



COMPLAINT HANDLING POLICY

Lead Manager:	Customer Relationships Manager
Responsible Senior Manager:	Head of Corporate Services
Approved By:	SMT and Customer Committee
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1. Introduction

- 1.1 Shropshire Towns and Rural Housing (STAR) aims to deliver great customer experience and have neighbourhoods where customers are proud to live. We are also committed to providing a high-quality customer feedback service, listening to our customers and dealing with complaints in a fair and impartial way.
- 1.2 By proactively listening to our customers and dealing with complaints about our services, we are able to make improvements based on the feedback you give us. It also allows us to manage, respond to and learn from complaints.
- 1.3 The policy sets out clear processes and timeframes to help customers understand how we will investigate their complaint and how we will respond. We have developed this policy in line with dispute resolution principles recommended by the Housing Ombudsman, which are to:
- **Be fair – treat people fairly and follow a fair process**
 - **Put things right**
 - **Learn from outcomes**
- 1.4 In a small number of cases where complainants, either individually or on behalf of someone they represent, pursue their complaint in an unreasonable and persistent way, where this is considered to be unacceptable or habitual.
- 1.5 The complaints policy aims to set out a clear and fair process for the handling of complaints from all our customers relating to the services we provide.
- 1.6 The policy contributes to the overall aim of dealing with all complainants in a transparent, consistent, fair, and reasonable way.

2. Scope

- 2.1 This policy relates to all parts of the organisation including services which may not actually deal directly with customers or third parties. The policy also applies to other organisations that provide services to our customers under contract or in partnership with us.

- 2.2 A customer can make a complaint if they are the person who is affected by the action, or a customer can give consent for somebody else to act on their behalf.
- 2.3 We will accept complaints from a local councillor or MP. They can intervene on a customers' behalf to help to resolve a complaint.

3. Definitions

3.1 Complaint

STAR Housing has adopted the Housing Ombudsman Service's definition of a complaint:

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.

3.2 Comment

A comment is customer feedback in relation to (for example) the availability, delivery or nature of a service, and could include how that service might be improved.

3.3 Compliment

A compliment is positive feedback about the service, and could be about the way a service was delivered or the outcome that was achieved.

3.4 Complaints Officer

STAR Housing's Complaints Officer is the Customer Relationships Manager. Their role is to ensure complaints are recorded and responded to by the most appropriate person in line with this policy.

3.4 Service Requests

A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly. Customers must be given the option to raise their service request as a complaint.

4. Complaints not dealt with under this policy

4.1 There are certain types of complaints that are not covered by this policy and will not be considered or escalated as a complaint. They are:

- Where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- The issue giving rise to the complaint occurred over 12 months ago. Although consideration will be given to complaints made outside this time limit where there are good reasons to do so.
- The complaint has previously been investigated under the complaints policy.

- Where a complainant is persistent, vexatious or being pursued in an unreasonable manner– see below
- First reports of Anti-Social Behaviour (ASB) are not dealt with under this policy. However, complaints about how we handle ASB will be accepted.
- Claims for personal injury; these will be addressed via Shropshire Council's Insurance Team
- We will not take complaints for areas that we are not responsible for i.e. services provided by Shropshire Council including Council Tax, bin collections, statutory services etc. we will however signpost you where possible.
- The complaints process will not be used to address service charge appeals or challenges for the charges that we make, however, we will accept complaints about how we handle these process.

4.2 Consideration will be given to each individual case. The Customer Relationships Manager, or member of the Senior Management Team in their absence, will approval complaint refusals. An explanation will be provided to the customer, setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman.

5. Making a complaint

5.1 As outlined above, a complaint is an expression of dissatisfaction, the customer does not have to use the word “complaint” for it to be treated as such.

5.2 The Housing Ombudsman Service encourages the early and local resolution of disputes between landlords and customers. We recognise that customers may not wish to follow a formal process and just want an issue resolved. These issues can be dealt with as a service request. However, we will always give our customers the option to access the complaints process.

5.3 This policy aligns with the Complaint Handling Code of the Housing Ombudsman Service, specifically designed for individuals involved in a Tenant/Landlord relationship. Although we are open to receiving complaints from the general public regarding our services, it is important to note that our responses will not adhere to this policy and will not be quantified.

5.4 A complaint will be raised when a customer expresses dissatisfaction with our response to their service request, even if the handling of the service request remains ongoing. We will not stop our efforts to address the service request if the customer complains.

