
Author**Title of policy**

Head of Lettings and
Income Protection

Customer Complaints Policy

**Section**

Updated: May 2025

Operations

1 Policy statement

- 1.1 We value and encourage a positive complaint handling culture and are committed to ensuring that all our customers have a strong voice to influence decisions and challenge us as their landlord. We are also committed to consistently providing an excellent service to all our customers. However, we recognise that there are times when our service fails to meet the high standards we have set.
- 1.2 This Policy sets out Rooftop Housing Group's ('Rooftop') approach, obligations and responsibilities regarding customer complaints and extends to all our services including those of our contractors and agents. It applies to all our customers and their designated advocates including non-resident service users, key workers, those in shared ownership properties and leaseholders. Application of this Policy to other parties will be considered on a case-by-case basis.
- 1.3 Rooftop encourages a culture of continuous improvement, both as individuals and as an organisation. Rooftop recognises a high number of complaints can be indicative of a well-publicised and accessible complaint process. Learning from our customer feedback, including customer complaints, is an integral part of that process and this Policy sets out our expectations on how we evidence, monitor and deliver any learning points that arise from the complaints we receive.
- 1.4 Customers must be able to raise their complaints in any way and with any colleague. All colleagues are made aware of the complaints process and know how to record complaints.
- 1.5 All colleagues will collaborate and co-operate to resolve complaints and take collective responsibility.

2 Statutory and Regulatory context

- 2.1 The Transparency, Influence and Accountability Standard (Regulator of Social Housing 2024) states:
 - 2.1.1 Registered providers must ensure their approach to handling complaints is simple and accessible.
 - 2.1.2 Registered providers must publicise their complaints process and what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled.
 - 2.1.3 Registered providers must provide tenants with information about the type of complaints received and how they have learnt from complaints to continuously improve services.
- 2.2 In addition, the supporting Code of Practice notes:
 - 2.2.1 Addressing complaints fairly, effectively and promptly is essential for providers to build trust with tenants. Providers should make every effort to ensure that tenants are aware of their complaints process. Tenants should be able to raise a complaint easily and should be listened to by their landlord when they do so.

- 2.2.2 In addressing complaints, registered providers should ensure that they provide regular updates to affected tenants about the progress they have made to resolve the complaint fairly and the next steps they plan to take, with clear timescales. In meeting this outcome, registered providers are expected to consider relevant requirements of other bodies, including those of the Housing Ombudsman (HO) and specifically its Complaint Handling Code which is now on a statutory footing as part of the Social Housing (Regulation) Act 2023.
- 2.2.3 Complaints present registered providers with valuable insight into tenants' experiences of interacting with their landlord. Registered providers should make good use of this learning in order to improve services for tenants, bringing about change at a service or organisational level where appropriate. As part of this learning, registered providers should analyse trends and themes from complaints data.
- 2.3 This Policy is also compliant with the rights enshrined in the General Data Protection Regulations (2018).

3 Definitions

- 3.1 A **Contact** is the day-to-day correspondence we have with our customers. This might include reporting Anti-Social Behaviour (ASB), requesting a repair or providing a customer with an update on a service we are providing. We may classify an initial contact as a Service Request when this is our first opportunity to put something right for the customer. It may, however, be clear that the issues raised are complex or longstanding, or the customer may request to raise a complaint. Where a customer expresses dissatisfaction with our handling of a service request, we will raise a complaint, even where the service request is ongoing.
- 3.2 We have adopted the Housing Ombudsman's definition of a **Complaint**. This is an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Rooftop, its own colleagues, or those acting on our behalf, affecting a customer or group of customers. A customer does not need to use the word 'complaint' for it to be treated as such. Whenever a customer expresses dissatisfaction, we will give them the choice to make a complaint.
- 3.3 An **Advocate** is a person that is representing the customer through this process. This may be a friend, relative or neighbour or someone in a more formal capacity, such as a solicitor. The customer will need to designate an individual or organisation to advocate on their behalf in writing. The customer will also have the right to be accompanied at any meeting with the landlord.

