



COMPLAINT HANDLING POLICY

Lead Manager:	Complaints & Disrepair Manager
Responsible Senior Manager:	Corporate Director
Approved By:	Customer Services Subcommittee and Board
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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 can 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 in a timely manner
 - Learn from outcomes
- 1.4 We strive to adhere to our Complaints Standards Framework that sets out our commitment to delivering a consistent, fair and customer-focused approach to complaint handling. The framework outlines how we expect our Board, scrutiny members, leaders, staff, contractors and customers to contribute to shaping a positive and responsive customer experience. This framework is embedded in our personal practices and underpins our commitment to delivering high quality services that respond effectively to customer feedback.
- 1.5 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, this is considered to be unacceptable or habitual.
- 1.6 This complaints policy is in place for tenants and leaseholders of STAR. For non-tenants who raise complaints to STAR, we will assess the individual circumstance and clarify with the non-tenant if we are to review through this Complaints Policy or if they are required to seek independent advice from another relevant agency.
- 1.7 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.
- 1.8 The policy contributes to the overall aim of dealing with all complainants in a transparent, consistent, fair, and reasonable way.
- 1.9 We aim to resolve any new complaint as a matter of urgency, and where possible, as a service first resolution whilst adhering to the Housing Ombudsman's Complaint Handling Code.

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 gain representation from somebody else to act on their behalf. This can be a family member, friend or supporting agency, such as Citizens Advice, for example.
- 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 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 & Disrepair Manager:** STAR's Complaints & Disrepair Manager ensures that complaints are recorded and responded to by the most appropriate person in line with this policy and timeframes set by the Housing Ombudsman. The Complaints & Disrepair Manager tracks and reports on trends in order to use the feedback from our customers to learn and improve, with the intention of ensuring we do better next time.
- 3.5 **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,

- unless expressly requested by the customer. 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 processes

4.2 Consideration will be given to each individual case. The Complaints & Disrepair Manager, or member of the Senior Management Team in their absence, will approve 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. If the customer expressly requests the matter is reviewed through the complaints policy this will be agreed.

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 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://starhousing.org.uk/complaints)
- By completing our online Contact Us form [Contact Us \(starhousing.org.uk\)](https://starhousing.org.uk/contact-us)
- Via our STAR Tenant Portal <https://www.starhousing.org.uk/tenantportal/>
- Via our social media pages
- Email at complaints@starhousing.org.uk
- In writing to: Shropshire Towns and Rural Housing, Ptarmigan House, Sitka Drive, Shrewsbury Business Park, Shrewsbury, SY2 6LG. Address 'for the attention of the Complaints & Disrepair Manager'
- Ask a friend, relative, a trusted person or an advocate such as a Member of Parliament or local 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 Complaints & Disrepair Manager who will be able to support them. We will:

- Accept complaints via a friend, family member, advocate (e.g. Citizens Advice), councillor or MP, with appropriate consent
- Offer translation, interpretation, or communication assistance e.g. British Sign Language, Easy Read or Braille
- Provide support for vulnerable residents, including those with mental health needs or disabilities
- Link residents to external advocacy services where appropriate
- Provide reasonable adjustments under the Equalities Act 2010
- Where a complaint raises issues that fall within the responsibility of both the Shropshire Council and STAR, we will agree with the council who will lead the investigation. We will let the customer know how their complaint will be handled

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 outside of agreed service level agreements whereby the repair has already spent that time from the customer's original request. If not, they will be completed 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's Compensation & Goodwill 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 Complaints & Disrepair Manager 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. Attempts will be made to resolve the matter straight away. 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. If further work is required to resolve the complaint after the initial attempt at resolution, it will be passed on to an appropriate service lead to investigate and contact the customer. The complaint is allocated to a senior lead to give oversight and review the final response.

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 unreasonably 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 received in form of a letter issued to the complainant. 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 Complaints & Disrepair Manager 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 and in line with the Housing Ombudsman's Complaint Handling Code. 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.

The Stage 1 response will include:

- The complaint stage
- The complaint definition
- The decision on the complaint
- The reasons for any decisions made
- The details of any remedy offered to put things right
- Details of any outstanding actions
- Details of how to escalate the matter to Stage 2 if the customer is not satisfied with the response

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 into the descriptions outlined at 2.3, however we will clearly explain the reason for this decision in writing to the customer.

