CITY OF WOLVERHAMPTON COUNCIL

Housing Complaints Policy

Version 1 September 2026

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WOLVERHAMPTON HOMES

This policy will be reviewed annually or sooner where required by changes in legislation, regulation, the Housing Ombudsman's Complaint Handling Code, guidance issued by the Regulator of Social Housing, or operational need.

The Council will consult with its managing agents and other relevant stakeholders as part of the review process where appropriate.

Contents

1.0 Introduction and scope 4
2.0 Types of feedback and definitions 5
3.0 Definition of a complaint 5
4.0 Service requests and complaints 5
5.0 Exceptions and exclusions 6
6.0 Who can make a complaint 7
7.0 How to make a complaint 7
8.0 The complaints process 8
9.0 The Housing Ombudsman 11
10.0 Complaints involving more than one organisation 11
11.0 Putting things right and remedies 12
12.0 Managing unreasonable complaint behaviour 12
13.0 Accessibility, equality and reasonable adjustments 13
14.0 Privacy and personal data 13
15.0 Learning, monitoring and governance 14
Schedule 1 15

1.0 Introduction and scope

1.1 The City of Wolverhampton Council (“the Council”) is committed to putting tenants at the centre of service delivery and to improving the quality of housing services. The Council welcomes feedback from tenants and customers including complaints, as this helps us to understand tenant and customer experience, resolve issues where things have gone wrong, and to use the learning from complaints to improve how services are delivered.

1.2 This policy sets out how complaints about housing management services will be handled. It provides a clear, fair and consistent approach to managing complaints, in line with the Housing Ombudsman Scheme, the Complaint Handling Code, and relevant regulatory requirements, including the Regulator of Social Housing’s Consumer Standards, including the Transparency, Influence and Accountability Standard.

1.3 The Council is the landlord for council homes, with housing management services delivered on its behalf by four managing agents: Bushbury Hill Estate Management Board, Dovecotes Tenant Management Organisation, New Park Village Tenant Management Co-operative and Wolverhampton Homes**.**

1.4 The Council remains accountable for ensuring that complaints relating to housing management services delivered on its behalf are handled in accordance with this policy, the Housing Ombudsman's Complaint Handling Code and relevant regulatory requirements.

1.5 This policy applies to complaints about the standard of housing management services, including the actions or lack of action by the Council, a managing agent, their staff, contractors or others acting on their behalf.

1.6 Where a tenant or customer has a complaint, this should be made to the managing agent responsible for the provision of housing services to their home, who will investigate and respond in line with this policy. A separate complaint to the Council is not required.

1.7 Complaints about council housing services are not dealt with through the Council’s Corporate Complaints Policy. Where a matter does not fall within the scope of this policy, it may instead be considered under the Corporate Complaints Policy. In such cases, the tenant or customer will be informed, and the complaint will be passed to the appropriate team within the Council.

1.8 For the purposes of this policy, references to “tenant” or “customer” include tenants, leaseholders, residents or any other complainant affected by housing services to whom this policy applies.

1.9 The Council and its managing agents will ensure that residents are made aware of this Complaints Policy and how to access it. The policy will be published on the Council's and managing agents' websites and will also be promoted through resident communications and other appropriate channels.

2.0 Types of feedback and definitions

2.1 The Council recognises that tenants and customers may contact housing services for a variety of reasons. Whilst this policy focuses on complaints, it is helpful to understand the different types of feedback that can be shared, including:

- **Service requests**: where a tenant or customer asks for a service to be provided, for example reporting a repair or requesting action on a housing issue.
- **Comments or suggestions**: where a tenant or customer provides feedback on how services could be improved.
- **Compliments**: where a tenant or customer provides positive feedback about a service that has been provided or an action taken by the Council, managing agent or member of staff.
- **Complaints**: where a tenant or customer expresses dissatisfaction with a service, action or lack of action.

2.2 The Council and its managing agents will ensure that feedback is handled through the appropriate process and that tenants or customers are advised how their enquiry will be managed.

3.0 Definition of a complaint

3.1 The Housing Ombudsman defines a complaint as:

"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 tenant or group of tenants."

