

Complaints Policy

1. Purpose

- 1.1 We aim to provide services that meet our customers' expectations and the standards we set for ourselves. When things do not go as planned, we want to understand what happened, put it right and learn from the experience. This policy explains how we will do that.
- 1.2 We encourage all feedback from customers, and this Complaints Policy sets out how we will deal with complaints fairly and effectively.
- 1.3 The policy also ensures Connexus meets its obligations with the Housing Ombudsman's Complaint Handling Code and associated regulatory standards and supports Connexus' obligations under UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 in relation to handling data protection complaints.
- 1.4 This policy can be made available in alternative formats/languages upon request.
- 1.5 We will ensure that Connexus views complaints as an opportunity to improve. We will highlight poor practice and put it right; taking each complaint as an opportunity to learn.

2. Scope

- 2.1 Scope: The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.

3. The Complaints Process

3.1 Providing an accessible complaints process:

We will provide customers with easy access to the complaints process, giving them a choice in how they can make a complaint without delay.

A customer can complain in any way that is easy for them:

- online form
- Email - hello@connexus-group.co.uk
- Telephone: 03332 31 32 33
- By post: Connexus, The Gateway, The Auction Yard, Craven Arms, SY7 9BW
- In person: when a customer speaks to a colleague
- Via social media: [@weareconnexus](https://www.instagram.com/weareconnexus)

3.2 Providing clarity on what is a service request and what is a complaint:

Service request:

'A request from a resident to Connexus to take action to put something right.'

Complaint:

'An expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by Connexus, its own staff, or those acting on its behalf, affecting a resident or group of residents.'

This includes complaints about how we have handled personal data (data protection complaints), such as how data has been collected, used, stored, shared, or protected.

A customer does not have to use the word “complaint” for Connexus to treat their concern as a complaint. If a customer tells us they are unhappy with our service, we will give them the option to make a complaint.

3.3 Defining who can make a complaint:

Any individual who is a tenant, licensee, leaseholder or shared owner of Connexus, or requests or receives a service from Connexus, or any of its subsidiaries; or a specific named person asked to act as an advocate on behalf of such an individual. This person must have permission to raise a complaint on behalf of a service user and Connexus will require explicit consent from them to use the nominated person.

Should an advocate be party to any contact restriction imposed upon them via the Connexus Unacceptable User Actions and Behaviour Policy, then these restrictions would still apply, and all contact would be required in line with their individual arrangement.

In respect of complaints about how we have handled personal data, this includes employees of Connexus.

For individuals who are not tenants, licensees, leaseholders or shared owners of Connexus, or are not receiving a service from Connexus, access to our complaints policy is limited to Stage 1. These individuals will not be able to request an escalation to the review stage, except in exceptional circumstances and with approval of the policy owner.

3.4 Clarifying when we will not accept a complaint:

We will consider the individual circumstances for each complaint. However, the below provides clarity on when we are unlikely to accept a complaint into the complaint process.

- If the matter occurred, or the complainant became aware of the issue, more than 12 months ago
- When the matter is best dealt with under a different policy e.g. a complaint about a neighbour (Anti-Social Behaviour policy (ASB)). However, if the complaint is about how we have handled a report of ASB, we will consider this a complaint about our service and this policy would apply

- When the complaint includes allegations about the behaviour or conduct of our staff or contractors, we will:
 - refer the conduct concerns to the appropriate internal procedures, such as disciplinary, safeguarding or fraud investigation processes.
 - consider any dissatisfaction with our service due to the alleged behaviour through this complaints policy;
- Where allegations involve potential criminal activity, we will:
 - not investigate the criminal matter itself through the complaints process. We may refer the matter to the police or other relevant external agencies for investigation.
 - consider any dissatisfaction with our service about how the allegations have been handled by Connexus through this complaints policy;
- Where Connexus has already provided a complaint response to the issue and what is being reported is the same, or a very similar issue, to which the response would be the same.
- 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.

Complaints relating to the handling of personal data will not be excluded from the complaints process unless there is a clear and lawful reason for doing so.