5.5 An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where we ask for wider feedback about their services, we will provide details of how residents can complain.

5.6 STAR Housing will make it as easy as possible to make a complaint and provide us with feedback. Complaints can be made by any of the following methods:

- By speaking to any member of staff
- Via the Make a Complaint page of our website, where full details of the Housing Ombudsman Service and Complaint Handling Code can be found; [Make a Complaint \(starhousing.org.uk\)](https://www.starhousing.org.uk)
- By completing our online Contact Us form [Contact Us \(starhousing.org.uk\)](https://www.starhousing.org.uk)
- Via our STAR Tenant Portal <https://www.starhousing.org.uk/tenantportal/>
- Via our social media pages
- Email at enquiries@starhousing.org.uk
- In writing to

Shropshire Towns and Rural Housing
Mount McKinley
Anchorage Avenue
Shrewsbury Business Park
Shrewsbury
SY2 6FG

Address 'for the attention of the Customer Relationships Team'.

- Ask a friend, relative, a trusted person or an advocate such as a Member of Parliament or Councillor to contact us on a customer's behalf. In these cases, we will need customer consent to discuss any issues with them.

5.7 We ask customers to let us know if they need any help in making a complaint and we will put them in touch with our Customer Relationships Team who will be able to support them.

5.8 Where a complaint raises issues that fall within the responsibility of both the Shropshire Council and STAR Housing, we will agree with the council who will lead the investigation. We will let the customer know how their complaint will be handled and the reply will be approved by both organisations before it is sent.

6. Putting Things Right

6.1 We aim to resolve expressions of dissatisfaction quickly, wherever possible at first point of contact with a customer. If the matter cannot be resolved quickly, or at the customer's request, we follow a two-stage complaints process detailed as Stage 1 and Stage 2. If we have made a mistake, there are several ways we can try to put it right. This includes:

- Speaking to the customer over the telephone or in person to ensure we are clear about the concerns.
- We will complete any outstanding repairs within the agreed timescales
- Making an apology.
- Acknowledging where things have gone wrong
- Giving a full explanation.
- Reviewing a decision that has already been made.
- Reviewing our policies and procedures.
- Offering redress or financial compensation – this may include making a goodwill payment, providing advice on making an insurance claim or through other means e.g. decorating vouchers etc. This will be in line with STAR Housing's Compensation Policy where the impact of the service failure will be assessed.

We will consider each case on its own merits and offer the most suitable remedy to resolve the issue, to take steps to put things right, and to learn and make service improvements.

7. Complaints Process

7.1 Stage 1

We aim to resolve all complaints at this stage.

Our Customer Relationships Team will log, define and acknowledge the Stage 1 complaint within five working days, if we are not responsible of any aspects of the complaint, these will be identified at this stage. They will contact the customer, setting out our understanding of the complaint and the outcomes the customer is seeking. A check will also be made on any customer support needs to help identify any reasonable adjustments that may be required in the handling of the complaint. Once a complaint is received, we will review it and pass it on to the relevant service lead to investigate and contact the customer. Attempts will be made to resolve the matter straight away.

Where additional complaints are raised during the investigations, these will be incorporated in the stage 1 response if they are related to the original complaints and if the response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to those already being investigated or it would be unreasonable to delay the response, the new issues will be logged as a new complaint.

We will aim to respond fully in writing within 10 working days from the day the complaint was acknowledged. The service lead will contact the customer again to talk through the outcome of the investigation and to check on satisfaction before the

letter is issued to the customer. This is an opportunity to review our response at stage 1 and amend if needed, before a formal response is issued within the 10 working days timeframe. A response to the complaint will be provided as soon as we know the answer to the complaint is known, not when all actions have been completed.

If the investigation is going to take longer than 10 working days, the Customer Relationships Team will contact the customer within the timeframe of the complaint being acknowledged, explaining the reasons for the extension. Any extension will not be longer than 10 working days without good reason and the reason(s) must be clearly explained to the complainant. We will provide the customer with details of how to contact the Housing Ombudsman at this point.

Where a response to a complaint will fall outside the timescales set out in the Complaint Handling Code, we will work with the customer to identify suitable intervals for keeping them informed about their complaint.

7.2 Stage 2

If a customer is not satisfied with the response given at Stage 1, they can ask us to review our original investigation.

Escalations may be refused if they fall in to the descriptions outlined at 2.3, however we will clearly explain the reason for this decision in writing to the customer.

We ask customers to do this as soon as possible, preferably within 20 working days of our response to the Stage 1 complaint.