4 Equality, Diversity and Inclusion: Principles

- 4.1 At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.
- 4.2 We will make it easy for customers to complain by providing different channels through which they can make a complaint under our duties under the Equality Act 2010. Complaints can be made to us in person, over the telephone, by email, by letter, or via our website. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances.

- 4.3 Our Assessing and Supporting Vulnerability Policy outlines our approach. We will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a customer has disclosed. Any agreed reasonable adjustments will be kept under active review.

5 Vulnerability: Reasonable Adjustments

- 5.1 There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where there are several complexities present, or where customers have vulnerabilities that may lead us to make reasonable adjustments to the way we apply this Policy.
- 5.2 In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy. This includes providing a named complaint owner to be the main point of contact for the person making the complaint and who is responsible for keeping them informed of progress on their complaint.

6 Data Protection: Principles

- 6.1 Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

7 Key Principles

- 7.1 All complaints are dealt with fairly, honestly, consistently and in a timely manner in line with the Housing Ombudsman Complaint Handling Code. We also ensure that our customers are aware of the Housing Ombudsman Service and provided with its contact details.
- 7.2 We will accept a complaint unless there is a valid reason not to do so and each complaint is treated on a case-by-case basis. Complaints made by a third party will be responded to and investigated in line with the Policy.
- 7.3 We will investigate complaints raised by one of our customers, a current or former tenant or a current or former leaseholder. We will also investigate complaints made by customers of other landlords, leaseholders, owner-occupiers, or private tenants about one of our customers causing a nuisance within the vicinity of their home. Such investigations will fall under the Anti-Social Behaviour and Hate Incidents Policy and procedures and not under the Customer Complaints Policy.
- 7.4 By default, we will not entertain group complaints. This is because it's important we consider the relevant impact and individual circumstances of each customer. In the event there is more than one complaint relating to the same issue, we may proceed without carrying out multiple investigations where the issues and facts are the same. We will record the specific outcome from a consolidated investigation that relates to an individual against their respective tenancy record through the complaint process and acknowledge each respective individual separately.
- 7.5 Negative comments or messages on social media will not be tracked or logged as complaints. Where possible and appropriate, we will signpost our customers to our complaints process.

- 7.6 All complaints are confidential and are recorded and investigated as such. The complaints process and the handling of related information is General Data Protection Regulation (GDPR) compliant.
- 7.7 Colleagues are trained and have responsibility for recognising complaints and making sure that if they are not responsible for handling the complaint that they support the customer by referring the complaint to the appropriate person quickly and explaining the next steps to the customer.
- 7.8 Mandatory Complaint Handling training provides an overview of the Customer Complaint Policy and procedure. The training forms part of the corporate induction process for new colleagues and we expect existing colleagues to complete the training on an annual basis. This ensures that colleagues can recognise a complaint and offer support as required.
- 7.9 Rooftop has a Complaints Team assigned to take responsibility for complaint handling and is responsible for liaison with the Housing Ombudsman. The Complaints Team has access to colleagues at all levels to facilitate the prompt resolution of complaints. They also have the authority and autonomy to act to resolve disputes promptly and fairly. The Complaints Resolution Manager will lead the team and support on a group wide level ensuring a consistent and compliant approach and championing the Customer Complaints Policy and procedure. They will also ensure complaints are reported to the Group Board.
- 7.10 We have appointed a member of the Group Board to have lead responsibility for complaints. This is the Member Responsible for Complaints (the 'MRC'). The MRC and Group Board will receive regular reports relating to complaints.
- 7.11 This Policy is published and promoted on the Rooftop website, through social media platforms and can be made available to customers in multiple formats, including alternative languages and hard copy. Alongside the Policy we provide a guide for customers to explain the complaints process, timescales and expectations.
- 7.12 Our complaints handling performance is measured against our own targets and the standards set out by the Regulator of Social Housing and Housing Ombudsman. We publish a self-assessment of our performance against these standards and the Group Board's response on our website annually. We will also publish complaints performance and a summary of the learning and actions on our website.

