details so the customer can challenge our plan for responding and/or the proposed timeliness of our response.

We will clearly communicate in writing any decision we make to decline to escalate a complaint to Stage 2. In doing so, we will explain our reasons for not escalating as well as confirm the customer's right to approach the Housing Ombudsman about our decision.

Housing Ombudsman

To make a complaint to the Housing Ombudsman, customers can click on this link to complete an online form.

Alternatively, you can get in touch with the Housing Ombudsman Service by phone (during the hours listed below), email or in writing using the details below:

Monday, Tuesday, Wednesday, Friday 9:00 - 17:00.

Thursday 9:00 - 15.30 (**lines are closed for staff training every Thursday from 15.30 to 17:00**).

Phone: 0300 111 3000 (Calls are recorded for training and monitoring purposes).

Email: info@housing-ombudsman.org.uk.

In writing:

Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET.

Please note the Housing Ombudsman Service will usually expect you to have followed Pathways complaints process before they can review your complaint.

Housing Ombudsman Service

Pathways is a registered member of the Housing Ombudsman Service. A condition of membership is that all members agree to be bound by the decisions and adjudications of the Housing Ombudsman's Service, regardless of whether the member agrees with the outcome or not. The Ombudsman may report a member's complaint handling failure to any appropriate regulatory agency and/or the board, committee, panel or senior officer of the member along with any related details as the Ombudsman sees fit. The Ombudsman may publish the fact and circumstances of a member's complaint-handling determinations, naming the member in the Ombudsman's annual report or elsewhere.

We will respond positively to all Ombudsman enquiries, investigations and recommendations and undertake to comply promptly with any determinations.

We will publish on our website compliance with the Ombudsman Code of Practice and provide an annual complaint performance and service improvement report to the Board.

Customer communication

We will maintain regular contact with the customer via their preferred method of communication throughout the complaints process, including where there is no new information.

Compensation

In some circumstances, it will be appropriate to offer compensation as part of a complaint response. Offers of compensation will be considered on a case-by-case basis and will take account of the following:

- The length of time that a situation has been ongoing
- The frequency with which something has occurred
- The severity of any service failure or omission
- The number of different failures
- The cumulative impact on the customer
- The customer's particular circumstances or vulnerabilities.

Restrictions

We may place restrictions on a customer's contact with us where their behaviour becomes unacceptable, impacts upon our ability to consider their complaint or to serve other customers, or they engage in abusive or threatening behaviour.

In these instances, we will explain the reason for our decision and how we propose to engage with the customer to address their concerns. We will ensure our decision takes account of the customer's needs and demonstrates regard for the provisions of the Equality Act 2010.

Promoting awareness of our approach to complaints

We will ensure that our complaints policy and process, together with the Housing Ombudsman's Complaint Handling Code and contact information is available online and provided in communications.

Reasonable Adjustments – Equality Act 2010

Pathways is committed to making sure all services are accessible to every resident. We will:

- Train staff to communicate clearly and respectfully
- Provide staff with the tools and information they need, including access to translation services
- Apply this policy fairly and respectfully to all customers
- Adapt our approach and make reasonable adjustments to ensure a customer can raise and address their complaint with us
- Fulfil our legal duties under the Equality Act 2010 to advance equality of opportunity and prevent discrimination
- Promote equality and prevent discrimination or victimisation based on:
  - Age
  - Sex
  - Sexual orientation
  - Disability
  - Race
  - Religion or belief
  - Gender reassignment
  - Pregnancy and maternity
  - Marriage and civil partnership
  - Any other protected characteristic under the Equality Act 2010.
- Keep a record of:
  - Any reasonable adjustments agreed with residents
  - Any disabilities residents choose to share with us
- Provide documents, policies and procedures in alternative formats on request, including:
  - Translations into other languages
  - Braille
  - Large print.

Legal and regulatory framework

Legislation:

- Social Housing (Regulation) Act 2023
- Housing Ombudsman's Complaint Handling Code
- Equality Act 2010
- Data Protection Act 2018.

Regulatory Standards:

- Transparency, Influence and Accountability
- Safety and Quality Standard
- Neighbourhood and Community Standard.

Learning from complaints

We are committed to learning from complaints and to establish a positive complaints handling culture. We will ensure that a complaints officer is appointed, all employees understand our expectations and senior management considers themes and trends to enable service improvements to be identified and delivered.

We will ensure that our Board appoints one of its members to have lead responsibility for complaints and the Board will receive regular information on complaints to enable it to understand our complaints handling performance.

We will publish summary details of complaints, learnings and improvements arising from them in our annual report and in our engagement with customers.

Review schedule

This policy will be reviewed every three years or more frequently as a result of an incident occurring, feedback obtained, internal/external audits and change in legislation/regulatory requirements. This process ensures the policy's continuing suitability, adequacy, and effectiveness.

The Pathways Chief Strategy Officer has responsibility for this policy, and ultimate responsibility for performance and compliance sits with the board.

Current version	Date approved	Date for review	Document owner
1.1	16.12.2025	By 16.12.2028	Craig Luttman

For more information, please visit:

www.lloydsliving.co.uk/pathways

This policy relates to Pathways only.

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