



Policy: Complaints Policy
Approved by: Leadership Group

Date Approved October 2026

Frequency of review: Annually

POLICY STATEMENT:

Broadland believes that excellent service is critical to our success and promotes the wellbeing of our residents. This Complaints Policy (policy) has been developed to ensure Broadland complies with current legislation, regulatory expectations and good practice, including the Housing Ombudsman Service Complaint Handling Code last revised on 17 April 2024 (Code), and will be subject to ongoing review.

Broadland takes complaints seriously and is committed to providing a supportive complaint handling service which acts upon learning and development of staff, processes and services to prevent recurring failures. We aim to get things right but recognise that sometimes our residents may have cause to complain about the service they have received or the way we have dealt with an issue.

Broadland recognises complaints are a valuable source of feedback, assurance and organisational learning.

In summary, we want to be fair, put things right where we identify they have been wrong, and learn from outcomes to improve our customer experience.

In this policy, Broadland refers to Broadland Housing Association Limited and each of its group companies, Broadland St Benedicts, Broadland Development Services, and Broadland Meridian (unless otherwise stated).

SCOPE:

This policy applies to residential tenants, leaseholders, (including shared owners), licensees, and former residents where the complaint relates to their period of occupancy and has been raised within a reasonable time, and where appropriate non-resident complaints.

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Broadland will accept anonymous complaints and, where possible, will investigate them based on the information provided. However, we are more likely to be able to investigate a complaint fully if we know who has experienced the issues being reported. Broadland will take reasonable steps to protect the identity of the complainant where this is requested.

This policy should be read alongside the Complaints Procedure and other documents listed within the “Relevant Key Legislation, Regulatory Requirements and Related Documents” section of this policy.

If a resident has a complaint about anything related to the processing of their personal data by Broadland Housing Association, under our Tenant Privacy Notice and Data Protection Policy this can be taken forward through this policy and accompanying procedure. Complaints can be raised in any of the ways documented in the Complaints Procedure, including by a representative if required, and will be responded to within the timescales stated in this policy.

The process to make STAIRS (Social Tenant Access to Information Requirements) review requests is different to complaints. This policy does not apply to those review requests.

KEY STAFF RESPONSIBILITIES:

Staff:

All employees are responsible for ensuring they are fully aware and adhere to the requirements set out in the policy.

Board:

The Board is responsible for ensuring that Broadland complies with the Complaint Handling Code and relevant RSH Consumer Standards in relation to complaints, including the TIA Standard. Board oversight will include regular reporting, annual self-assessment and scrutiny and assurance that lessons are being learned from complaints. Board members may be involved in stage 2 panel meetings (see further details of Stage 2 complaints including details of panel meetings for certain complaints below).

Member Responsible for Complaints (MRC):

The MRC is a Board Member who has additional responsibilities and oversight of complaints, as set out in the Complaint Handling Code.

Chief Executive and Executive Directors:

When a complaint is escalated to Stage 2, the Chief Executive or an Executive Director will independently review the complaint and provide the Stage 2 response. Where a Stage 2 panel meeting is required, they will chair the meeting.

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Complaint Handlers:

Complaint Handlers are specific staff members who have been trained to investigate and respond to stage 1 complaints in line with the Complaint Handling Code.

PA to the Executive Resources Director:

The PA to the Executive Resources Director provides administrative support only in relation to the administration of the stage 2 complaint escalations and where needed, stage 2 panel meeting arrangements. They create the information pack and (if needed) coordinate the meeting between the panel and complainant. They will also be present at any stage 2 panel meeting to take notes, including recording decisions and outcomes. They are not involved in any of the stage 1 complaint process and are entirely impartial in relation to the whole of the complaint resolution process.

Customer Experience Manager:

The Customer Experience Manager is the operational lead for complaint handling. They support Complaint Handlers, drive consistency, and identify and direct learning requirements, and has the authority and autonomy to access staff and information across the organisation to resolve complaints fairly and promptly.

Head of Fire Safety:

This role is the specific point of contact as defined in the Building Safety Regulations Specific Point of Contact (see “Definitions” section below) and only applies to complaints from residents living in a high-rise relevant complaint relating to a higher-risk building.

Staff:

All staff are trained to recognise when a resident is making a complaint and ensure that it is reported in line with our procedures. Broadland will also ensure that relevant service areas, Senior Managers and Technical Managers work together effectively during complaint handling so that communication, accountability and oversight are maintained throughout the complaint process. Broadland will also ensure that relevant staff, managers and third parties acting on its behalf are appropriately trained in complaint recognition, complaint handling, remedies, reasonable adjustments and learning from complaints.