3.2 Where a tenant or customer expresses dissatisfaction, they will be given a choice to have the matter handled as a complaint under this policy. A tenant or customer does not have to use the word 'complaint' for it to be treated as a complaint.

3.3 The Council operates a two stage complaints process.

3.4 Where an expression of dissatisfaction meets the definition of a complaint, it will be logged within the formal complaints process at Stage 1.

3.5 Stage 2 is the final stage of the Council's internal housing complaints procedure. If a tenant or customer remains dissatisfied following the Stage 2 response, they may refer their complaint to the Housing Ombudsman.

4.0 Service requests and complaints

4.1 A service request is a request for the landlord to provide or improve a service. This may include reporting a repair, requesting maintenance, or asking for action to be taken on a housing matter.

4.2 Service requests are not complaints. However, a complaint may be raised where a tenant or customer expresses dissatisfaction with:

- the response to a service request, or
- the way in which a service request has been handled.

4.3 A complaint can be raised at any stage, including while a service request remains ongoing.

4.4 Raising a complaint will not prevent or delay any action required to address the underlying issue. In these circumstances, the service request will continue to be progressed alongside the complaint.

5.0 Exceptions and exclusions

5.1 There may be circumstances where a complaint cannot be considered under this policy or where it is more appropriate for the matter to be dealt with through another procedure. The Council and its managing agents will consider the individual circumstances of each case before deciding whether a complaint falls within the scope of this policy.

5.2 Where a complaint is not accepted, a clear explanation of the reasons for the decision will be provided to the tenant or customer, together with details of their right to refer the matter to the Housing Ombudsman. Where appropriate, the tenant or customer will also be signposted to an alternative process.

Examples of complaints that may not be considered under this policy include:

- matters that are being dealt with as a service request, unless the complaint relates to the response to, or handling of, that service request.
- complaints that have already been fully investigated and responded to in accordance with this policy.
- complaints made by employees relating to their employment.
- complaints where the issues being raised occurred more than 12 months ago, or where 12 months have passed since the tenant became aware of the issue. However, discretion may be exercised where there is a good reason for the delay and it remains possible to investigate the complaint fairly and effectively.
- complaints that are subject to ongoing legal proceedings, where action has commenced following the relevant pre-action protocol.
- complaints where specific arrangements are in place in accordance with the Council's policy on the management of unreasonable complainant behaviour.
- complaints that are being dealt with through the Council's insurance claims process, until the outcome of that process has been determined.

5.3 This list is not exhaustive and each complaint will be considered on its own merits. Complaints will not be unreasonably refused and will take account of the Housing Ombudsman's Complaint Handling Code when applying any exclusion.

6.0 Who can make a complaint

6.1 Any tenant, customer or group of tenants affected by the actions, decisions or service being complained about may make a complaint under this policy. A complaint may be made by an individual tenant or on behalf of a number of tenants where they have been affected by the same issue.

6.2 Where a complaint is made on behalf of a group of tenants, a lead complainant should be identified. The names and addresses of all tenants included in the complaint may be requested to confirm their agreement to be represented as part of the complaint.

6.3 Tenants may appoint a representative of their choice to act on their behalf at any stage of the complaint and to accompany or represent them at any meeting. A representative may include a family member, friend, advocate, Citizens Advice, a Member of Parliament or a councillor.

6.4 Where a complaint is submitted by a representative or another third party, it will be handled in accordance with this policy. The Council or managing agent may seek consent from the tenant or customer before discussing the complaint where this is required by law or to protect the tenant's confidentiality.

6.5 Correspondence received from a Member of Parliament, councillor or other representative will be treated as a complaint where it expresses dissatisfaction on behalf of a tenant and the tenant wishes the matter to be considered through the complaints process. Complaints received in this way will be handled in accordance with this policy.

6.6 Enquiries made by Members of Parliament or councillors on behalf of their constituents that do not constitute complaints will be managed in accordance with the Council's Member Enquiries arrangements and will not automatically be treated as complaints.

6.7 No tenant will be treated unfairly because they have made a complaint. Complaints will be considered on their merits and tenants will not be discouraged from raising concerns about the services they receive.

