



Complaints and compliments policy	
<b>Document Owner:</b> Director of Customer Service & ICT	<b>Document No:</b> CE-PL-001
<b>Date Approved:</b> January 2026	<b>Review Date:</b> January 2029

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### 1.0 Purpose

1.1 The purpose of this policy is to ensure complaints and compliments are managed fairly, transparently, and consistently, in line with the principles and requirements of the Housing Ombudsman Complaint Handling Code. This policy supports the delivery of Beyond Housing’s strategy by:

- Empowering customers to succeed and thrive through responsive, person-centred service
- Embedding a culture of continuous improvement and learning from feedback
- Strengthening trust and accountability in how we deliver reliable, quality services
- Supporting our strategic goals to provide safe, secure, and affordable homes; create places where people are proud to live and deliver services that meet customer needs.

### 2.0 Scope

2.1 This policy applies to all Beyond Housing customers (current and former), colleagues, and relevant stakeholders. It also sets expectations for how Beyond Housing will respond to complaints from non-customers, ensuring respectful treatment and clear communication.

### 3.0 Definitions

3.1 **Complaint:** An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Beyond Housing, its colleagues, or those acting on its behalf, affecting an individual resident or group of residents.

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- 3.2 **Compliment:** An expression of praise, encouragement, or thanks for a positive experience.
- 3.3 **Customer:** Any current or former resident, leaseholder, or service user. Full details of who this policy applies to, and any exclusions, can be found in the underpinning complaint exclusion procedure.
- 3.4 **Housing Ombudsman Service:** The independent body that investigates complaints about housing organisations.
- 3.5 **Service request:** A request from a customer requiring action to be taken to put something right. A service request is not a complaint
- 3.6 **Relevant stakeholders:** Any individual, group, or organisation with an interest in Beyond Housing’s complaints and compliments process. This includes regulators, local authorities, Members of Parliament (MPs), councillors, contractors, partner agencies, and advocacy groups who may support customers or contribute to complaint resolution.

## 4.0 Responsibilities

- 4.1 The policy owner is the Director of customer service & ICT.
- 4.2 The Complaints Team is responsible for the delivery and oversight of this policy.
- 4.3 All colleagues are responsible for supporting the effective handling of complaints and compliments.
- 4.4 Corporate functions (e.g., Insight, Performance, Risk) and external partners (e.g., local authorities) may support the delivery and management of this policy.

## 5.0 Legislative and statutory requirements

- 5.1 This policy is underpinned by:
- The Regulator of Social Housing’s Transparency, Influence and Accountability Standard
  - Social Housing (Regulation) Act 2023
  - Localism Act 2011
  - Housing Act 1996
  - Data Protection Act 2018 (DPA)
  - UK General Data Protection Regulation (UK GDPR)
  - Privacy and Electronic Communications Regulations (PECR)
  - The Data Use and Access Act 2025 (DUAA)
  - Equality Act 2010

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- Housing Ombudsman Complaint Handling Code
- Consumer Standards (Code of Practice).

## 6.0 Policy detail

- 6.1 Customers, groups of customers and third-party advocates can easily make complaints using various channels, with reasonable adjustments provided as needed. The policy will be made available in alternative and accessible formats on request.
- 6.2 Each request will be reviewed to determine whether it is a complaint or a service request.
- 6.3 Complaints will be acknowledged, handled and resolved in line with the Housing Ombudsman Complaint Handling Code, in a fair, impartial and respectful manner. When acknowledging a complaint, we will confirm our understanding of the complaint, the outcome being sought, and any aspects outside our responsibility.
- 6.4 Customers will be kept informed throughout the process, and escalation routes will be clear and accessible.
- 6.5 The complaint process has two stages:

Stage	Acknowledge	Response	What we will do	Escalation
One	Within 5 working days of receiving the complaint	Within 10 working days of acknowledging the complaint*	Confirm our understanding of the complaint Investigate the issues raised Provide a clear written response addressing all points Explain any remedies, learning, or service improvements and escalation.	Yes, stage two
Two	Within 5 working days of escalation of the complaint	Within 20 working days of acknowledging the complaint*		Yes, Housing Ombudsman service

\*If more time is needed, we will explain why and provide a revised response date.

- 6.6 Extensions will only be applied where there is a valid reason, and customers will be informed promptly. Where a response falls outside of Code timescales, we will agree suitable intervals with the customer to keep them informed of progress.
- 6.7 Complaints from former customers will be accepted if the issue relates to their time as a customer and is raised within 12 months of the issue occurring. Exceptions to this timeframe may be made at our discretion.

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- 6.8 Concerns raised by non-customers are excluded from the formal complaints process and will be managed through appropriate service request routes, as set out in the Complaint Exclusion Procedure.
- 6.9 Third-party involvement in a complaint will require appropriate consent from the customer.
- 6.10 Learning from complaints will be systematically captured, analysed, and used to drive service improvements.
- 6.11 Compliments will be recorded and referred to the relevant person or team to recognise positive feedback and support a culture of best practice.
- 6.12 Compensation may be offered where service failures occur, reflecting the customer experience up to that point. Acceptance of compensation does not prevent escalation or future compensation considerations.
- 6.13 Challenging communication behaviour by customers will be managed in line with the acceptable communications procedure.
- 6.14 Issues that are not considered complaints and have an existing resolution process are excluded from this policy. Specific exclusions are detailed in the complaint exclusion procedure.
- 6.15 This policy, along with the Housing Ombudsman Complaint Code and contact details, will be published on the Beyond Housing website and in customer facing communications where appropriate.
- 6.16 Customers may seek advice and support from the Housing Ombudsman at any stage of the complaints process. If dissatisfaction persists after completing stage 2, they may escalate their complaint to the service for further review.

## **7.0 Underpinning procedures**

7.1 Detailed operational processes are set out in the following procedures:

- Complaints procedure
- Compensation procedure
- Complaint exclusion procedure
- Former customer complaint procedure
- Group complaints procedure
- Learning from complaints procedure

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- Acceptable communications procedure
- Data protection complaints procedure
- Compliments procedure
- MP/Councillor enquiry procedure.

## 8.0 Controls and reporting

8.1 This section includes the **controls** identified to assess the effectiveness of the policy and where testing of the controls is **reported**.

<b>Control</b>	<b>Line of defence (1st, 2nd or 3rd)</b>	<b>Responsible (Job role)</b>	<b>Reported to:</b>
Monthly quality assurance checks to monitor standard of responses and complaint investigations	1st	Complaints team leader	Customer experience & complaints manager
Weekly performance monitoring & reporting - Number of cases and timescales to respond	1st	Complaints team leader	Customer experience & complaints manager
Quarterly performance monitoring & reporting - Number of cases, timescales to respond, quality assurance, HOS cases	2nd	Customer experience & complaints manager	Senior leadership team Customer forum
Customer satisfaction surveys - Transactional survey to all complainants to establish opportunities for service improvements	2nd	Customer insight analyst	Senior leadership team Customer forum
Annual complaints performance and service improvement report,	2nd	Customer experience &	Customer forum Board

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including self-assessment against the code		complaints manager	
Cyclical internal audit	3rd	Customer experience & complaints manager	Customer forum Board

## 9.0 Consultation

9.1 This policy update has been informed by operational learning from delivering the complaints service, ensuring that practical experience and service insights shape our approach. We have also undertaken specific customer consultation on proposed changes to ensure the policy reflects customer needs and expectations. As part of this update, operational elements have been removed from the policy and will be addressed in underpinning procedures.

## 10.0 Approval and revision

10.1 This policy will be subject to a review every 3 years, or in response to a change in legislation or best practice, whichever is sooner.

<b>Accountable:</b>	Chief executive
<b>Responsible:</b>	Director of customer service & ICT
<b>Approval body:</b>	Customer forum

Version	Date	Information
1	November 2020	Complaint policy approach revised to align with Housing Ombudsman Service Code
2	October 2022	To comply with the Housing Ombudsman Complaints Handling Code
3	January 2024	Back stop review undertaken

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3.1	May 2024	Fast track review to add further clarity around compliance with the new handling code
3.2	July 2025	Partial review – KPI at section 6.4 and 6.13 changed to a five day acknowledgement to align to the housing ombudsman handling code
4	January 2026	Removal of procedural content
4.1	April 2026	Partial review – update at section 6.8 to confirm approach for non-customers. Additions made to points 6.1, 6.3 & 6.6 – approved by policy owner & customer forum



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## 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing manages complaints.
- 1.2 The procedure underpins the complaints policy to ensure we handle complaints in line with the Housing Ombudsman Service (HOS) handling code.

## 2.0 Scope

- 2.1 This procedure applies to all customers. Decisions about whether a matter can be accepted as a complaint must be made in accordance with the complaint exclusion procedure, which sets out the issues and circumstances that fall outside the complaints process.
- 2.2 This procedure applies to all colleagues in Beyond Housing, and ensures they understand what a complaint is, and our processes when handling complaints.
- 2.3 The procedure begins when a contact is received from a customer who wishes to make a complaint.
- 2.4 The procedure ends when a complaint has been fully resolved and/or when a complaint has exhausted all stages of the process.

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2.5 The complaint exclusion procedure provides details of complaints out of the scope of this procedure.

### 3.0 Definitions

#### 3.1 Core concepts

3.1.1 **Complaint:** An expression of dissatisfaction, however it is made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers.

3.1.2 **Service request:** A request requiring action to put something right. Not a complaint, but must be recorded, monitored and reviewed. A complaint must be logged when a customer expresses dissatisfaction with the response to their service request.

3.1.3 **Complaint definition:** The agreed statement of the issues raised and the outcomes sought, recorded at acknowledgement at both stages and used to frame the investigation and response.

#### 3.2 Who can complain and who acts for them

3.2.1 **Customer:** A customer is any individual who currently receives, or has previously received, a housing-related service from Beyond Housing. This includes tenants, former tenants, leaseholders, shared owners, applicants for housing, and any other customers or service users living in, applying to live in, or receiving services from Beyond Housing-managed properties.

3.2.2 Representatives acting on behalf of a customer (such as MPs, councillors, advocates or family members) are not customers themselves but may raise a complaint with the customer's consent.

#### 3.3 Roles (internal and external)

3.3.1 **Complaints team:** The team responsible for ensuring compliance with the complaints & compliments policy, coordinating end-to-end complaint management, and embedding learning and continuous improvement. The team

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oversees case logging, quality assurance, reporting and standards in line with the Housing Ombudsman Complaint Handling Code.

- 3.3.2 **Complaint officer:** The Beyond Housing colleague assigned to investigate a complaint, gather and assess evidence, communicate with the customer, and provide a fair and timely response. The complaint officer is responsible for ensuring the investigation is carried out impartially, in line with the complaints & compliments policy and the Housing Ombudsman Complaint Handling Code.
- 3.3.3 **Independent stage 2 decision-maker:** A colleague who was not involved at stage 1, with sufficient authority and autonomy to consider and determine the stage 2 complaint independently, free from actual or perceived conflicts of interest.
- 3.3.4 **Member Responsible for Complaints (MRC):** A board member appointed to provide oversight and challenge on complaint handling performance, learning, and publication duties in line with the Housing Ombudsman Complaint Handling Code.
- 3.3.5 **Governing body (Beyond Housing board):** Beyond Housing’s board, which receives and challenges the annual Code self-assessment and the annual complaints performance & service improvement report, appoints the MRC, and provides overall oversight of complaint handling.
- 3.4 **Stages and movement through the process**
- 3.4.1 **Stage 1 complaint:** A stage 1 complaint is the first stage of Beyond Housing’s complaint procedure. It is the landlord’s initial investigation and response, carried out in line with the Housing Ombudsman Complaint Handling Code, with acknowledgement and response within the required timescales.
- 3.4.2 **Escalation:** The escalation process is the mechanism by which a complaint moves from stage 1 to stage 2 of Beyond Housing’s complaint procedure. Escalation occurs when the complainant requests a further review. Under the Housing Ombudsman Complaint Handling Code, landlords must not refuse escalation unless a valid exclusion applies, and customers are not required to justify why they seek escalation.

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3.4.3 **Stage 2 complaint:** A stage 2 complaint is the second and final stage of Beyond Housing’s complaint procedure. It is an impartial review carried out by a person who was not involved at stage 1 and can act independently, with the authority and autonomy to make a fair and unbiased decision, in accordance with the Housing Ombudsman Complaint Handling Code.

3.4.4 **Closed complaint:** A complaint is considered closed when Beyond Housing has issued its final response in line with the Housing Ombudsman Complaint Handling Code, addressing all issues raised and confirming any remedies or actions. A complaint may still be closed where actions remain outstanding, provided there is an agreed plan with the customer for completing those actions, and progress is actively tracked, monitored and communicated until completion.

### 3.5 **Timescales and records**

3.5.1 **Working day:** For the purposes of complaints timescales, a ‘working day’ means Monday to Friday, excluding: (i) UK bank holidays; and (ii) published Beyond Housing closure days (e.g., agreed Christmas/New Year shutdown dates when our offices are closed and services are not operating).

3.5.2 Where a Beyond Housing closure day falls on a weekday that is not a bank holiday, that day is not counted as a working day for any complaint timescale.

3.5.3 **Date of receipt:** A complaint is treated as received on the calendar day it arrives through any accepted channel. If received on a non-working day (e.g., weekend, bank holiday, or published closure day), the next working day is treated as the date of receipt for timescale purposes.

3.5.4 **Cut-off time:** Contacts received after 5pm on a working day will be treated as received on the next working day for acknowledgement/response timescales.

3.5.5 **Extension:** An approved increase to the response timescale of up to 10 working days at stage 1 and up to 20 working days at stage 2, with reasons, a revised date,

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agreed update frequency, and Housing Ombudsman contact details provided to the customer.

- 3.5.6 **CRM:** The customer relationship management system used to log complaints and record all actions, evidence, contacts and correspondence associated with each case. The CRM provides a complete and auditable record of the complaint journey from receipt to closure.
- 3.5.7 **Complaints tracker:** A centralised record maintained by the Complaints team, used to monitor all stage 1 and stage 2 complaints. The tracker includes complaint references, stages, dates, outcomes, escalation status and service area themes. It supports performance reporting, trend analysis, governance reporting and the annual complaints performance & service improvement report.
- 3.5.8 **Ticketing system:** Used to convert inbound emails into service tickets. It is used as an intake channel for some customer contacts, including dissatisfaction or complaint related correspondence raised via the customer feedback inbox, before cases are created and managed within CRM.
- 3.6 **External redress and regulators (subject specific routes that do not displace HOS)**
- 3.6.1 **Housing Ombudsman Service:** The Housing Ombudsman Service is an independent, impartial and free service that investigates complaints from social housing customers about their landlord. It makes final decisions on disputes involving organisations that are members of its scheme, including housing associations, local authorities, and voluntary members such as private landlords and letting agents. The Housing Ombudsman also works to strengthen landlords' internal complaints procedures and promote learning from complaints, helping to prevent service failures from being repeated.
- 3.6.2 **Energy Ombudsman (Heat Networks):** The external redress body for heat network billing, metering, service and supply disputes, normally after eight weeks or a deadlock letter. This route is additional to, and does not replace, the customer's right to complete Beyond Housing's two stage process and access the Housing Ombudsman.

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3.6.3 **Deadlock letter:** A written confirmation from a heat network provider stating that it has issued its final position and that no further progress can be made internally. A deadlock letter allows the customer to escalate a heat network complaint to the Energy Ombudsman before the usual eight week period has elapsed.

3.6.4 **National House-Building Council (NHBC)/Buildmark and Financial Ombudsman Service (FOS):** For newbuild warranty/insurance matters under NHBC's Buildmark schemes, complaints may escalate to the FOS after NHBC's final response. This route does not affect the right to complain to the Housing Ombudsman about Beyond Housing's complaint handling or service delivery.

### 3.7 **Equality and access**

3.7.1 Beyond Housing is committed to ensuring that all customers can access and participate fully in the complaints process. In line with the Equality Act 2010 and the Housing Ombudsman Complaint Handling Code, we will routinely identify, record and meet disability, vulnerability, communication or language needs at every stage of the complaints journey.

