



RCH Group Policy: Complaints Policy 2026-29

Policy Owner	Customer Services Director
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Approval Body	Social Landlord Operations Committee
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This policy is available, on request, in different languages and in other formats such as large print, audio format and braille as required.

1. Scope

This is a Group policy and therefore applies to Staff, Board and Committee members of The RCH Group of companies. As at April 2026 The RCH Group consists of River Clyde Homes and its subsidiary, Home Fix Scotland Ltd.

2. Introduction

The purpose of this policy is to describe how River Clyde Homes (RCH) Group will handle complaints and the standards that customers and stakeholders can expect from us. RCH Group will promote quick resolution of complaints at the point of service delivery where possible, with detailed investigations reserved for more complex or serious complaints.

The RCH Group has a statutory duty under the Public Service Reform (Scotland) Act 2010 to comply with the Scottish Public Service Ombudsman (SPSO) Model Complaints Handling Procedure (MCHP) as amended from time-to-time. Compliance is monitored by the Scottish Housing Regulator (SHR) through the Scottish Social Housing Charter.

RCH Group are committed to learning from complaints and making improvements that will benefit our customers.

This policy should be read in conjunction with the following policies, legislation and documents:

- RCH Group Complaints Handling Procedure
- Unacceptable Behaviour Policy
- Customer Care Policy
- Data Protection Policy
- Anti-fraud, Bribery and Corruption Policy
- Whistleblowing Policy
- Redress and Compensation Policy
- Grievance and Dignity at Work Policy
- Code of Conduct for Staff
- Code of Governance
- Standing Order and Delegations
- Scottish Public Service Ombudsman Act 2002
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024
- Children and Young People (Scotland) Act 2014
- Equality Act 2010

3. Definitions

- **Complaint:** an expression of dissatisfaction by one or more customers or members of the public about RCH Group's action, or lack of action, or about the standard of service provided by or on behalf of RCH Group.
- **Complaints Handling Procedures:** RCH Group's detailed procedures for meeting the objectives set out in this Policy.
- **Frontline Resolution:** The first stage of the complaints process. For issues that are straightforward and simple that require little or no investigation.
- **Investigation:** The second stage of the complaints process. It is used for:
 - More complex complaints that are not suitable for frontline resolution
 - Complaints where frontline resolution has been tried but the customer is dissatisfied with our response.
- **Scottish Public Services Ombudsman:** An independent body that will conduct an external review of complaints if a customer is dissatisfied after exhausting RCH Group's complaints procedure

4. Policy Statement and Responsibilities

RCH Group aims to resolve complaints to the satisfaction of the customer, where we can reasonably do so. We encourage and welcome complaints from our customers and will use complaints to help us to:

- Address dissatisfaction expressed by customers
- Put right failures or omissions on our part
- Learn and take action to help improve our service delivery and performance

Who can make a complaint

Anyone who receives, requests or is affected by our services can make a complaint. This includes from members of the public who are not RCH customers. For the purposes of our policy and procedures, anyone who makes a complaint is termed 'customer'.

We will consider anonymous complaints if there is enough information to allow us to investigate. If we pursue an anonymous complaint we will record it on our system under 'anonymous' and complete necessary lessons learned reviewed.

We accept complaints from representatives of people affected by our services however may require a mandate if the complaint is in relation to private information.

How complaints can be made

We aim to make it as easy as possible for customers to make complaints and therefore offer a range of channels for complaints to be made as follows:

- In writing to our office
- Via email to our Contact inbox
- Face-to-face at our offices or at a staff visit
- By telephone to our Contact Centre or any of our staff
- Via our Customer Portal or website
- Via webchat with our Customer Experience Team

We do not accept complaints raised on social media platforms however where we are notified a customer wishes to make a complaint in this way we support them to make a complaint through our accepted routes.

Complaints must be made within 6 months of customers first becoming aware of the issues unless there are special circumstances for considering complaints beyond this time.

Complaints about contracted services

Where we use a contractor to deliver a service on our behalf, we recognise that we remain responsible and accountable for ensuring that the services provided meet RCH Group standards.

We will support customers to complain directly to contractors where appropriate by providing contact details.

What type of complaints we will accept

The RCH Group Complaints Policy can be used to express dissatisfaction with most aspects of RCH Group's service delivery, such as:

- Failure or refusal to provide a service
- Inadequate quality or standard of service, or an unreasonable delay in providing a service
- Dissatisfaction with a policy or the implementation of the policy principles

- Disagreement with a decision we have made (unless a separate appeals procedure is available)
- Unacceptable behaviour by a staff or Board member or a contractor
- Failure to follow RCH Group's own Policies or Procedures
- Failure to respond to enquiries and requests in an appropriate timescale
- Failure to provide information, or providing information and advice that is unreliable or incorrect
- Unfairness, bias or prejudice in service delivery
- Significant performance failures as defined by the Scottish Housing Regulator

Some issues will not be covered by the Complaints Policy and will be redirected to the most appropriate process. These include the following:

- Challenging a housing decision where there is another appeal route available
- Complaints against other tenants
- A routine first-time request for a service, or a first-time interaction that successfully addresses concerns
- A query or dispute regarding a bill or invoice unless the query or dispute has not been resolved and the customer wishes to pursue a complaint
- A communication issue being reported for the first time
- A request for compensation only
- An issue that is in court or that has already been heard by a court or tribunal
- A request to reopen a previously concluded complaint, or to have a complaint reconsidered after the final decision has been made.

