PBSA COMPLAINTS PROCEDURE

For residents, applicants, guarantors and authorised representatives

ANUK Unipol National Code accommodation

OUR COMMITMENT

We aim to provide a professional and fair service. When something goes wrong, we want to understand the concern, investigate it promptly and put matters right where appropriate. No person will be disadvantaged for raising a genuine concern or complaint in good faith.

At a glance

Stage	What happens	Target timescale
Early resolution	Raise the issue with the site team or accommodation office.	As soon as reasonably possible
Stage 1 - Formal complaint	Written investigation by the responsible manager.	Acknowledgement within 3 days; substantive response within 10 days
Stage 2 - Review	Independent review by a more senior manager not previously responsible.	Final response as soon as possible and normally within 28 days of the original complaint
External escalation	National Code and/or the appropriate independent redress route.	After the internal process, or if no substantive response within 28 days

This procedure explains how students, former students, guarantors and authorised representatives can raise a concern or make a formal complaint about purpose-built student accommodation managed by Brink Riley Properties. It also explains the response times, review process and external escalation routes that apply.

1. Purpose and scope

This procedure explains how Brink Riley Properties (BRP) will receive, investigate, respond to and record complaints about purpose-built student accommodation (PBSA) that we own, manage or operate.

It applies to complaints from:

- current or former residents;
- applicants and prospective residents;
- parents, guardians or guarantors acting with the resident's written authority;
- visitors and other people affected by the operation of the accommodation; and
- universities, local authorities or other authorised organisations raising a relevant concern.

A complaint is an expression of dissatisfaction about the standard of accommodation, facilities, repairs, services, staff conduct, communication, safety, management or our failure to follow a published policy or the National Code.

2. Matters dealt with outside this procedure

The following may be redirected to the appropriate process:

- urgent repairs, hazards or emergencies that require immediate operational action;
- appeals against deposit deductions, which should use the relevant tenancy deposit scheme process;
- purely contractual or legal disputes that fall outside the National Code's remit;
- insurance complaints, which follow the separate regulated insurance complaints process;
- staff grievances or whistleblowing concerns; and
- reports of crime, harassment, safeguarding concerns or serious misconduct, which may also be referred to the police, university or another competent authority.

URGENT OR SAFETY-CRITICAL ISSUES

Do not wait for the complaints process where there is an immediate risk to health, safety or security. Contact the site team, emergency out-of-hours service or emergency services as appropriate. The complaint can still be investigated once immediate protective action has been taken.

3. How to make a complaint

Complaints should preferably be made in writing so there is a clear record. Please include:

- your name, room or flat number and contact details;
- the name of the development;
- a clear description of what happened, including relevant dates and times;
- the steps already taken to resolve the issue;
- copies of relevant evidence, such as emails, photographs, reports or witness details; and
- the outcome or remedy you are seeking.

Complaints may be sent to:

Email	info@brinkriley.co.uk
Telephone	0800 228 9437

Post	Brink Riley Properties, 27a Bridge Street, Witham, Essex, CM8 1BU
In person	At the relevant accommodation office or BRP branch

4. Accessibility and representation

We will make reasonable adjustments to help people use this procedure. A complaint may be made by a representative, but we will normally require the resident's written consent before discussing personal information. Anonymous complaints will be considered where sufficient information is available, although anonymity may limit the investigation.

5. Early resolution

Where appropriate, residents should first raise day-to-day concerns with the site team or accommodation office. The team will try to resolve the issue quickly and explain any action taken. A resident may ask for the matter to be treated as a formal complaint at any time.

Where a concern relates to a specific member of staff, the resident may raise the matter in confidence before deciding whether to make a formal complaint. The member of staff concerned will take no part in receiving, investigating, reviewing or determining the complaint.

6. Stage 1 - Formal complaint

1. We will record the complaint and send a written acknowledgement within 3 days of receipt.
2. The acknowledgement will identify the person responsible for investigating the complaint and provide a reference number where available.
3. The investigator will gather relevant evidence, speak with the departments or contractors involved and consider any applicable tenancy terms, BRP policies and National Code requirements.
4. We will provide a substantive written response within 10 days of receiving the complaint.
5. Where a full response cannot reasonably be provided within 10 days, we will explain the reason for the delay and give an anticipated date for the full response.
6. The response will set out the issues considered, findings, any remedy or corrective action, and how to request a Stage 2 review.

7. Stage 2 - Senior review

A resident who remains dissatisfied should request a Stage 2 review, preferably within 10 working days of the Stage 1 response, explaining which parts remain unresolved and why.

- The review will be undertaken by a more senior member of staff who was not responsible for the original decision wherever practicable.
- The reviewer may request further information, reconsider the evidence and check whether the Stage 1 investigation and outcome were fair and proportionate.
- We will acknowledge the review request within 3 days.
- A final written response will be issued as soon as reasonably possible. The full internal complaints process should normally be concluded within 28 days of the original complaint.
- If exceptional circumstances prevent completion within 28 days, we will explain the reason, provide an updated timescale and explain the resident's external escalation rights.

8. Possible outcomes and remedies

Depending on the findings, we may:

- provide an explanation, clarification or apology;
- complete or prioritise repairs or other corrective work;
- repeat, replace or improve a service;
- review a decision or communication;
- provide staff guidance, training or supervision;
- amend a procedure or introduce wider service improvements;
- make any payment or practical arrangement specifically required by the National Code or another applicable obligation; or
- explain why no further action is justified.