8 Process

- 8.1 **Acknowledgement** – complaints must be acknowledged, defined and logged at Stage 1 of the complaints' process **within five working days of the complaint being received**. The acknowledgement will clarify which aspects of the complaint we are or are not responsible for.
- 8.1.1 **Stage 1** – if the customer clearly wishes to raise a complaint about the service we have provided, their concerns are investigated by the Complaints Team and a full response will be issued **within 10 working days of the complaint being acknowledged**. Rooftop will confirm, in writing and in clear plain language:
- a) the complaint stage.
 - b) the complaint definition.
 - c) the decision on the complaint.
 - d) the reasons for any decisions made, referencing relevant policy, law and good practice where appropriate.
 - e) the details of any remedy offered to put things right.

- f) details of any outstanding actions and how these will be tracked, actioned and communicated.
- g) details of how to escalate the matter to Stage 2 if the individual remains dissatisfied.

We respond to a complaint when we know the answer to the complaint, not when we complete the actions required to address the issue. We commit to tracking outstanding actions and providing updates to customers. We will agree suitable intervals with customers for being updated on outstanding actions on a case-by-case basis.

If new issues that are related to the Stage 1 are raised by the complainant and the Stage 1 response has not been issued, then they will be incorporated into the Stage 1 response. If new issues are identified during the Stage 1 process that are not part of the investigation, a new Stage 1 complaint will be logged for investigation to avoid any undue delay to the existing investigation.

If an extension to this timescale is needed when considering the complexity of the complaint, we will inform our customer of the expected timescale for response. Any extension must be **no more than 10 working days** without good reason, and the reason(s) must be clearly explained to the customer. If a complaint response is extended, the customer will be provided with the contact details for the Housing Ombudsman. Where responses fall outside the Code's extended timescales, we will agree with the customer suitable intervals for being updated on the complaint.

- 8.1.2 If all or part of the complaint is not resolved to the customer's satisfaction, then the complaint must be progressed to Stage 2. The person considering the complaint at Stage 2 will not be the same person that considered the complaint at Stage 1. We expect that a customer should have reasonable time to consider the resolution offered at Stage 1 and therefore expect that a request to escalate to Stage 2 should be received **within 30 working days** of the Stage 1 resolution being sent.
- 8.1.3 **Stage 2** – if all or part of the complaint is not resolved to the customer's satisfaction at Stage 1, it will be progressed to Stage 2. Customers are not required to explain their reasons for requesting a Stage 2 consideration. We will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response.

Requests for Stage 2 must be acknowledged, defined and logged at Stage 2 **within five working days of the escalation request being received**. The Stage 2 acknowledgement will clarify which aspects of the complaint we are or are not responsible for.

We will issue a final response to the Stage 2 **within 20 working days of the complaint being acknowledged**. If an extension to this timescale is needed when considering the complexity of the complaint, we will inform our customer of the expected timescale for response. Any extension must be **no more than 20 working days** without good reason and the reason(s) must be clearly explained to the customer. If a complaint response is extended, the customer will be provided with the contact details for the Housing Ombudsman. Where responses fall outside the Code's extended timescales, we will agree with the customer suitable intervals for being updated on the complaint.

- 8.2 We will contact the customer as early as possible at each stage to understand the outcome that they are seeking to enable their involvement and to facilitate a swift resolution.

Stage 2 is our final response. Rooftop will confirm, in writing and in clear plain language:

- a) the complaint stage.
- b) the complaint definition.
- c) the decision on the complaint.
- d) the reasons for any decisions made referencing relevant policy, law and good practice where appropriate.
- e) the details of any remedy offered to put things right.
- f) details of any outstanding actions and how these will be tracked, actioned and communicated.
- g) details of how to escalate the matter to the Housing Ombudsman if the individual remains dissatisfied.

- 8.3 We respond to a complaint when we know the answer to the complaint, not when we complete the actions required to address the issue. We commit to tracking outstanding actions and providing updates to customers. We will agree suitable intervals with customers for being updated on outstanding actions on a case-by-case basis.
- 8.4 Where the complaint is from a leaseholder or freeholder regarding a service charge, they may choose to take the matter to a Leasehold Valuation Tribunal.
- 8.5 We will support investigations by and the determination of the Housing Ombudsman or Leasehold Valuation Tribunal.
- 8.6 The outcome of every complaint will be recorded on the housing management system. Lessons learned from complaints will be agreed and overseen by the relevant Head of Service.
- 8.7 If a customer has a complaint about a contractor, we will ensure that our own complaints process is followed so that our customers do not have to go through two complaints processes.
- 8.8 Where the resolution for a complaint involves complex works, we will arrange for pre and post inspection by a Building Inspector.