We will log, define and acknowledge the Stage 2 complaint within 5 working days of receipt. The Customer Relationships Team will contact the customer, setting out our understanding of the complaint and the outcomes the customer is seeking. Once the complaint is received, we will review it and pass it on to the relevant member of the Senior Management Team (SMT) to investigate, and we will also try to resolve any outstanding matters straight away.

The SMT member will, where possible, contact the customer to review the initial investigation to ensure it was thorough and that it followed our complaints policy and procedure. If they are satisfied that it did, the original decision will be upheld.

We will respond fully within 20 working days from the day the Stage 2 complaint was acknowledged to confirm our decision. A response to the complaint will be provided as

soon as we know the answer to the complaint is known, not when all actions have been completed.

If the investigation is going to take longer, due to the complexity of the case, the Customer Relationships Team will contact the customer within 20 days of the complaint being acknowledged, explaining the reasons for the extension. They will provide the reasons for the delay, providing a new response date. Any extension will not be longer than 20 working days. We will provide the customer with details of how to contact the Housing Ombudsman at this point.

Where a response to a complaint will fall outside the timescales set out in the Complaint Handling Code, we will contact the customer at regular intervals to keep them informed about their complaint.

This is the end of our internal complaints process.

If the customer remains dissatisfied with the response they have received, they can refer their complaint to the Housing Ombudsman Service. The Housing Ombudsman can be contacted by telephone on 0300 111 3000, by email at info@housing-ombudsman.org.uk or in writing to Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ.

8. Learning from Complaints

- 8.1 Customer satisfaction is very important to us, and we use your feedback, including learning from complaints to shape improvements to our services and processes.
- 8.2 STAR Housing produce an annual report, and we will include our complaints performance and how we have improved services in line with customer feedback.
- 8.3 We will produce an annual complaints performance and service improvement report for scrutiny and challenge along with an annual assessment against the Housing Ombudsman's Complaint Handling Code.

9. Persistent or Unreasonable Complaints

- 9.1 As detailed above, we are committed to providing a high-quality customer feedback service and dealing with complaints in a fair and impartial way. However, in a small number of cases, customers pursue their complaints in an unreasonable and persistent way that can negatively impact the investigation of their complaint and the ability of staff to provide a quality service to other customers.

9.2 This may involve making persistent complaints about different matters, or repeated complaints about the same issue. These actions can occur either while their complaint is being investigated, or once the investigation has been completed.

9.3 How we will deal with vexatious or habitual complaints

9.4 Repeated or persistent contacts which hinder the ability of STAR staff to carry out their roles, may be classed as vexatious, and contact from that customer may be restricted.

9.5 This will be at the discretion of the Senior Management Team, and if deemed vexatious, the terms of contact will be communicated to the customer in writing.

9.6 Customers may be considered vexatious when they meet at least one of the following:

- Persist in pursuing a complaint where STAR procedures have been fully and properly implemented, or have been exhausted
- Change the substance of a complaint or continually raise new issues or seek to prolong contact by raising further concerns or questions upon receipt of a response whilst the complaint is being addressed (Any new issues that are significantly different from the original complaint will be raised as a new case and addressed separately)
- Are unwilling to accept documented evidence as being factual, or deny receipt of an adequate response in spite of correspondence specifically answering their questions
- Do not clearly identify the precise issues they wish to be investigated, despite reasonable efforts by STAR staff and others to help them specify their concerns
- Where the individual will not accept that STAR does not have a role in investigating their issue, for example the service is not delivered by STAR
- Focus on a trivial matter to an extent that is out of proportion to its significance and continue to focus on this point
- Have, in the course of pursuing their issue, had an excessive number of contacts with STAR (by telephone, e-mail, letter, in person or social media) placing unreasonable demands on staff
- Display unreasonable demands or expectations and fail to accept these may be unreasonable, for example, insist on immediate responses from staff when they are not available, and this is explained

9.7 It should be noted that contact should only be restricted regarding stated subject matters, and it should not leave the customer unable to access vital services, such as emergency repairs.

9.8 This will be reviewed at agreed periods, and when this review period expires a member of the Senior Management Team will review the customers' behaviours and contacts. There is a right to appeal against any decision made by STAR with regards to restricted contact.

9.9 If behaviour has improved to the required level, STAR will write to the customer advising the persistent or vexatious status has been removed.

9.10 If behaviour has not improved at the end of the review period, or escalates during this period, STAR will notify the customer specifying a further restrictions and review period.

