

# Bromford Flagship

## Complaints Policy

This Policy was approved by the coterminous Board “the Board” acting on behalf of Bromford Flagship Limited and its subsidiary Registered Providers - Bromford Housing Association Limited\*, Bromford Home Ownership Limited\*, Merlin Housing Society Limited\* and Flagship Housing Limited\*\* therefore applies to each of those entities. Any references to Bromford Flagship should be interpreted as equally applicable to all five Registered Provider entities.

\*operates as Bromford

\*\*operates as Flagship

- Samphire/Victory/Newtide and Flagship Homes are also trading names of Flagship Housing Limited, and this policy applies equally to customers of those housing divisions.

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### Policy Statement & Purpose

Our aim is to provide you with outstanding customer service; however, we understand that occasionally things can go wrong. If this happens, we want to make things right as soon as possible, learn from what has happened, and do what we can to stop it happening again. We are committed to a positive complaint handling culture.

Accountability and transparency are integral to a positive complaint handling culture. Our Group Board and Customer Influence Groups receive trend data on complaints, our operational teams review complaint trends to improve the services we deliver, and we report on learning and improvements from complaints in our Annual Complaint Performance and Service Improvement Report.

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### 1. Scope

The scope of this policy applies to all services delivered to customers by Bromford Flagship Ltd or partners and contractors working on our behalf and associated legal entities.

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**Definition:** We define a complaint as '*an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Bromford Flagship, our own colleagues, or those acting on our behalf, affecting a customer or group of customers.*'

You do not have to use the word 'complaint' for it to be treated as such. Whenever you express dissatisfaction, we will give you the choice to make a formal complaint.

A **service request** is 'a request from you (or an organisation working on your behalf) requiring action to be taken to put something right.' This will usually be the first time you have made us aware of an issue. We will record, monitor and review service requests regularly and our aim is to resolve service requests in a timely manner, so you do not need to use our formal process.

If you are dissatisfied with our response to a service request, even if the handling of the service request remains ongoing, we will consider this to be a complaint and we will follow the process set out in this policy.

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## 2. Reference Materials

The policy is supported by two sets of arrangements due to the merger of Bromford and Flagship Housing in February 2025. Work is underway to align our working practices for consistency.

Bromford	Flagship	Aim
<a href="#">Restricting Customer Access Policy</a>	<a href="#">Unacceptable Behaviour Policy</a>	How we manage unreasonable behaviour from complainants
<a href="#">Equality and Diversity Policy</a>	<a href="#">Equity, Diversity and Inclusion Policy</a>	How we make sure all customers are treated fairly and with respect
<a href="#">Privacy notice</a>	<a href="#">Privacy notice</a>	How we will collect, use, store and share your personal information
<a href="#">Mutual Exchange Policy</a>	<a href="#">Mutual Exchange Policy</a>	How we will ensure that mutual exchanges are accessible and enable housing mobility
<a href="#">Reasonable Adjustments Policy</a>	<a href="#">Reasonable adjustment Policy</a>	To enable our services to be more accessible for all our customers.
<a href="#">Data Protection Policy</a>	<a href="#">Data Protection Policy</a>	How we ensure the organisation processes data lawfully
<a href="#">Tenure Policy</a>	<a href="#">Allocations, lettings and tenancy policy</a>	How our homes are allocated and let

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## 3. Principles

### 3.1 Making a Complaint

You can raise a complaint by whichever route you prefer. Please contact us if you would like any assistance in making a complaint as we're happy to make reasonable adjustments to our process if you need them.

	For customers with a Bromford tenancy or lease agreement	For customers with a Flagship tenancy or lease agreement
	0330 1234 034	Newtide: 0808 168 4555 Samphire: 0808 169 9301 Victory: 0330 123 1860 Flagship Homes 01603 255444