9 Exclusions

9.1 Unacceptable behaviour

- 9.1.1 In line with the Code, we aim to deal fairly, honestly and consistently with all customers. Where a customer's actions are considered unacceptable, such as aggressive or abusive behaviour, unreasonable demands, vexatious or persistent and / or unsubstantiated complaints, the complaints process may be withdrawn or otherwise restricted. Where appropriate we may refer matters to the police or other agencies. Please refer to Rooftop's Unacceptable Behaviour Policy.
- 9.2 Each complaint is considered on an individual basis; we do not take a one size fits all approach when excluding complaints. However, complaints will not be investigated in cases where:
- The issue giving rise to the complaint occurred over 12 months ago, with discretion to consider each complaint request on a case by case basis. (Complaints where the customer has not been made aware of the issue within 12 months will be considered)
 - If customers express dissatisfaction with services when completing a satisfaction survey, we do not treat this as a complaint. All surveys will clearly outline how to make a complaint if the customer wishes to do so.

- Legal proceedings have started. This is defined as details of the Claim Form and Particulars of Claim, having been filed at court. Please note, where a customer has started a disrepair claim, this will not prevent us from inspecting the property, providing repairs to the property, or logging complaints until we are notified that court proceedings are beginning.
- Matters that have previously been considered under this Customer Complaints Policy.
- A customer's behaviour is deemed unacceptable (please see section 9.1.1 above).

9.3 The complaint relates to persons or bodies, over which we have no control, and actions or services which we are not responsible for providing.

9.4 The complaint relates to Anti-Social Behaviour (this is covered in the Anti-Social Behaviour and Hate Incidents Policy) unless the complaint concerns the management of the case.

9.5 If the complaint or escalation request is not accepted, an explanation must 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 Housing Ombudsman does not agree that the exclusion has been fairly applied, it may instruct Rooftop to take on the complaint.

9.6 A complaint made by a non-customer falls outside of this Policy and therefore will not be considered under this Policy. However, non-customers can bring relevant concerns to us and we undertake to investigate them and resolve them under the management of the appropriate team.

10 Putting things right

10.1 Where something has gone wrong, Rooftop will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. Remedies can be provided at any stage of the complaints process without the need for escalation.

These can include:

- Apologising.
- Acknowledgement, where things have gone wrong.
- Providing an explanation, assistance or reasons.
- Taking action if there has been delay.
- Reconsidering or changing a decision.
- Amending a record or adding a correction or addendum.
- Providing financial remedy (see Compensation Policy).
- Changing policies, procedures or processes.

11 Housing Ombudsman

11.1 The role of the Housing Ombudsman is to resolve complaints between landlords and residents. This includes investigating the complaint independently to decide if the landlord or managing agent has acted appropriately, along with making decisions around compensation or other remedies if needed. The Housing Ombudsman support effective landlord and resident dispute resolution.

11.2 Customers can contact the Housing Ombudsman regarding enquiries and advice at any point before or during the complaint process. The contact details are:

Complaint form: <https://www.housing-ombudsman.org.uk/residents/make-a-complaint/>

Email: info@housing-ombudsman.org.uk

Phone: 0300 111 3000

Write to:

Housing Ombudsman Service

PO Box 1484

Unit D

Preston

PR2 0ET

12 Compensation

- 12.1 We recognise that occasionally we may deliver services that fail to meet our customers' and our own service expectations. In these circumstances, compensation may be appropriate. In awarding compensation, we will consider whether any statutory payments are due, if any quantifiable losses have been incurred and the time, inconvenience and distress caused to the customer.
- 12.2 Compensation may be awarded at any stage of the complaint process if a complaint is upheld in line with our Compensation Policy.

