Housing Services Complaints Policy 2026

Document Version Control

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Date Approved				
Date Published				
Maintained By	Helen Oakes			
Review Date				
Version Number	Modified By	Modifications Made	Date Modified	Status
V1	Helen Oakes	Draft	17/06/2021	Draft
V2		Additions	18/06/2021	Draft
V3	Jon Elger	Track changes & additions	22/06/2021	Draft
V4	Helen Oakes	Review track changes	22/06/2021	Draft
V5	Helen Oakes	Modification – tenant panel	14/07/2021	Draft
V6	Helen Oakes	Modification – removal of tenant panel & finalise for CMT	23/07/2021	Draft
V7	Helen Oakes	Amendment to include comments and compliments further to CMT approval	28/07/2021	Final
V8	Helen Oakes	Review and revision as required by Regulator	08/11/2022	Revision
V9	Jo Frost	Review and revision as required by Regulator	27/06/2024	Revision
V10	Jo Frost	Review and revision as required by Regulator	14/04/2025	Revision
V11	Jo Frost	Review and revision as required by Regulator	10/04/2026	Revision
V12	Jo Frost	Review and revision as recommended by Regulator	23/07/2026	Revision
V13	Jo Frost	Review and further revision as recommended by Regulator	11/09/2026	Revision

1. **Introduction**

1.1 Redditch Borough Council Housing Services wants to make sure our residents and service users are satisfied with the services they receive.

1.2 We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them.

1.3 This Policy applies only to tenants, residents and users of housing services, and their representatives, and clearly sets out how complaints and feedback will be consistently dealt with, ensuring that residents and service users voices are heard and wherever possible and meaningfully engaged when changes or improvements are identified as required to our approach and processes.

2. **Aims and Objectives**

2.1 That the Housing Service:

- Affords clarity and consistency to residents, service users and members.
- Manages complaints and feedback, and in accordance with legislation, obligations, and consolidated best practice.
- Empowers staff to take responsibility and handle customer complaints effectively and minimise failure demand.
- Captures feedback and uses it to understand our residents and service users and as insight, to drive continuous service improvement.
- Makes best use of resources and delivers value for money to residents and service users.

3. **Our Principles**

3.1 Housing Services take all feedback and comments seriously and we encourage all colleagues to resolve issues by meaningfully engaging with our residents, service users and their representatives personally wherever possible, and to take a collaborative and co-operative approach to resolving complaints, working with colleagues across teams and departments where necessary.

3.2 We will:

- Put the resident, service user or their representative at the heart of the process, engaging and handling any complaint with sensitivity, dignity and

respect and endeavoring to both understand and respond clearly and appropriately to the circumstances.

- Keep members, residents and service users informed about the complaint's progress; do what we say we will, when we say we will do it and provide an outcome within agreed timeframes.
- Apologise and offer suitable redress if we have made a mistake, or when something has gone wrong, we will put it right as soon as possible.
- Make sure our response addresses all elements of the complaint and provides explanations for any decisions made or actions taken.
- Record all complaint information and use it in a positive way to prevent similar occurrences in the future to ensure that we can learn and improve.

4. **What is a complaint?**

4.1 A **complaint** is any expression of dissatisfaction, however made, about the standard of service, actions, or lack of action, by the Housing Service, its own staff, or those acting on its behalf (such as a partner or contractor), affecting an individual resident or group of residents and that requires a response.

4.2 A complaint could be in relation to any of the following:

- There has been a significant delay in providing a service.
- We have made a mistake in the way we provided a service.
- We have failed to deliver a service: this could relate to the quality, standard or service level.
- We have not listened properly.
- Our processes or policies have not been followed.
- Our legal or regulatory obligations have not been met.
- We have not delivered against a commitment or promise.
- Our staff have been rude, inappropriate, or unprofessional.

4.3 The word 'complaint' does not have to be used for it to be treated as such. Residents that express dissatisfaction will be given a choice to make a complaint.

4.4 Our definition of a service request is:

- A request from a resident requiring action to be taken to put something right, for example a repair being reported that has not been previously reported. Service requests are not complaints, but will be recorded, monitored and reviewed regularly.

