

Complaints and Compliments Procedure

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1. Introduction

Bernicia is committed to delivering high-quality, customer-focused services and ensuring that all feedback is handled professionally, consistently, and in line with regulatory expectations. We recognise that effective complaint handling is essential to maintaining trust, improving services, and meeting the standards set by the Housing Ombudsman's Complaint Handling Code.

This procedure sets out the operational requirements for managing complaints, compliments, and service requests across Bernicia and Square Building Trust Ltd (SBT). It provides colleagues, contractors, and partners with clear, directive instructions to ensure:

- Customers can raise concerns or positive feedback easily
- Complaints are recognised promptly and handled fairly
- Investigations are thorough, evidence-based, and timely
- Responses meet the standards set by the Housing Ombudsman's Complaint Handling Code
- Learning from complaints and compliments is systematically captured and used to improve services

All colleagues must follow this procedure in full. Failure to do so may result in non-compliance with regulatory requirements, reputational damage, and missed opportunities to improve customer experience.

2. Definitions

Complaints

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its staff, or those acting on its behalf, affecting a resident or group of residents."

Customers are not required to use the term *complaint*. Any expression of dissatisfaction must be treated as a complaint unless it is clearly a service request.

Bernicia's complaints process emphasises early resolution at Stage 1. Colleagues must take ownership of complaints, maintain regular contact with customers, and work to resolve issues quickly and effectively.

Compliments

We are happy to hear when we have done things right. When a customer shares a compliment with us about an individual or a team, we will record the compliment in our CRM system and arrange for it to be shared with the individual or team and notify their line manager. We also publicise some customer compliments in our internal staff communications and on our website.

Service Requests

We clearly distinguish between service requests and complaints:

- A **service request** is when a customer asks us to take action to put something right.
- A **complaint** arises when a customer expresses dissatisfaction with our service or our response, including dissatisfaction with how a service request has been handled.

A service request becomes a complaint when the customer expresses dissatisfaction with how the service request has been handled

Service requests are recorded and monitored in the CRM system. If dissatisfaction is expressed at any point, the matter must be logged as a complaint while the service request continues to be progressed.

3. Roles and Responsibilities

We operate a centralised complaints function that coordinates all complaints received by Bernicia.

Complaints Team

The centralised complaints function are responsible for:

- Coordinating all complaints and compliments received
- Monitoring cases and ensuring regulatory compliance
- Acting as the main point of contact for the Housing Ombudsman
- Acknowledging complaints and assigning complaint handlers
- Monitor extensions
- Ensure learning is recorded from complaints

Complaint Advisors, Team Leaders and Housing Managers

The complaint advisors and the relevant Team Leader/Housing Managers are responsible for investigating and responding to Stage 1 complaints. They must:

- Take ownership of the complaint
- Maintain regular contact with the customer
- Gather evidence and information promptly
- Provide a full and fair investigation
- Draft the complaint response

Heads of Service, Assistant Directors and Directors

Heads of Service, Assistant Directors and Directors are responsible for investigating and responding to Stage 2 complaints. They must:

- Review the Stage 1 investigation and outcome
- Provide an independent, fair, and impartial assessment

- Consider whether the Stage 1 decision was reasonable, evidence-based, and compliant with policy and the Complaint Handling Code
- Ensure they were not involved at Stage 1; if they were, another senior leader must carry out the review
- Provide a clear, balanced Stage 2 response that addresses all issues raised

Stage 2 is a review of the Stage 1 handling and decision. It is not a new investigation.

All Customer-Facing Colleagues

All colleagues are responsible for:

- Identifying dissatisfaction at the earliest opportunity
- Supporting early resolution wherever possible
- Ensuring dissatisfaction is logged promptly with the Complaints Team
- Providing information and support to complaint handlers when required
- Undertaking complaint-handling training where appropriate
- Working towards objectives that support effective complaint resolution
- Colleagues, contractors, and partners delivering services on Bernicia's behalf must follow this procedure in full.

4. Complaints Process

Identifying a Complaint

Colleagues must recognise dissatisfaction and offer the customer the opportunity to have their issue handled through the complaints process. Customers do not need to use the word "complaint", and complaints may be made through any reasonable channel.