RCH Group's Complaints Handling Procedure sets out more information on overlapping policies and procedures.

Complaints Process

Generally, first complaints will be logged at Stage 1 of the complaints process and where a customer remains unsatisfied following a response, a stage 2 complaint can be logged. However, if the complaint requires a full investigation ie if it is complex, serious or high-risk then it can be immediately escalated to Stage 2.

How we handle our complaints at each stage can be found below:

Stage 1 Complaint

- For issues that are straightforward and simple requiring little to no investigation
- 'on the spot' apology or explanation or other action to put right where possible
- Otherwise, answered within 5 working days
- Response to be given face-to-face or over the telephone (unless customer has declined) and followed up in writing (letter or email)
- Response will tell customer how to escalate complaint to stage 2

Stage 2 Complaint

- Where the customer is not satisfied with the stage 1 response they can request an escalation to stage 2
- Or complaint can be immediately escalated to stage 2 where it is complex, serious or high risk and requires investigation
- Complaint will be acknowledged in writing (letter or email) within 3 working days
- Customer will be contacted to discuss the complaint and expected outcome in more detail
- Response to be issued face-to-face or via telephone (unless customer has declined) and followed-up in writing (letter or email) within 20 working days
- Extensions may be agreed with customer (see below section)

Extensions to timescales

In exceptional circumstances, a short extension of time may be necessary due to unforeseen circumstances. Extensions must be agreed with the customer with the reasons explained in full. Stage 1 complaints that require further time to investigate should be considered for escalation to stage 2, unless the complaint could normally be handled within 5 working days but is not possible due to, for example, absence of a key staff member.

Extensions should not exceed 5 working days.

Complaint Resolution

When resolving complaints, a decision will be made on the outcome of the complaint as follows:

- Upheld: agreement that there has been a service delivery failure which should be accompanied by an apology
- Partially upheld: agreement that some elements of the complaint have included service delivery failure but not all
- Not upheld: RCH do not believe there have been service delivery failures or have been able to prove why actions were taken

- Resolved: both the customer and RCH Group agree on what action will be taken to resolve the complaint without making a decision on whether the complaint is upheld or not

All complaint responses will explicitly state the outcome in the written response. If the complaint contains multiple issues, a decision will be made on each issue where these differ.

Redress and Compensation

RCH Group will consider what form of redress is appropriate, taking into account the circumstances of the complaint.

The types of redress that can be considered are set out in RCH Group's Redress and Compensation Policy and may include:

- An apology
- Follow-up action to remedy the problem that led to the complaint
- An explanation of why the issue occurred and what will be done to stop it happening again
- A goodwill gesture such as a small gift or gift voucher
- Correction of information held on our systems
- Financial compensation as permitted by the appropriate policy

Claims for compensation are considered separately from complaints. RCH Group may make discretionary payments following capital or void works or where a customer has suffered an element of inconvenience, distress or pain and suffering.

We may also deal with some types of claims for damages or loss under RCH Group's insurance policies.

Consideration of complaints should not be used as a reason for delaying statutory compensation. For example, payments under the Right to Repair scheme, the Right to Compensation for Improvements, and Home Loss and Disturbance Payments.

Child Friendly Complaints

RCH Group are committed to ensuring that all complaints are handled in a manner that respects and promotes children's rights under the United Nations Convention on the Rights of the Child (the UNCRC). This includes where complaints are made directly by a child or made by an adult on behalf of a child or about something that affects a child.

We will follow best practice guidance from SPSO in these situations. The principles and guidance help us handle complaints in a way that is friendly for children and follows the United Nations rules.

When making the complaints process child friendly, we must:

- Let children and young people up to 18 years old share their views in a way that they feel comfortable with
- Keep a good record of the complaints process and the evidence

- Give feedback to the child or young person in a way that makes sense to them

This is covered in more detail within our Complaints Handling Guidance.

Expected Behaviours

We expect all staff to behave in a professional manner and treat customers with courtesy, respect and dignity throughout the complaints process. Equally, we ask customers who are bringing a complaint to us to treat our staff in the same manner.

