



COMPLAINTS POLICY

1 Introduction

- 1.1. CHISEL aims to give a good service to our tenants and other clients. We acknowledge that sometimes things go wrong and our aim is to put things right as soon as possible. We want to know when this happens or when tenants and clients are unhappy with the service they have received from us, so that we can learn and improve the way we work. We believe that complaints are an opportunity to listen and respond to in a proactive way.
- 1.2. Whilst our principal clients are our tenants, there are others who may receive a service from us. This policy applies to all tenants and anyone else who receives a service from CHISEL, referred to as our clients in this policy
- 1.3. The National Housing Federation defines a complaint as ***“An expression of dissatisfaction, however made, about the quality of service, actions or lack of actions by the organisation, its contractors or its staff affecting the complainant as an individual or group of individuals, whether justified or not”. This includes complaints that may be no more than merely an expression of dissatisfaction.*”**
- 1.4. The Localism Act introduced an additional democratic filter to complaints within social housing. Once a complainant has exhausted our internal process, the complainant may choose to have their complaint looked at by a “designated person” – a local councillor / MP or recognised tenant panel. The Housing Ombudsman Service will also accept direct referrals from clients, but only once 8 weeks have elapsed since the completion of our internal complaints procedure.
- 1.5. Within this policy we aim to set out how we will listen, respond and learn from problems and mistakes so that we can improve the services we deliver.

2 Policy Objectives

- 2.1 This policy aims to:
 - Set out a definition of a complaint that can be clearly understood by both clients and staff
 - Take a proactive approach to managing complaints
 - Enable and empower our staff to deal with complaints effectively at the earliest stage in the process
 - Be responsive to the needs of our clients.

- Be open, transparent and easy to understand
- Reflect current best practice
- Help us to learn from complaints and shape our services as a result
- Set out a process for dealing with unreasonable complaints

3. Policy

3.1 Our aim is to provide the best standard of service for all our clients and we welcome suggestions, comments and views on how to improve the services we offer. We recognise that from time to time things go wrong but we believe that most problems can be easily resolved; our aim is to get it right first time so every effort will be made to resolve matters quickly

3.2 What is a Complaint?

A complaint is an expression of dissatisfaction any client feels about an aspect of our service, policies, actions and decisions.

3.2.1 A complaint could be when a client feels:

- We have failed to respond to their initial request
- We have been unhelpful or rude
- We have failed to meet our stated standards or promises
- We gave unclear, misleading or unsuitable advice
- Our policies or procedures are incorrect or unfair

A complaint is not a request for a service, or an enquiry.

3.2.2 Our complaints procedure starts to apply only after we have given our first response or made the first attempt to deal with the matter, and the client is not happy with our response or efforts.

3.2.3 We have special procedures for reporting anti-social behaviour and neighbour nuisance and these matters will not be dealt with under this complaints policy unless we have failed to deliver to agreed service standards. Similarly, we will not deal with decisions made in accordance with our policies and procedures, where there is a right of appeal within that process, unless we have not followed our processes.

3.3 We will not be able to deal with the following via the complaints process:

- Any matter which is already being (or has been) dealt with by a solicitor or through the courts.
- Matters that are in the process of, or have been dealt with by insurers.
- Complaints that have already been through our internal complaints process.
- Complaints that fall outside our jurisdiction (e.g. complaints about utilities).

- Complaints relating to issues that took place more than 6 months ago and were not raised with CHISEL at the time. In the case of maintenance defects complaints must be made in timely manner in order that the issue can be dealt with promptly with the contractor who has undertaken the work.
- 3.4 Should the complaint be in regards to any agent acting on behalf of CHISEL, for example an agent we have employed to manage a service, clients may be advised to proceed through the agent's complaint handling process first before we will consider the matter. CHISEL requires that managing agent complaints procedures for CHISEL owned homes are approved by CHISEL.
- 3.5 When we receive a complaint, we welcome it as an opportunity to improve our relationship with our clients and improve our service. We will not be defensive as our values are to be open, transparent and accountable to our residents. We simply welcome the opportunity to hear where clients feel we have got things wrong and where they feel we need to improve as this helps us shape our service delivery.
- 3.6 We will do everything we can to resolve an issue informally and resolve the complaint/issue quickly. We will try to do this within 3 working days excluding Fridays (as our office is not open on Fridays), as a First Fix solution, and if we cannot resolve it to the client's satisfaction then we will escalate this to the formal stage of the complaints procedure.
- 3.7 All complaints and compliments will be recorded to help identify trends and improvements and will be reported to Board on a quarterly basis within our standard performance monitoring reports.