4.5 A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. RBC must not stop their efforts to address the service request if the resident complains.

5. **Who can complain?**

5.1 A resident or service user who has received a service provided by, or on behalf

of the Housing Service, can raise a complaint. A complaint can also be raised by someone who is representing a resident or service user, with the resident or service users' consent, including, but not limited to Elected Members. (*1)

6. **What is not considered a complaint?**

6.1 Where a resident or service user has expressed their dissatisfaction with the Housing Service, but it is not appropriate to follow this Policy. In the circumstances where an alternative procedure is more appropriate the resident or service user will be advised of this at the earliest possible opportunity and will be provided with this information. Such occasions are:

- Residents or people affected by a Housing Service who are not our Tenants or Leaseholders should instead follow the Corporate Complaints Policy.
- Survey feedback and requests for service need not be treated as complaints, however, where possible, the Council will make the respondent aware of how they can pursue their dissatisfaction as a complaint if they wish to.
- Appeals processes against a decision made - for some services there are alternative statutory appeals, tribunal processes or other policies in place which must be used rather than this Policy. For example, the Landlord's decision to end an Introductory Tenancy.
- Where dissatisfaction with a decision or judgment is expressed in the absence of any fault or failure on the part of the Housing Service, such as those listed in section 4.
- Complaints about Councillors and Members of Parliament (MP's)
- Complaints made more than one year after the resident or service user became aware of the issue (unless there are exceptional circumstances), due to the passage of time.
- Complaints that have already been investigated and have exhausted our two-stage complaint process.
- Staff personnel issues, such as discipline, grievance, recruitment, and selection.
- Allegations of fraud, theft, or corruption by a member of staff.

6.2 We will not take a blanket approach when considering complaints and each will be reviewed on an individual basis.

6.3 If the Council decides not to accept a complaint, a detailed explanation will be provided to the complainant or their representative, setting out the reasons why the matter is not suitable for the complaints process and the right process then to take the matter to the Ombudsman.

(*1) If the resident or service user is complaining or enquiring through a councillor or MP then consent is implied, however regard MUST be given to releasing information pertaining to third parties to any response to any enquiry or complaint, for example another resident or service user.

7. **How we will handle complaints from elected members**

7.1 Members are representatives of residents and service users; therefore, the complaint must be logged with the Housing Complaints Team, and treated in the same way as a complaint, and in accordance with section 8 & 9.

8. How we will handle complaints from residents, service users & their representatives.

8.1 Housing Services will apply a two-stage complaints process.

8.2 Any complaint relating to Housing Services, howsoever received, will be acknowledged, defined and logged within five working days of the complaint being received. The acknowledgment will set out our understanding of the issues and any outcome/s the resident or service user is seeking. We will also make clear any aspects of the complaint we are not responsible for.

If any aspect of the complaint is unclear, RBC will ask the resident for clarification.

8.3 The Housing Service will not unreasonably refuse to accept a complaint unless the criteria in Section 6 and 15 are met, and the reasons why it is not an acceptable complaint will be explained fully, in writing, within five working days. The communication will also outline the process of recourse to the Housing Ombudsman at this stage, should the resident, service user or their representative wish to challenge the decision.

8.4 Where it is identified that the resident or service user has a legal entitlement to redress, then a resolution should still be offered where possible, however, legal advice should be sought about how any offer of resolution should be worded.

8.5. RBC will issue a full response within 10 working days from the complaint being acknowledged. In exceptional cases, if we anticipate that the complaint will take longer to resolve, this will be explained to the resident with a clear timeframe set out for the resolution of the complaint which will not exceed a further 10 working days, without good reason. If any further extensions are required, we will agree with resident regular intervals to update them on the progress of the complaint. Such explanation will also include the contact details of the Housing Ombudsman.

8.6 If we asked the resident for clarification and there has been no response, then the complaint response will be provided based on the information we hold. This will be reassessed if the resident makes contact after the response is provided and had reasonable grounds for not responding.

