SIX TOWN HOUSING
COMPLAINTS POLICY

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1.0 PURPOSE AND COMMITMENT

Six Town Housing is committed to delivering high-quality services to our tenants, ensuring that everyone is treated fairly and with respect. This policy sets out our approach to handling complaints and explains the steps we will take to put things right when issues arise.

Six Town Housing will ensure tenants have access to an effective complaints process and that complaints are handled in accordance with the Housing Ombudsman Complaint Handling Code. Six Town Housing has overall responsibility for tenants' complaints. Bury Council Housing Services delivers housing management services and administers the complaints process on behalf of Six Town Housing through a Service Level Agreement.

We recognise that, at times, things can go wrong. When this happens, we are committed not only to resolving the issue promptly, but also to learning from the experience and using those lessons to improve the services we provide.

Our aim is to deliver a complaints service that is fair, easy to access, and transparent, ensuring that tenants feel confident their concerns are taken seriously. We are also committed to using complaints as a valuable source of feedback to drive continuous learning and service improvement.

We will ensure all complaints are handled in line with the Housing Ombudsman Complaint Handling Code.

The arrangements between Six Town Housing and Bury Council Housing Services do not affect a tenant's right to escalate their complaint to the Housing Ombudsman where appropriate.

2.0 SCOPE

This policy applies to complaints about the housing services provided by Six Town Housing to tenants and their authorised representatives.

It covers complaints about our actions, decisions, standards of service, or failure to act, including services delivered on our behalf by contractors.

Bury Council Housing Services will receive, investigate and respond to complaints on behalf of Six Town Housing. References within this policy to "we", "us" and "our" relate to the housing management services delivered by Bury Council under the management agreement with Six Town Housing.

3.0 LEGAL AND REGULATORY FRAMEWORK

This policy is developed in line with the following legislation and meets the requirements of:

- The Housing Ombudsman's Complaint Handling Code 2024
- Social Housing (Regulation) Act 2023
- Localism Act 2011
- Housing Act 1996 (Schedule 2)
- Data Protection Act 2018 and UK GDPR
- Equality Act 2010

4.0 WHAT IS A COMPLAINT

A complaint is:

An expression of dissatisfaction, however made. You do not need to use the word "complaint."

Any expression of dissatisfaction, however made, about our service, actions, or failure to act will be considered under this policy.

Whenever a tenant expresses dissatisfaction, we will give them the opportunity to make a complaint and explain the complaints process. Complaints may be made directly by the tenant or through an authorised representative and will be handled in accordance with this policy.

We will recognise dissatisfaction in all its forms and offer tenants the opportunity to raise a complaint. Tenants will not be treated differently or disadvantaged because of making a complaint.

Where concerns relate to services provided by contractors, we will take responsibility for managing these complaints.

We will accept all complaints unless there is a valid reason not to do so and will not unreasonably refuse to accept a complaint. Any decision not to accept a complaint will be considered on a case-by-case basis and will be clearly explained and evidenced.

5.0 SERVICE REQUESTS AND COMPLAINTS

A service request is where a tenant asks us to fix a problem or provide a service, such as carrying out repairs or maintenance work.

Where a tenant is dissatisfied with the way a service request has been handled or with the outcome, we will give the tenant the choice for this to be treated as a complaint. This applies even where the service request is still ongoing. In such circumstances, the complaint will be considered alongside the service request, and we will continue to progress the original request without delay while also addressing the concerns raised.

Whenever a tenant expresses dissatisfaction, we will provide them with the opportunity to make a complaint and explain how the complaints process operates.

This applies regardless of whether the dissatisfaction relates to a service request, an existing case, a completed service, or any other aspect of our service delivery.

We will ensure that tenants are not required to pursue a service request before being given the option to make a complaint.

6.0 EARLY RESOLUTION

We will seek to resolve complaints at the earliest opportunity. Where a complaint can be resolved quickly and to the tenant's satisfaction, we will confirm the outcome and ensure it is recorded appropriately.

A complaint will only be closed where it has been resolved to the tenant's satisfaction or where a full response has been issued.

Where a complaint is resolved at an early stage, it will still be recorded as a complaint in line with this policy.

7.0 HOW TO MAKE A COMPLAINT

Tenants can make a complaint through a range of channels, including online, by telephone, in writing, or in person.

We will ensure that information about the Complaints Policy is widely promoted and easily accessible to all tenants. Details of how to make a complaint and tenants' rights will be communicated through our website, social media channels, newsletters, tenancy sign-up processes, welcome packs and targeted communications such as emails, letters, and text messages. Information will also be shared through customer engagement activities and provided in accessible formats where required or upon request.