7.0 How to make a complaint

7.1 Making a complaint

A complaint does not need to be made in writing and may be submitted through a range of channels provided by the relevant managing agent, including:

- The managing agent’s website
- In person
- In writing
- By email
- By telephone
- Through a representative acting on the tenant’s behalf
- Through social media

Tenants or customers have the right to contact the Housing Ombudsman at any point during the complaint process.

7.2 Which organisation should receive the complaint

Tenants should direct housing complaints to the managing agent responsible for providing housing services to their home. Contact details for each managing agent are provided in Schedule 1 of this policy.

If a housing complaint is sent to the Council instead of the relevant managing agent, the complaint will be redirected to the appropriate managing agent and the tenant will be told who is handling the complaint.

7.3 Time limits for making a complaint

Complaints will normally be accepted where they are raised within 12 months of the issue occurring, or within 12 months of the tenant or customer becoming aware of the issue.

However, the Council and its managing agents recognise that there may be circumstances which prevent a complaint from being raised sooner. Each case will be considered on its own merits, and discretion may be exercised where there is a good reason for the delay and where it remains possible to investigate the complaint fairly and effectively.

7.4 Complaints outside the scope of this policy

Where a complaint is not accepted under this policy, the tenant or customer will be provided with a clear explanation of the decision and advised of their right to refer the matter to the Housing Ombudsman. If the Ombudsman does not agree that the exclusion has been applied fairly, it may require the Council to consider the complaint.

8.0 The complaints process

8.1 Overview

The Council and its managing agents are committed to resolving complaints fairly, consistently and as quickly as possible. We will aim to resolve complaints at the earliest opportunity and, where appropriate, put things right where things have gone wrong.

The housing complaints process consists of two stages:

- **Stage 1**
- **Stage 2**

At all stages of the complaints process the managing agent will:

- aim to speak to the tenant or customer to understand their concerns.
- deal with complaints on their merits.
- act fairly, independently and with an open mind.

- consider all relevant information and evidence.
- give tenants or customers a fair opportunity to explain their concerns.
- clearly explain the reasons for decisions reached.
- identify and consider any reasonable adjustments required.
- seek to provide an appropriate remedy where things have gone wrong.
- implement the required resolution where possible.
- manage tenant or customer expectations throughout the process.

A complaint response will be provided once the outcome of the investigation is known. Responses will not be delayed while any outstanding actions are completed.

Any actions arising from a complaint will be monitored and progressed separately, with updates provided where appropriate.

8.2 **Stage 1**

Stage 1 is the first formal stage of this policy. The aim is to resolve complaints wherever possible at this stage.

Stage 1 complaints will be acknowledged, defined and logged within five working days of the complaint being received.

The acknowledgement will set out:

- Our understanding of the complaint
- The resolution sought by the tenant
- Any elements which fall outside our responsibility and the reasons for this
- Any support needs or reasonable adjustments identified.

8.3 A full written Stage 1 response will be issued within ten working days of the complaint being acknowledged. Where any aspect of the complaint is unclear, we will contact the tenant or customer to seek clarification.

Where additional time is required for the response to be completed, the response period may be extended by up to a further ten working days where there is good reason. Where this applies, the tenant or customer will be informed of the reason for the delay and the revised response date.

Where the response cannot be issued within the extended timescale, we will agree suitable arrangements for providing updates and will continue to provide regular updates until the response is issued.

Where additional complaint issues are raised during the investigation, we will consider whether they are sufficiently related to be included within the existing Stage 1 complaint. If this would unreasonably delay the response, or the Stage 1 response has already been issued, the additional issues will normally be logged as a new complaint.

8.4 Stage 2

If a tenant or customer remains dissatisfied with all or part of the Stage 1 response, they may request a review at Stage 2.

Stage 2 is the final stage of the Council's internal housing complaints procedure. If a tenant or customer remains dissatisfied following the Stage 2 response, they may refer their complaint to the Housing Ombudsman.

A tenant or customer is not required to provide reasons for requesting a Stage 2 complaint. However, reasonable efforts will be made to understand why the tenant remains dissatisfied as part of the Stage 2 investigation and response.

Requests for a Stage 2 review should be made within twenty working days of the Stage 1 response. Requests received outside this period will be considered on a case-by-case basis and only where there is a valid reason to do so.