8.7 If the resident, service user or their representative remains dissatisfied with any outcome, the complaint will be progressed to Stage 2. Requests for escalation to Stage 2 must be provided to the Housing Complaints Team within twenty working days of the Stage 1 response being issued. If there are exceptional circumstances why this request was not made within this timeframe this may be extended. Residents are not required to explain their reasons for requesting a Stage 2 consideration. The Housing Complaints Team will make reasonable efforts to understand why a resident remains unhappy. Stage 2 complaints will not be reviewed by the same Officer as

Stage 1.

8.8 If we have accepted the complaint and responded at Stage 1, we would only refuse to escalate the complaint to Stage 2 for either of the following reasons:

- If the complaint should not be looked at further because it could compromise legal proceedings to do so.
- If it has now become clear that this complaint has previously exhausted the complaints process.
- We have considered the time that the request for escalation has been brought to our attention and are satisfied that it is out of timescale as referenced in 8.7.

Where it is decided the complaint will not be escalated, the reasons why will be explained to the complainant fully, within five working days. The communication will also outline the process of recourse to the Housing Ombudsman at this stage, should they wish to challenge the decision.

8.9 Where an escalation has been accepted at Stage 2, it will be acknowledged, defined and logged within five working days of the escalation being received. The acknowledgment will set out our understanding of the outstanding issues and any outcome/s the resident or service user is seeking. We will also make clear any aspects of the escalation we are not responsible for.

8.10 RBC will issue a final response within 20 working days from the complaint being acknowledged. In exceptional cases, if we anticipate that the complaint will take longer to resolve, this will be explained to the resident with a clear timeframe set out for the resolution of the complaint which will not exceed a further 20 working days, without good reason. If any further extensions are required, we will agree with resident regular intervals to update them on the progress of the complaint. Such explanation will also include the contact details of the Housing Ombudsman.

8.11 If we asked the resident for clarification and there has been no response, then the complaint response will be provided based on the information we hold. This will be reassessed if the resident makes contact after the response is provided and had reasonable grounds for not responding.

8.12 All complaint responses must be sent to the resident, service user or their representative when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned accordingly, with regular updates provided to the resident, service user or their representative.

8.13 Consider incorporating additional complaints made during Stage 1 if the response has yet to be issued. Where the response has been issued, or investigation would unreasonably delay the response, then a new complaint should be opened.

8.14 Where the problem is a recurring issue, any older reports should also be considered as part of the background work to the complaint, if this will

help to resolve the issue for the resident.

8.15 The complaint handler will always:

- Approach all complaints acting independently, sensitively and with an open mind free of bias, prejudice, or conflict of interest, taking account of any needs and vulnerabilities.
- Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.
- Have access to any staff at all levels to facilitate a quick resolution and have the authority and autonomy to act to resolve any dispute quickly and fairly.
- Give residents and service users the opportunity to set out their position and / or have a representative deal with their complaint on their behalf, and to be accompanied / represented at any meeting with the complaint handler, where it is reasonable to do so.
- Consider all information and evidence carefully.
- Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter, including the identification of individual staff members or contractors.
- Give any complainant, Officer or Contractor who is subject to the complaint, a chance to set out their position and comment on any adverse findings before a final decision is made.
- Respond in clear plain language, addressing all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.

9. **Timeframes for Responding to Complaints**

Logging and acknowledgement (All)	Five working days
Stage 1 response (Complaint not accepted)	Five working days
Stage 1 response (Complaint accepted)	Ten working days from acknowledgement of complaint
Request to escalate to Stage 2	Must be received within twenty working days following the Stage 1 response
Stage 2 response (Complaint not accepted)	Five working days
Stage 2 response	Twenty working days from acknowledgement of Stage 2 complaint

10. **Appropriate Remedies for Complaints**

10.1 Where something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or intended to be taken to put things right, and by when. Complaints can be resolved in several ways. We

intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result. Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.