We will regularly review our communication methods to maximise awareness of the complaints process and the right to escalate complaints to the Housing Ombudsman Service where appropriate.

We will make reasonable adjustments to ensure our complaints process is accessible to all tenants, in line with the Equality Act 2010. This may include providing information in alternative formats, offering interpretation or support, and adapting communication methods to meet individual needs.

Complaints may be made by a representative on behalf of a tenant. We will seek consent where required or make appropriate arrangements where consent cannot be obtained.

8.0 COMPLAINTS PROCESS

We operate a two-stage complaints process in line with the Housing Ombudsman Complaint Handling Code. This ensures complaints are properly investigated and that tenants can request a review if they remain dissatisfied.

Stage 1 involves an investigation into the complaint, while Stage 2 provides a formal review by a senior officer.

9.0 PUTTING THINGS RIGHT (REMEDIES)

We are committed to putting things right when service failures occur. Appropriate remedies may be offered at any stage of the complaints process and will not be dependent on a complaint being escalated.

Six Town Housing has processes in place to ensure complaints can be remedied at any stage of the complaints process. Complaint handlers are empowered to identify and implement appropriate remedies, including apologies, service improvements, corrective actions, and compensation where appropriate, without requiring escalation to Stage 2. This is supported by the Complaints Policy, complaint handling procedures, delegated authority arrangements, and complaint case records demonstrating remedies are routinely offered and implemented at Stage 1 and Stage 2.

When something has gone wrong, we will take appropriate action to put things right. Our response will be proportionate to the circumstances and the impact.

This may include an apology, a clear explanation, corrective action, a review of decisions, amendments to records, service improvements, or a financial remedy where appropriate.

Any remedy will reflect the impact on the tenant. We will clearly explain what actions will be taken and the timescales for completion, and we will ensure all actions are tracked and delivered.

We will take account of guidance issued by the Housing Ombudsman when determining appropriate remedies.

10.0 STAGE 1 – INVESTIGATION

Acknowledgement

We will acknowledge, define, and log the complaint within five working days of receipt.

At the point of acknowledgement, we will confirm our understanding of the complaint, clearly set out the issues we are investigating, and explain what we are responsible for, including where matters fall outside our remit. This ensures that both we and the tenant have a shared and clear understanding of the complaint from the outset.

Investigation

We will carry out a thorough, proportionate, and impartial investigation into all aspects of the complaint. This will include clearly defining the scope of the complaint,

reviewing relevant records, speaking to staff or contractors where necessary, and considering all available evidence.

We will ensure that all relevant information is carefully considered and that findings are based on a full and balanced assessment of the evidence. Our investigation will be conducted with an open mind and will focus on addressing all issues raised by the tenant.

We will clearly document our findings and ensure that decisions are transparent, consistent, and supported by evidence.

We will continue to investigate the complaint even if we are unable to contact the tenant.

We will not close complaints due to a lack of contact and will continue the investigation based on the information available to us.

Additional Issues Raised During Investigation

Where a tenant raises additional issues during a Stage 1 investigation, we will assess whether these issues are related to the original complaint.

Where the additional issues are related and the Stage 1 response has not yet been issued, they will be incorporated into the existing complaint and investigated as part of that response.

Where the Stage 1 response has already been issued, or where the additional issues are not related to the original complaint or where including them would unreasonably delay the Stage 1 response, the issues will be logged and handled as a new complaint.

We will clearly explain to the tenant how any additional issues are being handled and ensure that complaint timescales are not unnecessarily delayed.

Response Timing and Actions

We will provide a full written response within ten working days of acknowledging the complaint (working days are Monday to Friday, excluding public holidays).

In line with the Housing Ombudsman Complaint Handling Code, a complaint response will be provided when the outcome of the complaint is known and will not be delayed while outstanding actions required to address the issue are completed. Any outstanding actions will be clearly explained, tracked separately, and actioned promptly. We will provide appropriate updates until all actions are completed.

Our response will clearly set out:

- The complaint stage and complaint definition
- The decision on the complaint
- The reasons for the decision
- Details of any remedy offered
- Any outstanding actions and associated timescales
- How to escalate the complaint to Stage 2 if the tenant remains dissatisfied

If it becomes apparent that we are unable to respond within the applicable timescale, we will inform the tenant as soon as possible, explain the reason for the delay, and provide a revised response date.

Complaint Outcomes

Our response will clearly confirm whether the tenant's complaint has been upheld, partially upheld, or not upheld.

