Document Reference & Title	Enter Policy Reference Number here **Complaint Policy**
Document Type	**Standard Business Policy (SBP)**

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Suggestions / Recommendations for Change at Next Review

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1.Policy Statement

Cardo Group is committed to delivering a fair, transparent and consistent approach to complaint handling across all regions, contracts and services.
We recognise complaints as a valuable source of customer insight and an essential part of delivering a high- quality customer experience. We are committed to ensuring that all complaints are handled effectively, with empathy and professionalism, and that learning from complaints is used to improve services and prevent recurrence.
This policy supports Cardo Groups Customer Experience Strategy and contributes to the delivery of the organisation's 2029 Vision, particularly the commitment to deliver a customer centric service, listened to customer voice and ensure an excellent end to end customer journey.

2. Purpose

The purpose of this policy is to:

- Establish a clear and consistent approach to complaint handling across Cardo Group
- Ensure complaints are managed fairly, transparently and within appropriate timescales
- Support a customer-centric approach to resolving dissatisfaction
- Ensure customer feedback is used to inform service improvement
- Align complaint handling with Cardo's Customer Experience Strategy and organisational values
- Support compliance with relevant regulatory and client specific requirements

3. Scope

This policy applies to:

a. All Cardo Group regions, contracts and operating businesses
b. All employees, contractors and partners delivering services on behalf of Cardo Group
c. All complaints received from customers, clients or stakeholders

4. Our Approach to Complaints

Cardo Group will manage complaints through a structured and consistent approach, ensuring that customers are listened to, treated fairly and kept informed throughout the

process. We will provide accessible routes for customers to raise complaints, always respond in a timely and professional manner, take ownership of issues and work towards resolution. Customers will understand the outcome of their complaint, and it will be used as a source of insight to drive improvements.
This approach aligns with Cardo's broader commitment to delivering a consistent and exceptional customer experience across all services.

5. Definition of a Complaint

At Cardo a complaint is defined as:

"An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Cardo Group, its employees or those acting on its behalf, affecting an individual or group of customers"

Requests for service, information or first-time reporting of an issue are not considered complaints; however, where dissatisfaction is expressed regarding how these have been handled, this will be treated as a complaint.

6. Complaint Handling Principles

Complaints will be managed in line with the following principles:

Principle	Definition
Customer-Centred Response	Customers will always be treated with respect, empathy and fairness.
Transparency & Communication	Customers will be kept informed throughout the complaint process with clear and timely communication.
Consistency	A consistent approach will be applied across all regions and services, while allowing for local and client specific requirements.
Ownership & Accountability	Clear ownership will be maintained to ensure complaints are resolved effectively.

Early Resolution	Where possible, complaints will be resolved at the earliest opportunity.
Learning and Improvement	Complaints will be used as a source of insight to drive service improvement and prevent recurrence.

7. Complaint Handling

Cardo Group will manage complaints through a clear, fair and transparent process, ensuring the customers that are listened to, kept informed and provided with appropriate opportunities for resolution at every stage.
The complaint process is designed to support early resolution wherever possible while ensuring customers retain the right access the formal complaints process at any time.

Service Request / Early Resolution: In some cases, an expression of dissatisfaction may be resolved quickly without the need for a formal complaint investigation.
This stage is intended to resolve issues promptly, preventing unnecessary escalation, improving the customer experience through active intervention. Some examples of this may include missed appointments, communication concerns, minor workmanship issues or delays that require immediate clarification. This stage must be clearly identified as a service request, be customer-led, transparent and have no barriers to further escalation.
Customers must never be discouraged from making a formal complaint. Where a customer requests a complaint, or remains dissatisfied following early resolution attempts, the issue must immediately progress to a formal Stage 1 complaint.
Cardo will promptly contact the customer and give a clear explanation of actions being taken. If appropriate offer immediate remedial actions and have a supervisor-led follow up where required. Cardo will confirm that any actions are resolved with the customer to their satisfaction.

Stage 1 Complaint: To investigate and resolve complaints quickly, fairly and professionally a Stage 1 complaint will be logged when a customer requests a formal complaint, early resolution has not resolved the issue or where the issue is complex or serious enough to require formal investigation. Cardo should investigate a repair or service-related concerns, which includes establishing a factual timeline of events, undertaking root cause analysis, identifying remedial actions, lessons learned and improvement actions.