10. Review

10.1 The status of a customer/complainant assessed to be unreasonable in accordance with this policy will be reviewed after six months and at the end of every subsequent three months within the period during which the policy is to apply. The complainant will be informed of the result of this review if the decision to apply this policy them has been changed or extended.

9.7 Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

10. Legislation

8.1 This Policy is compliant with the following legislation:

- Social Housing (Regulation) Act 2023
- Housing Ombudsman Complaint Handling Code 2024
- Competence and Conduct Standard

11. Equality, Diversity and Inclusion

11.1 This policy clearly details the multiple ways that a complaint can be made, including via an advocate. This will help to remove barriers and ensure fair and equal access to the process for all customers.

11.2 All reasonable adjustments will be made if disability is considered a factor in the ability of our customer to make a complaint. We will take reasonable steps to accommodate any reasonable adjustments you may have to enable you to access this policy or receive responses to complaints in other formats and provide such assistance as you may reasonably require.

11.3 Shropshire Towns and Rural Housing are committed to making sure our policies and services reflect the communities we serve and to meet equal opportunities. Our aim is to make the Complaints policy easy to use and accessible to all of our customers in line with the Equality Act 2010.

12. Review

12.1 This policy will be reviewed on an annual basis or in line with changes in law or business requirements

12.2 The Housing Ombudsman requires landlords to “self-assess” against the Complaint Handling Code on an annual basis, publish this on their website and submit their assessment to the Housing Ombudsman Service.

Appendix : Equality Analysis and Equality Impact Assessment

Equality Analysis is a way of considering the potential impact on different groups protected from discrimination by the Equality Act 2010. It is a legal requirement that places a duty on public sector organisations (The Public Sector Equality Duty) to integrate consideration of Equality, Diversity and Inclusion into their day-to-day business. The Equality Duty has 3 aims, it requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Equality Act of 2010;
- advance equality of opportunity between people who share a protected characteristic and people who do not;
- foster good relations between people who share a protected characteristic and people who do not.

Equality Impact Assessment (EIA) is a tool for examining the main functions and policies of an organisation to see whether they have the potential to affect people differently. Their purpose is to identify and address existing or potential inequalities, resulting from policy and practice development. Ideally, EIAs should cover all the strands of diversity and Inclusion. It will help us better understand its functions and the way decisions are made by:

- considering the current situation
- deciding the aims and intended outcomes of a function or policy
- considering what evidence there is to support the decision and identifying any gaps
- ensuring it is an informed decision

Equality Impact Assessment (EIA)

Step 1: Scoping and Identifying the Aims		
Department	Corporate Services - Customer Relationships	
Title of Change	Complaint Handling Policy	
What are you completing this EIA for?	Policy	(If other specify here)
What are the main aims / objectives of the changes	<ul style="list-style-type: none"> • To provide customers with a fair and transparent way of raising complaints 	

Step 2: Assessing the Impact				
Protected Characteristic	Positive Impact(s)	Negative Impact(s)	Not Applicable	Action to address negative impact
Sex	X			
Gender reassignment	X			
Disability	X			
Age	X			
Sexual Orientation	X			
Pregnancy & Civil Partnership	X			
Marriage & Civil Partnership	X			
Religion or belief	X			
Race	X			

If you answer yes to any of the following, you MUST complete the evidence column explaining what information you have considered which has led you to reach this decision

Assessment Questions	Yes / No	Please document evidence / any mitigations
In consideration of your document development, did you consult with others, for example, external organisations, service users, ALMO's?)	Yes	This policy has been developed based on guidance administered by The Housing Ombudsman's Service. Consulted with the NFA Complaint Handling Group Policy was taken to the Customer Committee for review and approval
Have you taken into consideration any regulations, professional standards?	Yes	Housing Ombudsman's Complaint Handling Code which gives clear guidance on ease of access and reasonable adjustments.

Step 3: Review, Risk and Action Plans			
	Low	Medium	High

How would you rate the overall level of impact / risk to the organisation if no action taken?	X		
What action needs to be taken to reduce or eliminate the negative impact?	N/A		
Who will be responsible for monitoring and regular review of the document / policy?	Customer Relationships Manager		

Step 4: Authorisation and Sign Off

I am satisfied that all available evidence has been accurately assessed for any potential impact on employees and groups with protected characteristics in the scope of this project / change / policy / procedure / practice / activity. Mitigation, where appropriate has been identified and dealt with accordingly.

Governance Manager		Date	
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