4. PROCEDURE

4.1 How we will respond when we receive a complaint.

When a client tells us that they are unhappy with something, the staff member who has been contacted will take personal responsibility for recording the information. The client can tell us about their complaint on the telephone, in writing, by email or in person. They can also ask someone else to complain on their behalf if they would feel more comfortable having an advocate contact us. An advocate could be a friend or a family member. The client would need to confirm that they are happy for us to liaise with their advocate before we respond to the complaint.

4.2 First Fix:

Any member of staff may try to resolve the issue, although in practice this is most likely to fall to the Operations Manager. The member of staff will find out from the client what they are unhappy about, how they would resolve the matter and the timescale for resolution. The member of staff will do everything to resolve the complaint within 3 working days and if it is done to the client's satisfaction it will be considered resolved as a First Fix.

- 4.3. **Complaint (Stage 1)**: If the client's complaint cannot be resolved to their satisfaction within 3 working days, it will be treated as a formal complaint and passed to the Managing Director who will:
- Speak to the client within 5 working days to clarify the issues, identify the desired outcome and agree a timescale for the response
 - Investigate the complaint
 - Speak to the client to summarise the key points of the draft outcome letter and then *(these first 3 steps may happen simultaneously)
 - Write to the client confirming how the complaint has been resolved, within the agreed timescale previously agreed with the client.
 - The outcome letter will include advising the client whether their complaint has been upheld or not.
 - Ensure any actions agreed are followed up and carried out.

(In the absence of the Managing Director, this stage will be carried out by the Operation's Manager).

- 4.4 If the initial complaint is made against the actions of the Managing Director then stage 1 of the complaints procedure will be undertaken by the Chair or a Board Member designated by the Chair to deal with this matter.
- 4.5 **Panel Review (Stage 2)**: If the client feels that we have not dealt with their complaint in a proper or fair way, they can ask for a Panel Review. This request must be made within 10 working days of the date of the complaint response outcome letter; otherwise the complaint will be closed. When making a request for a Panel Review, it is important that clients tell us what has been unfair, and how they would like their complaint to be resolved. On receipt of a request to escalate a complaint to Stage 2, a complaints panel will be convened within 21 days of receipt of the request.
If a complaint has been upheld at Stage 1, it will not be escalated to a Panel Review unless the client clearly informs us of why they are still unhappy and what further resolution they are seeking.
- 4.5.1 We will always try to work with client's s to resolve problems without unnecessary delay and it may be possible to resolve the complaint without the need for a Panel Review meeting. If a Panel Review meeting is deemed necessary, an independent panel of three board members will hear their complaint in person; one of the panel will normally be a resident board member.
In the event that the complainant does not attend the arranged meeting the Panel will consider the complaint in their absence.
The panel's role is to decide whether the complaint has been handled correctly and fairly and their decision is the final within the terms of CHISEL's internal complaints procedure. The panel will provide their decision in writing to the client and the Managing Director within 10 working days of the panel meeting.
- 4.6 **Outcomes** – at any stage the complaint may be upheld, partially upheld or not upheld and this should be clearly communicated in any outcome letter. At all stages the objective is to find a positive resolution, although there will be times

when the clients desired outcome is simply not possible or reasonable. Where actions are agreed as part of the resolution, the complaint will be closed only when the agreed actions are complete.

4.7 Independent Review

If a complaint is not resolved at the end of our internal complaint process the client can:

- Refer the matter to a Designated Person OR
- Wait 8 weeks and refer the matter directly to the Housing Ombudsman.

4.7.1 A Designated Person may be a local Councillor (excluding County or Parish Councillors) or a Member of Parliament. They can try to resolve your complaint or refer it to the Housing Ombudsman. A designated person does not have any powers specifically in relation to CHISEL but we will work with them positively to find an outcome that is fair and agreed by both parties. At this stage we may meet with the designated person without the client being present.

