

## RESIDENT COMPLAINT POLICY

Date Reviewed	April 2026	Next Review Date	May 2028
Consultation	Resident Focus Group	Reviewed By	Ramesh Malhan
EIA	Completed	Responsible Officer	Chief Executive Officer
DPIA	Completed	Approval By	Board of Management

### 1. PURPOSE

The purpose of this policy is to provide high-quality services to all residents, recognise when things go wrong, put things right and value complaints as an important source of feedback to help us learn, improve and develop our services.

Black Country Housing Group (hereafter referred to as “BCHG”) recognises that effective complaint handling is not only about processes and timescales, but also about the culture within our organisation and the behaviours and attitudes we demonstrate. This policy sets out what constitutes a complaint, how complaints will be handled fairly and promptly, and how learning from complaints will be used to improve services and resident experience.

### 2. AIMS

The aims of this policy are to:

- Clarify what constitutes a complaint and what constitutes a service request.
- Put residents at the heart of the process and prioritise health and safety in decision-making, providing outcomes as quickly as possible.
- Apologise when we have made a mistake or when something has gone wrong and take action to put it right as soon as possible.
- Keep residents informed and deliver on commitments within agreed timescales.
- Ensure all aspects of the complaint are addressed and provide clear explanations for decisions, actions and outcomes.
- Learn from complaints and use feedback positively to improve services, communication and resident experience.
- Ensure continued compliance with the Housing Ombudsman’s Complaint Handling Code.

### 3. SCOPE

This policy applies to applicants applying for housing, tenants, and leaseholders of BCHG.

### 4. RELATED DOCUMENTS

#### Externally

Legislation and Regulation
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- The Housing Ombudsman’s Complaint Handling Code 2024
- Social Housing (Regulation) Act 2023
- Equality Act 2010
- Data Protection Act 2018
- Building Safety Act 2022

### Internally

Strategies	Policies
<ul style="list-style-type: none"> <li>• People and Culture Strategy</li> <li>• Quality Homes Strategy</li> <li>• Resident Engagement Strategy</li> <li>• Resident Success Strategy</li> <li>• Equality, Diversity and Inclusion Strategy</li> <li>• BCHG Way and Value-Based Service Standards</li> </ul>	<ul style="list-style-type: none"> <li>• Reasonable Adjustment Policy</li> <li>• Repairs and Maintenance Policy</li> <li>• Lettings Policy</li> <li>• Anti-Social Behaviour Policy</li> <li>• Resolution and Remedies Policy</li> <li>• Disciplinary Policy and Procedure</li> <li>• Neighbourhood Management Policy</li> <li>• Unacceptable Behaviour Policy</li> <li>• Income Collection Policy</li> </ul>

## 5. ROLES AND RESPONSIBILITIES

The Member Responsible for Complaints (MRC) is a Board Member responsible for ensuring the Board receives regular information on complaints, including insight into complaint handling performance, learning and service improvement. The MRC has lead responsibility for supporting a positive complaint handling culture across BCHG.

The Head of Customer Voice is the nominated Complaints Officer and is responsible for reporting complaint performance and learning to the Board, as well as liaising with the Housing Ombudsman Service.

All BCHG colleagues will be made aware of the complaints process and provided with training to understand how complaints are identified, recorded, managed and monitored.

Stage 2 complaint reviews are co-ordinated by the Senior Customer Relations Manager and include trained resident panel members, selected based on their skills and experience, working alongside a Senior Manager to provide independent review, challenge and assurance.

The Resident Experience Assurance Panel (REAP), attended by residents and colleagues, meets regularly to review learning from complaints, monitor themes and trends, and support a positive complaint handling culture focused on transparency, learning and continuous improvement.

## 6. DEFINITION

6.1 A complaint is defined as:

**“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by BCHG, its colleagues, or those acting on its behalf, affecting an individual resident or group of residents.”**

6.2 BCHG will recognise and respond to expressions of dissatisfaction in line with the Housing Ombudsman’s Complaint Handling Code. Where BCHG is made aware of an issue for the first time and the matter can be resolved quickly, it will normally be treated as a service request. Where the issue remains unresolved, dissatisfaction continues, or the resident asks for the matter to be investigated, BCHG will handle the matter as a complaint.

6.3 Ongoing cases where BCHG is acting within agreed timescales or agreed actions would not normally be considered complaints solely because additional information or updates are provided. Where there is uncertainty, colleagues should seek advice from the Head of Customer Voice.

6.4 A complaint can be made in any format, and BCHG colleagues are responsible for recognising and advocating for complaints. BCHG will support residents in defining a complaint where they may have difficulty articulating their concerns. Complaints raised by petition will normally be managed through the lead signatory. Complaints relating to third-party contractors acting on behalf of BCHG will be accepted and investigated by BCHG.

6.5 Expressions of dissatisfaction received through surveys, including Tenant Satisfaction Measures, may not automatically be treated as complaints. However, where significant dissatisfaction or potential risk is identified, BCHG will contact the resident to establish whether they wish to raise a formal complaint or require further support.

