

# Complaints Policy

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## 1. Introduction

1.1 This policy explains our approach to handling complaints and dissatisfaction. We handle complaints in line with the standards set by our regulator, the housing ombudsman and relevant laws:

- Housing Ombudsman Complaint Handling Code
- Regulator of Social Housing Regulatory Standards
- Localism Act 2011
- Building Safety Act 2022
- Equality Act 2010
- Data Protection Act 2018

1.2 This policy applies to:

- All customers who live in an A2Dominion home, regardless of tenure.
- All customers who receive services provided by A2Dominion.
- All applicants for a property owned or managed by A2Dominion.
- Former customers of A2Dominion.
- Any third party acting on behalf any of the above, with their consent.

1.3 We publish this policy on our website, along with information about the Housing Ombudsman Service and other regulatory bodies which may oversee complaints to or about A2Dominion homes or services. We will also publicise this policy and the services of the Housing Ombudsman Service in customer communications.

1.4 We will provide a copy of this policy to customers in other formats upon request.

## 2. Policy aims and objectives

2.1 We view complaints as a valuable source of feedback and learning for our services, helping to drive improvement and maintain positive relationships with our customers.



### **Our accessibility and translations service**

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- 2.2 Sometimes things go wrong, and when they do, we will try to put things right as soon as we can. We are committed to understanding what has gone wrong and making positive improvements to our services as a result.
- 2.3 The aim of this policy is to ensure that:
- We prioritise handling complaints from customers and a culture of learning from complaints, treating all feedback as a learning opportunity to improve services in the future.
  - We provide clear and transparent information to customers about our approach to managing and responding to complaints.
  - We provide a good and reliable service to all our customers.
- 2.4 We record all formal complaints to enable us to analyse the data, to recognise reoccurring issues and themes, to make sure that learning is applied, and look to improve procedures and policies where necessary.

### 3. Definitions

#### Service requests

- 3.1 We define a **service request** as “a request from a customer asking us to take action to provide a service or put something right”. An example might be to carry out a repair, to provide a rent or service charge statement, or provide information about our services or organisation.
- 3.2 A service request may become a complaint at any point, including if the handling of the service request remains ongoing, if:
- A customer wants to raise a complaint, or
  - Has had to request a service more than once, or
  - We fail to provide a service to our agreed standards (available at [a2dominion.co.uk/service-standards](http://a2dominion.co.uk/service-standards)).
- 3.3 We will not stop efforts to address the service request if a customer raises a complaint.
- 3.4 We record service requests when received from customers, and these are monitored and reviewed regularly by the relevant service areas within A2Dominion.

#### Complaints

- 3.5 We define a **complaint** as “an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents”.

- 3.6 We'll accept complaints if the issue occurred within the last 12 months or if the customer became aware of it within the last 12 months. In some cases, we might accept complaints outside this time frame if there are good reasons.
- 3.7 Customers do not need to use the word "complaint" for it to be treated as such.
- 3.8 We will not treat customers differently if they make a complaint.

### **What we will not accept as a complaint**

- 3.9 We will accept a complaint unless there is a valid reason not to. Reasons for not accepting a complaint include:
- Complaints relating to issues occurring more than 12 months ago (see 3.6 above).
  - Neighbour disputes or reports of Anti-Social Behaviour (ASB), unless the complaint is that we did not follow our **ASB Policy** and procedures.
  - Complaints relating to issues where legal proceedings have started (defined as the details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court), or where issues of legal liability arise (such as insurance claims), although we will consider complaints relating to our handling of these matters in line with our service standards.
  - Matters that are currently or have previously been considered under this complaints policy, or other legal or regulatory action, including determinations through the Housing Ombudsman Service.
  - Where the complaint relates to rent increases or service charges or their reasonableness, unless the complaint is that we have not followed our agreed standard of service in relation to information requests. Customers can access further support from the First-tier Tribunal (Property Chamber). See **Other sources of support** for more information.
  - Planned Section 20 works unless the complaint is that we did not follow the required consultation process. Customers can access further support from the First-tier Tribunal (Property Chamber). See **Other sources of support** for more information.
  - Anonymous complaints.
- 3.10 Whilst 3.9 lists some of the reasons we may decide not to accept a complaint, we will always act fairly and reasonably in reaching our decision, and each complaint will be considered on its own merits.
- 3.11 Where we decide not to accept a complaint, we will provide an explanation to the customer setting out the reasons why the matter is not suitable for the complaints process. We will provide information on how the customer can access the Housing Ombudsman.