	<a href="http://www.bromford.co.uk">www.bromford.co.uk</a>	<a href="https://www.newtide-homes.co.uk/my-community/complaints/make-a-complaint/">https://www.newtide-homes.co.uk/my-community/complaints/make-a-complaint/</a> <a href="https://www.samphire-homes.co.uk/my-community/complaints/make-a-complaint/">https://www.samphire-homes.co.uk/my-community/complaints/make-a-complaint/</a> <a href="https://www.victory-homes.co.uk/my-community/complaints/make-a-complaint/">https://www.victory-homes.co.uk/my-community/complaints/make-a-complaint/</a> <a href="https://flagship-homes.co.uk/existing-customers/your-feedback/make-a-complaint/">https://flagship-homes.co.uk/existing-customers/your-feedback/make-a-complaint/</a>
	Bromford Flagship, Shannon Way, Ashchurch, Tewkesbury, GL20 8ND	Newtide Homes, Riduna Park, Station Road, Melton, IP12 1QT  Samphire Homes, Coppice House, 5 Greenwood Court, Bury St Edmunds, IP32 7GY  Victory Homes, Michael Chaplin House, Station Road, Dereham, NR19 1DA  Flagship Homes, 31 King Street, Norwich, NR1 1PD.
	To any Bromford Flagship colleague or a representative of an organisation working on our behalf.	
	Through a representative (we'll need signed authority)	
	Where you have taken part in a satisfaction survey, and express dissatisfaction, you will be given the option to raise a complaint	
	Through an elected representative such as a Councillor or MP (we may proceed to handle the complaint with them based on implied consent)	
	You have the right to access the Housing Ombudsman Service at any point of our complaint process. Online complaint form: <a href="http://www.housing-ombudsman.org.uk/residents/make-a-complaint/">www.housing-ombudsman.org.uk/residents/make-a-complaint/</a> Phone: 0300 111 3000 Email: <a href="mailto:info@housing-ombudsman.org.uk">info@housing-ombudsman.org.uk</a> Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET	

When a complaint is made in the form of a petition or a group of customers it will be dealt with following the standard complaints process. It will be treated as one complaint and all correspondence will be addressed to the first signer, however, of course we will consider the individual circumstances of all signers.

#### This is how it works:

##### Stage 1

- When you make a complaint, we will acknowledge, clarify our understanding, and confirm the outcome you would like to achieve. We will do this **within 5 working days** of receipt.
- We aim to issue our Stage 1 responses **within 10 working days** of the complaint being acknowledged.
- If you have a complex case, we may need an extension beyond 10 working days to respond to the complaint fully. We will provide a clear explanation, and we aim not to extend this by more than a **further 10 working days**.
- If we need an extension beyond this, we will agree this with you.
- Our response will be sent to you when we are able to provide what we feel is a fair resolution to your complaint, not when the outstanding actions to remedy things are completed. Of course, we'll still track the actions and provide regular updates to you until we have fully resolved your complaint.
- If additional issues come to light during the Stage 1 investigation, these will be incorporated into the Stage 1 response if they are related, and the Stage 1 response has not been issued. Where the Stage 1 response has been issued, and the new issues are unrelated to those already being investigated, or it would unreasonably delay the response, this will be logged as a new complaint.
- Our formal Stage 1 response will include:
  - The stage of your complaint

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- An overview of your complaint
- An acknowledgement if required, of where things have gone wrong
- Our decision: the conclusion of Stage 1 of our complaints process
- The reasons for the decision we have made
- Details of any remedy offered to put things right
- Details of any outstanding actions
- Details of how to escalate the matter to Stage 2 if you are not satisfied with our response
- Your right to contact the Housing Ombudsman