6.6 BCHG will seek to understand and agree the desired outcome of the complaint with the resident before the investigation begins. Complaints will not be closed until BCHG has communicated the outcome directly to the resident, or in writing where this is the resident’s preferred method of communication.

6.7 BCHG will consider its duties under the Equality Act 2010, anticipate individual needs and make reasonable adjustments in a person-centred way. We welcome advocates, representatives and third-party support acting on behalf of residents where appropriate consent has been provided.

6.8 Complaints relating to colleague conduct, attitude, bullying or discrimination may also be investigated under the Disciplinary Policy and Procedure to determine whether there is a case to answer. Communication with residents will continue to be managed in line with this policy.

6.9 When investigating complaints, BCHG will consider a range of appropriate remedies. We will apologise when we have made a mistake or failed to meet expected standards, take action to put things right and, where appropriate, offer financial remedies in line with the Resolution and Remedies Policy.

6.10 If, following the completion of the complaints process, the resident remains dissatisfied with BCHG’s response, the complaint may be reviewed by the relevant Head of Service or Director alongside a trained resident panel member as part of the Stage 2 review process.

6.11 There may be occasions where it is not appropriate for BCHG to follow this policy. In such cases, the resident will be provided with a clear explanation, advised of any alternative procedures and informed of their right to refer the matter to the Housing Ombudsman Service. Examples may include ongoing legal proceedings, insurance claims, complaints pursued in an unreasonable manner in line with BCHG’s Unacceptable Behaviour Policy, or complaints raised more than 12 months after the issue occurred. BCHG will consider each case on its individual merits.

## 7. COMPLAINT HANDLING STAGES

Stage	Definition	Responsibility	Expectation
Risk Health and Safety Screening	“An event assessed by anyone in the team or individual resident to be at significant health and safety risk to building or person.”	Appropriate Senior Manager/Executive Team	Screen assessment with customer. If a significant health and safety risk is identified, a 24-hour response is appropriate but under stage 1.
Stage 1 Complaint	“An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by BCHG, its colleagues, or those acting on its behalf, affecting an individual resident or group of residents.”	Officer (without a conflict of interest)/ Manager/Team Leader	BCHG will acknowledge the complaint within 5 working days, confirm the complaint issues and provide a response within 10 working days. Where this is not possible, BCHG will explain the reason for the delay, agree an extension with the resident of no more than 10 additional working days, and provide details of the resident’s right to contact the Housing Ombudsman Service.
Stage 2 Review	“Review of how the original complaint was handled and whether the outcome was fair, reasonable, and in line with the Code, policy, legal, and statutory requirements.”	Head of Service or Director without a conflict of interest	BCHG will acknowledge the escalation request within 5 working days and provide a response within 20 working days. In exceptional circumstances, for example complexity or colleague absence, BCHG may agree an extension of up to a further 20 working days and will explain the reason for the delay, confirm the revised timescale, and provide details of the resident’s right to contact the Housing Ombudsman Service. Final responses will include the Housing Ombudsman’s contact details.

## **8. CONTINUOUS LEARNING AND IMPROVEMENT**

8.1 BCHG is committed to supporting a positive complaint handling culture by placing learning, reflection and continuous improvement at the heart of service delivery, in line with our “We Love to Learn” value.

8.2 The BCHG Board and the Member Responsible for Complaints (MRC) will consider complaint trends, systemic issues, serious risks and opportunities for improvement to support learning, accountability and service improvement.

8.3 BCHG will share learning from complaints with residents, including the outcomes of service improvements and the Housing Ombudsman Complaint Handling Code Self-Assessment.

## **9. DATA PROTECTION**

Confidentiality and data protection apply throughout the complaints process in line with BCHG’s Data Protection Policy and relevant data protection legislation. BCHG will not share personal or property-related information obtained during a complaint investigation with any third party unless they are entitled or authorised to receive it.

## **10. RESIDENT CONSULTATION**

This policy was reviewed with residents through a Focus Group and informed by learning from complaints, transactional surveys and the Tenant Satisfaction Measures. This insight was considered alongside the Housing Ombudsman Complaint Handling Code Self-Assessment to support the development of the policy.

## **11. PUBLICITY**

This policy will be made available through BCHG’s website, customer newsletters, social media, electronic notice boards, new customer onboarding processes and relevant correspondence.

## **12. EQUALITY, DIVERSITY AND INCLUSION**

An Equality Impact Assessment has been completed to help ensure that no individual or group is unfairly disadvantaged by this policy. At the time of assessment, no adverse impact was identified. BCHG will continue to monitor complaint trends and feedback to better understand resident experience and identify any emerging themes or disproportionate impacts.

Where potential barriers or impacts are identified, BCHG will consider appropriate reasonable adjustments in line with the Reasonable Adjustment Policy.

## **13. REVIEW OF POLICY**

This policy will be reviewed annually alongside the Housing Ombudsman Complaint Handling Code Self-Assessment. The review will be led by the Head of Customer Voice and approved by the BCHG Board.