DEFINITIONS:

AP – Accountable Person as defined under the Building Safety Act 2022 (BSA 2022) applies in relation to complaints from residents living in ‘high-risk buildings’ as defined under the BSA 2022.

BBS – Broadland Business Systems, our internal record-keeping system.

Board Member – may form part of a stage 2 panel meeting and approval of stage 2 complaint outcomes.

Broadland – all entities of Broadland Housing Association Limited (unless otherwise stated).

Community Complaint – When more than one resident is raising the same complaint and would like to do so alongside other residents.

Complainant – The person raising the complaint.

Complaint – A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by BHA or those acting on our behalf, affecting an individual resident or group of residents.

DPIA – Data Protection Impact Assessment.

EIA – Equality Impact Assessment.

H&S – Health & Safety.

PAP – Principal Accountable Person as defined under the BSA 2022. Applies in relation to complaints from residents living in ‘higher-risk buildings’ as defined under the BSA 2022.

Reasonable Adjustment – A request for Broadland to adapt their service to meet the needs of a resident or a member of their household on the basis of a protected characteristic under the Equality Act 2010, by making one or more reasonable adjustments.

Reasonable Expenses – Reasonable expenses will be considered if a complainant travels to attend a meeting in person at a mutually agreeable location which is usually a Broadland Housing Office.

Resident – Refers to a current tenant, shared owner, leaseholder, and licence holder.

RSH – Regulator of Social Housing.

Service Request – When a resident asks Broadland to put something right, and it is the first time that they have raised it.

Single Point of Contact – Applies to both complaints from complainants residing in a high-rise building as defined under the BSA 2022 (the definition of the accountable person is Broadland Housing Association), and to complainants where Broadland have identified a single point of contact is required to manage the complaint.

TAP – Tenant Assurance Panel.

TIA Standard – Transparency, Influence and Accountability Standard, one of the RSH’s Consumer Standards.

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RELVANT KEY LEGISLATION AND RELATED DOCUMENTS: (not limited to)	
Legislation	Documents
Building Safety Act 2022	Anti-Social Behaviour Policy and Procedure
Data Protection Act 2018 as amended by Data Use and Access Act 2025	Complaints Procedure
Equality Act 2010	Compensation Policy
Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023	Equality, Diversity and Inclusion Policy and Procedure
Housing Ombudsman Complaint Handling Code (Code)	Housing Ombudsman guidance on managing unacceptable behaviour
Housing Ombudsman Scheme	Housing Ombudsman guidance on remedies
Regulator of Social Housing consumer standards, including the Transparency, Influence and Accountability (TIA) Standard	Mutual Exchange Policy and Procedure
Social Housing (Regulation) Act 2023	Reasonable Adjustments Policy and Procedure
	Responsive Repairs Policy and Procedure
	Tenancy Agreement
	Tenant Privacy Notice

EQUALITY IMPACT ASSESSMENT:

This policy has had an Equality Impact Assessment that has identified that this policy does not discriminate either directly or indirectly and does not disadvantage any individual or group.

DATA PROTECTION

This policy (and associated Complaints Procedure) requires a Privacy Impact Assessment and one was completed and appropriate risk mitigations implemented.

Please refer to the Tenant Privacy Notice, and the Data Protection Policy and Procedures, for details on Broadland's use, security, sharing and retention of personal data.

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IMPORTANT PRINCIPLES:

Making a complaint

A complainant does not have to use the word “complaint” for the matter to be treated as such. Where an expression of dissatisfaction is made, Broadland will give the individual(s) the choice to make a complaint.

Where dissatisfaction is expressed through a survey or feedback exercise, this will not automatically be treated as a complaint. However, Broadland will ensure that individuals are made aware of how they may raise a complaint if they wish to do so.

Broadland will not stop its efforts to resolve the underlying service issue simply because a complaint has been raised.

In relation to a higher-risk building (in summary, a building that is at least 18m or has at least 7 storeys, containing at least 2 residential properties), a complaint may be a relevant complaint as defined in the BSA 2022. See the section ‘Relevant complaints regarding higher-risk buildings’ below for more information.

A complainant may have a representative deal with their complaint on their behalf and may be represented or accompanied at any meeting with Broadland staff.

Exclusions

Where a matter is being brought to Broadland’s attention for the first time, this is classified as a service request. For example, reports of Anti-Social Behaviour (ASB) will be directed to the correct service channel. Only the handling of existing ASB cases and previously made reports can be investigated as complaints, including considering whether the correct steps have been applied and taken under the Anti-Social Behaviour Policy and Procedure.