3.7.2 We will:

- Ask all customers at the point of receiving, acknowledging and investigating a complaint whether they have any disability-related, communication or language needs that may affect their ability to engage with the process
- Offer reasonable adjustments and accessibility support, which may include (but is not limited to):
  - Providing information in alternative formats (easy read, large print, coloured paper, audio, Braille or digital accessible formats)
  - Using British Sign Language (BSL) interpretation
  - Offering translation or interpretation for customers whose first language is not English
  - Allowing a representative or advocate to act on the customer's behalf

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- Adjusting how and when we communicate (for example: telephone calls instead of email, avoiding specific times, using plain language, or extending timeframes where appropriate)
- Providing additional support for customers who may be neurodivergent, have mental health conditions, or experience difficulties with communication, understanding or processing information
- Record any support needs or reasonable adjustments clearly in CRM, ensuring that they are visible to all colleagues who may handle the complaint
- Review adjustments throughout the complaint to ensure they remain appropriate
- Ensure that complaint officers and the complaints team take responsibility for identifying accessibility needs proactively, even if they are not explicitly disclosed by the customer
- Provide colleagues with access to guidance and training on recognising when adjustments may be necessary.

3.8 No customer will be disadvantaged in raising or progressing a complaint due to any known disability, language, communication needs, or vulnerability.

## 4.0 Responsibilities

### 4.1 Governing body (Beyond Housing board)

- Holds overall accountability for complaints governance and culture
- Appoints a MRC to provide oversight, challenge and assurance on complaint handling, learning from complaints, and publication duties in line with the Housing Ombudsman Complaint Handling Code
- Receives, reviews and challenges the annual self-assessment against the Code and the annual complaints performance and service improvement report, and approves these for publication.

### 4.2 Member Responsible for Complaints (MRC)

- Provides board level scrutiny and challenge of complaint performance, compliance and learning

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- Seeks assurance that the landlord operates a two stage process with stage 2 independence, and that learning is captured and acted upon.

#### 4.3 **Director of Customer Service and ICT**

- Sponsor for complaint handling, ensuring resources and systems are in place to meet the Code and to deliver learning from complaints.

#### 4.4 **Customer Experience & Complaints Manager**

- Owns the complaints procedure and ensures policy, procedure, templates and training are Code compliant
- Leads the completion of the annual Code self-assessment and the annual complaints performance and service improvement report, and coordinates publication following board review
- Ensures the complaints service operates a two stage process with independence at stage 2 (different decisionmaker from stage 1), and that responses include required signposting to the Housing Ombudsman
- Ensures processes provide reasonable adjustments under the Equality Act 2010 and that these are recorded.

#### 4.5 **Complaints team leader**

- Manages day to day complaint handling quality, including acknowledgement/response timescales, extension approvals, and quality assurance of draft responses
- Oversees performance monitoring, trend analysis and reporting, and supports the capture and delivery of learning actions.

#### 4.6 **Complaint officer**

- Coordinate investigations impartially, define the complaint, gather and test evidence, communicate with customers, and ensure records are complete and auditable
- At stage 1, coordinate the investigation with relevant service areas; operational and technical decisions remain with the service area(s)

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- At stage 2, coordinate the process while an independent decision-maker (not involved at stage 1) considers and determines the outcome; ensure the final response is approved and signed by that decision-maker.

#### 4.7 **Service area managers and technical leads**

- Provide timely operational input, evidence, and expert assessments; own and deliver service actions and remedies arising from complaint outcomes and learning.

#### 4.8 **Teams**

- **Customer Insight team/Performance team:** Supply data, analytics and insight to identify themes and measure performance, feeding board reporting and the annual report
- **ICT team:** Maintain and support systems (e.g., CRM) to ensure accurate, auditable complaint records
- **Service Improvement team:** Track and embed learning and corrective actions arising from complaints.

### 5.0 **Legislative and statutory requirements**

- Housing Ombudsman Complaint Handling Code
- Social Housing (Regulation) Act 2023
- Equality Act 2010
- Data Protection Act 2018
- UK GDPR (UK General Data Protection Regulation)
- Data (Use and Access Act) (DUAA) 2025.

### 6.0 **Procedure detail**

#### **Receiving a stage 1 complaint (Complaints team)**

##### 6.1 **Channels**

- 6.1.1 Complaints may arrive via any of the following routes by any individual as defined in the complaints policy:

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- Email/online notification to the customer feedback inbox
- A 'dissatisfaction to validate' case raised on CRM.

## 6.2 **Recognising a complaint vs a service request**

6.2.1 A customer does not need to use the word 'complaint' for it to be treated as one. When a customer expresses dissatisfaction, we must give them the choice to make a complaint.

6.2.2 We must recognise the difference between a service request and a complaint. A service request is a request requiring action to put something right; it is not a complaint, but it must be recorded, monitored and regularly reviewed.

6.2.3 If a customer expresses dissatisfaction with the response to a service request, a complaint must be raised, even if the service request handling continues. We must not stop efforts to address the service request.

## 6.3 **Acceptance**

6.3.1 We will accept complaints raised within 12 months of the issue occurring or the customer becoming aware of it, unless a fair exclusion applies (as set out in the complaint exclusion procedure). Beyond Housing will, however, consider discretion outside of 12 months where there is good reason (vulnerability, hidden defects, etc.).

6.3.2 Where we decide not to accept or escalate a complaint, we will explain our reasons in writing and provide the Housing Ombudsman's contact details so the customer can challenge our decision. Each complaint is considered on its merits.

6.3.3 When receiving a complaint, the Complaints team must ask the customer whether they have any disability, communication or language needs and ensure that appropriate adjustments or alternative communication methods are offered and recorded on CRM.

## **Triage by channel (Complaints team)**

### 6.4 **Via customer feedback inbox**

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- 6.4.1 The customer feedback inbox is monitored by the Complaints team.
- 6.4.2 The Complaints team reviews the contact and identifies within 5 working days whether it is a stage 1 complaint, ensuring the complaint is acknowledged, defined and logged within Code timescales.
- 6.4.3 If accepted as stage 1, the Complaints team creates a stage 1 complaint case on CRM, assigns a complaint officer, records the complaint definition (issues raised and outcomes sought), and uploads the inbound correspondence into the attachments section of the case.
- 6.5 **Via a ‘dissatisfaction to validate’ case**
- 6.5.1 Colleagues raise a dissatisfaction to validate case on CRM when potential complaint issues are identified; an alert is sent to the customer feedback inbox.
- 6.5.2 The Complaints team reviews the case within 5 working days. If accepted as stage 1, the Complaint team closes the dissatisfaction case, opens a stage 1 complaint case on CRM, assigns a complaint officer, and transfers the case details.
- 6.5.3 If not a stage 1 complaint, the Complaint team closes the dissatisfaction case (selecting ‘No complaint, customer informed’) and advises the relevant colleague on next steps to resolve the issue (e.g., creating a customer callback).

#### **Logging a stage 1 complaint (Complaints team)**

- 6.6 All stage 1 complaints are logged on CRM and the complaints tracker for performance and learning analysis.
- 6.7 **Escalation route – mandatory selection and visibility**
- 6.7.1 At the point of logging, the Complaints team must select the correct escalation route for reporting and template purposes. These routes relate to additional external regulatory bodies for specific types of issues, but do not replace the customer’s right to complete Beyond Housing’s two-stage complaints procedure or to access the Housing Ombudsman Service.

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6.7.2 The escalation route options are:

- **Housing Ombudsman Service (HOS)** – The default route for all landlord–customer complaints covered by the statutory Complaint Handling Code. After stage 2, customers may contact the Housing Ombudsman for an independent investigation
- **National House-Building Council (NHBC)** – For issues relating specifically to new-build structural warranty or insurance matters. These cases follow NHBC’s complaints process and may be escalated to the Financial Ombudsman Service (FOS) after NHBC’s final response. This does not affect the customer’s right to raise a complaint with the Housing Ombudsman about Beyond Housing’s complaint handling or service delivery relating to the issue
- **Heat Networks (Energy Ombudsman)** – For complaints relating to regulated heat-network billing, supply, or customer-service issues. From 1 April 2025, heat network complaints can be taken to the Energy Ombudsman after eight weeks or earlier where a deadlock letter is issued. This route operates in addition to, not instead of, the Housing Ombudsman’s jurisdiction over Beyond Housing’s complaint handling or service failures.

#### **Assigning a stage 1 complaint (Complaints team)**

6.8 Once the stage 1 complaint has been logged, the Complaints team will assign the case to a complaint officer. The assigned complaint officer will act as the customer’s key point of contact and will coordinate the investigation, communication, evidence gathering and administrative actions throughout the stage 1 process.

#### **Acknowledging a stage 1 complaint (Complaints team)**

6.9 The Complaints team issues a written acknowledgement within 5 working days of receipt, which defines the complaint and confirms the outcomes the customer is seeking.

6.10 The acknowledgement will include:

<b>Complaint procedure</b>	
<b>Procedure owner:</b> Customer Experience & Communication Manager	<b>Procedure ref no:</b> CE-PR-003
<b>Date approved:</b> March 2026	<b>Review date:</b> March 2029

- Name and role of the complaint officer (key point of contact)
- Complaint reference number
- Clarification of which aspects we are, and are not, responsible for (and any areas needing clarification)
- The target response date: 10 working days from acknowledgement, in line with the Complaint Handling Code
- A statement confirming that we have considered any known disability, communication or language needs and details of any adjustments offered or agreed
- An overview of the complaints process and details of next steps
- Contact details for the Housing Ombudsman Service.

6.11 The Complaints team uploads the acknowledgement to CRM and prepares the stage 1 response template.

#### **Investigating a stage 1 complaint (Complaint officer)**

6.12 Upon assignment, the complaint officer reviews case details and contacts the customer within 5 working days to confirm the issues and outcomes sought and to understand the customer's perspective.

#### **6.13 If we are unable to contact the customer**

6.13.1 If reasonable attempts to contact the customer are unsuccessful, the complaint officer will proceed based on the information already available. Where the original complaint provides enough context to understand the issues and the outcomes sought, the investigation will continue and a stage 1 response will be issued within standard timescales.

6.13.2 If the complaint lacks essential detail and further information is required to investigate fairly, the complaint officer will explain this in the stage 1 response, outlining the attempts made to contact the customer and what aspects of the complaint can and cannot be considered on the available evidence.

<b>Complaint procedure</b>	
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- 6.13.3 The complaint officer then updates and closes the 'Contact complainant' action on CRM. If any action exceeds its service level agreement (SLA), an SLA breach notification is triggered to the officer and line manager.
- 6.13.4 As part of the investigation, the complaint officer will work with relevant colleagues in the service area(s) identified in the complaint. The complaint officer's role is to coordinate the investigation, gather and test information from those colleagues, ensure that all evidence is considered fairly, and represent the customer's position throughout the process. Operational decisions, technical assessments and service-specific actions remain the responsibility of the relevant service area(s). The complaint officer does not make operational or technical determinations about another team's services; instead, they ensure that the investigation is thorough, impartial and compliant with the Housing Ombudsman's Complaint Handling Code, and that the customer receives a clear, fair, and evidence-based response.
- 6.13.5 The complaint officer records all collaboration and evidence reviews on CRM as part of the auditable case record.
- 6.13.6 In line with the Housing Ombudsman Complaint Handling Code, complaint officers must ensure that any colleagues contributing to the investigation:
- Deal with complaints on their merits, act independently, and maintain an open mind throughout the investigation
  - Give the customer a fair opportunity to set out their position
  - Identify and address any actual or perceived conflict of interest
  - Consider all relevant information and evidence carefully, ensuring that evidence provided by service areas, contractors or other colleagues is tested and assessed fairly
  - Ensure that any colleagues contributing to the investigation follow the above requirements.
- 6.13.7 The complaint officer must review recorded accessibility needs at the start of the investigation, ensure appropriate adjustments are in place, and proactively check with the customer if any additional support is required.

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6.13.8 A complaint concerning an employee is not investigated by the person the allegation concerns; it must be referred to HR and the colleague's line manager.

6.13.9 Any complaint indicating health, fire, or building safety risk must be escalated immediately in line with the fire & building information concerns procedure (HSFSP17).

6.13.10 The complaint officer maintains CRM actions and notes throughout, working within SLAs to provide a full stage 1 response within 10 working days of acknowledgement.

### **Extensions (stage 1)**

6.14 An extension may only be applied where the complaint is complex or there is a clear and evidenced reason why the response cannot be issued within the required timescale. Any extension must be fair, justified, and compliant with the Housing Ombudsman Complaint Handling Code, which permits extensions only with good reason and requires landlords to explain the revised timescale to the customer and agree how often updates will be provided. When informing the customer of an extension, we will also provide the Housing Ombudsman's contact details, in line with the Complaint Handling Code.

### **6.15 Requesting an extension (Complaint officer)**

6.15.1 If the complaint officer believes an extension is required, they must:

- Submit a formal extension request before the response deadline
- Provide clear reasons for the request, including:
  - Why the complaint cannot be completed within the timescale
  - What information, evidence or actions remain outstanding
  - The revised proposed response date
  - Any risk or dependency factors.
- Continue progressing the investigation while the request is being considered.

### **6.16 Extension limits**

6.16.1 Up to 10 additional working days with good reason.

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<b>Procedure owner:</b> Customer Experience & Communication Manager	<b>Procedure ref no:</b> CE-PR-003
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**6.17 Approval process (Complaints team leader/Customer experience & complaints manager)**

6.17.1 The extension request is reviewed by the complaints team leader. In the team leader’s absence, the customer experience & complaints manager will review and decide.

6.17.2 The approver will either approve or decline the request, ensuring that the justification meets Code requirements and that the proposed timescale is reasonable and proportionate. The approval action creates an auditable system record of all extension requests, decisions, reasons and revised deadlines.

**6.18 If an extension is approved**

6.18.1 The complaint officer must contact the customer to inform them of the extension, together with the revised timescale.

**6.19 If an extension is not approved**

6.19.1 The complaint officer must continue working within the original timescale and take immediate steps to complete the investigation by the deadline.

**Stage 1 complaint responses (Complaint officer)**

6.20 Where something has gone wrong, we must acknowledge this and set out the actions we have already taken, or intend to take, to put things right. Remedies may include:

- Saying “I am sorry”
- Providing an explanation, assistance, or reasons
- Taking action where there has been delay
- Reconsidering or changing a decision
- Providing a financial remedy, in line with the compensation procedure
- Changing policies or procedures
- Individual feedback or colleague training.

6.21 Any remedy offered must reflect the impact on the customer as the result of any fault identified. All proposed remedies must be clearly explained, include what will

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happen and by when, and be agreed with the customer where appropriate. Any financial remedy must be determined and approved in accordance with the compensation procedure, and all remedies must be followed through to completion.

## 6.22 **If the complaint is not upheld**

6.22.1 Where the investigation finds that the service was delivered correctly and no fault occurred, the response must:

- Clearly explain the reasons for the decision, referencing the evidence and policies considered
- Explain any service improvements or learning identified, even where no fault was found (if applicable)
- Confirm any next steps available to the customer, including escalation rights.

6.22.2 This is in line with the Housing Ombudsman Complaint Handling Code requirement to provide clear, evidence-based explanations regardless of outcome.

## 6.23 **Response format and timing**

6.23.1 The response will:

- Address all issues defined, set out remedies and timescales, and explain next steps
- Be issued when the answer is known, rather than waiting for outstanding actions to be completed
- Ensure that any outstanding actions are tracked and progress is communicated until completion.

## 6.24 **New issues raised during investigation**

6.24.1 If the customer raises new issues:

- If the issues are related, and the stage 1 response has not yet been issued, they should be incorporated into the stage 1 response

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- If unrelated, or if inclusion would unreasonably delay the response, a new complaint must be logged.

### **Closing a stage 1 complaint (Complaints team)**

- 6.25 The complaint officer submits the draft response to the Complaints team leader for a final quality check before issue. Once approved, the response is sent to the customer by the Complaints team.
- 6.26 The case is then closed on CRM and updated in the complaints tracker, logging the outcome and any outstanding actions and learning themes.

### **Receiving a stage 2 complaint (Complaints team)**

- 6.27 If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, the customer may request escalation to stage 2. We must not refuse escalation unless a valid exclusion applies (per the complaint exclusion procedure) and we will not require the customer to justify why they seek escalation.