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We will commit to acknowledging the complaint with the customer in line with the applicable client and /or their regulatory requirements, keep the customer informed throughout the investigation and provide a clear outcome and explanation.
Where Cardo is handling a complaint on behalf of a landlord or client, the complaint will remain within the client's applicable complaints process. Cardo will support the client in meeting its regulatory and contractual obligations and will not operate a separate complaints process where this would sit outside or duplicate the client's formal process.
For contracts subject to the Housing Ombudsman Complaint Handling Code, complaints must be acknowledged, logged and defined within 5 working days of receipt, with a full stage 1 response issued within 10 working days of acknowledgement, subject to any permitted extension under the code.

Stage 2 Complaint (Escalation): To provide a senior review where the customer remains dissatisfied following a Stage 1 complaint. The stage 2 review should look at whether the original investigation and outcome were appropriate, take into consideration any outstanding concerns and identify lessons learned and improvement actions. Any agreed improvement actions will be implemented, and this will be monitored by the relevant internal teams until embedded. Customers will receive a final response outlining the outcome of the review with a clear explanation of decisions made.

Where Housing Ombudsman requirements apply, the Stage 2 complaint must be considered by a person who was not responsible for considering the complaint at Stage 1.
The reviewer must have sufficient authority and independence to review the original investigation, decision and any outstanding issues.
Stage 2 complaints must be acknowledged within 5 working days of the escalation request and a final response issued within 20 working days of acknowledgement, subject to any permitted extension under the Housing Ombudsman Complaint Handling Code.

Insurance Claims: If a complaint identifies circumstances that may give rise to an insurance claim, the matter must be referred promptly to the Cardo Insurance Team. The team will investigate the claim and decide if Cardo are liable for the claim within 5 working days. If Cardo are liable, they will progress the claim through the insurance process.
Referral of a matter for consideration as an insurance claim does not automatically close or suspend the complaint. Where appropriate, the complaint and insurance processes will run concurrently with the customer kept informed about which aspects

of their case are being considered through each process. Employees must not admit liability or make commitments regarding the outcome or settlement of a potential insurance claim unless authorised to do so. Further requirements are set out within Cardo Group's Compensation Policy**.**

External Escalation: Where customers remain dissatisfied following completion of the complaints process, they may have the right to escalate their complaint externally in line with contract or regulatory requirements.

This may include:

- Housing Ombudsman Service
- Scottish Public Services Ombudsman
- Client-specific escalation routes

Cardo Group will cooperate fully with any external review or investigation.

Complaint Handling Timescales: Complaint handling timescales will align with client-specific policies and applicable regulatory requirements. Cardo operates an internal service standard of acknowledging complaints within 1 working day of receipt where operationally achievable. This is an internal customer service aspiration and does not replace, alter or extend and applicable client, contractual or regulatory deadline.

As a minimum standard, Cardo Group will:

- Acknowledge all complaints within 1 working day from the date the complaint was received
- Investigate and provide a written response to all complaints 10 working days from date of acknowledgement
- Provide clear response timescales
- Keep customers informed of delays or extensions
- Prioritise early resolution wherever possible

Where extensions are required, customers will be informed of:

- The reason for the delay
- Revised timescales
- Any interim actions being taken

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8. Regional and Regulatory Alignment

Cardo Group operates across multiple regions and contracts, each of which may be subject to different regulatory and client specific complaint handling requirements.
This policy establishes a consistent Group-wide approach; however, complaint handling will be aligned to:

- Wales and England – Housing Ombudsman Complaint Handling Code
- Scotland – Scottish Public Services Ombudsman (SPSO)
- Ireland – Client specific or local regulatory requirements

9. Governance and Responsibility

Complaint handling is a shared responsibility across the organisation. All employees are responsible for recognising and escalating complaints.
Operational teams are responsible for investigating and resolving complaints. Regional management are accountable for complaint performance and embedding learning and the Head of Customer Experience and Social Value is responsible for ensuring a consistent approach and overseeing continuous improvement.

The Customer Experience Working Group will provide governance and oversight of complaint insight, ensuring that trends, themes and improvement actions are identified and addressed.

10. Using Complaints to Drive Improvement

Cardo Group is committed to using complaints as a key source of customer insight, ensuring they contribute to continuous improvement and delivery of a consistent customer experience. Complaint data will be analysed to identify trends and root causes.

These will be reviewed through the Customer Experience Working Group and will inform service improvements which will be shared across regions to promote best practice.

11. Alignment to Customer Experience Strategy

This policy supports the delivery of Cardo Group's Customer Experience Strategy by reinforcing:

- Customer Voice and Insight
- Consistent Customer Experience
- Customer-Centred Culture
- Performance & Continuous Improvement

12. Policy Review

This policy will be reviewed regularly to ensure it remains aligned with:

- Cardo Group's strategic objectives
- Customer expectations
- Regulatory and client requirements
- Industry and best practice