- 3.12 If the Housing Ombudsman does not agree that an exclusion has been fairly applied, we will comply with any request from the Housing Ombudsman for us to take on the complaint in line with the rest of this policy.

### **Complaints relating to staff**

- 3.13 Where a complaint is made relating to one or more members of staff, we will investigate at Stage 1 of our policy. The complaint will usually be handled by the relevant line manager. Complaints can be escalated to Stage 2 of our policy and the Housing Ombudsman if the customer remains dissatisfied with the response provided.
- 3.14 We will need to make the relevant member(s) of staff aware of the complaint in order to conduct an investigation.
- 3.15 Should any action be taken against a member of staff, this will be in accordance with the relevant policy or procedure, and we may not disclose the full details of this in line with the Advisory, Conciliation and Arbitration Service (ACAS) guidelines and data protection laws.

### **Complaints relating to disrepair**

- 3.16 We will continue to seek to resolve complaints with customers pursuing Pre-Action Protocol for Housing Condition Claims in line with the Housing Ombudsman Service's October 2021 guidance ([housing-ombudsman.org.uk/landlords-info/guidance-notes/guidance-on-pre-action-protocol-for-housing-conditions-claims-and-service-complaints/](https://housing-ombudsman.org.uk/landlords-info/guidance-notes/guidance-on-pre-action-protocol-for-housing-conditions-claims-and-service-complaints/)).

## **4. Our approach**

### **How a complaint can be made**

- 4.1 Our complaints service is managed centrally by the Complaints & Resolution Service. Whilst customers are able to raise their complaint in any way and with any member of staff, the details of the complaint will be passed to the Complaints & Resolution Service for a response under this policy.
- 4.2 We strive to have an accessible complaints process. Complaints can be made in several ways:
- Through our online customer portal My Account which is available on our customer website ([a2dominion.co.uk/myaccount](https://a2dominion.co.uk/myaccount))
  - Through an online form ([my.a2dominion.co.uk/make-a-complaint/](https://my.a2dominion.co.uk/make-a-complaint/))
  - By telephone on 0800 432 0077
  - By email at [complaints@a2dominion.co.uk](mailto:complaints@a2dominion.co.uk)
  - Through our online Live Chat service (Monday- Friday) on our customer website ([a2dominion.co.uk](https://a2dominion.co.uk))
  - Through our social media channels

- To a member of staff
  - In writing to: Complaints & Resolution Service, A2Dominion, 113 Uxbridge Road, Ealing, London W5 5TL
- 4.3 We will consider the needs and reasonable adjustments of any customers who may need to access the complaints process, in line with our duties under the Equality Act 2010 and our own **Prioritisation Policy**.
- 4.4 With the customer's approval, we will act reasonably when giving customers the opportunity to have a representative deal with their complaint of their behalf, or be accompanied at any meeting with us. We will consider our wider safeguarding obligations when deciding whether to allow this or not. Where we do allow this, we will deal with the complaint in the same way as if the customer had raised it directly.
- 4.5 Where we consider that the actions of a customer or their representative are unacceptable, we may decide to restrict or change access to our service. See our **Unacceptable Actions by Complainants Policy**.
- 4.6 We don't usually count feedback from surveys or social media as formal complaints. However, when we can, we'll guide customers on how to file a formal complaint.