For more information about designated persons or the Ombudsman the visit the Ombudsman's website <http://www.housing-ombudsman.org.uk/> or telephone them on 0300 111 3000.

4.8 Compensation

We recognise that occasionally we may fail to meet acceptable standards of service which may result in loss, damage or inconvenience to our tenants and in these circumstances compensation may be appropriate. Compensation will be considered in accordance with CHISEL's Compensation Policy.

4.8.1 Compensation may be awarded at any stage of the complaint process if the complaint is upheld; our aim is to put the tenant back in the position they would have been if the failure in service delivery had not occurred. We will usually only consider the payment of compensation where we have failed to deliver our published standards of service or where we have been negligent. It is not necessary to make a complaint to make a claim for compensation.

4.8.2 Any offer of compensation should be made as a full and final settlement of the complaint and the tenant should be aware that their acceptance of the offer will be considered to be confirmation that the complaint has been resolved to their satisfaction.

4.9 Unreasonable Persistent and Abusive Complainers

There are a small minority of clients who persist unreasonably with their complaint or make complaints / demands to make life difficult for staff rather than genuinely resolve a problem. This may involve making serial complaints about different matters or continuing to raise the same or similar issues over and over again. Some clients may pursue their complaints in a way which can either impede the investigation of their complaint or have significant resource issues for CHISEL and impact on the ability of staff to provide a quality service to CHISEL's tenants as a whole.

We reserve the right to use our unreasonable behaviour policy, when a client's actions or behaviours are deemed to be unreasonable. We will always try to find a way to work with clients before reaching this stage, but very occasionally have to use this policy in order to ensure the safety and wellbeing of our staff and avoid waste of staff and board time. The following are examples of when this policy might be used in terms of complaints:

- The client is using threatening or offensive language or behaviour
- There is nothing further CHISEL can do to assist
- The complainant continues to raise the same or a closely related complaint even after the complaint process has been fully exhausted, e.g. the complaint has gone through all the stages of this policy previously in relation to this issue.
- The resources needed to deal effectively with the complaint are disproportionate to the benefit of the outcome sought.

4.10 Legal Action

At any stage the Managing Director or Board may take legal advice and consider the use of injunctions or other legal remedy, if it is assessed that a serial or persistent complainant is causing harassment or is considered to be a threat to staff.

5. Monitoring

- 5.1 Complaints are an opportunity to learn about what or how we need to improve our service. We therefore want to learn from every complaint and to capture and share the things that we learn so that everyone can improve.
- 5.2 In order to do this we will record and monitor every complaint including details such as what the complaint was about, how it was resolved, how quickly it was resolved and what we learnt. We will produce an annual summary of complaints, lessons learnt and service improvements made for both the Board and Operational Scrutiny Committee.
- 5.3 We will seek feedback from clients who have complained to find out about their experience of the process.
- 5.4 We will carry out regular complaint reviews in order to continuously look at how we can improve our handling of complaints.
- 5.5 Performance regarding complaint handling will be regularly reported to the Board as part of the quarterly performance monitoring reports.

6. Equality and Diversity

- 6.1 CHISEL respects and values the differences of our tenants, partners and staff. We will treat all clients fairly and with respect.
- 6.2 We will provide clients with any support they need throughout their complaint, this could include translating information or providing an interpreter if their first language is not English.
- 6.3 We will accept complaints from advocates or a representative acting on behalf of a tenant when the tenant has confirmed they would like that person to act on their behalf.
- 6.4 We will monitor complaints against our equal opportunities categories.

7 Consultation and Publicising the Policy

- 7.1 This policy has been consulted on through Operational Scrutiny Committee which is a tenant led committee.
- 7.2 This policy will be publicised to tenants through:
 - The Tenants Handbook
 - The website
 - The Newsletter
 - Tenants meetings



Unreasonable Behaviour Policy

1. The purpose of this policy

- To define the behaviours that are not acceptable and deemed as unreasonable to CHISEL, including behaviour by people making formal complaints.
- To ensure that the ability of staff to conduct business is not adversely affected by those few individuals who behave in an unreasonable manner.
- To ensure our staff have a safe working environment and are not exposed to unnecessary stress due to the unacceptable behaviour of others.
- To empower CHISEL's staff to deal confidently and effectively with unreasonable behaviour.