9. National Code escalation

Where the development is covered by the ANUK/Unipol National Code, a complaint concerning an alleged breach of the Code may be referred to the National Code Complaints Investigator after the complaint has first been raised with BRP.

- A resident may escalate where the issue remains unresolved after BRP's internal process.
- A resident may also escalate if no substantive response has been received within 28 days of first making the complaint.
- Evidence that the complaint was first raised with BRP must be provided.
- Former residents may complain, but the complaint must be received by the National Code within 6 months of the end of the tenancy.
- The National Code process deals with alleged breaches of the Code. It is not generally able to determine pure contractual or legal disputes and cannot make general monetary awards, although certain Code clauses may impose specific financial obligations.

NATIONAL CODE CONTACT

Online complaint form: https://www.nationalcode.org/for-students/problems-complaints/
National Code complaints procedure and online form: https://www.nationalcode.org/national-code-complaints-process

10. Other independent routes

Some complaints may also fall within an independent redress or regulatory scheme. The correct route depends on the nature of the complaint.

Type of issue	Possible route	Key point
Letting or property management service	The Property Ombudsman (TPO)	Normally after BRP's final response; referral deadline is generally 12 months from the final response.
Alleged breach of Propertymark rules	Propertymark	Propertymark may consider conduct and membership-rule

		issues after the agent and redress process.
Insurance complaint	Financial Ombudsman Service	The separate insurance complaints process applies; referral is generally required within 6 months of the final response.
Deposit deduction dispute	Relevant tenancy deposit scheme	Use the scheme's evidence and adjudication process.
Legal or contractual dispute	Independent legal advice / court	The National Code does not determine pure legal or contractual disputes.

11. National Code complaints governance

In addition to the resident-facing stages above, BRP will meet the following National Code requirements when handling complaints and when dealing with the Codes Complaints Investigator (CCI).

Confidential reporting and staff-related complaints (Code point 9.03)

Residents may raise matters of concern in confidence. Where a complaint concerns a member of staff, that person will take no part in investigating, reviewing or deciding the complaint. The matter will be allocated to an independent manager or director who is not implicated in the issues raised.

Accessible procedure and National Code signposting (Code points 9.02, 9.08)

This procedure will remain clearly accessible on BRP's website. It will include a direct link to the National Code complaints procedure and explain when a resident may lodge a complaint with the CCI.

Priority given to CCI correspondence (Code point 9.11)

Any correspondence or contact from the CCI will be treated as high priority and escalated immediately to the PBSA lead, Operations Director or another authorised senior manager.

Named contact within 2 days (Code point 9.11)

BRP will provide the CCI with a named contact for communication in connection with the investigation within 2 days of the request being made.

Response to the CCI within 5 days (Code point 9.12)

BRP will respond to correspondence from the CCI as soon as possible and, in any event, within 5 days.

No non-disclosure agreements (Code point 9.14)

BRP will not use a non-disclosure agreement, confidentiality agreement or similar restriction as a form of resolving a complaint or preventing a complainant from discussing the complaint, its outcome or matters of public interest.

Audit Panel directions (Code points 9.15 and 9.16)

BRP accepts and will comply with any directives given by the National Codes Audit Panel in accordance with the Code.

Authority of the Tribunal (Code point 9.17)

BRP recognises the authority of the Tribunal to determine whether a breach of the Code has occurred and to make recommendations accordingly.

Failure to comply with recommendations (Code point 9.17)

BRP accepts that where Tribunal recommendations are not followed or met, BRP may be deemed to be in breach of the Code; that breach may be made public to prospective occupants; and the Tribunal may exclude BRP or the relevant accommodation from the National Code.

12. Fairness, confidentiality and conduct

- Complaints will be considered objectively and without retaliation or disadvantage to the complainant.
- Information will be shared only with those who need it to investigate or resolve the matter, subject to legal and safeguarding obligations.
- Residents and staff are expected to communicate respectfully. Abusive, threatening or discriminatory behaviour may be managed under BRP's unacceptable behaviour arrangements without preventing genuine issues from being considered.
- No person who is directly implicated in a complaint should make the final decision on that complaint wherever practicable.
- A complaint will not normally delay necessary safety, tenancy-management or debt-recovery action, although any disputed matter will be properly considered.

13. Complaint records and learning

BRP will maintain a complaint log recording the development, issue, dates, stage, outcome, actions and learning points. Records will be retained securely in accordance with BRP's data protection and retention requirements.

Management will periodically review complaints to identify:

- recurring service failures or repair themes;
- delays against published timescales;
- training, staffing or contractor issues;
- potential breaches of the National Code or other standards; and
- actions that should be applied across other developments.

14. Closing a complaint

A complaint will be closed when the agreed action has been completed, a final response has been issued, or the complainant has not responded within 8 weeks of our final correspondence. Closure does not prevent the complainant from using an external route within the applicable deadline.

15. Document control

Document owner	PBSA / Operations Director
Approved by	Director
Version	1.1

Effective date	July 2026
Review frequency	Annually, or sooner if the National Code or redress requirements change
Related documents	Repairs Procedure; Safeguarding Policy; Data Protection Policy; Unacceptable Behaviour Procedure; Insurance Complaints Procedure; National Code Complaints Procedure