### **Acceptance**

- 6.28 There is no set time limit for a customer to request escalation from stage 1 to stage 2. An escalation request may be made at any point after the stage 1 response, unless a valid exclusion applies (as set out in the complaint exclusion procedure).

### **Logging a stage 2 complaint (Complaints team)**

- 6.29 Stage 2 complaints follow the same logging process as stage 1, but without the need for triage or escalation-route checks, as these were completed during stage 1 and the complaint has already been defined.
- 6.30 Upon receiving a request for escalation, the Complaints team must:
- Create a stage 2 complaint case on CRM, linked to the stage 1 case
  - Update the complaints tracker to reflect the stage 2 escalation
  - Upload the stage 2 acknowledgement letter once issued.

### **Assigning a stage 2 complaint (Complaints team)**

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- 6.31 Once the stage 2 complaint has been logged, the Complaints team must assign the case to the same complaint officer who handled the stage 1 complaint, to provide continuity for the customer and maintain a single point of coordination throughout the complaints process.
- 6.32 As part of the stage 2 process, the complaint officer is responsible for arranging an independent review of the complaint. To meet the requirements of the Housing Ombudsman Complaint Handling Code, this review must be carried out by a colleague who was not involved in the stage 1 investigation or decision, and who can consider the complaint independently, with an open mind and without any actual or perceived conflict of interest.
- 6.33 The complaint officer will identify and work with an appropriate colleague from the relevant service area(s) or another suitable team, who will act as the independent stage 2 decision-maker, ensuring that the stage 2 review is carried out by someone who was not involved at stage 1. The complaint officer will continue to coordinate the customer journey, communication, evidence gathering and administrative actions, while the independent decision-maker considers and determines the stage 2 complaint in accordance with the Housing Ombudsman Complaint Handling Code.

#### **Acknowledging a stage 2 complaint (Complaints team)**

- 6.34 The Complaints team issues a written acknowledgement within 5 working days of receipt, which defines the complaint, the escalation and confirms the outcomes the customer is seeking.
- 6.35 The acknowledgement will include:
- The name of the complaint officer assigned to coordinate the complaint and confirmation of their role as the customer's key point of contact
  - The complaint reference number
  - The stage 2 complaint definition, restating the issues raised and the outcomes the customer is seeking, as established at stage 1
  - Clarification of which aspects of the complaint we are, and are not, responsible for, and where further clarification may be needed

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- Reassurance that the stage 2 review will be carried out by a colleague who was not involved in stage 1, ensuring independence, an open mind, and the avoidance of any actual or perceived conflict of interest, in line with the Housing Ombudsman Complaint Handling Code requirements
- The target date for the stage 2 response, which is 20 working days from the date of acknowledgement, with confirmation that any extensions will be communicated in advance and with reasons
- Details of reasonable adjustments, if required.

6.36 Where the customer has provided a reason for requesting escalation, this may be referenced in the acknowledgement to demonstrate that their continued dissatisfaction has been understood (e.g., 'You explained that you are requesting escalation because...'). Customers **are not required to** justify escalation under the Code, and escalation cannot be refused unless a valid exclusion applies.

6.37 The Complaints team will:

- Create a stage 2 complaint case on CRM
- Attach a copy of the acknowledgement letter to the CRM case
- Assign the case to the same complaint officer who handled stage 1 to ensure continuity.

6.38 The complaint officer will then receive a CRM notification of the new stage 2 complaint case assigned to them, enabling them to begin coordinating the stage 2 process.

### **Investigating a stage 2 complaint (Complaint officer)**

6.39 Upon assignment, the complaint officer reviews the case details and contacts the customer within 5 working days to confirm the escalation, understand any unresolved issues, and confirm the outcomes the customer is seeking.

#### **6.40 If we are unable to contact the customer**

6.40.1 If reasonable attempts to contact the customer are unsuccessful, the complaint officer will proceed based on the information already available. Where the original complaint provides enough context to understand the issues and the outcomes

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sought, the investigation will continue and a stage 2 response will be issued within standard timescales.

- 6.40.2 If the complaint lacks essential detail and further information is required to investigate fairly, the complaint officer will explain this in the stage 2 response, outlining the attempts made to contact the customer and what aspects of the complaint can and cannot be considered on the available evidence.
- 6.40.3 The complaint officer then updates and closes the “Contact complainant” action on CRM. If any action exceeds its SLA, an SLA breach notification is triggered to the officer and line manager.
- 6.40.4 As part of the stage 2 investigation, the complaint officer will coordinate the process, ensuring the customer’s experience is managed, evidence is gathered and tested, and all information is recorded clearly on CRM. The stage 2 review itself will be carried out by an independent decision-maker who was not involved in the stage 1 investigation or decision, in line with the Housing Ombudsman Complaint Handling Code.
- 6.40.5 The independent decision-maker will consider all relevant evidence with an open mind and without any actual or perceived conflict of interest, reaching a fair and impartial final decision on the complaint. Operational decisions, technical assessments and service-specific actions remain the responsibility of the relevant service area(s), while the complaint officer continues to support the investigation and coordinate communication and administrative tasks throughout the stage 2 process.
- 6.40.6 The complaint officer records all collaboration and evidence reviews on CRM as part of the auditable case record.
- 6.40.7 In line with the Housing Ombudsman Complaint Handling Code, complaint officers must, and must ensure that any colleagues contributing to the investigation also:

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- Deal with complaints on their merits, act independently, and maintain an open mind throughout the investigation
- Give the customer a fair opportunity to set out their position
- Identify and address any actual or perceived conflict of interest
- Consider all relevant information and evidence carefully, ensuring that evidence provided by service areas, contractors or other colleagues is tested and assessed fairly.

6.40.8 We must offer reasonable adjustments where appropriate under the Equality Act 2010, record any adjustments and disclosed disabilities.

6.40.9 A complaint concerning an employee is not investigated by the person the allegation concerns; it must be referred to HR and the colleague's line manager.

6.40.10 Any complaint indicating health, fire, or building safety risk must be escalated immediately in line with the fire & building information concerns procedure (HSFSP17).

6.40.11 The complaint officer maintains CRM actions and notes throughout, working within SLAs to provide a full stage 2 response within 20 working days of acknowledgement (or within an approved extended timescale in line with the extensions process).

### **Extensions (stage 2)**

6.41 An extension may only be applied where the complaint is complex or there is a clear and evidenced reason why the response cannot be issued within the required timescale. Any extension must be fair, justified, and compliant with the Housing Ombudsman Complaint Handling Code, which permits extensions only with good reason and requires landlords to explain the revised timescale to the customer and agree how often updates will be provided. When informing the customer of an extension, we will also provide the Housing Ombudsman's contact details, in line with the Complaint Handling Code.

### **6.42 Requesting an extension (Complaint officer)**

6.42.1 If the complaint officer believes an extension is required, they must:

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- Submit a formal extension request before the response deadline.
- Provide clear reasons for the request, including:
  - Why the complaint cannot be completed within the timescale
  - What information, evidence or actions remain outstanding
  - The revised proposed response date
  - Any risk or dependency factors
- Continue progressing the investigation while the request is being considered.

#### 6.43 **Extension limits**

6.43.1 Up to 20 additional working days with good reason.

#### 6.44 **Approval process (complaints team leader/customer experience & complaints manager)**

6.44.1 The extension request is reviewed by the complaints team leader. In the team leader's absence, the customer experience & complaints manager will review and decide.

6.44.2 The approver will either approve or decline the request, ensuring that the justification meets Code requirements and that the proposed timescale is reasonable and proportionate. The approval action creates an auditable system record of all extension requests, decisions, reasons and revised deadlines.

6.44.3 **If an extension is approved** - The complaint officer must contact the customer to inform them of the extension, together with the revised timescale.

6.44.4 **If an extension is not approved** - The complaint officer must continue working within the original timescale and take immediate steps to complete the investigation by the deadline.

#### **Stage 2 complaint responses (Complaint officer)**

6.45 Following completion of the stage 2 investigation, the complaint officer will draft the stage 2 response, drawing on the findings of the colleague who was not involved at stage 1 to ensure independence and compliance with the Housing Ombudsman Complaint Handling Code.

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6.46 The independent stage 2 decision-maker will consider and approve the final response and will sign it as the person who determined the stage 2 complaint. The draft response must address all issues defined in the stage 2 complaint and reflect all evidence reviewed during the investigation.

6.47 **The stage 2 response must:**

- Set out the decision outcome for each element of the complaint providing a clear, evidence-based explanation that references relevant records, policies, procedures, contractual obligations, legislative requirements, and service standards.

6.47.1 Confirm any remedies identified, which may include:

- Saying “I am sorry”
- Providing an explanation, assistance, or reasons
- Taking action where there has been delay
- Reconsidering or changing a decision
- Providing a financial remedy, in line with the compensation procedure
- Changing policies or procedures
- Individual feedback or colleague training.

6.47.2 Any remedy offered must reflect the impact on the customer as the result of any fault identified. All proposed remedies must be clearly explained, include what will happen and by when, and be agreed with the customer where appropriate. Any financial remedy must be determined and approved in accordance with the compensation procedure, and all remedies must be followed through to completion.

6.48 **If the complaint is not upheld**

6.48.1 Where the investigation finds that the service was delivered correctly and no fault occurred, the response must:

- Clearly explain the reasons for the decision, referencing the evidence and policies considered

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- Explain any service improvements or learning identified, even where no fault was found (if applicable)
- Confirm any next steps available to the customer, including escalation rights.

6.48.2 This is in line with the Housing Ombudsman Complaint Handling Code requirement to provide clear, evidence based explanations regardless of outcome.

#### 6.49 **Response format and timing**

6.49.1 The response will:

- Confirm that the stage 2 review was carried out by a decision-maker who was not involved at stage 1, in line with the Housing Ombudsman’s statutory Complaint Handling Code
- Address all issues defined, set out remedies and timescales, and explain next steps
- Be issued when the answer is known, rather than waiting for outstanding actions to be completed
- Ensure that any outstanding actions are tracked and progress is communicated until completion
- State that stage 2 is the final stage of Beyond Housing’s internal complaints procedure
- Explain next steps available to the customer should they remain dissatisfied. For example, contacting the Housing Ombudsman Service for an independent review after stage 2, in line with the statutory Complaint Handling Code.

#### 6.50 **Closing a stage 2 complaint (Complaints team)**

6.50.1 The complaint officer submits the draft response to the Complaints team leader for a final quality check before issue. Once approved, the response is sent to the customer by the Complaints team.

6.50.2 The case is then closed on CRM and updated in the complaints tracker, logging the outcome and any outstanding actions and learning themes

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## 7.0 Process flowchart

[Stage 1 complaint process flowchart](#)

[Stage 2 complaint process flowchart](#)

## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Quality checking of complaint responses	1st	Complaints team leader	Customer experience & complaints manager
Monthly case QA checks	1st	Complaints team leader	Customer experience & complaints manager
Monitoring of reasonable adjustments	1st	Complaints team leader	Customer experience & complaints manager
Monitoring of response timescales, extensions and SLA breaches	1st	Complaints team leader	Customer experience & complaints manager
Performance reporting (complaints performance, timeliness, themes)	2nd	Customer experience & complaints manager	Executive team & senior leadership team
Complaint handling data report (including themes and learning)	2nd	Customer experience & complaints manager	Customer forum
Annual self-assessment against the Housing Ombudsman Complaint Handling Code (completion & publication)	2nd	Customer experience & complaints manager	Beyond Housing board
Annual complaints performance and service improvement report (preparation & publication)	2nd	Customer experience & complaints manager	Beyond Housing board
Oversight and challenge from the Member Responsible for Complaints (MRC)	3rd	Board appointed MRC	Beyond Housing board

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Board level reporting on complaints performance, themes and learning	3rd	Director of customer service & ICT	Beyond Housing board
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## 9.0 Consultation

9.1 This complaints process has been designed to meet the requirements of the Housing Ombudsman Complaint Handling Code (effective April 2024). It incorporates all mandatory provisions, including:

- A clear definition of a complaint and a distinction between complaints and service requests
- Accessibility and awareness measures so customers can raise complaints easily and through multiple channels
- A two stage complaints process with defined timescales (stage 1: 10 working days; stage 2: 20 working days) and clear rules for extensions
- Independence at stage 2, with the review carried out by someone not involved in the stage 1 investigation, ensuring fairness and impartiality
- Transparency in communication, including acknowledgement, complaint definition, clarification of responsibilities and escalation rights
- Provision of reasonable adjustments under the Equality Act 2010
- Requirements for thorough record-keeping, fair and proportionate remedies, and continuous learning from complaints to support service improvement.

## 10.0 Data retention

Record	Format and location	Retention period
Customer feedback inbox	Email inbox	6 years
Triage system	Ticket system (from emails received)	6 years
CRM	CRM system – stage 1 and stage 2 complaints cases	6 years
Housing Ombudsman folders	Housing Ombudsman	6 years
Stage 1 folders	Stage 1	6 years
Stage 2 folders	Stage 2	6 years
MP/Cllr folders	MP & Councillors	6 years
NHBC cases folder	NHBC Cases	6 years

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Complaints trackers	Excel spreadsheet	6 years
Compensation tracker (archived)	Excel spreadsheet	6 years

### 11.0 Approval and revision

11.1 This procedure will be subject to review every 3 years, or in response to a change in regulation or best practice.

<b>Accountable/approved by:</b>	Director of customer service and ICT
<b>Responsible:</b>	Customer experience & communication manager

Version	Date	Information
1	January 2021	New procedure
2	October 2024	Update due to change in HOS complaint handling code and introduction of CRM
3	March 2026	To reflect changes in complaints service delivery

Complaint compensation procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-001
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## 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing identifies, decides and delivers remedies, including financial compensation where appropriate, when complaint investigations find that our actions or service failures caused loss, distress/inconvenience, or avoidable delay.
- 1.2 We apply the statutory Housing Ombudsman Complaint Handling Code principles of fairness, proportionality, timeliness and transparency to determine remedies and communicate them clearly in the complaint response.
- 1.3 Awards of compensation are intended to reflect the customer’s experience up to the point of issuing the relevant stage response. Compensation at stage 1 does not preclude a further award at stage 2 if additional detriment is evidenced during escalation.
- 1.4 Where the matter involves allegations of legal liability, we manage it under our insurance arrangements; this procedure explains the boundary between discretionary compensation (redress for service failure) and insurance claims.

## 2.0 Scope

- 2.1 Applies to all Beyond Housing customers and to all colleagues who are determining complaint outcomes at stage 1 or stage 2.
- 2.2 Remedies are normally decided as part of the stage response; discretionary compensation is considered where appropriate alongside non-financial remedies.
- 2.3 Where the investigation indicates a potential insured loss (e.g., significant property damage, higher-value quantifiable loss, personal injury), the case is referred to the

<b>Complaint compensation procedure</b>	
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assurance/insurance process; discretionary compensation under this procedure will not duplicate insured redress.

- 2.4 The procedure ends when the customer accepts the remedy, and payments are made (where applicable).

### 3.0 Definitions

- 3.1 **Complaint:** The definition, provided by the Housing Ombudsman Service (HOS) is: ‘An expression of dissatisfaction, however it is made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers.’
- 3.2 **Customer/complainant:** The person who reported the complaint.
- 3.3 **Complaints team:** The team responsible for compliance with the complaint and compliment policy, coordinating and advising complaint responses and ensuring learning and continuous improvement is embedded, in line with the Housing Ombudsman Complaint handling code.
- 3.4 **Assurance team:** The team responsible for managing claims made against Beyond Housing.
- 3.5 **Housing Ombudsman Service:** The Housing Ombudsman Service is an impartial, independent organisation that reviews complaints about housing organisations that are registered with it. The outcome of these investigations includes remedies, orders, and recommendations. They provide redress for the resident, require the landlord to improve their service if necessary, and offer additional recommendations based on the case findings.
- 3.6 **Claim:** A request for payment under the terms of a policy for a loss that has been sustained.
- 3.7 **Claimant:** The person who is making a claim.
- 3.8 **Remedy:** The combined set of actions we take to put things right (e.g., apology, explanation, repairs/service actions, refunds/credits, compensation, learning).
- 3.9 **Discretionary compensation:** A goodwill financial payment for distress/inconvenience, avoidable time/loss of amenity, or complaint-handling failures arising from our service.
- 3.10 **Quantifiable loss:** Direct, evidenced financial loss caused by our service failure (e.g., proven costs incurred). (Higher-value losses are managed via insurance).
- 3.11 **Vulnerability (for remedy decisions):** Any factor that amplifies impact (health, disability, caring responsibilities, digital/financial exclusion, etc.) and may justify a higher or faster remedy.