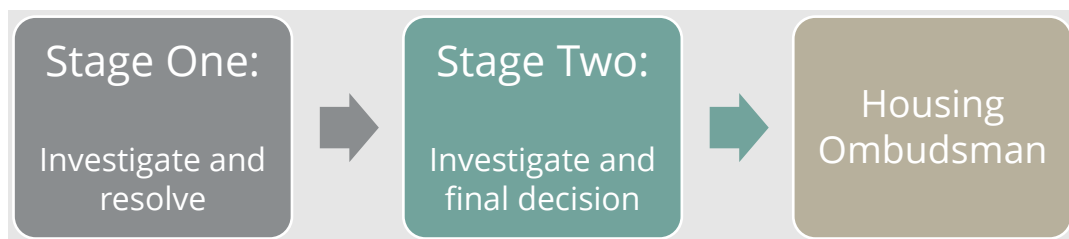
### Our approach to handling complaints

- 4.7 We will ensure that relevant staff are suitably trained on the importance of handling complaints in an effective way.
- 4.8 We will keep appropriate records of the complaint and the outcomes at each stage of the complaint, including correspondence with the customer and other parties, and any relevant supporting documentation such as reports and surveys.
- 4.9 We will always aim to remedy a complaint without the need for escalation. We will look to resolve complaints quickly and effectively. Where appropriate, and with agreement from the customer, we will provide an explanation, apology or resolution 'there and then'. If this approach isn't possible, we will log a formal Stage One complaint.
- 4.10 We will issue a response to the complaint when the answer to the complaint is known, and not when any outstanding actions are complete. This means that within the complaint response we may list outstanding actions, which will be tracked and actioned promptly. We will provide contact details of a colleague who will provide appropriate updates.
- 4.11 All staff will review a complaint on its own merit. They will act independently and have an open mind. They will give the customer a fair opportunity to set out their position, take measures to address any actual or perceived conflicts of interest, and consider all the relevant information and evidence carefully.

4.12 Within the response to the complaint, we will address all the points that are raised, and provide clear reasons for any decisions, referencing the relevant policy, law and/or good practice. We'll write in plain language and include:

- The complaint stage.
- How we've defined the complaint.
- The decision on the complaint.
- The reasons for our decisions.
- The details of any remedy offered to put things right.
- Details of any outstanding actions.
- Details of how to escalate the complaint (if escalation is available).

4.13 We operate a two stage complaints process:



4.14 A complaint can be raised with the Housing Ombudsman Service at any stage of the process for an independent review of the case.

### Stage One

4.15 When a Stage One complaint is made, we will acknowledge and log it within 5 working days.

4.16 When we receive a complaint, we'll assign a reference number and a named Complaints Caseworker who will be responsible for keeping the customer updated throughout the complaints process. We will also provide the customer with details of the Housing Ombudsman Service.

4.17 We will contact the customer to fully understand the complaint and the outcomes that the resident is seeking. If any aspect of the complaint is unclear, we will ask the customer for clarification.

4.18 If there are parts of the complaint which we are not responsible for, we will let the customer know and where possible signpost the customer to alternative help and support.

4.19 We will aim to issue a full response within 10 working days of the date that we acknowledged the complaint. Where we cannot meet this timescale, we will inform the customer of the expected timescale for response and the reasons for the delay. We will also provide the customer with the details of the Housing Ombudsman Service. We will act reasonably when deciding on the expected timescale, and where we need an extension exceeding a further 10 working days, we provide the customer with our reasoning for this.

- 4.20 Where additional, related, issues come to light during the initial investigation process, we will add these to the original complaint, unless this would reasonably delay our Stage 1 response. If we cannot add these to the original complaint, we will log them as a new complaint under this policy.
- 4.21 If the customer is not satisfied with our response at Stage 1, the complaint can be escalated to Stage 2.

## Stage Two

- 4.22 Upon receipt of a request to escalate a complaint to Stage 2, we will acknowledge and log it within 5 working days from the day that the escalation request was received and apply it to one of the two pathways below. We will decide which pathway to take based on what we consider the impact to be:

Head of Service / Director review	Review panel
<b>Reviews complaints about a one-off issue</b>	<b>Reviews complaints that have a wider impact on A2Dominion</b>
<ul style="list-style-type: none"> <li>• Would apply to most Stage 2 complaints</li> <li>• Customer requested the matter be resolved as quickly as possible.</li> <li>• The complaint at Stage 1 is not upheld, but the customer disagrees with our policy. This will allow us to examine our existing policies.</li> </ul>	<ul style="list-style-type: none"> <li>• Complaint will require major works to resolve resulting in high costs of £5000+.</li> <li>• Complaint involves significant or repeated service failures, by more than one service area.</li> <li>• Complaint has wider risk or impact for the group. This could be for policies, financial liabilities, or could affect large numbers of customers (e.g., service charge complaints that affect entire schemes).</li> </ul>