If Connexus will not accept a complaint, we will provide an explanation in writing to the complainant and advise them of their right to take their complaint further with the Housing Ombudsman (where applicable) or another appropriate organisation.

3.5 Data Protection Complaints

Individuals are encouraged to raise data protection complaints directly with Connexus in the first instance so that we can investigate and resolve concerns before they are escalated to the Information Commissioner's Office.

Data protection complaints will be handled under this complaints policy. This ensures Connexus meets its legal obligations under data protection legislation to provide a clear and accessible process for individuals to raise concerns directly with us.

Where a complaint relates to how we have handled personal data, we will:

- Accept complaints made through any channel
- Record the matter as a Stage 1 complaint
- Assess the complaint against relevant data protection legislation, including UK GDPR and the Data Protection Act 2018
- Investigate the circumstances, including any potential breach or failure to comply with data protection requirements
- Take appropriate remedial action where required
- Keep the individual informed of progress and outcome
- Handle the complaint in line with the complaints process and timescales set out in this policy

Data protection complaints must be acknowledged within 30 calendar days of receipt, in line with data protection legislation, however Connexus will operate a shorter internal timescale in line with this complaints policy to ensure a timely response.

Where a complaint is about the handling of a service users' data, they also have the right to raise their concerns with the Information Commissioner's Office (ICO). We will provide details of how to contact the ICO in our responses.

3.6 Providing a clear complaint process:

Connexus has a two-stage complaints process with specified timescales in which to respond. This includes complaints relating to data protection matters, which will follow the same complaints process, including escalation where appropriate.

Complaints about data protection will be investigated and responded to without undue delay, within the timescales set out in this policy.

We will:

- **acknowledge**, define and log a complaint at stage 1 and 2 **within five working days of the complaint being received** (stage 1) or a request to escalate the complaint (stage 2).
- respond:
 - to a Stage 1 (Complaint) **by the 10th working day** from the acknowledgment date
 - to a Stage 2 (Review) **by the 20th working day** from the acknowledgment date

Extensions to these timescales may be required. If so, we will contact the customer beforehand and clearly state our reasons why.

- Stage 1 complaint extensions will be no longer than an additional ten working days without good reason
- Stage 2 complaint extensions will be no longer than an additional 20 working days without good reason

We will agree suitable intervals with the customer to update them on their complaint. This also applies when the response falls outside of the extended timescales set out in their Complaint Handling Code.

Following the completion of our investigation, we will send a written response. This will outline the reasons for our decision, referencing the relevant policy, law and good practice where appropriate. We will also advise how we have been able to resolve the matter, or the proposed actions we will take to do so. If there are outstanding actions, we will provide clarity on what to expect next and by when.

Record keeping during all stages of a complaint is crucial, as such Connexus will keep comprehensive records of what we do to try and resolve an individual's concerns, including recording them on our central complaint system.

3.7 Ensuring complaint responses are not biased and that colleagues have the relevant authority:

Stage 1 – Complaint

A Manager from the service area about which there is a complaint, will investigate and respond. They will not have had any involvement in the issue prior to receiving the complaint.

Stage 2 – Review

A Connexus Complaints Manager will investigate, review and respond, or a colleague at a suitably senior level. They will not have been involved prior to the stage 2 review. They will be authorised to provide a final response on behalf of Connexus.

3.8 Resolving issues promptly and fairly:

The early and local resolution of issues between Connexus and our customers is key to effective complaint handling. If a customer expresses dissatisfaction, we will explain the complaints process and discuss an individual's concerns and how best to resolve them. These efforts will not obstruct access to the formal complaints procedure or result in any unreasonable delay.

We log, monitor and review service requests. If a customer is dissatisfied with the response to a service request, we will open a Stage 1 complaint, but we will not stop trying to resolve the service request.

We want to resolve issues as early as possible, but when a complaint is raised, we will follow the complaints process and will respond within the timescales set out for that stage.

A customer will not be disadvantaged in their future dealings with us, as a result of making a complaint.

3.9 Defining the timescale in which a complaint can be escalated:

We will accept a request to escalate a complaint once we have provided our written stage 1 complaint response, up to a calendar month after the actions promised in the stage 1 outcome have been completed.