Stage 2 complaints will be acknowledged, defined and logged within five working days of the escalation request being received.

The acknowledgement will confirm:

- Our understanding of the complaint
- The outcome sought by the tenant
- Any elements which fall outside our responsibility and the reasons for this

Where any part of the complaint is unclear, the tenant will be asked for clarification.

The Stage 2 review will be carried out by an officer who was not involved in the Stage 1 investigation, to ensure an independent and impartial review. The Stage 2 review is not usually a reinvestigation, but a review of the Stage 1 handling to ensure it was thorough, fair and reasonable.

A final written Stage 2 response will be issued within twenty working days of the complaint being acknowledged. Where additional time is required, the response period may be extended by up to a further twenty working days. The tenant will be informed of the reason for the delay and the revised response date.

Where the response cannot be issued within the extended timescale, suitable arrangements for providing updates will be agreed with the tenant and updates provided until the response is issued.

The Stage 2 response will clearly set out:

- Our understanding of the complaint
- The decision reached
- The reasons for that decision
- Any remedy or action to be taken.
- Any outstanding actions
- Details of how to refer the complaint to the Housing Ombudsman if the tenant or customer remains dissatisfied.

9.0 The Housing Ombudsman

9.1 If a tenant or customer remains dissatisfied following the final Stage 2 response, they may refer their complaint to the Housing Ombudsman.

9.2 Tenants have the right to contact the Housing Ombudsman at any stage of the complaints process for advice and guidance.

9.3 The Housing Ombudsman is an independent and impartial service that investigates complaints about social housing landlords. It considers complaints based on the evidence and whether the landlord has acted fairly in all circumstances and in accordance with the Housing Ombudsman Scheme and the Complaint Handling Code.

9.4 The Housing Ombudsman can be contacted by:

- Telephone: 0300 111 3000
- Online: www.housing-ombudsman.org.uk
- Post: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

9.5 Most housing management complaints fall within the jurisdiction of the Housing Ombudsman. Where another Ombudsman has jurisdiction, details will be provided in the complaint response.

10.0 Complaints involving more than one organisation

10.1 Where a complaint concerns both a managing agent and the Council, tenants or customers will not be expected to pursue separate complaints through different procedures.

10.2 The housing element of the complaint will remain within this two-stage housing complaints process and the tenant or customer will be kept informed of which organisation is responsible for investigating each part of the complaint.

10.3 At acknowledgement and throughout the investigation, tenants will be advised:

- which issues are the responsibility of the managing agent.
- which issues are the responsibility of the Council.
- which organisation is leading on each part of the complaint.

10.4 Where appropriate, a coordinated response may be issued. This will not affect the tenant's or customer's right to progress the complaint through Stage 1, Stage 2 and, if they remain dissatisfied, to the Housing Ombudsman.

11.0 Putting things right and remedies

11.1 We are committed to resolving complaints fairly and learning from occasions where service standards have not been met. Where we identify that something has gone wrong, we will take appropriate action to put matters right.

11.2 Remedies will be proportionate to the circumstances of the complaint and may include:

- acknowledging where things have gone wrong
- providing an apology
- providing an explanation
- reviewing or reconsidering a decision
- taking action to resolve the issue raised
- reviewing policies, procedures or working practices
- identifying service improvements
- identifying learning and actions to prevent recurrence.
- financial remedy, where this is appropriate.

11.3 We will seek to ensure that any remedy offered is fair, reasonable and proportionate to the impact experienced by the tenant or customer.

11.4 Where a financial remedy is considered by a managing agent, this will be considered on a case-by-case basis and will reflect the individual circumstances of the complaint, the impact on the tenant or customer and any relevant guidance issued by the Housing Ombudsman.

11.5 Where actions are identified as part of a complaint outcome, these will be monitored, tracked and progressed promptly. We will not delay issuing a complaint response while outstanding actions are completed.

12.0 Managing unreasonable complaint behaviour

12.1 The Council recognises that tenants have a right to make a complaint and to have that complaint investigated fairly. We are committed to ensuring that access to the complaints process is not restricted unreasonably.