2. Who does this policy apply to?

This policy applies to all CHISEL tenants, members of their household, their visitors and members of the public and all those who deal with CHISEL.

3. What behaviour is unreasonable?

- a. We recognise that, when people contact CHISEL they may have reason to feel aggrieved or upset.
- b. We do not view assertive behaviour or putting forward your case in a persuasive manner as unreasonable.
- c. However, we will manage, under this policy, behaviour that is aggressive, rude or abusive, or which places unreasonable demands on our staff.
- d. Unreasonable behaviour is behaviour or language, whether face to face, by telephone, social media or written that may cause staff to feel intimidated, threatened or abused. Examples may include:
 - Threats
 - Verbal abuse
 - Racist and sexist language
 - Derogatory remarks
 - Offensive language
 - Rudeness
 - Making inflammatory statements
 - Raising unsubstantiated allegations
- e) Whilst we accept that those in contact with us may feel angry, it is not considered acceptable when that anger becomes aggression directed towards staff.

4. Unreasonable requests and communication

a) Requests may be considered unreasonable by the nature and scale of service expected. Examples may include:

- Requesting responses within unreasonable timescales
- Insisting on speaking with certain members of staff
- Adopting a "capture-all" approach by contacting many staff members and third parties

b) Communication may be considered unreasonable if, for example, individuals: Continually contact us while we are in the process of looking at a matter, e.g.

- Make a number of approaches about the same matter without raising new issues
- Refuse to accept a decision made where explanations for the decision have been given
- Continue to pursue complaints/issues which have no substance
- Continue to pursue complaints/issues which have already been investigated and determined
- Continue to raise unfounded or new complaints arising from the same set of facts

c) We recognise that our resources, including staff time, have to be used where they can be most effective. This might mean that we cannot respond to every issue in the way a person would like, if in doing so it would take up what CHISEL regards as being a disproportionate amount of time and resources.

5. How will we manage unreasonable behaviour?

a) CHISEL has a zero-tolerance position on violence and threats against its staff and this behaviour will always be reported to the police.

b) All members of staff have the right to terminate phone calls when clients are behaving unreasonably, aggressively or in an abusive manner. Similarly, all staff have the right to take steps to protect their own safety if they feel threatened through a face-to-face encounter with an aggressive tenant.

c) CHISEL will only restrict communication with individuals if we have advised of our intention to do so and have previously given the opportunity for the behaviour to be modified, but the same pattern of behaviour continues.

d) If we decide a restriction is appropriate, CHISEL will consider which of the options (see next section) best fits the circumstances. The level of restriction that we apply will be proportionate, taking into account the nature, extent and impact of the individual's behaviour on our ability to do our work.

e) We will be transparent and explain to you what restriction we are putting in place, our reasons for doing so, and how long the restriction will apply.

6. Options to restrict contact

a) If you continue to behave unreasonably after we have asked you to modify your behaviour, the options we will consider are:

- Restricting contact, whether via telephone, face to face, or email, to specified days and times.
- Terminating contact if an individual persistently raises issues which we have already responded to in full. We will politely explain that we are unable to comment further on the matter and will ask if there are any other issues to be raised. If no new issues are raised and the individual persists in raising issues which we have already addressed, we will advise so before ending contact. Where relevant a written warning will then be sent, with a view to limiting future communication to written communication only.
- Terminating telephone contact if an individual is aggressive, rude, abusive or offensive. We will politely ask the person to modify their behaviour, but if the behaviour continues we advise that the behaviour is unacceptable and end the call. The manager of the member of staff involved will intervene including where relevant, sending a written warning, with a view to limiting future communication to written only.
- Restricting the issues, we will correspond on.
- If we have already fully explained our reasons for a decision and the individual has exhausted the procedure to request a review of that decision, we will decline to respond to further correspondence which does not raise new issues. The correspondence will be read and filed but we will not acknowledge correspondence unless we are provided with significant new information or evidence relating to the matter.
- We will block emails if the number and length of emails sent causes difficulties for us to conduct our business
- We will not respond to correspondence which is abusive or offensive and we will block emails that are abusive or offensive.
- If an individual makes a large number of reports to us which prove to be unfounded, we may ask that in future any further allegations submitted are supported by an independent third party such as the Citizens Advice Bureau, a legal representative or an advocate, to ensure that in future our staff resources are spent in a proportionate way.
- Physical violence, verbal abuse, threats or harassment against our staff will not be tolerated and will be reported to the police, who may decide to prosecute.