We will log, define and acknowledge the Stage 2 complaint within 5 working days of receipt. The Complaints & Disrepair Manager 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 a 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.

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 Complaints & Disrepair Manager 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.

The Stage 2 response will include:

- The complaints stage
- The complaint definition
- The decision on the complaint
- The reasons for any decisions made

- The details of any remedy offered to put things right
- Details of any outstanding actions
- Details of how to escalate the matter to the Housing Ombudsman Service if the customer remains dissatisfied.

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 Monday to Friday between 9am to 5pm, by email at info@housing-ombudsman.org.uk or in writing to the Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET.

Before formally closing a complaint, STAR will:

- Contact the customer and clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion
- Record any dissatisfaction or outstanding issues, which may be escalated or logged as a new complaint
Include in the final letter the residents right to escalate to the Ombudsman/local MP as per above.

At each Stage of our complaints process we will liaise with our customers to ensure they wish to continue with our complaints process and that they are aware of guidance offered through the Housing Ombudsman.

8. LEARNING FROM COMPLAINTS

- 8.1 Customer satisfaction is very important to us, and we use customer feedback, including learning from complaints to shape improvements to our services and processes.
- 8.2 STAR 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.
- 8.4 The Complaints & Disrepair Manager will track and report on trends in order to use the feedback from our customers to learn and improve, with the intention of ensuring we do better next time.

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. The Housing Ombudsman's complaint handling code states that landlords must have policies and procedures in place for managing unreasonable and unacceptable behaviour

from residents and/or their representatives when pursuing a complaint.

9.2 This is to define what is unacceptable and unreasonable behaviour and outlines how we will manage this behaviour consistently.

9.3 Unreasonable behaviour is behaviour considered undesirable and/or inappropriate in a given context or situation and would be considered as such by the general public or the community in which the behaviour is occurring. Unreasonable behaviour would include (but is not necessarily confined to):

- Aggressive or abusive behaviour: including physical acts of aggression, threats and behaviour or language (verbal, written or face to face) that is intended to insult, degrade or bully, or is otherwise derogatory or discriminatory
- Unreasonable Demands: this can include demanding responses within an unreasonable timescale; insisting on dealing (or not dealing) with a specific member of staff; repeatedly changing the substance of a complaint; raising unrelated concerns; requesting old complaints be revisited and requesting large volumes of information without good reason
- Unreasonable levels of contact: this can include an overload of correspondence, emails or telephone calls; copying in several members of staff; repeatedly raising the same complaint and refusing to accept a decision
- Unreasonable refusal to co-operate: this can include refusing to provide further details, evidence, clarity or a summary of the concerns raised, or not co-operating with normal procedures
- Abuse of social media: this can include contacting staff using their personal details or personal social media accounts and publishing personal and private information about staff online
- Making threats to the organisation or colleagues

9.4 We will recognise that sometimes people may act out of character in times of trouble or distress. We recognise complainants may be upset or there may be distressing circumstances leading up to the complaint.

9.5 A degree of hostility may be tolerated provided it does not meet the threshold of unacceptable behaviour as defined above.

9.6 Whilst recognising that circumstances might have been given rise to behaviours that would ordinarily be considered as unacceptable the safety and wellbeing of colleagues and others will be paramount.

9.7 We will make every attempt to work with anyone demonstrating unreasonable behaviour to remedy their complaint. When the complainant refuses or is unable to behave reasonably, we may delay the investigation of the complaint and advise the complainant accordingly. Where all attempts to work with the complainant, demonstrating unreasonable behaviour, have been unsuccessful, we will outline the actions to manage that behaviour.

9.8 Mediation or advocacy through third parties will be considered especially where a complainant has access to support workers or advocates who support them.