Complaints must be raised within 12 months of the issue arising or within 12 months of the complainant becoming aware of the issue. We may apply discretion to accept complaints made outside this time limit where there are good reasons to do so.

Broadland will not investigate or respond to complaints where legal proceedings have started and/or a claim has been started in a court or tribunal. Where legal proceedings have been started of the same nature as the complaint, the complaint will cease.

Broadland will not accept complaints about matters that have previously been considered under this policy.

Note that:

- Where the complaint relates to personal injury or the impact on a complainant’s health or certain kinds of financial loss, the more appropriate route may be through Broadland’s insurers. However, Broadland will accept a complaint in relation to housing activities it carries out, where the complainant is dissatisfied with the landlord’s actions or inactions relating to insurance claims.

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- Broadland cannot accept complaints where the matter is outside of Broadland's control and jurisdiction. For example, complaints about planning application decisions, enforcement or appeals would sit with the Local Planning Authority and they have their own statutory appeal process. Construction activity where Broadland is not the principal contractor would sit with the developer. Broadland will always try to signpost residents to the relevant authority. However, Broadland will accept complaints about how we communicated, consulted or engaged in relation to matters we are involved in, such as development, as those are within our control.
- Broadland does not take a blanket approach to exclusions. Each matter will be considered on its individual circumstances and any decision not to accept or not to escalate a complaint will be clearly explained, recorded and communicated with the complainant.
- Where Broadland decides not to accept a complaint, or decides not to escalate a complaint, it will write to the complainant to set out the reasons for that decision and where the complaint falls within the Housing Ombudsman's jurisdiction to explain how the matter may be referred to the Housing Ombudsman.
- Any decisions made with regard to exclusions will be logged on a central register so that they are clear and auditable.

Staff and contractors' behaviour fall within the Ombudsman definition of complaint under "actions of staff or those acting on behalf of landlord". Such complaints will be investigated where the incident relates to our services or staff acting on our behalf, but may be excluded where:

- Broadland is not the appropriate enforcement authority;
- the incident is under police investigation;
- the incident occurred outside of working hours;
- where there is insufficient information to reasonably investigate; or
- those acting on behalf of Broadland Development Services.

Concerns relating to matters with an alternative appeals process

- Complaints relating to decisions made under the Mutual Exchange process will not be investigated through the complaints process. Where a resident wishes to challenge such a decision, the matter will be considered through the relevant appeals process. Broadland will explain how to submit an appeal and signpost the resident to the appropriate team or procedure. Following the appeals process, where a resident has concerns relating to the appeals process or the service received, a complaint can be raised.
- Complaints relating to decisions made under the Allocations process will not be investigated through the complaints process. Where a perspective tenant wishes to challenge such a decision, the matter will be considered through the relevant appeals process. Broadland will explain how to submit an appeal and signpost the perspective tenant to the appropriate team or procedure.

Accessibility

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Broadland will publicise this policy, the Complaints Procedure, the Housing Ombudsman Service and the right to complain through its website and by suitable alternative means, such as during the complaints process and in door to door magazines from time to time.

Complaints may be raised in any format and with any member of staff. Broadland will consider reasonable adjustments requests in line with the Reasonable Adjustments Policy and Procedure so that complainants with protected characteristics under the Equality Act 2010 are not placed at a substantial disadvantage in accessing or using the complaints process.

Residents may appoint a representative to act on their behalf in relation to a complaint. Broadland will also allow residents to be accompanied or represented at meetings where appropriate. This cannot be a legal representative as this is not a legal process.

Our two stage complaints process and the timescales that apply

Broadland operates a two stage complaints process. Where a complainant is dissatisfied with the stage 1 response, the complaint can progress to stage 2 for a final review.

It is a requirement that the stage 1 complaint consideration must have concluded and a response provided, in order for the complaint to proceed to stage 2. However, this does not apply if the stage 1 response has not been provided within the relevant timescale shown below. In that case, the complaint can proceed to stage 2 at the expiry of the relevant timescale.

It is helpful if the complainant gives reasons why they remain dissatisfied with the outcome of the stage 1 complaint. This will help us understand what we can do to put things right and/or respond at stage 2, but we will not refuse to escalate the complaint if reasons are not given as part of the request. However, we will not escalate the complaint if it is clear that the complainant has accepted the response to the stage 1 complaint, including any remedies offered (such as compensation) in full and final settlement of the whole of the complaint. See also the section 'Remedies and resolution' below.