- 4.23 The complaint will be assigned for investigation to a Head of Service, a colleague of an equivalent grade, or a Director, usually within the service area to which the complaint relates. At times they may be from another service area. The person considering the complaint at Stage 2 will not be the same person that considered the complaint at Stage 1.
- 4.24 Customers do not have to explain their reasons for requesting a Stage 2 consideration, but we will make reasonable efforts to understand why they remain unhappy.
- 4.25 We will only consider issues included in the complaint at the point that we issued our Stage 1 response (including repeat occurrences of the same issue). New information may be treated as a new complaint under this policy.

- 4.26 We will aim to issue a full response within 20 working days of the date that we acknowledged the complaint. Where we cannot meet this timescale, we will inform the customer of the expected timescale for response and the reasons for the delay. We will also provide the customer with the details of the Housing Ombudsman Service. We will act reasonably when deciding on the expected timescale, and where we need an extension exceeding a further 20 working days, we provide the customer with our reasoning for this.
- 4.27 The Stage 2 response will represent our final response, and will include the details of how to escalate the matter to the Housing Ombudsman Service if the customer remains dissatisfied.

## 5. Putting things right

- 5.1 Where something has gone wrong, we will acknowledge this. We will share the actions already taken, or those we intend to take, to put things right. This may include:
- Apologising.
  - Acknowledging where things have gone wrong.
  - Providing an explanation, assistance or reasons.
  - Taking action if there has been delay.
  - Reconsidering or changing a decision.
  - Amending a record or adding a correction or addendum.
  - Providing compensation.
  - Changing policies, procedures or practices.
- 5.2 Any remedy that we offer will reflect the impact on the customer as a result of any fault identified, including any out of pocket expenses in line with our **Compensation Policy**. We will also take into account any guidance issued by the Housing Ombudsman Service.
- 5.3 Where we offer a remedy, we will clearly set out what will happen and by when, in agreement with the customer where appropriate. We will track the completion of remedies.

## 6. Exceptional circumstances

- 6.1 Where we believe that we are unable to comply with the Housing Ombudsman Service Complaint Handling Code due to exceptional circumstances, such as a cyber-attack, we will:
- Notify the Housing Ombudsman Service.
  - Provide information to residents that may be affected.
  - Publish this information on our website or other relevant media.
  - Provide timescales for returning to compliance with the Code.



- 6.2 All services operate business continuity plans to mitigate disruption to services in the event of unforeseen circumstances.

## 7. Other sources of support

- 7.1 Depending on the reason for the complaint, the customer may be able to escalate their complaint to a relevant regulatory body.

### The Housing Ombudsman Service

- 7.2 The Housing Ombudsman Service investigates complaints and resolves disputes involving customers of social landlords. Their service is free, impartial and independent.
- 7.3 A complaint can be raised with the Housing Ombudsman Service at any stage of the process for an independent review of the case.
- 7.4 The Housing Ombudsman service can be contacted in the following ways:
- Online: [housing-ombudsman.org.uk/contact-us/](https://housing-ombudsman.org.uk/contact-us/)
  - Telephone: 0300 111 3000
  - Email: [info@housingombudsman.org.uk](mailto:info@housingombudsman.org.uk)
  - In writing to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

### The Building Safety Regulator

- 7.5 The Building Safety Regulator in England is part of HSE and was established under The Building Safety Act 2022 to:
- Regulate higher-risk buildings.
  - Raise safety standards of all buildings.
  - Help professionals in design, construction, and building control, to improve their competence.
- 7.6 Customers can complain to the Building Safety Regulator about the following things:
- Issues in a high-rise residential building that could lead to fire spreading.
  - Issues in a high-rise residential building that could lead to part or all of the building collapsing.
  - Issues with fire safety or structural integrity in a high-rise residential building that is being designed, built or renovated.
  - People and organisations we regulate, for example building inspectors and people accountable for safety in a building.
  - The Building Safety Regulator itself.
- 7.7 The Building Safety Regulator can be contacted in the following ways:

- Online: [gov.uk/guidance/contact-the-building-safety-regulator](https://www.gov.uk/guidance/contact-the-building-safety-regulator)
- Telephone: 0300 790 6787

## First-tier Tribunal (Property Chamber)

7.8 Customers can access support with residential property disputes relating to:

- rent increases
- leasehold disputes, including the reasonableness of service charges
- leasehold enfranchisement

7.9 Contact details vary depending on geography. Full details by county can be found at [gov.uk/courts-tribunals/first-tier-tribunal-property-chamber](https://www.gov.uk/courts-tribunals/first-tier-tribunal-property-chamber).

## 8. Learning and improvement

8.1 We do not view high volumes of complaints as a negative, as they can be indicative of a well-publicised and accessible complaints process. We will proactively monitor complaint volumes to ensure our complaints process is accessible.

8.2 We will aim to look beyond the circumstances of individual complaints and consider whether service improvements can be made as a result of any learning from complaints.

8.3 We will use learning from complaints to introduce positive changes in service delivery which will be shared through our Customer Annual Report.

8.4 We will produce an annual complaints performance and improvement report which will be reviewed by our Board. The report will contain a qualitative and quantitative analysis of our complaint handling performance, a summary of any excluded complaints, any Housing Ombudsman Service findings of non-compliance and recommended service improvement actions arising from complaints lessons learnt exercises. The report will be published on our customer website.

## 9. Consultation

9.1 This policy has been developed and updated informed by feedback from customers including consultation with our Customer Services Committee and following lessons we have learnt from previous Housing Ombudsman Service determinations, spotlight reports, and in line with the Housing Ombudsman Service guidance.

9.2 This policy was also developed in consultation internally across A2Dominion, including relevant operational service leads.

## 10. Equality, Diversity & Inclusion Statement

- 10.1 A2Dominion Group, colleagues, partners, stakeholders and contractors are committed to providing services, which are relevant and appropriate to the needs of people. We will treat others fairly and without discrimination.
- 10.2 We will ensure that all our services relating to this policy are accessible and available for all customers as set out in the requirements of the Equality Act 2010.
- 10.3 An Equality Impact Assessment (EIA) has been carried out.

## 11. Data Protection Statement

- 11.1 The protection of personal data is of great importance to A2Dominion Group and more than just a legal obligation.
- 11.2 A2Dominion Group and affiliate organisations are the data controllers registered with the Information Commissioner's Office with the following registration numbers:
- A2Dominion Housing Group Limited: Z4843307
  - A2Dominion Homes Limited: Z9799978
  - A2Dominion South Limited: Z7835340
  - A2Dominion Housing Options Limited: Z5412073
  - A2Dominion Residential Limited: Z3391351
  - A2Dominion Developments Limited: ZA103931
  - Pyramid Plus London LLP: Z3594227
  - Pyramid Plus South LLP: Z3594230
- 11.3 Our data protection policy and procedures are governed by the Data Protection Act 2018. We collect and process personal information in order to provide housing services and meet our contractual and legal obligations. All persons authorised to receive personal data are obliged to handle personal data in accordance with applicable laws and regulations at all times.
- 11.4 For information on how we collect, store, process and use customers' personal data, please visit our website on [a2dominiongroup.co.uk/privacy-and-cookie-policy](https://a2dominiongroup.co.uk/privacy-and-cookie-policy).
- 11.5 For employee related privacy statement, please contact our HR team at [hrenquiries@a2dominion.co.uk](mailto:hrenquiries@a2dominion.co.uk).
- 11.6 Customers can also contact the Data Protection Officer / Data Compliance team at [governance@a2dominion.co.uk](mailto:governance@a2dominion.co.uk).

## 12. Associated documents

- Compensation Policy
- Unacceptable Actions by Complainants Policy
- Prioritisation Policy
- Housing Ombudsman Complaints Handling Code 2024