9.9 A Senior Lead will take the decision for formal action. Formal action will include

issuing a letter and imposing measures, which will be set out in the letter together with the appeal process. Actions we may take:

- Providing a single point of contact for the customer
- Limiting contact to a single form i.e. writing, email or telephone
- Limiting contact to certain times of the day/week
- Declining to give any further consideration of an issue unless additional evidence is provided
- Only considering a certain number of issues in a specific period

- 9.10 At the time that restrictions are imposed, a review period will be set for 30, 60 or 90 days depending on the severity of the behaviour. If the individual's behaviour has improved at the point of review, consideration will be given to lifting the measures. If it has not improved, we will provide an explanation as to why the restriction will remain in place for a further period pending the next agreed review date.
- 9.11 Complaints have the right to appeal any decision to impose measures within 20 working days of the issue of the formal letter. You will be informed how to do this in the formal letter. A Director from a different service or a more senior manager will carry out the review. The Complaints & Disrepair Manager will notify the customer of the outcome of the appeal in writing within 10 working days of receipt of the appeal.
- 9.12 Following the outcome of the appeal, if the complainant still does not agree or feels it is unreasonable, they may refer the matter to the Housing Ombudsman about the same issue. These actions can occur either while their complaint is being investigated, or once the investigation has been completed.
- 9.13 We will always consider making reasonable adjustments for a resident if we are asked to do so. We may still use the policy if there are actions or behaviours which are having a negative effect on our staff or our work even where a reasonable adjustment has been made.
- 9.14 Any restrictions placed on contact due to unreasonable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.

10. TRAINING AND STAFF DEVELOPMENT

- 10.1 Targeted training will be prepared and issued to key staff. Investigating officers will receive comprehensive training on how to approach a complaint and the expectations related to the investigation and response process. Wider training will also be provided to ensure that all staff have a clear understanding of the policy and know who to contact for further advice.
- 10.2 Staff identified as potential first points of contact for tenants will receive training on identifying and recording complaints effectively. A template will be provided to ensure that key information is collected during the initial interaction.
- 10.3 Processes will be established to confirm that all relevant staff have undertaken the appropriate training, and that new staff are promptly identified and provided with the necessary education to handle complaints in alignment with policy standards.

11. ROLES AND RESPONSIBILITIES

11.1 Complaints & Disrepair Manager:

- Will act as the designated Complaints specialist, ensuring complaints are logged, acknowledged, and monitored
- Ensure compliance with the Housing Ombudsman Code
- Provide oversight of complaint handling and reporting
- Tracks and report on trends in order to use the feedback from our customers to learn and improve, with the intention of ensuring we do better next time

11.2 Service Leads and Line Managers:

- Investigate and respond to complaints at Stage 1.
- Contact the customer to clarify complaint details and resolution expectations.
- Support learnings from complaints so they are embedded in the service.
- Determine levels of compensation for service delivery failure.

11.3 SMT:

- Provides oversight and reviews Stage 1 final responses
- Lead investigations at Stage 2
- Ensure there is consistency in the way in which complaints are handled
- Determine whether service changes have been embedded within the service to residents
- Decide on the handling of persistent or unreasonable complainants

11.4 All Staff:

- Are responsible for recognising and reporting complaints appropriately
- Will support residents in making complaints and escalating concerns

11.5 Member Responsible for Complaints:

- A member of the governing body will review:
 - The volume, categories and outcomes of complaints, alongside complaint handling performance
 - Review issues and trends arising from complaint handling
 - Review updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings

12. PUBLICATION

12.1 The complaints policy and details of the Housing Ombudsman Services will be published on Shropshire Town and Rural's website. We will publish regular reminders about how to make a complaint, where to find the complaints policy and relevant Housing Ombudsman scheme information in our newsletters for customers.

13. LEGISLATION

13.1 This Policy is compliant with the following legislation:

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

14. EQUALITY, DIVERSITY AND INCLUSION

14.1 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.

14.2 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.

14.3 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 and will ensure that the Complaints policy is available in alternative formats upon request and is easy to find on the website. A copy of the Housing Ombudsman Complaint Handling Code will be referenced and linked in all relevant webpages.

15. REVIEW

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

15.2 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.

16. VERSION CONTROL

Renewal Date	Version	Approved By	Comments
12 2025	4.5	CSS	Minor amendments, as well as updates from housing ombudsman regarding unreasonable behaviour
04 2024	4	CSS	-