## Stage 2

- If at conclusion of the Stage 1, you're not satisfied with our response to all, or some of your complaint, you can escalate your complaint to Stage 2 where a more senior colleague will consider your complaint.
- You can progress your complaint to Stage 2 up to three months from the date you received our resolution to your complaint at Stage 1.
- You are not required to explain your reasons for requesting to escalate to a Stage 2; however, we will need to understand the issues outstanding and the outcome you are hoping to achieve. It's unlikely that we would refuse your request for escalation (please see exclusion section) however, if this is the case, we will provide you with an explanation, together with your right to take that decision to the Housing Ombudsman.
- The review will look at the handling of the complaint to date, decisions made, the resolution offered and may draw upon the views of subject matter experts where necessary to reach a fair resolution wherever possible.
- You will receive an acknowledgment of your escalation request within **5 working days** of us receiving the request.
- We will review your complaint and respond within **20 working days** of the complaint being acknowledged at Stage 2. If your complaint is complex, we may need more time to respond, and if this is the case, we will provide a clear explanation. We aim not to extend this by more than a **further 20 working days**.
- If we need an extension beyond this, we will agree this with you.
- Our complaint response will be sent to you when we have the answer to the complaint, not when the outstanding actions to remedy things are completed. Of course, we'll still track the actions and provide regular updates to you until we have fully resolved your complaint.
- If you raise additional complaints during the Stage 2 investigation, these will be incorporated into the Stage 2 response if they are related, and the Stage 2 response has not yet been issued. Where the Stage 2 response has already been issued, or if the new issues are unrelated, or it would unreasonably delay the response, then the new issues will be logged as a new Stage 1 complaint.
- Our response will include:
  - The stage of your complaint
  - An acknowledgement if required, of where things have gone wrong
  - An overview of your complaint
  - Our decision: the conclusion of Stage 2 of our complaints process
  - The reasons for any decisions made
  - The details of any remedy offered to put things right
  - Details of any outstanding actions
  - Details of how to escalate the matter to the Housing Ombudsman Service if you remain dissatisfied

## 3.2 Further Options

### Housing Ombudsman

You can contact the **Housing Ombudsman** at any stage of your complaint. They are contactable at:

- Online complaint form: [www.housing-ombudsman.org.uk/residents/make-a-complaint/](http://www.housing-ombudsman.org.uk/residents/make-a-complaint/)
- Phone: 0300 111 3000
- Email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)
- Postal address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

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The New Homes Quality Code requires builders to have an effective After Care Service in place. This complaints policy is compliant with the requirements of the code. If you are not happy with our response, you can refer your complaint to the **New Homes Ombudsman Service**:

- **Email:** [customer.services@nhos.org.uk](mailto:customer.services@nhos.org.uk)
- **Telephone:** [0330 808 4286](tel:0330 808 4286) (9.00am to 5pm Monday to Friday)
- **Postal address:** West Wing, First Floor, Maylands Building, 200 Maylands Avenue, Hemel Hempstead, HP2 7TG

## **Building Safety Regulator**

In-line with the Building Safety Act 2022, we are committed to safeguarding the well-being of customers in our High-Rise Buildings, by being accessible and allowing for the prioritisation and resolution of building safety complaints in line with this policy. You can refer your complaint to the Building Safety Regulator when you:

- are not satisfied with our final response
- have unresolved issues
- have not got a response

The Building Safety Regulator can be contacted in the following ways:

- **Telephone:** 0300 790 6787
- **Website:** <https://contact-building-safety-regulator.service.gov.uk>

### **3.3 Putting things right**

When something has gone wrong, we will acknowledge this and set out the actions we have already taken, or intend to take, to put things right. These actions can include remedies such as an apology and acknowledgement if things have gone wrong, together with an explanation as to why the service fell below the expected standard. We will be clear on any next steps setting out what will happen and by when, and there may be a need to consider a financial remedy which we will discuss and agree with you.

Any remedy proposed will be followed through to completion and we will take account of the guidance issued by the Housing Ombudsman when deciding on the most appropriate remedies.

Complaints about the conduct or behaviour of our colleagues or other parties acting on our behalf will be addressed in-line with human resources and contract management policies. Despite taking these matters very seriously, we may not always be able to share the outcome of an investigation in these circumstances.

### **3.4 Restricting access**

On rare occasions we may make the decision to restrict access to our services by making alternative arrangements for communication to manage the relationship more effectively. For full details as to how and why the decision will be taken, please refer to our Restricting Customer Access Policy or Unacceptable Behaviour Policy.

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## **4. Responsibilities**

We have a dedicated complaints team who are assigned to investigate complaints. They have access to colleagues at all levels to facilitate the prompt resolution to complaints. They have the authority and autonomy to act to resolve disputes promptly and fairly. In accordance with the Housing Ombudsman Complaint Handling Code 2024 this team is defined as 'Complaint Officers'.