Any one of the above options (or a combination of these) may be applied to an individual.

7. Unreasonable behaviour by someone making a formal complaint

a) CHISEL is committed to dealing with all complaints equitably, comprehensively, and in a timely manner.

- b) We will not normally limit the contact which complainants have with CHISEL; however, we expect that all our members of staff are treated respectfully by complainants and clients at all times. This applies to verbal, written or face-to-face contact between clients and staff.
- c) Unreasonable behaviour is explained in section 3 & 4 above and can be applied to complainants.
- d) CHISEL will take action to protect its staff from such behaviour. If a complainant or client behaves in a way that is unacceptable, unreasonably persistent or vexatious, we will follow this policy.
- e) Raising legitimate queries or criticisms of a complaints procedure as it progresses, for example if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious or an unreasonably persistent complainant.
- f) Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it once, or more than once, should not necessarily cause him or her to be labelled vexatious or unreasonably persistent.

8. Definitions

- a) We have adopted the Local Government Ombudsman's (LGO) definition of "*unreasonable complainant behaviour*" and "*unreasonable persistent complaints*".
- b) We define unreasonably persistent and vexatious complainants as those complainants who, because of the frequency or nature of their contacts with CHISEL, hinder our consideration of their or other people's complaints.
- c) Examples include the way or frequency that complainants raise their complaint with staff, or how complainants respond when informed of our decision about the complaint.
- d) Features of an unreasonably persistent and/or vexatious complainant include the following. This list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category.
 - i. Have insufficient or no grounds for their complaint and be making the complaint only to annoy (or for reasons that he or she does not admit or make obvious).
 - ii. Refuse to specify the grounds of a complaint despite offers of assistance.
 - iii. Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved.
 - iv. Refuse to accept that issues are not within the remit of the complaints policy and procedure despite having been provided with information about the scope of the policy and procedure e.g. subject to legal action or an insurance claim.
 - v. Refuse to accept that issues are not within the power of CHISEL to investigate, change or influence (examples could be a complaint about something that is the responsibility of another organisation).

- vi. Insist on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice, for example, insisting that there must not be any written record of the complaint.
- vii. Make what appear to be groundless complaints about the staff dealing with the complaints, and seek to have them dismissed or replaced.
- viii. Make an unreasonable number of contacts with us, by any means in relation to a specific complaint or complaints.
- ix. Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the complainant (an example of this could be a complainant or client who insists on immediate responses to numerous, frequent and/or complex letters, telephone calls or emails).
- x. Harass or verbally abuse or otherwise seek to intimidate staff dealing with their complaint by use of foul or inappropriate language or by the use of offensive and racist language.
- xi. Raise subsidiary or new issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process.
- xii. Introduce trivial or irrelevant new information whilst the complaint is being investigated and expect this to be taken into account and commented on.
- xiii. Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed.
- xiv. Electronically record meetings and conversations without the prior knowledge and consent of the other person involved.
- xv. Adopt an excessively 'scattergun' approach. E.g. by pursuing the same complaint or complaints with CHISEL at the same time as with a Member of Parliament, elected councillors and/or other external bodies, as a result of which CHISEL has to use multiple resources in order to deal with enquiries, when resources could be better used to investigate and respond to the original complaint.
- xvi. Continue to argue the outcome of the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given.
- xvii. Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has been concluded, and insist that the minor differences make these 'new' complaints which should be put through the full complaints procedure or persistently approaching the council through different routes about the same issue.