Extensions (Stage 1)

Where additional time is required to complete the investigation, we may extend the response timeframe by up to ten additional working days. We will explain the reasons for the delay and confirm a revised response date and agree appropriate updates on the progress of the complaint.

If further time is needed beyond this, it will only be in exceptional circumstances. In such cases, we will agree the extension with the tenant and provide details of the Housing Ombudsman should the tenant remain dissatisfied.

Where a response is expected to fall outside the timescales set out in the Housing Ombudsman Complaint Handling Code, we will agree appropriate update intervals with the tenant and maintain regular communication until the response is issued.

11.0 STAGE 2 – REVIEW

If the tenant is dissatisfied with the Stage 1 response, they can request escalation to Stage 2 of our complaints process within 1 calendar month. This may be done if the tenant disagrees with the decision, or if they feel that issues raised have not been fully addressed or resolved. If what has been agreed at stage 2 has not been resolved and the issue remains, then a complaint can be escalated longer than the 1 calendar month.

A tenant does not need to provide a reason for requesting escalation to Stage 2, and requests will not be unreasonably refused.

The complaint will be reviewed by a Senior Officer who has not been involved in the Stage 1 investigation, ensuring independence and a fresh assessment of the complaint.

The Stage 2 review will involve a thorough and impartial reassessment of the complaint, including consideration of all relevant information and evidence. This will include reviewing how the complaint was handled at Stage 1, the quality and adequacy of the investigation, and whether the conclusions reached were reasonable and evidence based and/or ongoing issues and agreed actions from Stage 1 still unresolved.

The review will ensure that all aspects of the complaint have been fully addressed and that any identified service failures, learning points, or opportunities for improvement have been appropriately recognised.

Acknowledgement

We will acknowledge, define, and log the request for Stage 2 within five working days of escalation.

At this stage, we will clearly confirm the issues being considered and what aspects of the complaint are under review.

We will also reconfirm our understanding of the complaint, ensuring that the scope of the review and our responsibilities are clearly set out.

Response

We will provide a full response within twenty working days of acknowledging the Stage 2 request (working days are Monday to Friday, excluding public holidays).

The Stage 2 response will be issued when the outcome of the review is known and will not be delayed while outstanding actions are completed. Any outstanding actions will be clearly set out, tracked, and progressed promptly, with regular updates provided to the tenant until completion.

The Stage 2 response will clearly set out the decision, the reasons for that decision, any remedies offered and confirm that this is the final response to the complaint. It will also include details of how to contact the Housing Ombudsman. All relevant staff will be involved as necessary to ensure a comprehensive, accurate and informed response is provided.

Our response will clearly set out:

- The complaint stage and complaint definition
- The decision on the complaint
- The reasons for the decision
- Details of any remedy offered
- Any outstanding actions and associated timescales
- How to escalate the complaint to the Housing Ombudsman if the tenant remains dissatisfied

Extensions (Stage 2)

If we are unable to respond within the applicable timescale, we will inform the tenant as soon as possible, explain the reason for the delay, and provide a revised response date. Where additional time is required, the response timeframe may be extended by up to 20 additional working days.

In exceptional circumstances where further delay is required, this will be agreed with the tenant. We will also provide details of the Housing Ombudsman should the tenant remain dissatisfied.

Where a response is expected to fall outside the timescales set out in the Housing Ombudsman Complaint Handling Code, we will agree appropriate update intervals with the tenant and maintain regular communication until the response is issued.

12.0 HOUSING OMBUDSMAN

If a tenant remains dissatisfied following our final response, they may refer their complaint to the Housing Ombudsman. The Ombudsman is independent, impartial, and free to use.

Tenants may contact the Ombudsman at any stage for advice and support. Contact details will be included in all complaint responses.

13.0 TIMEFRAMES AND DISCRETION

We will normally accept complaints within 12 months of the issue arising or from when the tenant became aware of the matter.

However, we recognise that there may be circumstances where it is appropriate to consider complaints outside this timeframe. We will apply discretion on a case-by-case basis, considering factors such as vulnerability, personal circumstances, ongoing issues, or where we have contributed to a delay in the complaint being raised.

14.0 FAIR EXCLUSIONS

We will consider all complaints fairly and take account of the individual circumstances in each case. While we aim to accept and investigate all complaints, there may be limited situations where we decide not to investigate part or all of a complaint.

In line with the Housing Ombudsman Complaint Handling Code, we will ensure that access to the complaints process is maintained wherever possible. Complaints can still be raised alongside insurance claims where they relate to service delivery, such as delays or communication.