12.2 In a small number of cases, the actions of an individual or group may make it difficult for a complaint to be managed effectively. This may include repeated contact about the same issues after the complaints process has been completed, excessive correspondence, or behaviour that places unreasonable demands on staff resources.

12.3 Where an individual or group makes repeated complaints about different matters, or raises the same issue multiple times, either during the investigation or after it has been completed, this may be considered persistent or unreasonable behaviour, depending on the facts of the case.

12.4 Where this occurs, the matter will be managed in accordance with the Council's Policy on the Management of Unreasonable Complainant Behaviour Procedure: Managing Unreasonable Customer Behaviour Procedure. Any action taken will be evidence based, reasonable, proportionate and subject to regular review.

12.5 The existence of such arrangements does not remove a tenant's or customer's right to have their complaint considered, nor will it prevent new complaints from being assessed on their merits.

13.0 Accessibility, equality and reasonable adjustments

13.1 We are committed to ensuring that the complaints process is accessible to all tenants and complies with the requirements of the Equality Act 2010.

13.2 We will consider the individual needs of tenants and make reasonable adjustments where required to enable access to the complaints process. This may include:

- communication support
- alternative methods of contact
- assistance by telephone or in person
- provision of information in accessible formats

13.3 Information about this policy and how to make a complaint will be made available, upon request, in alternative formats, including large print, Braille, audio, easy read and other languages.

13.4 Any reasonable adjustments agreed with a tenant will be recorded and kept under review throughout the complaints process.

14.0 Privacy and personal data

14.1 We are committed to protecting your right to confidentiality and privacy.

14.2 Personal data will be handled in accordance with data protection law, including the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation and any subsequent changes to data protection legislation.

14.3 Information will only be shared where there is a lawful basis to do so and where it is necessary for the investigation and resolution of the complaint.

14.4 Further information about how personal information is processed can be found in the Council's Privacy Notice.

15.0 Learning, monitoring and governance

15.1 We recognise the value of complaints as a source of learning and service improvement. Feedback received through complaints helps us understand tenant and customer experiences and identify opportunities to improve services.

15.2 The Council maintains oversight of complaint handling by managing agents including compliance with complaint handling timescales, the Housing Ombudsman's Complaint Handling Code, complaint outcomes, learning identified, service improvements implemented, performance and the effectiveness of complaint handling across managing agents.

15.3 The Council is required to complete and publish an annual self-assessment against the Housing Ombudsman Complaint Handling Code in accordance with Housing Ombudsman requirements.

15.4 Performance, learning and compliance will be reported through the Council's governance arrangements and through each managing agent's governance arrangements, as appropriate.

15.5 An annual complaint performance report and learning information will be published annually on the Council's website in accordance with regulatory requirements.

Schedule 1

Managing agent contact details

Tenants of council homes should direct housing complaints to the managing agent that manages their home via the available channels used by the organisation.

This two-stage housing complaints policy applies to all four managing agents.

Managing agent contact details below are included to help tenants and customers access the correct route quickly.

Managing Agent	Managing Agents contact details
Wolverhampton Homes	**Address**: Wolverhampton Homes, Wednesfield Housing Office, Alfred Squire Road, Wednesfield, Wolverhampton, WV11 1XU **Online contact form:** https://Wolverhampton Homes **Via the My Account app:** Through our My Account app **In person**: At the Civic Centre, Monday to Friday 10am to 3pm **Telephone**: 01902 556789
Bushbury Hill Estate Management Board	**Telephone**: 01902 552995 **Address**: The Management Centre, 14 Kempthorne Avenue, Low Hill, Wolverhampton, WV10 9JG. **Email**: info@bushburyhill.org **Online contact form**: Bushbury Hill EMB
Dovecotes Tenant Management Organisation	**Telephone**: 01902 552780 **Address**: The Housing Office, 86 Ryefield, Pendeford, Wolverhampton, WV8 1UD **Email**: generalenquiries@dovecotestmo.com **Online contact form**: Dovecotes TMO
New Park Village Tenant Management Co operative	**Telephone** 01902 552670 **Address**: 12 Valley Road, New Park Village, Wolverhampton, WV11 1XU. **Email**: NewParkVillage2@wolverhampton.gov.uk **Online** contact form: New Park Village TMC