- xviii. Persist in seeking an outcome which we have explained is unrealistic for legal or policy (or other valid) reasons.
- xix. Complain about or challenge an issue based on a historic and irreversible decision or incident.
- Xx Persistently arguing the same point, asking us to change records, information or decisions when we have already explained our position.
- xxi. Combine some or all of these features or persisting in behaviour that has the intention or impact of causing harassment to staff

9. Vexatious complaints made by telephone

- a) A complaint to CHISEL does not have to be made in writing. If a complainant or client keeps telephoning either to discuss an existing complaint or to make a new complaint, and this is manifestly unjustified, inappropriate or an improper use of CHISEL's time and procedure, and is disruptive, it is reasonable to ask the individual to put their concerns in writing.
- b) Care must be taken before making a decision that communications will not be accepted by telephone that the complainant is able to communicate in writing as requested and has a contact address/email address with whom to correspond.
- c) If the complainant or client persists with unreasonable or unacceptable behaviour (as described above), it may be reasonable to tell the complainant that CHISEL will, for a set period, not accept telephone calls and will only deal with the complainant in writing.

10. Deciding the course of action to be taken

- a) It is important not to spend large amounts of time on vexatious complainants, but skill will be needed to try and avoid inflaming an already difficult situation. It may be worth spending some time defusing a situation, rather than taking a hard line and then spending even more time holding that line. The best way of handling the situation will be a matter of judgement and should in the first instance be considered by the Managing Director.
- b) If a decision is taken that the complaint is vexatious and will not be dealt with under CHISEL's complaints procedure, or will not be progressed to the next stage, this decision must be clearly communicated to the complainant and reasons given.

11. Imposing restrictions

- a) If the complaint is already being dealt with under the CHISEL's Complaints Procedure we will ensure that the complaint is being, or has been investigated properly according to the corporate complaints procedure.
- b) Managing Director will consult with the Chair of the Board prior to issuing a warning to the complainant. The MD will contact the complainant in writing (letter or email) to explain why this behaviour is causing concern, and ask the complainant/client to change this behaviour. The MD will explain the actions that CHISEL could take if the behaviour does not change.
- c) If the disruptive behaviour continues, the Housing Manager will issue a reminder letter to the complainant or client advising them that the way in which they will be allowed to contact CHISEL in future will be restricted.
- d) If CHISEL decides to impose a restriction, the MD will make this decision and inform the complainant/client in writing of what procedures have been put in place and for what period.
- e) Any restriction that is imposed on the complainant's / client's contact with CHISEL will be appropriate and proportionate and the complainant/client will be advised of the period of time the restriction will be in place for.
- f) In most cases restrictions will apply for between 3 and 6 months but in exceptional cases may be extended. In such cases the CHISEL will review the restrictions on a quarterly basis.
- g) Restrictions will be tailored to deal with the individual circumstances of the complainant or client and may include the following options:
 - Refusing to make contact with the complainant by telephone except through a third party e.g. solicitor/councillor/friend acting on their behalf.
 - Restricting the complainant from sending emails to individual and/or all CHISEL officers and insisting they only correspond by letter.
 - Corresponding with a named officer only and advising that correspondence sent to any other officers will not be responded to.
 - Banning the complainant from attending the CHISEL's offices or premises.
 - Requiring contact to take place with only one named staff member.
 - Restricting telephone calls to specified days / times / duration
 - Requiring any personal contact with the client to take place only in the presence of two officers.
- Letting the complainant or client know that we will not reply to or acknowledge any further contact from them on the specific topic of that

complaint (in this case, a designated member of staff should be identified who will read future correspondence).

- h) When the decision has been taken to apply this policy to a complainant or client the Managing Director will contact the complainant in writing (and/or as appropriate) to explain:
- Why we have taken the decision
 - What action we are taking
 - The duration of that action,
 - The review process of this decision

The MD will enclose a copy of this policy in the letter to the complainant.

- j) Where a complainant or client continues to behave in a way which is unacceptable, the MD in consultation with the Chair of the Board may decide to refuse all contact with the complainant or client.
- k) Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, we will consider other options, for example reporting the matter to the police or taking legal action. In such cases, Chisel reserves the right to take action without prior warning to the complainant or client.

12 New complaints from complainants who are treated as abusive, vexatious or persistent

- a) New complaints from people who have come under this policy will be treated on their merits. The MD will decide whether any restrictions which have been applied before are still appropriate and necessary in relation to the new complaint. We do not support a “blanket policy” of ignoring genuine service requests or complaints where they are founded.

13. Review

- a) The status of a complainant judged to be unreasonably persistent or vexatious will be reviewed by the MD after three months and at the end of every subsequent three months within the period during which the policy is to apply.

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