

RUNNYMEDE BOROUGH COUNCIL

Housing Services Complaints Policy

Review due: June 2026

1. Introduction

1.1 The Council strives to provide high-quality services to all residents and customers in line with its Customer Charter.

1.2 A statutory Complaint Handling Code for registered providers of social housing took effect from April 2024 and the Housing Ombudsman monitors compliance against the Code. The Local Government and Social Care Ombudsman can investigate complaints about the Council's services such as housing allocations and homeless applications. While the Local Government Ombudsman and Housing Ombudsman Complaint Handling Codes are aligned, this policy specifically clarifies the Council's approach to dealing with complaints as required by the Housing Ombudsman Complaint Handling Code.

1.3 A complaint is "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."

2. Policy Details

2.1 Housing Services welcomes feedback including compliments and complaints; and is committed to enabling a positive complaints culture, with effective procedures, well-trained staff, putting things right for residents when they have gone wrong and demonstrating a desire for continuous improvement. An annual self-assessment against the Code will be carried out with the involvement of tenants and will be published and reported to the Housing Committee.

2.2 A complaint can be about quality of service, behaviour of staff or perceived failure to adhere to the policy. It is not a service request (e.g. request for a repair), request for information, explanation of Council policy, or feedback (e.g. in a survey). The resident does not have to use the word complaint for it to be treated as such. A service request is a request requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored, and reviewed regularly. A complaint will be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Complaints about someone causing antisocial behaviour are dealt with separately.

2.3 Residents must not be treated differently if they complain.

2.4 Learning from complaints informs our risk management, audit functions and contracting arrangements, aids governance and helps us make improvements to policies, processes, and training.

2.5 Some issues can be resolved through discussion with the customer and appropriate member of staff. If this does not resolve the matter, a customer can complain formally using the Council's two stage complaints procedure by completing the e-form on the website, emailing or writing, phoning or complaining in person. Staff will assist a customer who needs help to make a formal complaint.

2.6 Complainants will be given the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any relevant meeting. Staff will clarify if it is appropriate to take a complaint from a representative, including Councillors and MPs, by checking if they have the complainant's consent to act on their behalf and are satisfied they are acting in the complainant's best interests. Councillors have an important dual role in scrutinising the delivery of council services and signposting and pursuing complaints on behalf of the public.

2.7 If an issue is raised on social media, it is sometimes possible to address it via social media. However, we will usually suggest that this is formalised by the complainant so it can be logged and dealt with in line with this policy. We cannot investigate a complaint where data protection could be compromised as a result of responding, without the explicit consent of the person the complaint concerns.

2.8 We will not take a blanket approach to excluding complaints and will consider the individual circumstances of each complaint. However, an issue may not be treated as a complaint if:

- It has already been considered at Stage 2 of the complaints policy.
- Complaints will be accepted within 12 months of the issue occurring or the resident becoming aware of the issue. Complaints may be accepted outside this time limit in exceptional cases, for example due to ill health or incapacity.
- Legal proceedings have started, with details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- The issue has already been decided by a court or independent tribunal.
- There is a designated appeals process, specific statutory review or right of appeal (for example for homelessness, disrepair etc.) unless the complaint is specifically about officer conduct and not the statutory process.

2.9 Customers have the right to challenge our decision not to accept their complaint by going to the Ombudsman, who can instruct us to take on the complaint.

2.10 Complaints will be acknowledged within 5 working days and be responded to within 10 working days if all possible. If this is not possible the complainant will be kept informed and be given a timescale for a full response.

2.11 Complaint investigations will be conducted impartially, and complaints will be responded to by a senior manager.

2.12 Where the problem is a recurring issue, we will consider any older reports as part of the background to the complaint if this helps resolve the issue for the tenant.

2.13 If a complaint is not resolved to the complainant's satisfaction it will be progressed to stage 2. Residents are not required to explain their reasons for requesting a stage 2 consideration, rather the Council will make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. At the end of stage 2, we will advise the complainant of their right to refer the complaint to the relevant Ombudsman Service.

2.14 The Council will issue a final response to a stage 2 complaint within 20 working days of the complaint being acknowledged or decide whether an extension to this timescale is needed and inform the resident of the expected timescale. Any extension will only be for a justified reason, which will be explained to the resident. When informing the resident of an extension, we will provide the resident with the contact details of the Ombudsman.