Any request to escalate received outside of the above timescale, will be considered on a case-by-case basis by the Complaints team.

3.10 Providing opportunities for customers to appeal decisions:

A customer may object to a decision that has been based on policy if they feel that the policy has been unfairly applied, or they feel the policy is not correct. The Complaints Policy allows the customer to appeal that decision.

3.11 Ensuring Policies are accessible and when to apply reasonable adjustments:

Connexus complies with the Equality Act 2010 and has an Equality and Diversity Policy that covers all aspect of equalities. All policies are subject to an Equalities Impact Assessment to ensure that any adaptations to the normal policy or procedure may be applied to accommodate an individual's needs.

The Formal Complaints process has been designed to be accessible to all, but we will proactively ask customers if they need any support or reasonable adjustments when accessing/using our services. We will do this in the following ways:

- By including a paragraph in written communications (e.g. acknowledgement letters) that proactively asks if adjustments or support are needed.
- By asking whether a reasonable adjustment might be required when in conversation with a customer.
- By including a note in our published documents indicating that we can provide the document in an alternative format on request.

We will record any reasonable adjustments requested when dealing with a complaint. This will be in accordance with the Reasonable Adjustments Policy and procedure.

3.12 Improving our Services through learning from complaints:

We will accurately record customers' complaints and what we do to resolve them so that we can identify what needs to be 'put right' in terms of behaviour, process, or systems.

The data we gather will be reviewed each quarter to ensure we are making best use of the intelligence we are gathering and to spot emerging trends.

This will benefit all customers and colleagues; and in turn, ensure that we are taking learning from complaints to improve services for all customers.

4. Method/s

4.1 Connexus will advise all customers at least once a year about the complaints process and their right to access the Housing Ombudsman service, not just when they have been through Connexus' formal complaints process.

4.2 Connexus aims to record and resolve complaints quickly, fairly and effectively.
We will: -

- Allow complaints in any format through which it communicates with customers about issues that have occurred within the last 12 months, or the customer became aware of the issue. If a complaint is raised outside of 12 months, we will consider the complaint on an individual basis to determine if there is a good reason to accept the complaint
- Handle complaints submitted via a third party or representative in the same way as one received directly from the customer, once we have confirmation that they are acting on the customers behalf.
- Be positive about complaints.
- Give the resident a fair chance to set out their position.
- Be clear what is, or is not, within our responsibility and manage expectations of a possible outcome.
- The acknowledgement letter at both stages will set out the reason for the complaint and the outcome the customer is seeking.

- Where a customer raises additional issues during a Stage 1 investigation, we will discuss this with the customer and confirm whether the issues are related to the original complaint:
 - Where the additional issues are clearly related and can be investigated without causing unreasonable delay to the Stage 1 response, they will be included within the existing complaint.
 - Where the issues are unrelated, raised after the Stage 1 response has been issued, or would unreasonably delay the response, we will register these as a new Stage 1 complaint. We will clearly explain this to the customer, including the reasons for the decision and how the new complaint will be handled.
- Where a customer raises new issues during a stage 2 review that have not been previously considered or responded to at Stage 1, we will assess whether these issues are related to the original complaint:
 - Where the new issues are distinct or have not been investigated at Stage 1, we will register these as a new Stage 1 complaint to ensure they are investigated fully and a response provided in line with this policy. we will clearly explain this to the customer, including the reasons for this approach and how the new complaint will be handled.
 - Only issues that have been considered and responded to at Stage 1 will be included within the Stage 2 review. Customers retain the right to request a Stage 2 review once they have received a Stage 1 response to any new complaint.
- Clearly explain the reasons for our decisions.
- Send a complaint response (stage 1 and 2) when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.
- Provide updates to the customer on any outstanding actions until they are complete
- Provide information on how to contact the Housing Ombudsman
- Provide information in our response about the customer's right to escalate their concerns to the Information Commissioner's Office (ICO) if a complaint relates to data protection
- Direct the complaint to the appropriate organisation if the complaint relates to matters not within the responsibility of Connexus.