<b>Complaint compensation procedure</b>	
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- 3.12 **Threshold:** A defined financial limit used to determine whether discretionary compensation is appropriate. Thresholds prevent duplication of redress, ensure lawful handling of potential liability claims, and maintain consistency in discretionary awards.
- 3.13 **Exclusion:** A defined reason why a case cannot be considered under the discretionary compensation procedure, typically because it relates to an insured loss, legal claim, statutory entitlement, or a situation outside Beyond Housing’s responsibility. Exclusions ensure that customers receive the right outcome from the right process and that discretionary compensation is applied fairly and consistently.
- 3.14 **CRM:** The customer relationship management system used to log complaints and record all actions, evidence, contacts and correspondence associated with each case. The CRM provides a complete and auditable record of the complaint journey from receipt to closure.

#### 4.0 Responsibilities

- 4.1 **Complaint officer/stage 1 decision-maker:** Assesses remedy using the checklist in 6.2, proposes discretionary compensation (within authority) and non-financial actions, records rationale and evidence in the customer relationship management system (CRM), and includes the remedy in the stage 1 response.
- 4.2 **Independent stage 2 decision-maker:** Considers the case afresh, confirms the appropriate Stage 2 remedy and signs the Stage 2 response as the person who considered the complaint independently (not involved at stage 1); any compensation awarded reflects impacts evidenced up to the stage 2 response date.
- 4.3 **Complaints team leader/customer experience & complaints manager:** Provides quality assurance, ensures consistency of awards and that payments/credits are processed within service level agreements (SLAs); monitors themes for governance reporting.
- 4.4 **Assurance team:** Manages insured losses/claims; advises complaint officers on boundaries to avoid duplicate redress.

#### 5.0 Legislative and statutory requirements

- 5.1 The statutory Complaint Handling Code requires landlords to acknowledge where things have gone wrong and to set out proportionate actions to put things right, including financial remedies where appropriate. This procedure adopts those principles and ensures remedies are timely, fair and clearly explained.

#### 6.0 Procedure detail

<b>Complaint compensation procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-001
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

### When to consider remedies

- 6.1 Consider remedies during the investigation and confirm them in the stage response. If new impacts are evidenced after response (e.g., extended delay), review the remedy and provide an updated response where needed.

### Remedy assessment checklist

- 6.2 Complaint officers must evaluate and record in CRM:
- Impact on the customer (including vulnerability) and duration of avoidable detriment
  - Avoidability and contributory factors
  - Customer effort to pursue resolution and any complaint-handling failures
  - Evidence of quantifiable loss
  - Non-financial actions needed to put things right
  - Proportionate discretionary compensation (if appropriate).

### Remedy menu

- 6.3 **Non-financial:** Apology; explanation; correction of records; expedite or re-do works; appointments at customer convenience; practical support; policy/process change; colleague feedback/training.

### Financial

- 6.4 Refunds/credits (e.g., rent, service charges, heat billing) where a charge was not correctly applied or service not provided
- 6.5 Discretionary compensation for time, distress/inconvenience, complaint-handling failure
- 6.6 Quantifiable loss (evidenced out of pocket costs) — within discretionary thresholds or via insurance if above threshold.

### Scope of awards at each stage

- 6.7 Compensation offered within a stage 1 or stage 2 response reflects the impacts and evidence available up to the date of that response.

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- 6.8 Where a complaint escalates to stage 2, the independent stage 2 decision-maker will consider any additional detriment occurring after stage 1 and may make a separate or additional award if proportionate.
- 6.9 If further impacts arise after a stage response (for example, further avoidable delay), Beyond Housing will review the remedy and update the customer where appropriate.

### Acceptance and escalation rights

- 6.10 Acceptance of a compensation offer does not limit or remove the customer’s right to request escalation to stage 2.
- 6.11 Where a complaint has reached stage 2, acceptance of compensation does not limit or remove the customer’s right to refer the matter to the Housing Ombudsman Service following our final response.
- 6.12 Beyond Housing will not require any waiver of escalation rights as a condition of accepting compensation.

### Compensation categories and ranges

<b>Category</b>		<b>Award level</b>		
1	Discretionary - Time (avoidable duration of loss of service/amenity)	Low 2–10 days	Medium 11–21 days	High 22+ days
		£25	£75	£125
2	Discretionary - Distress and inconvenience (impact of avoidable loss)	Low	Medium	High
		£25	£75	£125
3	Complaint Handling Failure	Low	Medium	High
		£25	£75	£125
4	Quantifiable loss	Up to £125 under this procedure (evidence required). Above £125 → refer to Assurance/Insurance.		

- 6.13 Officers may combine categories where the facts warrant it, ensuring the overall award is proportionate and avoids duplication with refunds/credits. The Code expects proportionality, not strict tariffs.

### Authority levels

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	<b>Position</b>	<b>Authorisation level</b>
1	Complaints officer	£125
2	Complaints team leader	£500
3	CX & complaints manager	£1,000
4	CX & communication manager	£2,500
5	Director	£5,000
6	Executive director	>£5,000

6.14 If the total proposed would exceed the officer’s financial limit, the case must be escalated to the next authorisation level. This protects fairness, transparency and proportionality in line with the Housing Ombudsman’s expectations and ensures that higher-value awards receive appropriate oversight. All escalations must include clear documentation of the rationale, evidence, remedy assessment and justification for the proposed amount.

#### **Acceptance window and payment processing**

6.15 Beyond Housing does not impose a timescale for customers to accept compensation offers. As compensation reflects the position up to the stage response, acceptance can occur at any time thereafter.

6.16 Once the customer confirms acceptance (and provides any required details), Beyond Housing will process payment/credit within 10 working days, unless a legal or verification requirement reasonably extends this period (in which case we will explain the reason and revised date).

6.17 If material facts change significantly prior to acceptance (for example, a separate refund is applied or an insurance claim is settled for the same loss), Beyond Housing may review the offer to prevent duplication of redress, explaining the reasons in writing.

#### **Recording and communication**

6.18 The stage response must:

- Itemise the remedy (each element), the rationale, and how/when payments will be made
- Pay-out service level agreement:
  - Explain that once accepted, payments/credits are processed within 10 working days (unless legal/verification steps delay; explain any delay)

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- Explain payments should normally be by bank transfer
- Confirm any actions with timescales and how progress will be tracked
- Explicitly state that acceptance of compensation does not affect escalation rights.

## Exclusions

6.19 The following instances would not be considered under the complaint compensation procedure:

- Personal injury/high-value property damage
- Claims for loss of earnings
- Claims for damage caused by circumstances beyond a landlord's control e.g. storms or flooding
- Claims for damages caused by landlord
- Problems caused by a third party not working for the landlord (If we contributed to delay or communication failures, we will consider partial redress for our part only)
- Circumstances under the Right to Repair provisions of The Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994
- Any cost to decant (move) a customer due to demolition, major works or re-housing
- Any cost for home loss, payable under the Land Compensation Act 1973
- Any improvement costs agreed between the customer and Beyond Housing
- Loss of services as a result of misuse or vandalism by a customer, their family or visitors to
  - their home
  - Where reasonable access has not been given to carry out our services.

## 7.0 Process flowchart

1. Complaint investigation completed
2. Identify whether a service failure has occurred
3. Decision
4. No service failure identified → Explain decision in the stage response → Record in CRM → End

OR

<b>Complaint compensation procedure</b>	
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5. Service failure identified → Assess impact (duration, distress, vulnerability, customer effort)
6. Decision
7. Potential insured or higher-value loss identified → Refer to assurance/insurance process → End compensation process

OR

8. No insured loss → Apply remedy assessment checklist
9. Identify appropriate non-financial remedies and any discretionary compensation
10. Decision
11. Proposed compensation within officer authority → Confirm remedy in the stage response

OR

12. Exceeds officer authority → Escalate for approval to the next authorisation level
13. Approved remedy confirmed in the stage response
14. Decision
15. Customer accepts the remedy → Process payment and complete actions

OR

16. Customer does not accept the remedy → Customer may request escalation to stage 2
17. Further impacts arise after the stage response → Review the remedy and update the customer where appropriate
18. End.

## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Quality checking of compensation decisions and letters	1st	Complaints team leader	Customer experience & complaints manager
Monthly QA checks	1st	Complaints team leader	Customer experience &

<b>Complaint compensation procedure</b>	
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			complaints manager
Quarterly reporting	2nd	Customer experience & complaints manager	Executive team and senior leadership team
Annual analysis in the annual complaints performance and service improvement report	2nd	Customer experience & complaints manager	Beyond Housing board and Customer Forum
Moderation review (spot-check of ranges and rationale)	3rd	Board-appointed Member Responsible for Complaints (MRC)	Beyond Housing board

## 9.0 Consultation

9.1 Consultation has taken place with the Assurance team, the director of customer service & ICT and the chief finance officer.

## 10.0 Data retention

Record	Format and location	Retention period
CRM case	CRM system	6 years
Complaint tracker	Excel	6 years

## 11.0 Approval and revision

11.1 This procedure will be subject to a review every three years.

<b>Accountable/approved by:</b>	Director of customer service & ICT
<b>Responsible/procedure owner:</b>	Customer experience & communications manager

Version	Date	Information
1	September 2022	Complaint policy approach revised to align with Housing Ombudsman Service Code
2	June 2025	Reviewed following recommendation from Ombudsman to align to Handling Code that came into effect April 2024.

<b>Complaint compensation procedure</b>	
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3	March 2026	Reviewed following complaints policy consultation.
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Complaint exclusion procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-005
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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## 1.0 Purpose

1.1 This procedure sets out when and how Beyond Housing may refuse to accept or escalate a customer complaint because it falls outside its complaints procedure, and how it will explain and signpost where a different process applies. It reflects the statutory Housing Ombudsman Complaint Handling Code expectation that 'landlords must accept a complaint unless there is a valid reason not to do so', and that refusals are explained in writing with details of how to challenge via the Housing Ombudsman.

## 2.0 Scope

- 2.1 This procedure applies to customer complaints (as per our complaints procedure) where an exclusion may apply.
- 2.2 This procedure does not prevent us from taking service action (e.g., completing repairs, safeguarding steps) where required, it governs only whether a case sits in the complaints process.
- 2.3 Concerns raised by non-customers are excluded from the formal complaints process and are managed as service requests, outside of the Housing Ombudsman Scheme.

## 3.0 Definitions

<b>Complaint exclusion procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-005
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

- 3.1 **Complaint:** An expression of dissatisfaction, however it is made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers.
- 3.2 **Exclusion:** A valid reason not to accept or escalate a complaint within the two-stage process; we must still explain reasons in writing and signpost appropriately.
- 3.3 **Anti-social behaviour (ASB)** is conduct by an individual or group that causes, or is likely to cause, harassment, alarm or distress to another person, or nuisance or annoyance to people living in, visiting, or otherwise lawfully using a home or local area.
- 3.4 **Housing Ombudsman Service:** The Housing Ombudsman Service is an independent, impartial and free service that investigates complaints from social housing customers about their landlord. It makes final decisions on disputes involving organisations that are members of its scheme, including housing associations, local authorities, and voluntary members such as private landlords and letting agents. The Housing Ombudsman also works to strengthen landlords' internal complaints procedures and promote learning from complaints, helping to prevent service failures from being repeated.

## 4.0 Responsibilities

### 4.1 Complaints team

Decides whether an exclusion applies, records the rationale in the customer relationship management system (CRM), issues the refusal letter with signposting, and ensures service actions (if any) continue via the correct route.

### 4.2 Relevant service areas

Service areas act on service requests, anti-social behaviour (ASB) cases, safeguarding, or claims routes as appropriate.

### 4.3 Customer experience & complaints manager/Member Responsible for Complaints (MRC)

Oversee consistency and Housing Ombudsman Complaint Handling Code compliance through quality assurance and reports.

## 5.0 Legislative and statutory requirements

- 5.1 Housing Ombudsman Complaint Handling Code.

<b>Complaint exclusion procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-005
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## 6.0 Procedure detail

### Exclusion criteria (valid reasons not to accept/escalate)

- 6.1 We will accept a complaint unless one or more of the valid reasons below applies. Where an exclusion applies only in part, the in-scope elements will be accepted as a complaint and the out-of-scope elements sign-posted.
- 6.2 If we refuse (in whole or part), we will write to the customer explaining the reason(s) and provide the Housing Ombudsman Service (HOS) contact details to challenge our decision.
- 6.3 Exclusions are used only to ensure customers are placed into the right process to resolve their issue, not to prevent complaints; they help avoid delays and ensure customers reach the route that can genuinely deliver the outcome they need.

### Legal proceedings/claims

- 6.4 We exclude complaints in this category so that customers receive the correct legal or insurance route for resolving their issue, ensuring their case is handled by the process with the authority to deliver the outcome they are seeking.
- 6.5 Legal proceedings have started (e.g., Claim Form and Particulars of Claim have been filed). The matter is for the court/tribunal; we cannot run a parallel complaints process
- 6.6 The complainant has submitted a compensation/liability claim about the same issues (manage through claims/insurance). We will still investigate any separate service quality concerns not determined by the claim.

### Matters outside the landlord's responsibility

- 6.7 These exclusions help ensure customers are directed to the organisation legally responsible for resolving their issue, so they are not delayed by a complaints process that cannot provide the remedy they want.
- Issues that are the statutory responsibility of another body (e.g., Local Government and Social Care Ombudsman (LGSCO) type local authority functions such as nominations/housing benefit decisions)

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- Criminal matters (e.g., theft/damage by unknown persons) should be reported to the police; we will consider any landlord service failures (e.g., security doors) within scope.

### Different internal procedures apply

6.8 We use this exclusion to make sure customers are moved directly into the correct internal process, such as ASB, safeguarding or allocations, because those routes are designed to investigate, act and resolve the specific issue far more effectively than the complaints process.

- Anti-social behaviour: ASB reports are managed under the ASB policy. Decisions taken as part of the ASB process are not considered under the complaints procedure. We will, however, accept complaints about how an ASB case was handled, including concerns about delays, communication or failure to follow the ASB policy
- Safeguarding concerns: are investigated under the safeguarding policy. We will accept a complaint about how we handled a safeguarding concern once concluded
- Service requests: a new issue not previously reported to us is a service request, not a complaint; it must be recorded and progressed. If dissatisfied with the service request handling, a complaint must then be raised
- North Yorkshire Home Choice (NYHC): housing application decisions. Decisions about eligibility/qualification, priority/banding, property eligibility, medical/welfare assessments and related allocation judgements are subject to NYHC’s own two-stage review process, not the Beyond Housing complaints procedure. Applicants may:
  - Request a stage 1 review within 21 days of the decision; the review is carried out by a senior officer who was not involved in the original decision
  - If still dissatisfied, request a stage 2 review considered by two independent officers from the NYHC partnership; applicants normally have 14 days to submit further information, and the panel aims to issue a written outcome within 56 days
  - We will signpost applicants to the NYHC review route and continue any relevant service actions in parallel.
- Tees Valley Home Finder (TVHF): housing application decisions. Decisions made under the Tees Valley Common Allocation Policy (e.g., eligibility/qualification, banding/priority, closing/suspending an application, bedroom need) are subject to TVHF’s “Right to review a decision” process, as set out in the Common Allocation

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Policy. Typically, applicants must request a review within 21 days of notification; the reviewing body considers all relevant facts and aims to provide a written outcome. We will sign-post applicants to the TVHF review route and continue any relevant service actions in parallel.

*If a customer is dissatisfied with how Beyond Housing handled their communications or service around an NYHC/TVHF decision (for example, delays or poor sign-posting), that handling can still be considered under our two stage complaints procedure; however, the allocation decision itself must be challenged through the NYHC/TVHF review process.*

### Eligibility/relationship

6.9 These exclusions ensure customers are guided to the procedure that matches their relationship with Beyond Housing, so they receive a response through the appropriate route without unnecessary delay or confusion.