All Bromford Flagship employees are responsible for maintaining a positive complaint handling culture and aspire to taking action to prevent complaints. The Group Board oversees our complaint performance and has responsibility for reviewing and responding to the Annual Complaint Performance and Service Improvement Report. The Chief Customer Officer has the lead executive responsibility for ensuring a positive complaint handling culture across the organisation. In addition, the Member Responsible for Complaints (the MRC) is a Board Member. They are responsible for ensuring that the Board receives regular information on complaints, providing

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insight on our complaint handling performance. The MRC has lead responsibility for supporting a positive complaint handling culture.

We record and monitor all complaints that we receive and use this information to consider and identify improvements that can be made to our services and publish our performance in our Annual Report.

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## **5. Competence and Training**

We will commit to demonstrating a sufficient level of skill, knowledge and aptitude that shows we can provide good quality advice and services to our customers. Competence will be detailed through our process and procedure documentation and remain under continuous review to ensure we provide our services safely and by suitably trained colleagues.

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## **6. Legislative or Regulatory Requirements**

The key pieces of legislation relating to this policy are:

- Housing Ombudsman Complaint Handling Code 2024.
- Housing Act – 1996 (Schedule 2).
- Building Safety Act 2022.
- Localism Act 2011.
- Landlord and Tenant Act 1985 as amended by the Commonhold and Leasehold Reform Act 2002.
- Equality Act 2010.
- General Data Protection Act 2018.
- Social Housing Regulation Act 2023.
- Regulator of Social Housing Consumer Standards 2024.

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## **7. Exclusions**

We will use discretion when applying this policy and may deal with a complaint differently where individual circumstances merit it. We will always provide our reasoning for doing so and be fair and reasonable in our explanation. If you're not happy with our explanation, you always have the right to take that decision to the Housing Ombudsman.

Matters that will not be considered as a complaint, or escalation include:

- Service requests, such as the reporting of repairs where we have not been notified of issues previously.
- The complaint relates to issues where legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.
- Where the issue giving rise to the complaint happened, or was first found, over twelve months ago. However, we will apply discretion where complaints are made outside of this time-period where there is good reason to do so. This will include looking at the history of the issues raised.
- Matters that have already been considered under the Complaint's Policy.
- An expression of dissatisfaction with our services made through a survey is not defined as a complaint, however, where possible, if you're not happy with the service, we'll make you aware of your right to make a complaint.
- Complaints relating to the setting of service charges can be referred to the First Tier Tribunal (<https://www.gov.uk/courts-tribunals/first-tier-tribunal-property-chamber>).
- An issue with a decision we have made where there is another policy in place to appeal the decision.
- The first reports of anti-social behaviour (ASB), or ongoing issues included in an existing ASB case. (Only complaints about the way Bromford Flagship have or are handling a ASB case will be progressed through our Complaint's Process).
- Insurance claims for damages and/or legal proceedings (associated complaints regarding service failures are not excluded in these cases).
- Matters already being dealt with by the Housing Ombudsman service.

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- Something we have no control over, such as Local Authority property allocations.

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## **8. Assurance Framework**

We will monitor compliance with this policy through our regular Complaint Handling Code Self-Assessment, internal audit, and performance measures. Regular reporting will be provided to the Board, senior leaders, and Customer Influence Groups to support learning from complaints and to promote the open and transparent use of information to assess performance and risks.

An annual complaint report highlighting performance, trends and lessons learnt is available to customers on our website.

A member of the governing body has been appointed to have lead responsibility for complaints supporting a positive handling culture. Referred to as the Member Responsible for Complaints, they ensure the Board receives regular updates on complaint matters.

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## **9. Equality Impact Assessment Statement**

An Equality Impact Assessment was completed on this policy on 31/03/2025 and all identified negative impact has been mitigated

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## **10. Document Details and Version Control**

**Owner:** Victoria King-Lowe, Director of Place.  
Sam Greenacre, Managing Director Newtide Homes

**Approved By:** Bromford Flagship Board

**Date of Approval:** 17 May 2025

**Next Review Due:** May 2026

**Policy Version:** 1

**Share to website:** Yes

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Renewal Date	Version	Approved By	Comments
May 2026	2	Bromford Flagship Board	