A complainant must request escalation of their complaint to stage 2 within 4 weeks of the date of the stage 1 response. Broadland will consider any reasonable requests for an extension on a case-by-case basis.

The tables set out our complaint handling timescales for stage 1 and stage 2 of the complaints process and shows a running counter of the total working days a complainant can expect the process to take, including where extensions apply. These timescales are in accordance with the Code.

Stage 1

Process step	Stage	Target timescale	Extension	Total timescale
Log, define and acknowledge	Stage 1	Within 5 working days of receipt	No extensions	5 working days
Issue full written response	Stage 1	Within 10 working days of acknowledgement	10 working days (complex cases, with good reason)	15 or (with extension) 25 working days

Stage 2

Process step	Stage	Target timescale	Extension	Total timescale
Log, define and acknowledge escalation	Stage 2	Within 5 working days of receipt at Stage 2	No extensions	5 working days
Issue final written response	Stage 2	Within 20 working days of acknowledgement	Up to 20 working days (complex cases, with good reason)	25 or (with extension) 45 working days

The complaints process, if completing both stages 1 and 2 without extensions and escalation to stage 2 is received immediately from the complainant, can take up to 40 working days from logged to receiving a final written response. With the maximum use of extensions at both stages the process could take up to 70 working days.

Stage 2 complaints including details of panel meetings for certain complaints

During the stage 2 process, a member of the Executive Team, and a Complaint Handler who was not involved in the stage 1 process, will review the complaint information and may seek to communicate with the complainant (or their appointed representative) to gain a clear understanding of the unresolved issues, the outcome sought and in the case of certain complex complaints whether Broadland wishes to hold a stage 2 panel meeting to help complete the review fairly and proportionately. Broadland is not required to hold a panel meeting for every stage 2 complaint.

Following the initial stage 2 review, Broadland may decide that either:

1. A stage 2 panel meeting is required: or

2. A panel meeting is not required in which case a written stage 2 response will be issued by a member of the Executive Team without a meeting. However, the stage 2 response will still involve all relevant officers and staff members needed for us to issue a final response.

Broadland may make reasonable adjustments to the format of any stage 2 review or panel meeting in order to support the needs of the complainant, and the effective management of the complaint, if a reasonable adjustment request is made. Broadland may also make adjustment for other complainants if reasonable to do so. This may include arrangements for attendees to be heard separately, attendance by written submission, remote attendance, or other appropriate steps.

Broadland reserves the right to determine the most appropriate format for any stage 2 meeting, considering fairness, accessibility, logistics, resourcing requirements and the nature of the complaint.

The stage 2 response will include details of how the complainant can refer the complaint to the Housing Ombudsman Service if they remain dissatisfied with Broadland's response.

If a panel meeting held

Where Broadland decides that a stage 2 panel meeting is required, the meeting will be chaired by a member of the Executive Team and will include appropriate panel members to support a fair and proportionate review of the complaint. Panel members will either be Tenant Board members, Independent Board members or members of our Tenant Assurance Panel.

The stage 1 complaint handler will attend the panel meeting to explain the complaint history, investigation, findings and actions taken. Other relevant staff members, including technical or senior managers, will also attend where their involvement is needed to assist the panel in understanding the complaint, its subject and reaching a fair outcome.

Administrative support (usually from the PA To Executive Resources Director) may also be present at the meeting for the purposes of documenting key decisions and outcomes.

A stage 2 panel meeting will only be recorded when specifically requested. Recordings will be shared with the complainant and will be securely stored and deleted in line with Broadland's retention arrangements.

The meeting will usually take place at a Broadland office, remotely, or by another mutually agreed arrangement. Payment of the complainant's reasonable expenses will be considered if a complainant travels to attend a meeting in person.

Following the stage 2 panel review, Broadland will issue its final written stage 2 response further to the panel's involvement and approval. The written outcome will usually be issued within 3 working days of the meeting, unless Broadland has explained that additional time is needed, for example, due to further investigation or information being

required. If there is a panel meeting, the final written stage 2 response will still be issued in line with the overall timescales set out in this policy.

Remedies and resolution

Broadland's approach to remedies and compensation is set out in the Compensation Policy and is aligned to the Housing Ombudsman's Guidance on Remedies.

Compensation may be considered where service failure, delay, inconvenience, distress, loss of amenity, time and trouble, financial loss, poor complaint handling or other adverse impact has been identified.

Where compensation or another remedy is offered at stage 1, the resident may:

- accept that outcome as full and final resolution of the whole of the complaint (in which case the whole of the complaint is resolved at stage 1); or
- accept that outcome in relation to one or more agreed elements of the complaint (in which case that/those element(s) of the complaint is/are resolved at stage 1) and reject the outcome regarding the remainder of the complaint and ask for a stage 2 review; or
- reject the outcome entirely and ask for a stage 2 review.