- **Concerns raised by non-customers** are managed outside of the Housing Ombudsman Scheme and the formal complaints process. Beyond Housing will still record, acknowledge and respond proportionately through appropriate service request routes
- **Sub-tenants of leaseholders:** Complaints about the leaseholder’s tenancy management sit with the leaseholder/agent; we will consider landlord obligations (e.g., building safety/communal areas) where applicable.

### Previously exhausted/no new evidence

6.10 This exclusion prevents customers from being drawn into repeated complaint cycles that cannot provide a different outcome; while ensuring they are supported to escalate to the Housing Ombudsman where appropriate.

- A complaint that has exhausted our complaints procedure (final response issued) and where the customer presents no new facts or evidence will not be re-opened. (Customers retain their right to go to HOS)
- This exclusion also applies where an individual customer attempts to re-raise the same issues that were already considered and concluded as part of a group complaint. Once the group complaint has received a Final Response, an individual

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participant cannot restart the process unless they present new, materially relevant information that was not previously available

- Similarly, where a group complaint participant subsequently submits an individual complaint about issues that were fully addressed within the concluded group complaint, this will not be accepted as a new complaint unless new evidence or new issues are presented that were not part of the original group investigation.

### Time limit and discretion

6.11 This exclusion helps us focus on issues we can meaningfully investigate, while still allowing discretion in situations where fairness, vulnerability or new information means looking at the matter remains the right thing to do.

- Complaints raised more than 12 months after the issue occurred may be excluded; Beyond Housing will, however, consider discretion outside of 12 months, where there is good reason (vulnerability, hidden defects, etc.).

### 7.0 Process flowchart

1. **Triage and fact-check:** Confirm what the customer wants resolved; check jurisdiction/responsibility; check prior reports; check legal/claim status; check timing (12 months).
2. **Split scope where needed:** Accept in-scope issues into the complaints procedure; route out of scope issues to the correct process.
3. **Record rationale in complaints tracker:** Add free-text justification; attach any evidence (e.g., claim issued, safeguarding referral, local authority decision letter).
4. **Issue written decision:** Explain reason(s), what we will still do (service actions), and how to challenge (HOS contact).
5. **Service action continues:** Where there is work to do (repairs, safeguarding steps), continue services in the correct route.

### 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
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Complaint exclusion procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-005
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

QA sample of exclusions (reasons, letters, sign-posting)	1st	Complaints team leader	CX & complaints manager
Quarterly reporting of exclusions by reason and any themes	2nd	CX & complaints manager	Executive team, senior leadership team and customer forum
Inclusion in the annual complaints performance & service improvement report	2nd/3rd	CX & complaints manager/MRC	Beyond Housing board

## 9.0 Consultation

9.1 The customer forum was consulted on the draft compensation procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
Exclusion decision and rationale	Complaints tracker	6 years
CRM case	CRM	6 years
Supporting documents	SharePoint/folders	6 years

## 11.0 Approval and revision

11.1 This procedure will be reviewed every three years, or sooner if required by changes in regulation or best practice.

<b>Accountable/approved by:</b>	Director of customer service & ICT
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Complaint exclusion procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-005
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

<b>Responsible/procedure owner:</b>	Customer experience & communications manager
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Version	Date	Information
1	March 2026	New procedure



<b>Former customer complaint procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-007
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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## 1.0 Purpose

1.1 This procedure sets out the eligibility decision process used by the Complaints team to determine whether a former customer can access Beyond Housing’s two-stage complaints procedure. It ensures compliance with the Housing Ombudsman’s statutory Complaint Handling Code, which requires landlords to accept a complaint unless there is a valid reason not to, and recognises that current or former customers can complain to the Housing Ombudsman.

## 2.0 Scope

2.1 This procedure applies only to the initial intake decision for complaints raised by former customers. If accepted, the complaint enters the standard Complaints procedure. If excluded, the Complaints team must issue a written decision explaining the reason(s) and provide Housing Ombudsman signposting, in line with the complaint exclusion procedure.

## 3.0 Definitions

3.1 Former customer: Any individual who previously held a tenancy, lease, shared ownership, licence or other housing-related agreement with Beyond Housing and no longer does so.

## 4.0 Responsibilities

4.1 Complaints team:

- Complete a former-status and date check
- Make the accept/exclude decision
- Record the rationale in the complaints tracker
- Issue decision letters, including signposting where required.

4.2 Complaints team leader:

<b>Former customer complaint procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-007
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

- QA sample of decisions for accuracy and fairness
- Ensure compliance with the Code and exclusion rules.

## 5.0 Legislative and statutory requirements

5.1 Housing Ombudsman Complaint Handling Code: Landlords must accept complaints unless there is a valid reason not to.

## 6.0 Procedure detail

### Former customer status and date check

- 6.1 The Complaints team must complete one mandatory check:
- Confirm the complainant was ever a Beyond Housing customer
  - If they were a customer, confirm the issue occurred during the period they were a customer or is reasonably connected to the ending of that period (e.g., final charges, move-out actions).

### Decision outcome

- 6.2 **Accept:** Accept the complaint into the standard complaints procedure if:
- The complainant is a former customer
  - The issue relates to their customer period or is reasonably connected to the end of their customer relationship.
- 6.3 **Exclude – not a former customer:** Exclude the complaint if:
- The complainant was never a Beyond Housing customer (They may raise their concerns through the non-customer complaints procedure).
- 6.4 **Exclude – former customer, but issue not connected:** Exclude the complaint if:
- The complainant is a former customer, but
  - The issue has no connection at all to their time as a customer or to actions/decisions taken by Beyond Housing.
- 6.5 Where this applies, the complainant may still raise their issue under the non-customer complaints procedure.
- 6.6 Former-customer status does not prevent access to that route but does not give their concerns elevated status within the customer complaints process.

<b>Former customer complaint procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-007
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6.7 In both exclusion scenarios, issue written reasons and Housing Ombudsman signposting as per the complaint exclusion procedure.

### Communication of decision

6.8 Where accepted:

- Inform the former customer that their complaint will now progress through our standard two-stage process as per the complaints procedure.

6.9 Where excluded: As per the complaints exclusion procedure:

- Provide a written explanation of the reason(s)
- Provide Housing Ombudsman contact details so they may challenge the exclusion if they wish
- Record the exclusion and rationale in CRM and the tracker.

### 7.0 Process flowchart

1. Former-customer complaint received
2. Verify former-customer status and dates
3. Decision
4. Accept → Log as Stage 1 in the Complaints procedure  
OR
5. Exclude → Issue written reasons + HOS signposting + record in CRM/tracker

### 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
QA sample of former-status/date checks	1st	Complaints team leader	CX & complaints manager
Monitoring acceptance/exclusion decisions & reasons	1st	Complaints team leader	CX & complaints manager
Quarterly analysis of exclusion themes	2nd	CX & complaints manager	Executive team
Inclusion in annual Code self-assessment & annual complaints report	2nd/3rd	CX & complaints manager/MRC	Board

Former customer complaint procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-007
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

## 9.0 Consultation

9.1 The customer forum was consulted on the draft former customer complaints procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
Decision outcome, rationale & dates	CRM & complaints tracker	6 years
Former-status evidence (tenancy/lease confirmation)	Housing management system	6 years

## 11.0 Approval and revision

11.1 This procedure will be reviewed every three years or sooner if regulations change.

<b>Accountable/approved by:</b>	Director of customer service & ICT
<b>Responsible/procedure owner:</b>	Customer experience & communication manager

Version	Date	Information
1	March 2026	New procedure



<b>Group complaint procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-008
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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### 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing receives, logs, investigates, and responds to group complaints in a way that is accessible, fair, timely and transparent, in accordance with the statutory Housing Ombudsman Complaint Handling Code.
- 1.2 It explains how we will manage lead complainants/representatives, consent, and evidence where the same or closely related issues affect multiple residents, while ensuring clear outcomes and learning.

### 2.0 Scope

- 2.1 A group complaint applies only where customers intentionally submit a complaint together or one customer submits a complaint explicitly on behalf of named others. We do not group individual complaints automatically. Where separate complaints are received from different customers about similar or identical issues, and there is no statement from the customers that they wish to complain as a group, each complaint will proceed individually under the standard complaints procedure.
- 2.2 Before confirming a group complaint, Beyond Housing will undertake due diligence to ensure that any named individuals:
- Are aware they have been included
  - Agree to be represented by the lead complainant or representative

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- Consent to the communication approach (e.g., correspondence issued only to the lead complainant unless individuals request otherwise)
- Understand how their data will be used and shared.

2.3 This ensures group complaints are customer led and consent based, rather than created by Beyond Housing.

2.4 Excludes non-customers (dealt with under the non-customer procedure).

2.5 Where facts materially differ between residents, cases may be split into separate complaints for specific issues, while still coordinating the investigation.

### 3.0 Definitions

3.1 **Group complaint:** A complaint raised by more than one customer where those customers have intentionally chosen to complain together about the same issue(s). This includes complaints submitted by a lead complainant or representative on behalf of named individuals, subject to consent. A series of similar complaints received separately does not constitute a group complaint unless the customers have made it clear that they wish their issues to be handled as a group.

3.2 **Lead complainant:** One customer who acts as the main point of contact for the group.

3.3 **Representative:** Any authorised individual or body acting for named customers with their consent.

3.4 **Working day:** Monday–Friday, excluding UK bank holidays and published closure days.

3.5 **Stage 1/stage 2:** As defined in our complaints procedure (acknowledgement ≤ 5 working days; stage 1 response ≤ 10 working days from acknowledgement; stage 2 response ≤ 20 working days from acknowledgment, with extensions only on good reason).

3.6 **CRM:** The customer relationship management system used to log complaints and record all actions, evidence, contacts and correspondence associated with each case. The CRM

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provides a complete and auditable record of the complaint journey from receipt to closure.

## 4.0 Responsibilities

### 4.1 Complaints team:

- Reviews newly logged cases to identify whether multiple customers are raising the same or closely related issues, indicating a potential group complaint
- Where appropriate, creates a parent case in customer relationship management system (CRM) and links all named customers, without changing any reporting, acknowledgement or timescale requirements mandated by the statutory Complaints Handling Code
- Obtains or ensures the presence of consent where a customer acts as a representative or as the lead complainant for others, in line with the Code's rules on representatives
- Assigns the case to the appropriate complaint officer.

### 4.2 Complaint officer:

- Follows the standard complaint investigation process, gathering and assessing evidence in collaboration with service areas
- Identifies the common issues affecting the group and any customer-specific variations (e.g., different dates, severity, vulnerabilities, impacts)
- Prepares one consolidated complaint response for the common issues, and customer-specific annexes where their experience or remedy differs.

### 4.3 Independent stage 2 decisionmaker:

- Conducts the stage 2 review independently of anyone involved at stage 1, as required by the Code
- Reviews the consolidated group issues and any customer-specific matters raised at escalation
- Issues a single stage 2 response covering the common findings and annexed individual responses where applicable
- Signs the final response as the independent reviewer.

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#### 4.4 **Customer experience & complaints manager/complaints team leader:**

- Oversees quality assurance of acknowledgements and responses to ensure Code compliance (timescales, clarity, independence at stage 2)
- Ensures group complaints are monitored in CRM for accuracy, consistency, timelines, and learning
- Ensures learning from group cases is fed into governance and the annual complaints performance & service improvement report.

#### 5.0 **Legislative and statutory requirements**

- Housing Ombudsman Complaint Handling Code
- Housing Ombudsman - Guidance on group complaints.

#### 6.0 **Procedure detail**

6.1 Group complaints must be customer led. Beyond Housing will not combine separate complaints into a group unless the customers explicitly ask us to do so. This ensures fairness, clarity and consent for all participants, in line with the Housing Ombudsman’s expectations on representation, consent and transparency.

#### **Receiving and logging (Complains team)**

6.2 The complaints team is responsible for completing due diligence checks and recording consent. The lead complainant may support by providing contact details and encouraging responses, but Beyond Housing will not rely solely on the lead complainant to collect consent.

6.3 A group complaint is accepted only where customers have intentionally asked to complain together, or a lead complainant submits a complaint on behalf of named individuals.

6.4 If we receive similar or identical complaints individually, and the customers have not expressed an intention to act as a group, these are not grouped by Beyond Housing and will follow the standard complaints process individually.

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6.5 When a group complaint is submitted, the Complaints team must carry out due diligence to confirm:

- Each named customer knows they are included
- They are happy to be represented by the lead complainant (or have appointed a representative)
- They understand that correspondence will normally be sent to the lead complainant only (unless they request individual communication)
- They consent to any necessary data sharing.

6.6 Due diligence timescales and method:

- Within five working days of receiving a request for a group complaint, the complaints team will take reasonable steps to confirm awareness and consent for each named customer before including them in the group case
- We will normally contact each named customer directly using the contact details held by Beyond Housing (and any additional contact details provided by the lead complainant). We will make at least two contact attempts using at least two different methods where available (for example, telephone and letter or email)
- Where we are unable to make contact after these attempts, we will not include that individual in the group complaint at that point. We will write to the individual (where we have an address) explaining that we have received a request to include them in a group complaint, how to confirm consent, and how to raise an individual complaint if they prefer
- We will proceed with the group complaint for the customers whose consent has been confirmed, and we will add any further customers later if they provide consent.

6.7 Consent must be recorded and stored in CRM for each member of the group before the complaint is accepted and progressed.

### **Acknowledgement (Complaints team)**

6.8 Send one consolidated acknowledgement to the lead complainant (and copy other named residents if consent allows), confirming:

- The group definition (common issues)

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- Any customer-specific elements we will assess separately
- Timescales and the lead point of contact
- Reasonable adjustments (we will accommodate individual needs)
- Data-sharing boundaries (we will not disclose personal data between residents).

### Investigation (Complaint officer)

- Conduct a single evidence-gathering exercise for the common issues
- Where experience differs by customers, gather individual evidence
- Maintain a shared evidence record in the parent case and customer-specific notes in each linked record.

### Extensions

6.9 If complexity/volume means we cannot meet the Code timescale, request an extension before the due date, giving reasons, a revised date, update frequency, and include HOS contact details in the notice to customers.

### Outcomes and remedies

6.10 Issue one consolidated stage 1 response covering the common findings and actions, plus annexed customer-specific pages where impacts/remedies differ.

6.11 Remedies may include group actions (e.g., programme changes, contractor rectification) and individual remedies (compensation) proportionate to each customer’s impact.

6.12 Confirm learning and how we will prevent recurrence.

### Escalation to stage 2 (on request)

6.13 Any customer may request stage 2. We will normally conduct one stage 2 review of the common issues plus customer-specific reviews where required

6.14 The stage 2 review is conducted by an independent decision-maker not involved at stage 1, who signs the stage 2 final response.

### After stage 2

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- 6.15 We will signpost each customer to the Housing Ombudsman Service for independent review if they remain dissatisfied.
- 6.16 The Ombudsman may choose to accept a lead/test case and apply findings to others where facts are the same.

**Data protection and consent safeguards**

- 6.17 Obtain consent for any representative or lead complainant to receive communications on behalf of named customers. Consent should be in writing where possible. Where written consent is not possible, verbal consent may be accepted and must be recorded in CRM, including the date, time, method of contact, and what the customer agreed to.
- 6.18 Do not share personal data between customers without consent
- 6.19 Where a customer withdraws from the group, we will continue their case individually without prejudice.

**7.0 Process flowchart**

Receiving the complaint:

- Complaint received from a customer (or representative)
- Check whether the customer is:
  - Submitting a complaint on behalf of named others, OR
  - Submitting their own individual complaint only.

Determine if it is a group complaint:

- Did the customer explicitly state that this is a group complaint?
  - Yes - proceed to due-diligence checks
  - No - treat as an individual complaint. Do NOT group similar complaints automatically.

If a group complaint is claimed:

- Obtain the full list of named individuals included in the group.
- Complete due diligence:
  - Contact each named individual

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- Confirm they know they are included
- Confirm they agree to be represented by the lead complainant
- Confirm they are happy for correspondence to be sent to the lead complainant only (unless they request individual updates)
- Confirm consent for data sharing within the group.