Where a complaint is identified, the colleague must:

- Log the complaint in the CRM system
- Advise the customer that the complaint will be acknowledged within 5 working days
- Identify any vulnerabilities or reasonable adjustments required

Distinguishing Complaints from Service Requests

Upon receipt of a complaint, the Complaints Team will assess the issues raised and prioritise any immediate actions required to protect customers or their homes. They will confirm whether the matter requires a formal complaint response under Bernicia's Complaints and Compliments Policy.

If the issue is identified as a service request rather than a complaint, the team will:

- Record the matter as a service request for monitoring and learning
- Contact the customer to explain the decision and confirm what actions have been taken

- Confirm in writing the agreed actions and how the customer can raise a Stage 1 complaint if they remain dissatisfied

If dissatisfaction with the service request is expressed at any point, the matter becomes a complaint while the service request continues to be progressed.

Stage 1 Complaint Handling

Stage 1 Acknowledgement

Upon receipt of the complaint, the Complaints Team will:

- Assess urgency and prioritise any immediate actions
- Confirm whether the issue meets the definition of a complaint
- Contact the customer if more information is required
- Identify any vulnerabilities or reasonable adjustments

The complaint will be formally acknowledged within 5 working days. The acknowledgement will:

- Define the complaint clearly
- Confirm what will and will not be investigated
- Explain the next steps
- Be issued via the CRM system by email unless the customer requests otherwise

A complaint handler will be assigned based on the nature of the case. At Stage 1 this may be a member of the Complaints Team, a Team Leader, or a manager from the relevant service area.

Stage 1 Investigation

The complaint handler must carry out a full, fair, and evidence-based investigation. They must:

- Keep an open mind and deal with complaints on their merits
- Act independently and use evidence to support their investigation
- Give the customer a fair opportunity to explain their position
- Listen and understand
- Consider vulnerabilities and reasonable adjustments
- Take ownership of the complaint
- Address any conflict of interest
- Consider whether communication and delays were reasonable
- Review all relevant information before reaching a decision

New relevant information must be considered. Unrelated issues must be logged as new complaints.

Stage 1 Response

The complaint handler will issue a response once the outcome is known, rather than waiting for follow-up actions to be completed.

The response must include:

- A clear understanding of the complaint and desired outcome
- Findings for each issue raised, with reasons
- Key dates and evidence
- Whether each issue is upheld or not upheld
- A genuine apology where appropriate
- Details of any compensation or goodwill gesture
- An action plan for outstanding tasks
- Information on how to escalate to Stage 2

The Stage 1 response will be issued within 10 working days of acknowledgement, via the CRM system by email unless the customer requests otherwise.

Stage 2 Complaint Handling

Requesting Escalation

If the customer remains dissatisfied with the Stage 1 response, they may request escalation to Stage 2. Requests are normally made within 10 working days, but discretion will be applied where circumstances prevent this.

Customers do not need to provide new evidence to request escalation. To understand the reasons for escalation, the Complaints Team will ask:

- Why the customer remains unhappy
- What outcome they are seeking

Stage 2 Acknowledgement

An acknowledgement will be issued within 5 working days of the escalation request, via the CRM system by email unless the customer requests otherwise.

Stage 2 Review

The review will be conducted by a Head of Service, Assistant Director, or Director not involved in Stage 1.

Stage 2 is not a new investigation. It is a review of:

- Whether Stage 1 was thorough
- Whether the decision was fair
- Whether the outcome was reasonable

New relevant information will be considered however unrelated issues must be logged as new complaints.

Stage 2 Response

The Stage 2 complaint owner will issue a response once the outcome is known.

The response must include:

- Understanding of unresolved issues
- Findings and rationale
- Key dates
- Whether issues are upheld or not upheld
- Apology where appropriate
- Service improvements
- Compensation where applicable
- Outstanding actions
- Information on escalating to the Housing Ombudsman

The Stage 2 response will be issued within 20 working days of acknowledgement, via the CRM system by email unless the customer requests otherwise.

Extensions

Extensions may be required where complaints are complex, involve multiple service areas, require specialist input, or where essential information cannot be obtained within standard timescales.

Where an extension is required, the complaint handler must explain:

- Why additional time is needed
- What information or actions are outstanding
- The revised timescale
- How the customer will be kept updated

This discussion must be recorded in the CRM system, and an extension letter issued.

Stage 1 extensions must not exceed 10 working days, and Stage 2 extensions must not exceed 20 working days, unless clearly justified. Customers must also be advised of their right to contact the Housing Ombudsman.