We recognise that customers may be distressed when they get to the point of complaint, however RCH Group will not tolerate aggressive or abusive behaviour towards our staff. We will also not accept conduct that results in unreasonable levels of contact that adversely affect our service to other customers.

RCH Group may consider restricting contact with customer. This will be in line with our Unacceptable Behaviour Policy.

Confidentiality and Data Protection

RCH Group will treat all complaints received as confidential. Information sharing about the complaint and the person making the complaint will be kept to a minimum and will only be what is necessary to enable proper investigation and application of our complaint procedure.

Where a customer, or person making the complaint, has expressed a wish that we do not discuss the complaint with a named individual, we will respect this. However, where this impacts on our ability to fully investigate and resolve the matters raised, we will discuss this impact with the customer.

Our response to complaints will generally not disclose personal information about other individuals, such as other customers or RCH Group employees, unless it is necessary and reasonable in the circumstances. We will advise customers whether a complaint they have made has been upheld or not but will not provide specific details beyond this about our employees or customers.

Complaints about RCH Group staff and Committee and Board members

Line managers will deal with any complaints about members of staff in accordance with the relevant terms and conditions of employment and relevant HR policies. When serious complaints are raised against senior staff or committee and board members, an investigation will be conducted by an individual who is independent of the situation and of a senior level. RCH Group will also follow all guidance from the Scottish Housing Regulator.

RCH Group staff members may raise concerns using RCH Group's Whistleblowing Policy and grievance procedures.

Events notifiable to the Scottish Housing Regulator

There are situations where complaints may result in a notifiable event to the Scottish Housing Regulator (SHR). This includes situations such as:

- A serious complaint against the Chief Executive of RCH Group
- Escalations to the SPSO or HPC that are upheld against RCH

Notifiable Events should be reported immediately in the first instance to the Governance team who will ensure the Notifiable Events Policy is followed. More guidance can be found in the SHR Notifiable Events Guidance or by contacting the Governance Team.

Performance Management and Learning from Complaints

RCH Group will maintain a structured system for recording and reporting on complaints. We will use the information gathered to measure performance, identify trends and contribute to continuous improvement in service delivery.

Regular performance updates will be provided to both RCH Group's Executive Leadership Team, Senior Leadership Team and Social Landlord Operations Committee. This will include a review of escalations made to the Scottish Public Services Ombudsman (SPSO) or the Housing Property Chamber (HPC).

Heads of Service will be responsible for the following in their business areas:

- Maintaining oversight of complaints handling in their business area
- Ensuring that lessons learned from complaints are communicated to all staff in customer facing roles
- Implementing service improvements that can be achieved within existing policies and resources
- Ensuring that the Customer Experience Team receives all information required to maintain RCH Group's complaints recording systems

Publicising the Complaints Policy and Performance

RCH Group will actively publicise the Complaints Policy and procedures to our customers using a range of tools such as newsletters, annual reports and our website. We will also use these channels to communicate our performance in complaints handling.

We will provide information and assistance to any customer seeking help with making a complaint. We may also signpost customers to other support services such as advocacy services.

Roles and Responsibilities

The Board	• Approval of Complaints Policy and formal adoption of Complaints Handling Procedure
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	• Monitoring the number and type of complaints, along with underlying causes and improvement actions (Social Landlord Operation's Committee) • The Board has responsibility which promotes a culture in that: ○ Complaints are welcomed ○ Staff at all levels can help to resolve complaints • RCH Group learns from complaints
Executive Leadership Team	• Monitor the operation of the Policy across the RCH Group as a whole • Is accountable to the Board for policy implementation
Senior Managers	• Ensure implementation of the complaints policy and procedures in their business area • Review complaints reasons and outcomes regularly with teams and identify opportunities for learning and service improvement • Manage complaints that are high risk or high profile • Establish investigation and response responsibilities for complaints covering more than one service area
Customer Experience Team and frontline officers	• Identify complaints and seek to resolve them on the spot where possible
Customer Experience Team	• Manage the complaints process including logging complaints, allocating to the appropriate team and sending responses

5. Equality, Diversity and Inclusion

RCH Group are committed to ensuring that our complaint policy is easily accessible to all customers ensuring that they are aware of their right to complain. This policy will be published in our website and easy-to-read complaint guides available in our office and publicised on our website. We offer a range of methods to complain and our staff will support customers to make complaints where they require this. Our policy and easy-to-read guide is available in various formats on request.

An equalities impact assessment has been undertaken.

The RCH Group will apply this policy fairly and consistently. In implementing this policy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion or belief, gender, disability, age, sexual orientation, or any other grounds. Our commitment to equality and fairness will

apply irrespective of factors such as age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

6. Review

This policy will be reviewed in its entirety every 3 years, unless an earlier review is required due to changes in legal, regulatory or best practice requirements, or because monitoring and reporting reveals that a change in policy is required sooner.

Appendix 1

Complaints Handling Procedure Flowchart