If due diligence fails:

- Any named individual does not consent:
  - Remove them from the group complaint
  - Offer to run their complaint individually.

If no named individuals consent:

- Treat the case as an individual complaint from the lead complainant.

Logging the group complaint:

- Create a parent group complaint case in CRM
- Link each validated group member’s individual record
- Upload consent records
- Confirm the lead complainant as the point of contact.

Acknowledgement:

- Send one consolidated acknowledgement to the lead complainant
- Where we are still confirming consent for some named customers, the acknowledgement will explain that the group complaint will proceed for those who have confirmed consent and that additional customers will be added once consent is received
- Copy in other group members only if they have consented.

Investigation stage:

- Conduct a single investigation into the common issues
- Capture any customer-specific differences (impact, dates, vulnerability, individual evidence)
- Maintain evidence in the CRM parent case and linked sub-records.

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Extensions (if required):

- Assess complexity and request an extension before the SLA deadline
- Provide reasons, new date, update frequency and HOS signposting.

Drafting the response:

- Prepare one consolidated stage 1 response covering shared issues and findings
- Provide individual annexes where remedies or experiences differ
- Issue the consolidated response to the lead complainant (and others only if consented).

Stage 2 (if requested):

- Conduct one stage 2 review for the group, with individual annexes where needed
- Stage 2 must be completed by an independent reviewer.

## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Quality checks on group acknowledgements, responses, and consent handling	1st	Complaints team leader	CX & complaints manager
Monthly QA sample: consistency of remedies across group members	1st	Complaints team leader	CX & complaints manager
Quarterly reporting of group-complaint themes & actions	2nd	CX & complaints manager	Executive team & senior leadership team
Annual publication: include group-complaint themes, learning and improvements in the annual complaints performance & service improvement report and the self-assessment (approved by board)	2nd/3rd	CX & complaints manager/MRC	Beyond Housing board

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## 9.0 Consultation

9.1 The customer forum was consulted on the group complaint procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
Group parent case + linked records	CRM system	6 years
Consents and evidence kept with the case.	CRM system	6 years
Complaints Tracker	Excel	6 years
Supporting documents	SharePoint/folders	6 years

## 11.0 Approval and revision

11.1 This procedure will be reviewed every 3 years, or sooner if required by changes in regulation or best practice.

<b>Accountable/approved by:</b>	Director of customer service & ICT
<b>Responsible/procedure owner:</b>	Customer experience & communication manager

Version	Date	Information
1	March 2026	New procedure



Learning from complaints procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-009
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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## 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing identifies, captures, analyses and escalates learning from complaints, ensuring that opportunities for improvement arising from complaint investigations are recorded, reviewed and acted upon.
- 1.2 It supports the statutory Housing Ombudsman Complaint Handling Code requirement that landlords must demonstrate how they learn from complaints and use the learning to improve services and prevent recurrence.

## 2.0 Scope

- 2.1 This procedure applies to:
- All stage 1 and stage 2 complaint investigations
  - Root cause analysis and identification of opportunities for improvement arising from complaint handling, service quality issues or policy/process gaps
  - The Complaints team, complaint officers, customer experience & complaints manager, the Service Improvement team and relevant service areas.
- 2.2 It does not duplicate operational learning processes already in place. It provides the single, standard method for capturing, documenting and escalating complaint-derived learning.

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### 3.0 Definitions

3.1 **Complaint learning:** Insights, issues, gaps or improvement opportunities identified during a complaint investigation which, if addressed, would reduce future complaints, improve service quality or enhance customer experience.

3.2 **Root cause analysis (RCA):** The structured identification of:

- What went wrong,
- Why it went wrong, and
- What could prevent recurrence.

3.3 **Learning brief:** A structured summary of a learning issue, using the corporate template, expanded monthly from tracker entries. The learning brief sets out:

- Issue/gap identified
- Impact
- Reason it is being raised now
- Suggested areas for investigation
- Potential improvement ideas
- Definition of success
- Proposed action owner.

3.4 **Service Improvement team triage:** A monthly review of complaint learning briefs to determine whether each issue becomes:

- A formal service improvement project, or
- A local improvement for the relevant service area, director or manager.

### 4.0 Responsibilities

4.1 **Complaint officers:** Identify root causes and improvement opportunities during complaint investigations. Record RCA/learning points clearly in the complaints tracker.

4.2 **Complaints team leader:**

- Review learning points recorded by complaint officers
- Transfer opportunities into the complaints tracker learning log (rolling record with dates)

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- Ensure completeness, clarity and correct categorisation.

#### 4.3 Customer experience & complaints manager:

- Review the tracker monthly and select learning items requiring escalation
- Develop full complaint learning briefs using the associated template
- Share completed briefs with the Service Improvement team and relevant directors.

#### 4.4 Service Improvement team:

- Review learning briefs monthly
- Decide whether each item is best managed as:
  - A formal service improvement project, or
  - A local operational improvement
- Allocate ownership to the relevant director or service area lead.

#### 4.5 Directors/service managers:

- Receive and act upon improvement opportunities assigned by the Service Improvement team
- Ensure any resulting actions are delivered and monitored.

## 5.0 Legislative and statutory requirements

#### 5.1 Housing Ombudsman Complaint Handling Code:

- Landlords must demonstrate learning from complaints and show how learning informs service improvement, culture and accountability
- Landlords must publish learning and improvements annually.

## 6.0 Procedure detail

### Capturing learning from complaint investigations

#### 6.1 During every stage 1 and stage 2 investigation, the complaint officer must identify:

- Root causes
- Gaps in process or policy
- Communication issues
- Training needs.

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6.2 These insights must be recorded in complaints tracker.

### Recording learning in the complaints tracker

6.3 The complaints team Leader reviews learning entries weekly. New items are logged with:

- Date identified
- Brief description of learning
- Category/theme (e.g., communication, repairs, allocations, customer information)
- Potential impact.

6.4 This rolling log forms the basis for monthly reporting.

### Developing monthly complaint learning briefs

6.5 Each month, the customer experience & complaints manager reviews the tracker entries and selects items requiring further exploration or organisational attention. For each selected item, the manager completes a complaint learning brief using the standard template.

6.6 Briefs must include:

- Issue/gap identified
- Impact
- Why raised now
- Suggested areas for investigation
- Potential improvement ideas
- Definition of success
- Proposed action owner.

### Sharing learning briefs for triage

6.7 All completed learning briefs are submitted monthly to the Service Improvement team who conducts triage to determine the correct route for each item:

- **Formal service improvement project:** where the issue spans multiple areas, is high-impact, or requires significant change

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- **Local improvement:** where the issue can be resolved by a single team or service manager.

### Allocation to service areas

6.8 Where the item is categorised as a local improvement, the Service Improvement team shares the brief with the relevant director.

6.9 The director assigns ownership, ensuring:

- Actions are taken forward
- Timelines are set
- Progress is monitored.

### Monitoring and closure

6.10 The Service Improvement team tracks progress against all allocated improvement actions. The complaints team Leader monitors recurrence and flags if conditions worsen or new patterns emerge. Completed learning actions feed into the:

- Annual complaints performance & service improvement report
- Annual HOS Code self-assessment.

## 7.0 Process flowchart

1. Complaint investigation
2. RCA and learning identified (Complaint officer)
3. Learning logged in complaints tracker (Complaints team leader)
4. Monthly review & learning brief created (CX & complaints manager)
5. Learning brief sent to Service Improvement team
6. Service Improvement team triage (project vs local improvement)
7. Allocation to director/service area
8. Actions delivered & monitored
9. Learning included in annual reporting and Code self-assessment

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## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Weekly review of learning entries	1st	Complaints team leader	CX & complaints manager
Monthly learning brief completion	1st	CX & complaints manager	CX & comms manager
Monthly Service Improvement team triage	2nd	Service Improvement team	Director of customer service & ICT
Quarterly review of learning themes	2nd	CX & complaints manager	Senior leadership team
Inclusion in annual complaints performance & service improvement report	2nd/3rd	CX & complaints manager & MRC	Beyond Housing board and customer forum
Annual Code self-assessment learning section	3rd	CX & complaints manager	Beyond Housing board

## 9.0 Consultation

9.1 The customer forum was consulted on the draft learning from complaints procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
Learning entries in complaints tracker	Excel tracker	6 years
Complaint learning briefs	SharePoint folders	6 years

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<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

### 11.0 Approval and revision

11.1 This procedure will be reviewed every three years, or sooner if required due to regulatory or best-practice changes.

<b>Accountable/approved by</b>	Director of customer service & ICT
<b>Responsible</b>	Customer experience & comms manager

Version	Date	Information
1	March 2026	New procedure

<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

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## 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing will manage situations where a customer’s communication frequency, or method places an excessive burden on resources, impacts colleague wellbeing, or prevents us from effectively serving other customers.
- 1.2 Our aim is to maintain fair, respectful, and efficient communication with all customers while ensuring that our resources are used appropriately. It aims to improve services for all customers.
- 1.3 It sets out how we assess what constitutes unreasonable, vexatious or malicious communication and how we will manage and respond to this.

## 2.0 Scope

- 2.1 This procedure:
- Applies to all customers, those advocating on behalf of customers, and other individuals who interact with Beyond Housing.
  - Is organisation wide, covering all areas of our work and all channels of contact.
  - Applies to all customer interactions across all channels, including but not limited to:
    - Telephone calls
    - Emails
    - Live chat
    - Social media posts and messages
    - Me & My Home
    - Written communications
    - Face to face communications.

<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

### 3.0 Definitions

- 3.1 **Customer** – For the purpose of this procedure customer is anyone who contacts Beyond Housing. For example a tenant, shared owner, leaseholder, outright sale customer, member of the public, housing applicant, advocate, professional.
- 3.2 **Colleague** – Anyone employed directly by Beyond Housing or those acting on its behalf.
- 3.3 **Unreasonable communications** - Behaviour which is unreasonable, vexatious or malicious in nature, persistent or involves a high volume of contact.
- 3.4 **Managed communications arrangement** - The arrangement put in place to manage a customer when they demonstrate unreasonable communications.
- 3.5 **PSR – Personal safety risk** - A PSR is based upon information that indicates a customer may expose colleagues/contractors to a risk or harm.
- 3.6 **UDC – User defined characteristic** - The term UDC refers to a personal record held within Beyond Housing’s management information system.
- 3.7 **CRM – Customer relationship management** - The system used to record all customer interactions and notes.
- 3.8 **DM – Document management** - The system used to store documents relating to a customer tenancy.

### 4.0 Responsibilities

- 4.1 The customer experience & communications manager is the procedure owner. The customer service manager is responsible for the delivery.
- 4.2 All service managers are responsible for the implementation of the procedure within their respective service areas, ensuring that colleagues are aware of the procedure and are supported to follow it.
- 4.3 All colleagues are responsible for implementing the requirements of this procedure at the point of service delivery.

### 5.0 Legislative and statutory requirements

- 5.1 This policy complies with the Regulator of Social Housing’s (RSH) Standards, particularly the Transparency, Influence and Accountability Standard and best practice by the Housing Ombudsman Service.
- 5.2 Other relevant legislation and references points include, but are not limited to:
- RSH Consumer Standards

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- Housing Ombudsman Service – Complaint Handling Code and Managing unacceptable behaviour policy – Guidance for landlords
- Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999
- Equality Act 2010
- Data Protection Act 2018
- Vulnerable circumstances policy
- Personal safety risk procedure
- Service with respect standards.

## 6.0 Procedure detail

6.1 At Beyond Housing we strive to deliver an excellent and accessible service to all our customers. We believe that customers have a right to be heard, understood and respected. When responding to unreasonable communications from customers, we will take any vulnerable circumstances and known support needs into consideration.

6.2 Sometimes it is difficult to deliver services effectively where there are unreasonable communications with colleagues, or unreasonable demands, such as high levels of repetitive contact, or requiring immediate responses. We will take action to protect the health and wellbeing of our colleagues who have a right to do their jobs without fear of being harassed or communicated with in a demeaning or hostile manner.

6.3 We will also consider the impact of customer communications behaviour on the wider customer base and our ability to offer a fair and consistent service to all customers.

### 6.4 Unreasonable levels of contact

6.4.1 Levels of contact become unreasonable when the amount of time spent managing the communication, impacts our ability to deliver services effectively, or limits our ability to deliver the quality of service we provide to others.

6.4.2 Examples of this type of contact can include, but not limited to:

- Repeated contact about the same thing whilst a request is being progressed or after it is closed
- A high volume of calls, unnecessarily lengthy telephone calls, or a high frequency of visits to our offices repeating the same points of discussion
- High volumes of information provided through any communications channel where the information repeats what has already been given
- Copying colleagues into emails with other parties where this is not necessary
- A high volume of contact into the business without allowing a reasonable time to respond
- Continuing to use an incorrect communication method after been advised of the correct method.

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## 6.5 Unreasonable contact and recording

6.5.1 Contacting colleagues other than using a formal business route or recording interactions with colleagues is considered unreasonable.

6.5.2 Examples of this type of behaviour can include, but is not limited to:

- Publishing information about colleagues online, including social media, without their specific consent
- Recording and publishing conversations or interactions, for example in telephone calls or face to face meetings, with colleagues that are taken without their specific consent
- Contacting colleagues using their personal details or social media presence such as email, WhatsApp, Facebook, Instagram, X, Snapchat or LinkedIn.

## 6.6 Unreasonable demands

6.6.1 Demands on our service can be unreasonable if they impact our ability to provide a consistent service, or if it involves an amount of colleague time in excess of what would ordinarily be needed to provide that service.

6.6.2 Behaviour or demands disproportionate to the matter, which appear to be without sufficient grounds or are made specifically to cause annoyance, misdirect or waste company resources, will also be considered unreasonable.

6.6.3 Examples of these types of demands can include, but is not limited to:

- Repeatedly demanding a response in a timescale outside of routine/typical service response time or service level agreements
- Insisting on speaking with a specific colleague when that is not possible, or refusing to speak to certain colleagues
- Repeatedly changing the substance/context of a request
- Refusing to accept a decision where explanations for the decision have been given and the complaints process has been exhausted
- Refusing to accept explanations relating to what Beyond Housing can and cannot do
- Refusing to co-operate, for example by not providing information we request to allow us to help resolve the issue.

## 6.7 Habitual or vexatious complainant

6.7.1 Complaints regarding services are managed in accordance with the established complaints policy. Once the complaints process has been exhausted, if a customer continues to raise the same issue in an excessive or unreasonable manner, they may be classified as a habitual or vexatious complainant.

<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

6.7.2 Colleagues are trained to approach all complainants with patience and empathy, recognising their needs and concerns. However, there are circumstances when no further reasonable action can be taken to address a real or perceived issue.

6.7.3 Customers, or those representing them, may be deemed habitual or vexatious complainants if their current or prior conduct meets one or more of the following criteria:

- Persist in pursuing a complaint where the complaint process has been exhausted
- Are unwilling to accept documented evidence of service given as being factual (e.g. photographic evidence, recordings of telephone calls), or deny receipt of an adequate response in spite of correspondence specifically answering their questions
- Do not clearly identify the precise issues which they wish to be investigated, despite reasonable efforts of staff and, where appropriate, other support/advocacy bodies to help them specify their concerns, and/or where the concerns identified are not within the remit of Beyond Housing to investigate
- Focus on a trivial matter to an extent, which is out of proportion to its significance, and continue to focus on this point. (It is recognised that determining what is a 'trivial' matter can be subjective, and careful judgement must be used in applying this criteria).

## 6.8 Unacceptable behaviour

6.8.1 Beyond Housing recognises that people may act out of character when in distress or difficulty, so being upset or angry may be understandable; however, when these emotions escalate into aggressive, abusive or insulting behaviour towards our colleagues; such behaviour will be considered unacceptable, and is dealt with in line with the [personal safety risk procedure](#) (PSR). Aggression is not limited to acts causing physical harm, it also includes any behaviour that may cause staff to feel threatened, abused, intimidated, harassed or afraid.

6.8.2 Whilst we will always try to help, we will not accept aggressive, abusive behaviour or harassment towards our colleagues.