Anonymous complaints will be logged and investigated as far as reasonably practicable, and any contact restrictions in place will not prevent a tenant from accessing the complaints process.

We will always explain any decision not to accept or investigate a complaint, provide clear reasons for that decision, and signpost tenants to alternative options where appropriate, including the right to refer the matter to the Housing Ombudsman Service.

There may be circumstances where we are unable to consider a complaint, for example where legal proceedings have formally commenced. This is defined as when details of a claim, including the Claim Form and Particulars of Claim, have been filed with the court.

Where we decide not to accept a complaint, we will clearly explain our reasons and advise the tenant of their right to refer the decision to the Housing Ombudsman.

Decisions will be made on a case-by-case basis, ensuring that each matter is considered fairly and in line with this policy.

Where an issue does not meet the criteria for a complaint, the relevant service manager will consider the matter outside of the complaints process and respond accordingly.

15.0 COMPLAINT CLOSURE

We will only close a complaint once we have provided a response that addresses all the issues raised. A complaint will only be closed where it has been resolved to the tenant's satisfaction, or where we have clearly explained our final position, including the reasons for our decision and the tenant's right to escalate the matter if they remain dissatisfied.

16.0 LEARNING AND IMPROVEMENT

We are committed to using complaints as a key source of learning to improve our services and outcomes for tenants.

We will ensure that lessons learned from complaints are identified, recorded, and used to drive service improvement. This includes analysing complaint trends, tracking actions taken in response to complaints, and using this information to inform service delivery and decision-making.

We will also ensure that learning from complaints is embedded through staff training and development, so that improvements are sustained over time.

Accurate records of complaints, outcomes, and resulting actions will be maintained to support transparency, accountability, and continuous improvement.

17.0 GOVERNANCE

We are committed to ensuring effective governance and oversight of complaints handling. We will regularly monitor and report on complaint performance to the Six Town Housing Board, Housing Advisory Board and Senior Leaders to support transparency and accountability.

We will complete an annual self-assessment against the Housing Ombudsman Complaint Handling Code to ensure ongoing compliance and identify areas for improvement. We will also publish information on complaint performance and the learning arising from complaints to demonstrate how feedback is used to improve services.

We will produce an Annual Complaints Performance and Service Improvement Report in accordance with the Housing Ombudsman Complaint Handling Code.

The report will provide an assessment of complaints performance, complaint handling effectiveness, lessons learned, service improvements delivered, and areas identified for further development.

18.0 FAIR ACCESS AND ACCEPTABLE BEHAVIOUR

In some circumstances, we may need to manage how we communicate with a tenant in line with our Zero Tolerance Procedure, where behaviour is considered unreasonable or unacceptable. Any such arrangements will be proportionate, regularly reviewed, and will demonstrate due regard for the provisions of the Equality Act 2010. These arrangements will not prevent the tenant from accessing the complaints process, and the tenant will always be able to raise and pursue a complaint.

Where a complaint is assessed as malicious or vexatious, we will clearly explain the reasons for this decision and any action we intend to take in managing the complaint. Any such decision will be made on a case-by-case basis, ensuring it is fair, evidence-based, and in line with this policy. We will also ensure that any restrictions applied do not unreasonably restrict the tenant's ability to access our services or the complaints process.

19.0 COMPLAINT RECORDING AND RECORD KEEPING

Throughout the complaints process, we will maintain clear, accurate, and comprehensive records for all complaints, in line with the Housing Ombudsman Complaint Handling Code.

Our records will include:

- The details of the complaint and how it was received
- The defined scope of the complaint and any changes during the investigation
- All correspondence and communication with the tenant
- Actions taken, investigations carried out, and evidence considered
- Decisions made and the reasons for those decisions
- Any remedies offered and actions completed, including timescales

All complaints will be recorded within our case management system to ensure a complete and auditable record of how each complaint has been handled.

We will ensure that records are kept up to date throughout the complaints process and that there is a clear audit trail demonstrating how decisions have been reached and actions delivered.

Complaint data will be used to monitor performance, identify trends, and support learning and service improvement across Six Town Housing.

All information will be handled and retained in accordance with the Data Protection Act 2018 and UK GDPR, ensuring that personal data is processed lawfully, fairly, and securely.

20.0 REVIEW

This policy will be reviewed every year or sooner if required by changes to Ombudsman guidance or legislation.

APPROVAL AND REVIEW

Document owner	Kate Waterhouse	**Director of Six Town Housing**	
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Review frequency		**1 year**	