Specialist Services

Some complaints relate to regulated or specialist areas where additional statutory requirements apply. These complaints must be handled in accordance with the relevant regulatory framework and may require specialist colleagues to lead the investigation.

Examples include:

- Heat networks - managed in line with Ofgem guidance and consumer protection regulations, led by the Asset and Property team
- Data governance or data protection - managed in line with ICO guidance, led by the Risk and Assurance team

Where specialist complaints overlap with other service areas, the Complaints Team will coordinate the investigation to ensure a consistent and compliant response.

5. Monitoring of complaints

Reporting of complaints

Bernicia is committed to strong governance and accountability in complaints handling. To ensure compliance with regulatory requirements and to drive continuous improvement, complaints performance is monitored closely across the organisation.

Performance Monitoring

We monitor complaints performance through:

- Monthly performance reviews, including timescales, themes, and outcomes
- Heads of Service access to all complaints and compliments relating to their service areas, enabling them to understand performance, identify themes, and take ownership of service improvements
- Regular learning from complaints sessions with key stakeholders to share insights and drive improvement
- Quarterly reporting to the Customer Service Committee, including:
 - TSM – Complaints Relative to Landlord Size (CH01) for Stage 1 and Stage 2
 - TSM – Complaints Responded to Within Timescale (CH02) for Stage 1 and Stage 2
 - TSM Perception – Complaints Handling (TP09)
 - Internal satisfaction survey results

Customer Scrutiny

We also provide involved customers with quarterly complaints performance and trend information to support scrutiny and ensure transparency.

Ongoing Complaint Actions

A complaint response must be issued once the outcome of the investigation is known, rather than waiting for follow-up actions to be completed. Where follow-up actions are required, the complaint handler must clearly outline these actions in the response letter, including any appointments, tasks, or deadlines.

Monitoring Actions

- All follow-up actions must be recorded as tasks within the CRM system to enable monitoring and oversight.
- The complaint handler may nominate another colleague to complete the actions but remains responsible for ensuring they are tracked and completed.
- Customers must be kept updated until all actions are completed.
- Actions must be completed within agreed timescales unless a justified delay is communicated to the customer.

Stage 2 Oversight

For Stage 2 complaints, oversight of ongoing actions is also provided by a senior member of the Complaints Team to ensure accountability, timely completion, and compliance with the Complaint Handling Code.

Governance Oversight

Ongoing actions and themes are reported through the Voice of the Customer report, providing governance oversight and ensuring that learning from complaints is captured, monitored, and acted upon.

6. Where we may deal with complaints in a different way

Exclusions

There are circumstances where Bernicia may decide not to progress an issue through the formal complaints process. These decisions must be made fairly, proportionately, and with consideration of individual circumstances, including any vulnerabilities or reasonable adjustments.

Valid reasons for not progressing a complaint are set out in the Complaints and Compliments Policy. Where a complaint cannot be progressed, Bernicia will:

- Provide the customer with a clear, evidence-based explanation
- Outline the reasons for the decision
- Inform the customer of their right to escalate the matter to the Housing Ombudsman
- Provide clear signposting to any relevant organisation or body where appropriate

All decisions must be recorded in the CRM system.

Anonymous Complaints

Anonymous complaints cannot be handled through the formal complaints process because we are unable to contact the customer or provide a response.

However:

- They will be logged and recorded as service requests for monitoring and learning
- Any safeguarding, safety, or risk-related concerns will be acted upon
- Themes from anonymous complaints will be included in learning reviews where relevant

Social Media

Complaints raised via social media will be acknowledged and responded to through the same channel initially. We will:

- Advise the customer of the appropriate route to raise a formal complaint
- Move the conversation into a private channel as soon as possible
- Avoid discussing personal details or case specifics on public platforms

Personal dialogue will not take place on public social media channels.

Dissatisfaction through surveys

Dissatisfaction expressed through surveys is not defined as a complaint. Customers are advised within the survey that complaints must be raised separately.

However:

- Survey dissatisfaction is monitored for learning and service improvement
- Customers may be signposted to the complaints process if appropriate

MP and Executive Contact

Dissatisfaction raised through our Executive Team, an MP, or a Local Councillor will be responded to outside of the complaints process in the first instance. Where appropriate, we will advise the customer that raising a formal complaint may be the most suitable route.