6.8.3 **All instances of unacceptable behaviour should be dealt with using the [PSR procedure](#).**

6.8.4 Examples of this type of behaviour can include, but is not limited to:

- Behaviour or language (verbal or written) that may cause colleagues to feel offended, afraid, threatened, or abused
- Derogatory or discriminatory remarks; including racist, sexist, disablist, homophobic, or transphobic comments
- Using insulting or degrading language
- Making serious allegations against us or others without evidence.

## 6.9 Identifying unreasonable communications

<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

- 6.9.1 Colleagues who are experiencing unreasonable communications from a customer should document the behaviour, including dates, times, channel and nature of interaction. They should then complete the [‘Unreasonable communications form’](#).
- 6.9.2 The information provided will be reviewed by the customer service manager to determine if the criteria for managed communications are met. Each case is evaluated individually.
- 6.9.3 The outcome of the decision will be provided to the reporting colleague.

#### 6.10 **Stage one – Cooperation request**

6.10.1 Once a decision has been made by the customer service manager, if it is deemed the communication is unreasonable, the first step is for the reporting colleague to contact the customer in writing, or appropriate method when considering vulnerabilities, to explain:

- The concerns regarding their communication
- The impact on our ability to serve them and other customers
- Our expected standards of communication
- Their cooperation in communicating with us reasonably
- That continued behaviour may result in a managed communication arrangement being put in place.

6.10.2 Support from the Communications team should be sought when writing the letter. Templates are available; however, every case is unique, and the letter should reflect this and consider the customer’s vulnerabilities.

6.10.3 A letter should be sent to the customer by the reporting colleague, and a copy placed on the customer’s CRM account.

6.10.4 If the unreasonable behaviour persists, the reporting colleague should proceed to stage two. Additionally, they should inform the customer service manager via email, providing evidence of the continued unreasonable communication and confirming that stage two is being implemented.

#### 6.11 **Stage two - Implementation of a managed communication arrangement (if unreasonable communication behaviour continues)**

6.11.1 The reporting colleague, with support from the customer service manager, should determine how best to manage the unreasonable communications and what arrangements should be put in place.

6.11.2 Arrangements may include:

- Limiting communication to a single channel (e.g., email only)
- Setting defined response times (e.g. responses within 5 working days)

<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

- Using a single response to cumulative contacts in a given time period (e.g., Respond to all contacts once per week at a set time)
- Assigning a single point of contact within the business
- Limiting frequency of communication (e.g. one enquiry per week)
- Suspending non-urgent communication until further notice.

6.11.3 Support from the customer experience & communication manager should be sought when writing the letter. Templates are available; however, every case is unique, and the letter should reflect this and consider the customer’s vulnerabilities.

6.11.4 The managed communications arrangement letter should include the period of time the arrangement is in place for and the appeal process.

6.11.5 A letter should be sent to the customer, by the reporting colleague, and a copy placed on the customer’s CRM account.

6.11.6 A user defined characteristic (UDC) should be placed on the customer’s account, detailing the managed communications in place.

6.11.7 The ‘communication restriction’ UDC (**UDC type ‘COMRES’**) should be added as a person UDC against the person record in the HMS. Further guidance on adding UDCs can be found here: [HMS UDC user guide.pdf](#).

6.11.8 In the rare event a customer refuses to adhere to the managed communications, this should be raised with your director and the customer experience & communications manager.

## 6.12 Appeal

6.12.1 If a customer wishes to appeal the managed communication arrangement, they must appeal within 10 working days of receiving notification of the decision. The contact restriction conditions will remain in place during this time, and until a final decision has been determined.

6.12.2 The customer experience & communications manager, or a senior colleague, of manager level or above, will review the appeal and decide if the managed communications agreement is upheld, if any changes will be made to it, or if it should be removed altogether.

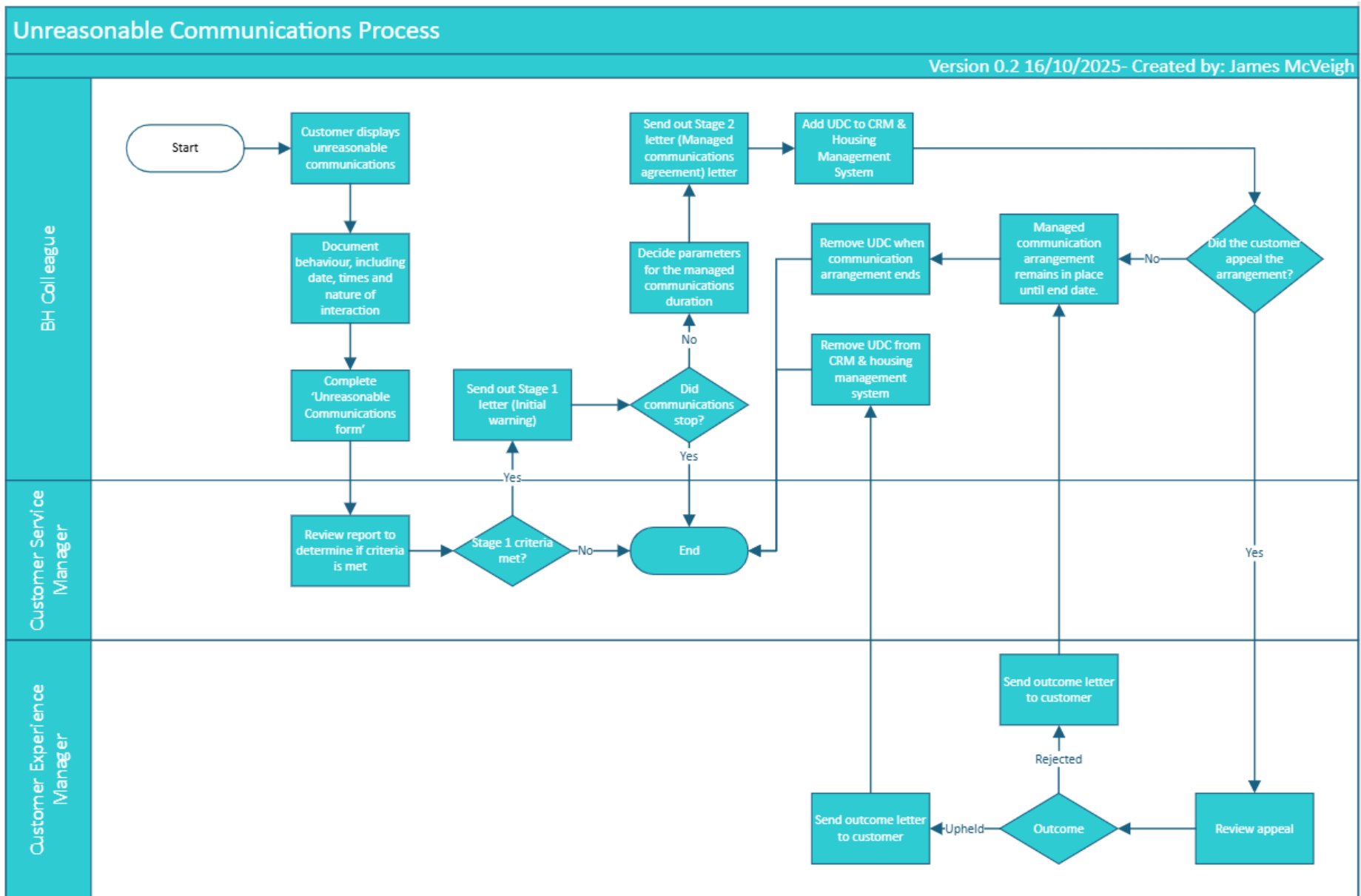
6.12.3 The outcome of this will be communicated to the customer within 10 working days of their appeal request, by the manager reviewing the appeal, and a copy of the letter uploaded to the customer’s CRM account. The reporting colleague will also be notified of the outcome.



<b>Acceptable Communications Procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communications Manager	<b>Procedure Ref No:</b> CE-PR-002
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6.12.4 If the decision to remove the managed communications agreement is taken, the reporting colleague should remove the UDC from the customer's account.

7.0 Process flowchart



Acceptable communications procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

## 8.0 Controls and reporting

8.1 This section includes the **controls** identified to assess the effectiveness of the procedure and where testing of the control is **reported**.

Control	Line of defence (1st, 2nd or 3rd)	Responsible (Job role)	Reported to:
Unreasonable communications form	1st	Customer services manager	Quarterly complaints meeting with senior leaders
Appeal process	2nd	Customer experience & communications manager	Quarterly complaints meeting with senior leaders

## 9.0 Consultation

- 9.1 Consultation took place with customers and colleagues. The consultation received overwhelmingly positive support from customers with 96% agreeing that the procedure:
- Takes a fair, transparent and reasonable approach
  - Will help us to provide a better service to all customers
  - Supports our goal of keeping communication fair, respectful, and efficient while using resources appropriately
  - Happy with the information provided in the procedure.
- 9.2 Customer feedback led to four suggested improvements, now reflected in sections 3.7, 6.42, and two in 6.28.

## 10.0 Data retention

10.1 This section highlights any data or records that the procedure requires the business to manage and update in delivery of the procedure.

Record	Format and location of record	Retention period
Stage 1 letter	DM/CRM	3 years
Stage 2 letter	DM/CRM	3 years
Appeal letter	DM/CRM	3 years

Acceptable communications procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-002
<b>Date approved:</b> December 2025	<b>Review Date:</b> December 2028

### 11.0 Approval and revision

11.1 This procedure will be subject to a review every three years, or in response to a change in legislation or best practice, whichever happens first.

<b>Accountable/approved by:</b>	Director of customer services & ICT
<b>Responsible/procedure owner:</b>	Customer experience & communications manager

Version	Date	Information
1	December 2025	New procedure

<b>Data protection complaints procedure</b>	
<b>Procedure Owner:</b> Data Governance & Policy Manager	<b>Procedure Ref No:</b> GBA-PR-011
<b>Date approved:</b> January 2026	<b>Review Date:</b> January 2029

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## 1.0 Purpose

1.1 The Data (use & access) Act 2025 introduces a new right for data subjects to submit a complaint to a data controller, previously a complaint of this nature could be made directly to the Information commissioners office (ICO). This procedure explains the steps to be taken when a data protection related complaint is received.

1.2 This procedure supports the data governance policy and the complaints and compliments policy.

## 2.0 Scope

2.1 This procedure applies to any data subject, which can include customers, colleagues, or any individual who has a relationship with the organisation that requires the processing of their personal data.

2.2 The ICO states that a complaint can be made to an organisation about how it is handling people's information; if it:

- has not properly responded to your request for your personal information;
- is not keeping information secure;
- holds inaccurate information about you;
- has disclosed information about you;
- is keeping information about you for longer than is necessary;
- has collected information for one reason and is using it for something else; or

<b>Data protection complaints procedure</b>	
<b>Procedure Owner:</b> Data Governance & Policy Manager	<b>Procedure Ref No:</b> GBA-PR-011
<b>Date approved:</b> January 2026	<b>Review Date:</b> January 2029

- has not upheld any of your data protection rights.

2.3 This procedure only applies to a complaint relating to a data protection matter, all other complaints would be managed through the complaints procedure.

### 3.0 Definitions

3.1 Data subject – an identified person, or a person who can be identified (either directly or indirectly) through the application of personally identifiable information (PII) or special category data.

3.2 Data controller – the entity that, either alone or jointly with others, determines the purpose, conditions and means of processing PII.

3.3 Data processing – is the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.

3.4 ICO – Information Commissioners Office is the independent regulatory office in charge of upholding information rights in the interest of the public.

### 4.0 Responsibilities

4.1 The data governance & policy manager is the procedure owner and responsible for implementation of the procedure.

4.2 The assurance analyst is responsible for supporting the data governance manager by collating information and investigating complaints as outlined in the procedure.

4.3 All colleagues are responsible for supporting customers to submit a data protection complaint when assistance is needed.

4.4 All managers are responsible for supporting a complaint investigation when needed, which may involve providing information or explanation around actions that have been taken.

### 5.0 Legislative and statutory requirements

5.1 The key legislation relevant to this procedure is:

- Data Protection Act 2018
- UK GDPR 2018
- Data (use & access) Act 2025

<b>Data protection complaints procedure</b>	
<b>Procedure Owner:</b> Data Governance & Policy Manager	<b>Procedure Ref No:</b> GBA-PR-011
<b>Date approved:</b> January 2026	<b>Review Date:</b> January 2029

## 6.0 Procedure detail

### 6.1 How a complaint can be made

6.1.1 A data subject can submit a complaint in a number of ways including:

- By completing the complaint form on the web site
- By email, which can be sent or forwarded to [data.protection@beyondhousing.co.uk](mailto:data.protection@beyondhousing.co.uk)
- In writing
- By telephone
- In person.

6.1.2 The data subject will be asked to provide the details of the complaint, explaining how this has affected them and what they would expect to see as a suitable outcome.

### 6.2 Acknowledgment and target date

6.2.1 The assurance analyst will send an acknowledgement letter to the data subject within 5 working days, outlining the details of the complaint and the target date for a response.

6.2.2 The legislation states that we must acknowledge receipt of complaints within 30 days of receiving them and without undue delay tell people the outcome of their complaint. Our approach will be to provide the complaint response in within 1 month in line with other data subject right requests.

6.2.3 A contact note will be added to the CRM system.

### 6.3 Investigation

6.3.1 The assurance analyst and data governance manager will discuss the details of the complaint and agree key actions to inform and agree the direction of the investigation.

6.3.2 The assurance analyst will collate all relevant information relating to the complaint made, the nature of the complaint will dictate what this information may need to be, and who may need to provide information.

6.3.3 A complaint investigation folder will be created in the secure data protection team drive, and all records relating to the complaint from start to finish are to be stored in here.

6.3.4 If the complaint is highlighting a possible data breach, then the investigation would need to be completed in line with the data breach reporting procedure, and the timescales and actions outlined in that process, with the complaint response being a secondary stage once the breach procedure has been followed in full.

6.3.5 It may be necessary to contact the data subject to clarify details throughout the investigation, providing updates where possible.

<b>Data protection complaints procedure</b>	
<b>Procedure Owner:</b> Data Governance & Policy Manager	<b>Procedure Ref No:</b> GBA-PR-011
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6.3.6 A record of the conclusion to the complaint must be written and retained in the investigation folder, this must clearly explain the findings and what has been done to resolve the complaint and where appropriate, any actions that have been taken.

#### 6.4 **Complaint outcome and response**

6.4.1 In the first instance the outcome will be explained to the data subject by telephone or in person, this allows for better explanation of the findings and the resolutions available and reflects the fact that data protection can sometimes be a technical subject to understand.

6.4.2 A written response will always be provided to the data subject, and this will outline the findings and actions taken to resolve the complaint.

6.4.3 If the data subject is dissatisfied with the outcome of the complaint, then the complaint can be escalated to the ICO, and this will be explained to the data subject in both the verbal and written response, providing contact details on how they can do this.

6.4.4 In the same way we would always want to learn and improve to prevent re-occurrence when a data breach occurs, any learning and improvements that can be taken from the complaint will be progressed by the Data governance and policy manager, and this will be included in the reporting to the data protection champions and the audit & risk committee.

### 7.0 **Process flowchart**

7.1 Not useful for this procedure.

### 8.0 **Controls and reporting**

8.1 This section includes the **controls** identified to assess the effectiveness of the procedure and where testing of the control is **reported**.

<b>Control</b>	<b>Line of defence (1st, 2nd or 3rd)</b>	<b>Responsible (Job role)</b>	<b>Reported to:</b>
100% review of complaint outcomes and responses	1st	Data governance & policy manager	n/a
Quarterly reporting of data protection complaints and response times	2nd	Data governance & policy manager	Audit & risk committee

Data protection complaints procedure	
<b>Procedure Owner:</b> Data Governance & Policy Manager	<b>Procedure Ref No:</b> GBA-PR-011
<b>Date approved:</b> January 2026	<b>Review Date:</b> January 2029

## 9.0 Consultation

- 9.1 As the implementation of this procedure is delivered by the assurance analyst and the data governance & policy manager, consultation has been restricted to the data governance team and the data protection champions.
- 9.2 The procedure has been written to reflect the requirements outlined in the ICO document ‘Complaints guidance for organisations’, to support compliance.

## 10.0 Data retention

- 10.1 This section highlights any data or records that the procedure requires the business to manage and update in delivery of the procedure.