10.2 Such remedies may include:

- Acknowledging where things have gone wrong.
- Providing an explanation, assistance, or reasons.
- Apologising.
- Acting promptly if there has been delay.
- Reconsidering or changing a decision.
- Amending a record.
- Providing a financial remedy (See Appendix 1 – Compensation Matrix)
- Changing Policies, Procedures and working practices, with inclusion of a resident panel and within the confines of legislation and regulation.

10.3 The factors to consider in formulating a remedy may include, but are not limited to:

- Length of time that a situation has been ongoing.
- Frequency with which something has occurred.
- Severity of any service failure or omission.
- Number of different failures.
- Cumulative impact on the resident.
- Any circumstances or vulnerabilities of the resident.

10.4 Financial compensation may also be considered with regard to payments for quantifiable losses incurred, time lost, distress and inconvenience caused to the complainant. Please refer to the Compensation Matrix in Appendix 1.

11. **Suspending Complaints**

11.1 Investigations may be suspended if there are concurrent investigations for:

- Adult and child safeguarding.
- Court and/or Tribunal proceedings.
- Grievance & Disciplinary.
- Criminal proceedings.

11.2 Once concluded, any outstanding issues in relation to the complaint can be considered if it is deemed appropriate to do so. A Tier 4 Manager, or above, will make the decision to suspend and/or to continue a complaint.

12. **Withdrawing Complaints**

12.1 A complaint may be withdrawn verbally or in writing at any time by the resident or service user, or their representative. When this occurs, the Officer or Manager handling the complaint will write a response, confirming the withdrawal and advising them that if their intention has been misunderstood, to let us know as soon as possible. We reserve the right to withdraw 'complaints' that are logged on internal systems where they do not fall within the definition of a complaint under this policy.

14. **Unreasonable behaviour & vexatious complaints**

14.1 Residents or service users who pursue complaints against Housing Services in an unreasonable manner, or where we deem them to be persistent or vexatious, will be dealt with appropriately, ensuring that other residents, service users or Housing Services staff are not adversely affected. Examples are, but are not limited to:

- Not accepting that certain issues are not within the scope of the complaint procedure.
- Making multiple and sustained contacts with the Housing Services team through various communication channels about the same matter.
- Making multiple and sustained contacts through Members.
- The use of a 'scatter gun' approach in pursuing complaints with multiple members of the organisation and/or external organisations, despite being informed it is not necessary to do so and so makes or has made excessive demands on the time and resources of staff.
- Sends repeated, persistent, or abusive communications in connection with the same complaint.
- Makes or publishes derogatory statements or remarks about staff members or the Housing Service, or otherwise harasses, abuses, threatens, or intimidates staff on repeated occasions despite being formally advised this is unacceptable.
- Makes unjustified and unsubstantiated complaints about staff dealing with the complaint.
- Changes the basis of the complaint, or introduces knowingly false, trivial, or irrelevant information as the investigation proceeds, which they expect to be considered and commented on.
- Refuses to accept a decision made on a complaint, repeatedly arguing points with no new evidence or insufficient evidence and persists in pursuing a complaint where the Complaints Policy has been fully and properly implemented and exhausted.
- Is known to have recorded meetings or face to face/telephone conversations without the prior knowledge and consent of other parties involved.

14.2 It is not possible to devise a single strategy to deal with complaints that are pursued unreasonably, or which are persistent or vexatious, as each case must be looked at on its own merits. If a Tier 4 manager, or in their absence an Assistant Director, considers the behaviour is unreasonable, the following procedure will be followed:

- We will inform the resident or service user through an appropriate medium as to why we feel their behaviours or actions are unacceptable.
- We will give opportunity to change their behaviours within a reasonable timescale before taking any further action.
- Should the behaviours persist, evidence will be gathered and presented to a Tier 4 Manager or Assistant Director.
- The Tier 4 Manager or Assistant Director will review the evidence and then decide on any restrictions to be applied and how long these should last.
- This decision will be subject to review every 12 months.
- Restrictions will always be reasonable, proportionate, and balanced, based on the nature of the issues established and will not aim to stop the resident or service user from accessing appropriate housing services.