4.3 Roles and responsibilities for complaint handling:

- We will have a team to manage the complaints process, monitor compliance with the Housing Ombudsman Complaint Handling Code and liaise with the Housing Ombudsman
- We will have appropriate managers who will respond to complaints. They will:
 - a) Have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments
 - b) Take collective responsibility for any shortfalls identified through complaints, rather than blaming others
 - c) Act within the professional standards for engaging with complaints as set by any relevant professional body
 - d) have the appropriate authority to offer suitable remedies to resolve a complaint
- Will recognise that putting things right is every colleague's responsibility.
- Connexus' Chief Operating Officer assumes lead responsibility for its complaint handling.

- Connexus appoints a Member Responsible for Complaints (MRC) from the Board in accordance with the Housing Ombudsman Complaint Handling Code. The MRC supports a positive complaint handling culture by receiving regular information on complaint performance, complaint themes, Housing Ombudsman determinations and learning from complaints and provides constructive challenge. The MRC can then provide assurance to the Board regarding the effectiveness of Connexus complaint handling arrangements.

5. Measurement

- 5.1 We will monitor the complaints we respond to and whether the responses are in accordance with this policy and the Housing Ombudsman Complaint handling code.
- 5.2 We will monitor the root cause of complaints and the outcomes and use this feedback to improve our services and reduce the number of complaints about the same issues.
- 5.3 We will demonstrate to customers what we are learning from complaints and what we have changed, at least annually, through our newsletter which is sent to every customer.
- 5.4 The Customer Experience team will produce an annual report for the Customer Committee. This report will include:
 - Case Volumes
 - Referral Rates
 - Time to Resolution
 - Trends and Themes
 - Lessons Learned
 - Customer Feedback with the process
 - Assessment of compliance with the Housing Ombudsman Code
- 5.5 We will complete a Self-Assessment against the Housing Ombudsman Code of Practice and Annual Complaints Performance and Service Improvement Report by the specified deadline each year. We will ensure that this is made available to customers for scrutiny and challenge and shared with the Housing Ombudsman. In addition, if Connexus undergoes any restructure or merger, or makes any significant change to its complaint procedures, Connexus will complete a new self-assessment and publish this. Similarly, if the Housing Ombudsman requests a review following a determination, we will do so. The annual review will then be completed every 12 months from this date.
- 5.6 The Head of Customer Service and Engagement will provide a quarterly update to the lead Board member of any determinations and invite them to take part in any review of a complaint that resulted in a determination of severe maladministration.
- 5.7 Colleagues who as part of their role either respond to, or receive complaints, will receive ongoing training to ensure their skills and knowledge are maintained.

6. Appendices

Appendix 1 – Equality Impact Assessment Form

7. Document Control

Approved by ELT	
Approved by Customer Experience Committee	06 August 2026
Effective date	08 August 2026
Review date	31 August 2028
Policy developed by	Customer Experience Manager
Consultations	Customers, Colleagues and Internal Audit
Associated documents	Complaints Procedure, Compensation Procedure

Version	Author	Date Published	Next Review	Comments
1.0	Head of Communities	29 May 25	31 Mar 28	Update to existing policy following HOS complaint determinations.
2.0	Customer Experience Manager	08 Aug 26	31 Aug 26	Update to policy with recommendations made by the HOS in their letter dated 3rd June 2026 following their review of our policy due to the regulators Level 3 regulatory judgement And updated to include handling data protection complaints as required under the Data (Use and Access) Act 2025 (DUAA).

Equality Impact Assessment Form

Strategy / policy / procedure / service / function / project being assessed	Complaints Policy
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Stage 1		
Lead officer	[REDACTED]	
Date of assessment	August 2026	
Date for next review	Upon policy review	
Reason for assessment	Policy amendments following Housing Ombudsman Service recommendations for improvement.	
Agreed and signed off by lead officer's line manager	Manager's signature [REDACTED]	Date 24/08/26

Stage 2		
Aims of the service / function / policy/project under assessment	We encourage all feedback from customers and this Complaints Policy sets out how we will ensure that we deal with complaints fairly, effectively and comply with the approach as set out by the Housing Ombudsman's Complaint Handling Code and associated regulatory standards.	
Main stakeholders / beneficiaries	Any person who requests or receives a service from Connexus or any of its subsidiaries; this includes an authorised advocate to raise a complaint on behalf of a service user.	
Who is likely to be affected by the service/ function/ policy/project?	As noted above in main stakeholders.	
What are the arrangements for monitoring and reviewing the actual impact of the service/function/policy/project?	The policy is reviewed every 3 years, or sooner following changes to the Housing Ombudsman Code. Key measurements are outlined in the policy under 'measurement'.	