13 Member Responsible for Complaints (the MRC)

- 13.1 The MRC will be responsible for ensuring the Group Board receives regular information on complaints that provides insight on Rooftop's complaint handling performance. They must have access to suitable information and colleagues to perform this role and report on their findings. A role description for the MRC has been created which contains specific detail of the duties and responsibilities.
- 13.2 As a minimum, the MRC and the Group Board must receive:
- a) regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance.
 - b) regular reviews of issues and trends arising from complaint handling.
 - c) regular updates on the outcomes of the Housing Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings.
 - d) the annual complaints performance and service improvement report.

14 Learning

- 14.1 We actively seek to identify learning from customer complaints and use them to improve services. We will report learning as necessary to relevant committees and customer panels.
- 14.2 The Complaints Team will complete a lessons-learned report, including any opportunities to improve that have been identified.
- 14.3 Rooftop will maintain a database of all lessons learned and ensure that any actions identified are monitored for completion and effectiveness. This will be the responsibility of the Head of Service and the Complaints Team.
- 14.4 The relevant Head of Service is responsible for implementing and communicating any lessons learnt within their own team and across the wider business.

- 14.5 Any service improvements are implemented by those Heads of Service whose business areas are the subject of the complaint.
- 14.6 Where a complaint concerns a colleague or colleagues acting inappropriately, the Human Resources department will be notified to support the investigation.
- 14.7 Rooftop will also network, share and learn from any good practice including specific spotlight reports or topics that have been reported on by the Housing Ombudsman as necessary.

15 Performance Monitoring

- 15.1 Overall compliance against our Policy will be monitored by the Complaints Resolution Manager.
- 15.2 The Executive Director – Operations will be the lead person accountable for complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
- 15.3 We are promoting a high performing learning culture through harnessing customer feedback to genuinely improve the service we provide and offer opportunities for continuous learning within our service teams.
- 15.4 Complaints performance is reported to the Leadership Team, the Executive Team and Group Board. The MRC will receive detailed information relating to volume, categories and outcomes as specified at Section 13.
- 15.5 Cases that are under notification to or review by the Housing Ombudsman are reported to Executive Team through the Compliance, Health and Safety report, including any impact against our existing risk assessment and risk score.
- 15.6 Regular and relevant reports are also taken to the Audit and Risk Committee.
- 15.7 Our performance will be shared more widely with our customers via the website quarterly and each year through the annual report to customers.
- 15.8 In line with the Code, each year we will carry out an annual self-assessment of our performance which will be reported to the Group Board and made publicly available via our website together with the Group Board's response.

16 Review

- 16.1 This Policy will be reviewed annually together with the self-assessment against the Housing Ombudsman Complaint Handling Code unless there are major changes in legislation or good practice.

17 Consultation

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| 17.1 | Leadership Team sub-group | April 2025 |
| 17.2 | Executive Team | April 2025 |

18 Responsibilities

Responsible body

- | | | |
|------|---|--------------------------------|
| 18.1 | Formulation, amendment and approval of policy | Board of Rooftop Housing Group |
| | Monitoring of policy | Complaints Team |

	Operational management of policy/policy author	Head of Lettings and Income Protection Complaints Resolution Manager
18.2	Date of formulation of policy	February 2005
18.3	Dates of policy reviews	
	Minor changes to reflect recommendations from the Housing Ombudsman	August 2025 May 2025 January 2025 September 2024 March 2024 May 2023 November 2022 December 2020 July 2019 August 2015
18.4	Date of next review	May 2026

Appendix 1

Associated documents

Internal – Rooftop policies and procedures

- Complaints procedure
- Whistleblowing Policy and procedure
- Compensation Policy and procedure
- Unacceptable Behaviour Policy
- Assessing and Supporting Vulnerability Policy
- Receiving Dissatisfaction and Complaints directly – Guidance for Board Members
- Complaints guide to Customers
- MRC Role Description

External

- Social Housing (Regulation) Act 2023
- Regulator of Social Housing Transparency, Influence and Accountability Standard (2024)
- ISO 9001:2015 Quality Management System
- Housing Ombudsman's Complaint Handling Code (2024)
- Equality Act 2010
- Leasehold Valuation Tribunal for service charge disputes
- NHF Code of Governance (2020)
- NHF Together with Tenants Charter