14.3 The Housing Service can apply restrictions in ways the resident or service user can access its services, which may include one or more of the following:

- The Council will take no further action on their complaint.
- Their use of the complaints process will be limited to a single point of contact or one form of contact only.
- They may be placed on the Staff Safety Database if it is deemed there is a risk to staff, and in accordance with the Council's Staff Safety Database procedures.
- The Housing Service will not respond to any further contact unless legally obligated to do so.
- Their right to enter Council premises will be restricted or removed.
- Legal action may be taken, including injunctions or Court Orders to control their behaviour and communications.

14.4 The resident or service user will be notified of any restrictions applied to them in writing within five working days of the decision. This will confirm:

- Why the decision has been taken
- What it means for their contacts with the Council;
- How long the restrictions will last
- What the complainant can do to have the decision reviewed;
- How future correspondence will be dealt with.

This information will also be noted on the residents' record whilst restrictions are in place.

15. **How to complain**

15.1 Residents and service users can complain in person, over the telephone, in writing, by email and digitally.

15.2 To complain by telephone residents, service users and their representatives should telephone 01527 64252 during office hours and state to the Customer

Service Team they are unhappy with a situation they wish to have rectified or wish to make a complaint about the service that they have or have not received.

15.3 To complain by email, residents, service users, or their representatives should address their complaint to housingcomplaints@redditchbc.gov.uk

15.4 To complain in writing correspondence should be sent to:

Housing Complaints
Town Hall
Walter Stranz Square
Redditch
B98 8AH

15.5 To complain digitally residents and service users and their representatives should use this link to our website: https://www.redditchbc.gov.uk/residents/my-home/housing-complaints-and-compliments/i-am-a-council-tenant/housing-feedback/

15.6 Residents, service users and their representatives can complain in person at any of our public offices.

15.7 The Housing Ombudsman can be contacted at any stage for advice and guidance.

Website: Housing Ombudsman Service
online complaint form.
Phone: 0300 111 3000
Address: Housing Ombudsman Service
PO Box 1484
Unit D Preston
PR2 0ET

16. **Equality**

16.1 The Housing Service will make this Policy available in a clear and accessible format for all residents and service users. The Policy will be available on the Council's website and a copy in all our public offices.

16.2 The Housing Service will comply with the Equality Act 2010 and may adapt normal policies, procedures, or processes to accommodate an individual's needs in line with the Act and ensure that relevant officers are appropriately trained to deal with such requests.

17. **Monitoring and Review**

17.1 Systems will be in place to ensure full compliance with this Policy.

17.2 At the conclusion of the complaint, the resident or service user will be contacted to undertake quality and assurance checks. While satisfaction will be measured, it is acknowledged that some outcomes might never be satisfactory for the resident or service user, and this will be a consideration in measuring and reporting on satisfaction data.

17.3 Complaint for the Housing Services will be shared and reviewed with the Housing Management Team, with the intention of taking collective responsibility for shortfalls identified through complaints and maintaining professional standards in dealing with complaints. An update on complaints is provided in the Housing Improvement Plan to the Housing Improvement Board and the Housing Strategic Oversight Board and reviewed independently with the Portfolio Holder for Housing.

17.4 Housing Services will report back on wider learning and improvements resulting from complaints in the Annual Report, more regularly through service wide web pages to residents, service users and elected members.

17.5 Where the monitoring and review process identifies a need to change or amend policies, procedures and working practices, within the bounds of legislation and regulation, then the Housing Service will make every effort to engage residents and service users in that process.

17.6 This Policy will be reviewed annually, at the same time as the requirement for the Annual Self- Assessment, and at any time there is a significant restructure, a change in procedures or a change in legislation. The outcomes must be reported to members, published on the website and in the Annual Report.

17.7 Indicators of success will include positive feedback from users of the Policy, a continuing trend of learning and improvement within the Housing Service, empowered and efficient staff and resident and service user satisfaction.

18. **Legislation and Guidance**

- The Housing Ombudsman Complaint Handling Code
- The Equality Act 2010
- The Housing Act 1996 (as amended)

19. **Related Policies and Procedures**

Appendix 1 – The Compensation Matrix