Record	Format and location of record	Retention period
Complaint investigation folder, includes all records associated with the complaint	Secure sharepoint site with restricted access	2 years from date of complaint response

## 11.0 Approval and revision

- 11.1 This procedure will be subject to a review after three years, or in response to a change in legislation or best practice, whichever happens first.

<b>Accountable/approved by:</b>	Director of governance & business assurance
<b>Responsible:</b>	Data governance & policy manager

Version	Date	Information
1	January 2026	New procedure



Compliments procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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## 1.0 Purpose

1.1 This procedure describes how Beyond Housing captures, records, shares and celebrates compliments and positive feedback. It ensures all positive feedback is recognised, promotes a culture of appreciation, and provides a consistent process for collecting data used for service improvement, assurance and annual reporting.

## 2.0 Scope

2.1 This procedure applies to:

- Any compliment or positive feedback received about a Beyond Housing colleague, team or service
- All colleagues across the organisation, who are responsible for capturing compliments using the corporate ‘Customer compliments’ Microsoft Form
- All compliments, regardless of how they are received (verbal, email, letter, digital, social media, internal referral).

2.2 It does not govern complaint handling or learning, which are covered by the complaints procedure and the learning from complaints procedure.

## 3.0 Definitions

<b>Compliments procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

3.1 **Compliment:** Positive feedback from a customer, stakeholder or partner expressing satisfaction with a service, action or colleague contribution.

3.2 **Customer compliments form:** The corporate form used to capture all compliments. It records:

- Date received
- Colleague name (if known)
- Customer’s address
- Service area
- Details of the compliment
- Impact/outcome.

3.3 **Viva Engage recognition post:** An automatic sharing of the compliment on the Beyond Housing Viva Engage platform, tagging the named colleague for visibility, recognition and celebration.

3.4 **Compliments dataset:** The dataset automatically generated from form submissions, used for reporting, trend analysis and inclusion in the annual complaints performance and service improvement report.

#### 4.0 Responsibilities

4.1 **All colleagues:** Required to record any compliment received using the customer compliments form.

Must complete the form promptly, ideally on the same working day.

4.2 **Digital configuration lead:** Owns the form, dataset, configuration and any automated flows.

Ensures data accuracy, storage, availability and access controls.

4.3 **Complaints team:** Ensures compliments are included within the Beyond Housing customer voice report, quarterly complaints reviews and annual complaints and service improvement reporting.

<b>Compliments procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

4.4 **Service areas/Line managers:** Receive automatic email notifications when their colleague is complimented. Responsible for sharing feedback within their teams and embedding learning from positive practice.

4.5 **Customer experience & complaints manager:** Oversees reporting of compliments as part of the annual complaints performance and service improvement report.

## 5.0 Legislative and statutory requirements

5.1 **Housing Ombudsman Complaint Handling Code:** Expectations for transparency and learning from feedback (including positive feedback).

## 6.0 Procedure detail

### Receiving a compliment

6.1 A compliment may be received via:

- Phone call
- Email or letter
- In person
- Social media or website feedback
- Referral via another team
- Any colleague who becomes aware of positive feedback.

6.2 All colleagues must record compliments using the customer compliments form as soon as possible.

### Completing the customer compliments form

6.3 The colleague completing the form must gather/enter:

- Date received
- Colleague name(s) (if known)
- Customer address
- Service area

<b>Compliments procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

- Details of the compliment in the customer’s own words where possible
- Impact/outcome (e.g., what difference the colleague or service made).

6.4 The form submission automatically generates:

- A Viva Engage post tagging the named colleague(s) for recognition and visibility
- An email notification sent to the colleague and their line manager
- A record in the central compliments dataset for reporting.

### Posting to Viva Engage

6.5 Once submitted:

- The compliment is posted automatically on Viva Engage
- The colleague is tagged, enabling teams and leaders to celebrate positive contributions
- Managers can further recognise the colleague through internal reward or recognition schemes where appropriate.

6.6 As per our GDPR procedure, the customer name and address is not included in the public post to Viva Engage.

### Data capture and reporting

6.7 All form submissions are automatically captured in a dataset owned by the digital configuration lead.

6.8 The dataset is accessible to the Complaints team for:

- Volume reporting
- Trend/theme analysis
- Positive practice case studies
- Annual complaints performance and service improvement reporting.

6.9 This ensures compliments are included alongside complaints data to provide a balanced picture of customer sentiment.

### Feedback to service areas

Compliments procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

6.10 Service managers receive notifications for their teams and are expected to:

- Share the compliment in team meetings
- Celebrate best practice
- Reflect on what contributed to the positive outcome
- Use examples in coaching, training or continuous improvement discussions.

## 7.0 Process flowchart

7.1 Full process diagram to be created based on:

Compliment received



Colleague completes customer compliments form



Automatic actions:

- Viva Engage recognition post
- Email to colleague + line manager
- Record added to compliments dataset



Data reviewed for trends and reporting



Positive practice shared/embedded

## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Accuracy and completeness of form configuration	1st	Digital Configuration Lead	ICT Operations Manager
Quarterly review of themes and positive practice	2nd	CX & complaints manager	Executive team/Customer forum

Compliments procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-004
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

Inclusion in the annual complaints performance and service improvement report	2nd/3rd	CX complaints manager &	Beyond Housing board
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## 9.0 Consultation

9.1 The customer forum was consulted on the draft compliments procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
Form submissions	Microsoft 365 dataset	6 years
Viva Engage posts	Viva Engage platform	As per Microsoft retention policy
Compliments reporting datasets	SharePoint	6 years

## 11.0 Approval and revision

11.1 This procedure will be reviewed every three years, or sooner if required due to regulatory changes or internal process developments.

<b>Accountable/approved by:</b>	Director of customer service & ICT
<b>Responsible/procedure owner:</b>	Customer experience & communications manager

Version	Date	Information
1	March 2026	New procedure



<b>Councillor enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-006
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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### 1.0 Purpose

- 1.1 This procedure sets out how Beyond Housing receives and manages enquiries from local councillors, ensuring they are routed quickly and appropriately to the relevant service area for action. Councillor enquiries are not treated as formal cases and do not enter the MP enquiry or complaints procedures unless the constituent expresses dissatisfaction as defined in the complaints procedure.
- 1.2 Councillor enquiries are handled as service requests, enabling service areas to respond directly and efficiently.

### 2.0 Scope

- 2.1 This procedure applies to all councillor enquiries received by the Complaints team, whether received directly or forwarded by another colleague.
- 2.2 Where councillor enquiries are sent directly to service areas without passing through the Complaints team, they are handled by service managers under normal operational processes and do not fall within the scope of this procedure, unless a colleague requests support or escalation from the Complaints team.
- 2.3 This procedure does not apply to:

<b>Councillor enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-006
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

- MP enquiries (covered by the MP enquiries procedure)
- Complaints expressed via councillors (which must follow the standard complaints procedure if the constituent is dissatisfied).

### 3.0 Definitions

- 3.1 **Councillor enquiry:** A request from a local councillor seeking information, clarification or action on behalf of a constituent. This is not automatically a complaint unless the constituent expresses dissatisfaction.
- 3.2 **Service request:** A request requiring action to put something right; not a complaint unless the resident expresses dissatisfaction. Councillor enquiries fall within this category by default.
- 3.3 **CRM:** The customer relationship management system used to log complaints and record all actions, evidence, contacts and correspondence associated with each case. The CRM provides a complete and auditable record of the complaint journey from receipt to closure.

### 4.0 Responsibilities

- 4.1 **Complaints team:**
- Receive councillor enquiries sent to the team inbox
  - Identify the relevant service area
  - Forward the enquiry promptly to the appropriate team leader or service manager
  - Provide coordination support only when requested by the service area.
- 4.2 **Team leaders/service managers:**
- Own and coordinate the response and any associated actions
  - Communicate directly with the councillor
  - Keep internal colleagues informed as required
  - Ensure enquiries are resolved promptly.

### 5.0 Legislative and statutory requirements

<b>Councillor enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-006
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

- 5.1 There are no specific legislative or statutory requirements for handling councillor enquiries.
- 5.2 Councillor enquiries are not governed by the Housing Ombudsman’s Complaint Handling Code unless the underlying issue becomes a complaint from a constituent.

## 6.0 Procedure detail

### Receiving a councillor enquiry

- 6.1 Enquiries may arrive:
- Directly to the Complaints team inbox
  - Via a colleague who has been contacted directly by a councillor.
- 6.2 All colleagues should forward councillor enquiries to the Complaints team for routing, unless they are already the appropriate service lead to respond.

### Routing the enquiry

- 6.3 Upon receipt, the Complaints team will:
- Identify the appropriate team leader or service manager
  - Forward the enquiry to them for action
  - Confirm to the service area that they will handle the response.
- 6.4 No CRM case is created. The enquiry is handled entirely as a service request, not a formal case.

### Service area response

- 6.5 The relevant team leader or manager will:
- Review the enquiry
  - Coordinate the investigation or action required
  - Issue the response directly to the councillor
  - Copy internal colleagues where necessary
  - Update the Complaints team if support or escalation is required.

<b>Councillor enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-006
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

### When a councillor enquiry becomes a complaint

6.6 If the councillor expresses dissatisfaction on behalf of the constituent, or the constituent expresses dissatisfaction directly, the matter must enter the standard complaints procedure, following the definitions and requirements set by the Housing Ombudsman Complaint Handling Code.

### 7.0 Process flowchart

1. Councillor enquiry received
2. Forwarded to Complaints team (or received directly)
3. Complaints team identifies relevant service area
4. Enquiry sent to team leader/manager
5. Service area investigates and responds directly
6. (If dissatisfaction expressed → Complaints procedure)

### 8.0 Controls and reporting

Control	Line of defence (1st, 2nd or 3rd)	Responsible (Job role)	Reported to:
Inbox triage & routing	1st	Complaints team	Complaints team leader
5 working day response SLA (Councillor enquiries received via Complaints team inbox)	1st	Complaints team	Complaints team leader

### 9.0 Consultation

9.1 The customer forum was consulted on the draft councillor enquiry procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

### 10.0 Data retention

Record	Format and location	Retention period
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<b>Councillor enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-006
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

Councillor enquiry emails	Email system	6 years
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### 11.0 Approval and revision

11.1 This procedure will be reviewed every 3 years, or sooner if service needs or regulatory guidance changes.

<b>Accountable/approved by</b>	Director of customer service & ICT
<b>Responsible</b>	Customer experience & communications manager

Version	Date	Information
1	March 2026	New procedure



MP enquiry procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-010
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

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### 1.0 Purpose

1.1 This procedure sets out how Beyond Housing receives, records, allocates and responds to enquiries from Members of Parliament (MPs). It ensures that elected representatives receive timely, accurate and coordinated responses, that all enquiries are captured for monitoring and reporting, and that the correct service leads oversee the substantive response.

### 2.0 Scope

2.1 This procedure covers only MP enquiries that are received by, or forwarded to, the Complaints team. The Complaints team is responsible for logging these enquiries in the complaints tracker, creating a customer relationship management (CRM) case, and allocating the enquiry to the relevant director for response.

2.2 Some MP enquiries may be sent directly to service areas and treated as service requests rather than being routed through the Complaints team. Where this occurs, those enquiries are managed by the relevant service area under their normal operational processes and do not fall within the scope of this procedure, unless they are subsequently passed to the Complaints team for coordination.

### 3.0 Definitions

3.1 **MP enquiry:** A request for information, clarification or action made by an elected representative acting on behalf of a constituent.

3.2 **CRM case:** The record created in Beyond Housing’s CRM system to assign, track and manage the enquiry. Used to ensure clear accountability and a full audit trail.

3.3 **Complaints tracker:** The central monitoring tool where all MP enquiries are logged for oversight, performance monitoring, and reporting purposes.

<b>MP enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-010
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

## 4.0 Responsibilities

### 4.1 Complaints team

- Receive and log all MP enquiries in the complaints tracker
- Create a CRM case and assign the enquiry to the relevant director for response
- Ensure any supporting documents or customer history are attached to the CRM case
- Acknowledge receipt to the elected representative where required
- Monitor tracking and escalate delays where necessary.

### 4.2 Relevant director

- Owns the substantive response
- Assigns the case internally if needed (e.g., to a service manager)
- Ensures the response is accurate, complete, and issued within the required timelines
- Approves and signs off the final response unless delegated.

### 4.3 Service areas

- Provide timely information, evidence or clarification to support the director in drafting the response
- Keep the CRM case updated so the Complaints team can monitor progress.

### 1.1. Customer experience & complaints manager

- Oversees quality, consistency and timeliness of MP responses
- Provides reporting to executive team and senior leadership team.

## 5.0 Legislative and statutory requirements

5.1 There are no specific legislative or statutory requirements governing the handling of MP enquiries.

5.2 These enquiries are not governed by the Housing Ombudsman Scheme, the Complaint Handling Code, or any statutory complaints legislation. They are managed as a matter of good practice, transparency and organisational accountability.

<b>MP enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-010
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

5.3 General data protection requirements still apply (e.g., ensuring appropriate authority or consent before sharing personal information), but there is no dedicated regulatory framework that sets mandatory standards for MP enquiry handling.

## 6.0 Procedure detail

### Receiving an MP enquiry

6.1 Enquiries may arrive via email to the Complaints team inbox:

- Directly from an MP
- From individual colleagues where the MP has approached them directly.

### Logging the enquiry

6.2 The Complaints team must:

- Enter the enquiry in the complaints tracker, capturing:
  - Date received
  - Name of MP
  - Constituent's details
  - Service area(s) involved
  - Summary of the enquiry.
- Create an MP CRM case
- Attach all correspondence to the CRM case.

### Assigning the enquiry

6.3 The Complaints team assigns the CRM case to the director responsible for the relevant service area

6.4 Where multiple service areas are involved, the enquiry is assigned to the lead director, who coordinates responses across teams

6.5 The director may delegate drafting but remains accountable for the quality and timeliness of the response.

### Acknowledgement

<b>MP enquiry procedure</b>	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-010
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

6.6 Where appropriate, the Complaints team sends a brief acknowledgement to the MP confirming:

- Receipt of the enquiry
- That it has been passed to the relevant director
- Timescales.

### **Drafting and approving the response**

6.7 The director prepares the draft response, supported by service areas.

6.8 All information must be accurate, complete, and explain clearly what action has been taken or will be taken.

6.9 The director approves and signs the final response unless formally delegated.

### **Issuing the response**

6.10 The director (or delegated service lead) provides the final approved response to the Complaints team, who will send the response to the MP or Councillor and upload a copy to CRM and the complaints tracker.

### **Monitoring progress**

6.11 The Complaints team monitors deadlines for all active MP enquiries via the tracker.

6.12 Delayed responses are escalated to the customer experience & complaints manager, and if required, to the executive team.

## **7.0 Process flowchart**

1. MP enquiry received
2. Forwarded to Complaints team
3. Logged in complaints tracker
4. CRM case created
5. Assigned to relevant director
6. Director drafts and approves response
7. Response issued to MP
8. CRM and tracker updated

MP enquiry procedure	
<b>Procedure Owner:</b> Customer Experience & Communication Manager	<b>Procedure Ref No:</b> CE-PR-010
<b>Date approved:</b> March 2026	<b>Review Date:</b> March 2029

## 8.0 Controls and reporting

Control	Line of defence (1st/2nd/3rd)	Responsible role	Reported to
Logging accuracy (tracker + CRM)	1st	Complaints team	Complaints team leader
Monitoring deadlines and escalation	1st	Complaints team	Complaints team leader
Quarterly reporting of enquiry volumes	2nd	CX & complaints manager	Executive team/customer forum

## 9.0 Consultation

9.1 The customer forum was consulted on the draft compensation procedure. Feedback provided by forum members was considered and used to inform the final version of the document, alongside regulatory and operational requirements.

## 10.0 Data retention

Record	Format and location	Retention period
MP enquiries & responses	CRM + Complaints Tracker	6 years

## 11.0 Approval and revision

11.1 This procedure will be reviewed every 3 years, or sooner if service needs or regulations change.

<b>Accountable/approved by</b>	Director of customer service & ICT
<b>Responsible/procedure owner</b>	Customer experience & communications manager

Version	Date	Information
1	March 2026	New procedure