Stage 3 Collect and evaluate the evidence				
Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on any racial groups? Describe how and which.			X	
Does the policy or service have a positive or negative impact on individuals where English is not their first language? Describe how and which.		X		Copies can be translated, and translation services are available to ensure the policy is understood by all when/where required, this is emphasized within the policy with the inclusion of reasonable adjustments, linked to our reasonable adjustment policy
Does the policy or service have a positive or negative impact on women or men? This includes Transgender people / Trans people. Describe how and which			X	
Does the policy or service have a positive or negative impact on people with disabilities? Describe how and which.			X	The policy at 2.10 provides assurance that the process has been designed to be accessible to all, but should a customer advise that they have a disability that requires a reasonable adjustment to the process, we will consider whether we can meet their request. The statement also includes that the policy complies with the equality act 2010.
Does the policy or service have a positive or negative impact on people of a particular age? (e.g. children, young people, older people). Describe how and which			X	A service user or customer will be at least 16 years old, therefore children would not be able to access this policy, however, an advocate could make a complaint on their behalf

Key questions	Positive impact	Negative impact	No specific impact on any one group	Evidence
Does the policy or service have a positive or negative impact on people with particular sexuality / sexual orientation? Describe how and which			X	
Does the policy or service have a positive or negative impact on people in terms of marriage/civil partnership status? Describe how and which			X	
Does the policy or service have a positive or negative impact on people with a particular religion or belief? Describe how and which			X	
Does the policy or service have a positive or negative impact on people in terms of pregnancy/maternity? Describe how and which			X	
Is it possible that the service/function/policy could discriminate or unfairly disadvantage those that do not have access to digital equipment?		X		A hard copy of the policy can be made available in print for those unable to view the policy on the Connexus Website or receive a copy via e-mail. Any action/outcome would consider the preferences of the customer, for example, those who are not able to access digital services would be communicated via telephone and letter. The complaints process is published in the customer newsletter at least annually
Is it possible that the service/function/policy could discriminate or unfairly disadvantage or cause an individual/community financial hardship?			X	

Outsourced services	
If delivery of your strategy, policy, project or service is partly or wholly provided by external organisations / agencies, please list any arrangements you plan, to ensure that they promote equality and diversity.	Language Line is in place for translation services as part of the reasonable adjustments we put in place for all Connexus customers.
Relations between different equality groups	
Does your assessment show that a policy, project or service may have a differential impact between any discrete groups? If yes, please explain how this issue is going to be tackled.	N/A

Stage 4 – Summary of replies from individuals and stakeholders consulted, including any previous complaints on equality and diversity issues about the policy or service
The updates made to this policy were because of the Housing Ombudsman Service assessment of the policy in line with the Complaint Handling Code. The majority of these recommendations were ensuring what was included in the procedure (internal document) was made clearer in the policy (published policy for customers).
Stage 5 – Options resulting from this equality impact assessment, including measures necessary to minimise or remove any adverse impact and better promotion of equality and diversity. Consider any alternative solutions
None

Stage 6 – Arrangements for regular monitoring of the impact of the policy, project or service

Section 4 (Measurement) within the policy describes how the policy will be monitored.

The Policy has a set review date, at which point it will be reviewed and a refreshed EIA completed.

If we receive several complaints about the policy or access to the complaints process, we will review our approach early to decide if any amendments were necessary to ensure it is accessible and fair to all

Stage 7 – Any actions and outcomes, including how these are to be communicated both internally and externally as required

Policy will be uploaded to the website and the intranet upon approval and in accordance with the Housing Ombudsman Complaint Handling Code requirements. The policy will be promoted via newsletters and updated on the Connexus website.