Process for MP/Executive Contact

- The enquiry will be recorded in the CRM system as an MP/Executive contact.
- The Customer Feedback Officer (or relevant colleague) will acknowledge the enquiry within 5 working days of receipt.
- The enquiry will be assigned to the relevant Service Manager to respond.
- The target for a response is 10 working days from receipt of the enquiry.
- A response will be provided to the MP and to the customer on request.

If the customer expresses dissatisfaction with the MP/Executive response, or if the issue meets the definition of a complaint, the matter may be progressed through the formal complaints process.

7. Housing Ombudsman

Housing Ombudsman

Bernicia provides information about the Housing Ombudsman Service on its website, in the complaints leaflet, and within complaint correspondence. Customers are encouraged to contact the Ombudsman for advice at any stage of the complaints process, and to request formal investigation if they remain dissatisfied after exhausting Bernicia's complaints procedure.

Dedicated members of the Complaints Team are responsible for managing all queries and information requests from the Housing Ombudsman. These colleagues liaise with relevant service areas to obtain the information required and ensure that responses are provided within the strict timescales set by the Ombudsman and in line with the Housing Ombudsman's Complaint Handling Code.

All colleagues must prioritise Ombudsman requests due to their regulatory importance and time-sensitive nature. Failure to respond promptly may result in formal investigation, findings against the organisation, or orders requiring service improvements.

Learning from Ombudsman decisions, orders, and recommendations is captured and shared with relevant service areas and governance bodies to support continuous improvement.

Managing contact from the Housing Ombudsman

Bernicia is registered on the Housing Ombudsman's Interactive Portal, which enables landlords to share information and evidence securely and efficiently. The Portal allows Bernicia to:

- Submit documentary evidence
- Provide updates
- View the status of cases under review
- Respond to information requests

All contact should be managed through the Portal in the first instance. Only authorised colleagues may upload information, and all submissions must be accurate, complete, and compliant with data protection requirements.

Case Queries

When a query from the Housing Ombudsman is received:

- A senior member of the Complaints Team will review the request and determine the action required.
- Simple information requests will be logged on an internal tracker and managed through the Portal.
- Relevant service areas will be contacted promptly to provide information or evidence where needed.
- All colleagues must prioritise these requests to ensure compliance with Ombudsman deadlines.

Casework and Assessment Team Review

Where the Ombudsman advises that a case has progressed to the Casework and Assessment Team:

- The case will be updated in the CRM system to mark it as “under review by the Housing Ombudsman”.
- This ensures visibility of current and outstanding Ombudsman cases.
- Relevant information will be collated and reviewed.
- A senior member of the relevant service area will be informed to support visibility, ownership, and full review.

- All colleagues must prioritise requests at this stage due to the strict timeliness required by the Ombudsman.

8. Misuse of the complaints Process

Bernicia is committed to providing a complaints service that is accessible, fair, and responsive to all customers. However, on rare occasions, a customer's behaviour may become unreasonable in a way that significantly impacts colleagues, services, or the organisation's ability to manage complaints effectively. In these circumstances, Bernicia may apply restrictions or alternative arrangements under the Managing Unacceptable Behaviour Policy.

Restrictions relate to how a customer contacts Bernicia or how communication is managed. They do not restrict access to essential services or the customer's right to raise complaints.

Unreasonable Behaviour

Unreasonable behaviour does not refer to customers who are persistent or who raise legitimate concerns. It refers to behaviour that, because of its nature, frequency, or scale, places disproportionate demands on colleagues or prevents the organisation from progressing a complaint fairly and efficiently.

Examples of behaviour that may constitute misuse of the complaints process include, but are not limited to:

- Demanding responses within unreasonable timescales, particularly where these fall outside published standards or do not allow for a fair investigation
- Insisting on dealing with (or refusing to deal with) specific colleagues without valid reason, or repeatedly requesting changes in complaint handlers
- Changing the substance of the complaint, or continually raising new issues significantly different from the original complaint
- Requesting old complaints to be revisited when all stages of Bernicia's complaints process and external routes of appeal have been exhausted
- Requesting large volumes of information without good reason, particularly where the information is irrelevant or has already been provided
- Pursuing complaints outside Bernicia's remit, including issues relating to other organisations
- Demanding disproportionate compensation that is not aligned with Bernicia's Complaint Compensation Policy Compliance Note
- Excessive or repetitive contact, including repeated calls, emails, or messages that place unreasonable demands on colleagues or disrupt service delivery
- Repeatedly raising the same issues and refusing to accept Bernicia's response after a thorough investigation
- Refusing to provide essential information needed to progress the complaint while continuing to demand action

Where such behaviour is identified, Bernicia will take a proportionate and fair approach. Before any restrictions are applied, the customer will be informed of the concerns regarding their behaviour, given an opportunity to discuss the matter, and advised of the potential consequences if the behaviour continues.