2.15 An appropriate remedy can be provided at any stage of the Council's complaints process without the need for escalation to stage 2 or to the Ombudsman.

2.16 If a customer makes a complaint in an unreasonable way, for example repeatedly or aggressively, we will write to them explaining what action we are taking to resolve the matter. This could include restricting how the complainant should contact us and who they can contact. If a complaint is considered vexatious or unreasonably persistent, we may follow the Council's [unreasonable complainant behaviour protocol](#) and explain this to the complainant in writing. In the case of council tenants behaving unreasonably we may take enforcement action in line with their tenancy agreement. Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and will demonstrate regard for the provisions of the Equality Act 2010.

2.17 The Council is committed to ensuring that disabled people are not disadvantaged in accessing its housing services. To this end, we will anticipate and make reasonable adjustments for disabled people and for people with support needs in applying this policy and our complaints procedure. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident discloses. Any agreed reasonable adjustments will be kept under active review.

3. Communication and training

3.1 The Council will provide residents with advice about how to make a complaint and contact information for the relevant Ombudsman as part of its regular correspondence with tenants and residents.

3.2 All Housing staff will receive guidance on the value of learning from complaints in order to improve services and training on the complaint's procedure. This is so tenants can effectively raise a complaint with any member of staff.

4. Monitoring and performance management

4.1 We aim to review this policy in two years to ensure it reflects current legislation, the Complaint Handling Code and that it is accessible and clear.

4.2 Phone calls may be recorded for training and monitoring purposes.

4.3 The Housing Business Development and Policy Manager has lead responsibility for complaint handling and for assessing themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.

4.4 The Chair of the Housing Committee has lead responsibility for complaints to support a positive complaint handling culture and acts as the Council Member Responsible for Housing Complaints. The Chair of the Housing Committee is responsible for ensuring the Committee receives regular information on complaints that provides insight into complaint handling performance.

4.5 The Housing Committee will receive:

- a) regular updates on the volume, categories and outcomes of complaints, alongside
- b) complaint handling performance
- c) regular reviews of issues and trends arising from complaint handling
- d) regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings
- e) annual complaints performance and service improvement report.

4.6 The Council will produce annual complaints performance and service improvement reports for scrutiny and challenge by tenants and Housing Committee, including:

- a) the annual self-assessment against the Complaint Handling Code
- b) a qualitative and quantitative analysis of complaint handling performance, including a summary of the types of complaints not accepted
- c) the service improvements made as a result of the learning from complaints
- d) any annual report about the landlord's performance from the Ombudsman.
- e) any other relevant reports or publications produced by the Ombudsman.

5. Equalities Implications

5.1 An Equality Impact Assessment is a way of assessing the impact a policy will have on particular groups, to ensure the Council has complied with its public sector equality duty to eliminate discrimination and to advance equality between those who share a protected characteristic. The Equality Impact Assessment screening carried out in January 2021 found that "There is no evidence of any negative impacts on people with protected characteristics. Housing's new Complaints Policy with detailed responsibilities, procedures and guidance are intended to further promote a fair and transparent complaints handling regime, with an emphasis on learning from complaints to improve governance, training and service delivery."

5.2 In accordance with the Equality Act, we will make changes in our approach as necessary to ensure our services are accessible to disabled people as well as everybody else. The reasonable adjustments required may be physical, but we will also adjust our services to ensure that the objectives of this policy are delivered equally well for all our customers including people with, for example, learning disabilities and those who cannot read or write or speak English. As detailed above the Council is committed to ensuring that disabled people are not disadvantaged in accessing its Housing complaint handling service.

6. Version Control

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
V1	January 21	First draft completed	January 21	Angela Horsey	Housing Committee
V2	April 23	Recommendations from Self Assessment against the Complaints Handling Code incorporated	January 23	Angela Horsey	HMT
V3	April 24	Amendments to policy	June 24	Angela Horsey	Housing Committee
V4	February 25	References to 'days' corrected to 'working days'		Emily Devine	
V4.1	October 25	Reference to 'designated person' removed at 2.6 and requirement to act within 14 days removed at 2.13		Angela Horsey	