If compensation or another remedy has been accepted as full and final resolution of an agreed element of a complaint, because that element has been resolved it cannot be considered at stage 2. Only the other elements that still require resolution can be part of the stage 2 review.

Relevant complaints regarding higher-risk buildings

In relation to all the higher-risk buildings where Broadland is landlord to its residents, Broadland is both an AP and the PAP.

APs and the PAP are responsible for:

- the repair and maintenance of the common parts of a higher-risk building; and
- managing building safety risks which involve the spread of fire or structural failure.

Residents of a higher-risk building can complain about building safety risks, or the performance of an AP or PAP.

Concerns may be about the performance of an AP or PAP. For example:

- their communications to residents;
- responses to raised concerns; or
- how they manage building safety risks

Residents can also raise concerns about building safety risks, which are structural safety issues and spread of fire issues. For example:

- flammable cladding on the outside of a building;
- fire doors or smoke extraction which are not working or missing that may increase the risk of fire spread; or

- failure of the building's structure, such as parts of the building collapsing, cracks, or parts of the building falling off.

These are known as 'relevant complaints'. Residents can raise issues to the PAP for the building, i.e. Broadland. We will also accept any complaint which is a relevant complaint, made to any AP for the building. These will be directed through the single point of contact.

If a complaint is accepted by Broadland as a relevant complaint, the complainant will be informed of that fact. If a complaint is not accepted by Broadland as a relevant complaint, the complainant will be given reasons for that decision and informed of the right to take the issue to the Building Safety Regulator for final determination.

Relevant complaints are prioritised taking account of the level of risk involved. Otherwise, this policy and the accompanying Complaints Procedure apply to relevant complaints in the same way as other complaints made to Broadland. However, where a complainant is not satisfied with our final complaint response at stage 2, the complainant can choose to refer the relevant complaint to the Building Safety Regulator for investigation, rather than the Housing Ombudsman Service.

As the PAP at a higher-risk building, we will keep a record of any relevant complaint for 7 years showing:

- the information contained in the complaint;
- steps taken by any AP for the higher-risk building in response to the complaint;
- any involvement of the regulator in relation to or in response to the complaint; and
- the outcome of the complaint.

Managing unacceptable behaviour

Broadland is committed to ensuring that complainants are treated with respect and fairness. Broadland also recognises that, in a small number of cases, the behaviour of a complainant may affect its ability to investigate, respond or engage effectively and safely.

The principles set out above are supported by procedure guidance, including how behaviours are assessed, managed, reviewed and communicated which is contained within the Complaints Procedure.

Broadland also has a duty of care to its employees and will take the necessary steps to protect their health, safety and wellbeing during the complaints process.

Where the nature, volume or manner of a complaint presents a risk to staff wellbeing or their ability to carry out their role safely and effectively, Broadland will take proportionate steps to manage the process fairly, safely and in accordance with this policy and the Complaints Procedure.

Where behaviour is deemed unacceptable, Broadland will take proportionate steps in accordance with its other Housing Management policies. Within our complaints process,

we will apply similar principles within the Housing Ombudsman Guidance for Landlords on managing unacceptable behaviour to deal with such behaviour. Details on unacceptable behaviour are contained within the Complaints Procedure.

Reasonable adjustments

Broadland is committed to ensuring that residents with protected characteristics are not placed at a substantial disadvantage in accessing its services or the complaints process and will consider reasonable adjustment requests where appropriate, in line with its equality duties under the Equality Act 2010.

The principles and detailed arrangements for considering, assessing and implementing reasonable adjustments are set out in Broadland's Reasonable Adjustments Policy and Procedure.

Learning from complaints

Broadland will use complaint information and monitoring to identify and implement service improvements.

Complaint handling performance will be monitored regularly and reported through the appropriate channels.

Performance, themes, outcomes, learning and compensation information is provided at monthly meetings with the Member Responsible for Complaints.

Broadland will produce an annual complaints performance and service improvement report. This report will be submitted to Broadland's Board. The report along with the governing body's response will be published on our website in accordance with the Housing Ombudsman's requirements.

Broadland will carry out an annual self-assessment in accordance with the Housing Ombudsman's requirements and publish it along with any action plans on our website.

Broadland will also refresh its self-assessment where there is a significant change in operating environment, including mergers, acquisitions, significant restructures, or where business continuity arrangements have been activated.