All decisions to apply restrictions will be made in accordance with the Managing Unacceptable Behaviour Policy and will consider any vulnerabilities or exceptional circumstances. Bernicia will always aim to maintain access to essential services and ensure that customers are treated with dignity and respect.

9. Using Customer Feedback

Bernicia values all customer feedback, whether positive or negative, and recognises its importance in shaping services, improving performance, and ensuring accountability. Complaints and compliments provide valuable insight into customer experiences and expectations, and this feedback is used systematically across the organisation to drive continuous improvement in line with the Housing Ombudsman's Complaint Handling Code.

Learning from Complaints

Complaints are analysed to identify trends, recurring issues, and areas where services may not be meeting customer expectations. This analysis informs service reviews, training needs, and improvement plans.

Lessons learned from complaints are:

- Recorded and reviewed quarterly
- Shared with relevant service areas
- Incorporated into the Voice of the Customer reporting framework
- Used to inform service improvement actions and organisational learning

Managers are responsible for disseminating learning within their teams and ensuring that improvements are implemented effectively. This may include:

- Changes to processes or procedures
- Additional staff training
- Updates to communication templates
- Adjustments to service delivery models
- Improvements to customer information or guidance

Bernicia also publishes information about how services have been improved as a result of complaints. This demonstrates transparency, accountability, and a commitment to listening to customers.

Learning from Housing Ombudsman decisions, orders, and recommendations is also captured and shared with relevant service areas and governance bodies to support continuous improvement.

Learning from Compliments

Compliments are equally important. They highlight examples of excellent customer service and provide insight into what customers value most.

Compliments are:

- Recorded in the CRM system
- Shared with the relevant colleagues and their managers
- Publicised internally or externally to celebrate success and reinforce positive behaviours

Compliments help inform staff training and development by identifying effective approaches, communication styles, and behaviours that contribute to high-quality customer service.

Governance and Oversight

Customer feedback is incorporated into the Voice of the Customer reporting framework, which provides governance oversight and ensures that senior leaders have visibility of trends, learning, and service improvements.

10. Square Building Trust Ltd

Bernicia acts as the managing agent for Square Building Trust Ltd (SBT). SBT operates using Bernicia's Complaints and Compliments Policy and this procedure. Complaints are logged in the CRM system and managed in the same way as Bernicia complaints, with a clear flag to distinguish SBT cases. This ensures accurate reporting, governance oversight, and compliance with regulatory requirements.

Square Building Trust Reporting

Complaints performance is shared with SBT on a quarterly basis through their Committee Report. This includes:

- Total number of complaints
- Stage 1 and Stage 2 breakdown
- Adherence to complaint handling timescales
- Themes and learning
- Updates on the status of ongoing complaints

This reporting supports SBT's governance responsibilities and ensures transparency and accountability.

Housing Ombudsman

SBT is registered with the Housing Ombudsman and submits its own Annual Complaint Service and Improvement Report, with support from Bernicia.

SBT is not registered on the Housing Ombudsman's Interactive Portal and manages Ombudsman cases via email. These cases are coordinated by senior members of Bernicia's Complaints Team, in line with Section 7.2 of this procedure. All evidence,

correspondence, and timescales are managed in accordance with the Housing Ombudsman's requirements to ensure compliance.

Version number: V3.0

Related policy: Complaints and Compliments Policy

Effective From: August 2026

Applicable To: This policy applies to:

- Bernicia
- Square Building Trust Limited where Bernicia are the managing agents

Related Supporting Documents:

- Complaint Compensation Policy Compliance Note
- Heat Networks Complaints Compliance Note
- Managing Unacceptable Behaviour Policy

Approved By: Assistant Director, Customer Experience

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Owner: Assistant Director, Customer Experience

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11. Version Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
V3.0	August 2026	Head of Customer Contact Centre	Assistant Dir, Customer Experience	New template, changes to how compensation is handled, heat networks and ICO complaints as well as STAIRs.