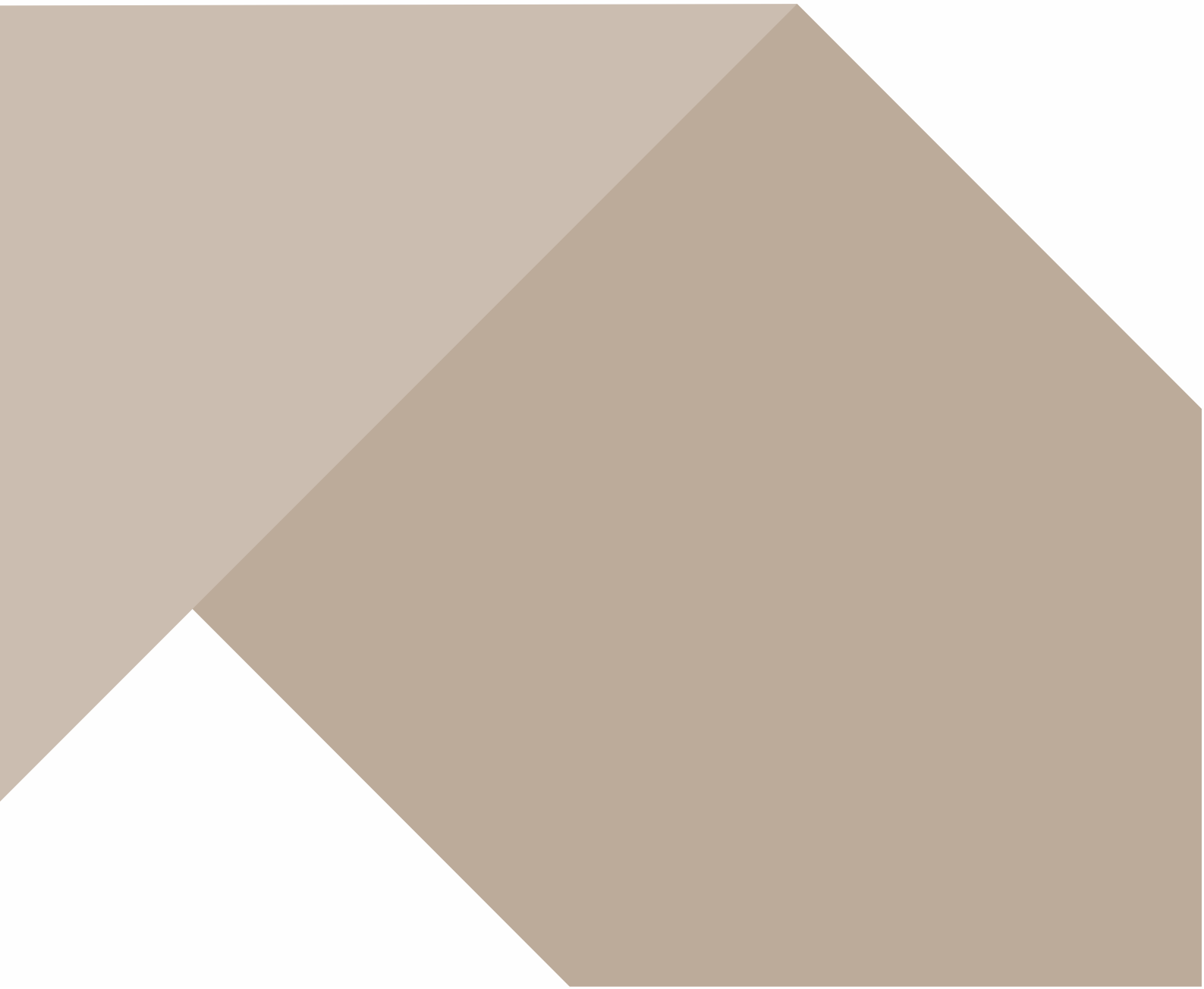


Wheatley Group Complaints Policy

We will provide this policy on request at no cost, translated, in large print, in Braille, on tape or in another non-written format.



We can produce information on request at no cost in large print, in Braille, on tape or in another non-written format. We can also translate this into other languages. If you need information in any of these formats please call us on 0800 479 7979 or email info@wheatley-group.com

Możemy, na życzenie, bezpłatnie przygotować informacje dużą czcionką, w alfabecie Braille’a, na taśmie lub w innym niepisanym formacie. Możemy je również przetłumaczyć na inne języki. Jeśli potrzebujesz informacji w którymkolwiek z tych formatów, zadzwoń do nas pod numer 0800 479 7979 lub wyślij e-mail na adres info@wheatley-group.com

Podemos produzir informações mediante solicitação e sem custos, em impressão grande, Braille, cassete ou noutro formato não descrito. Também podemos traduzi-las em outros idiomas. Se precisar de informações em qualquer um destes formatos, contacte-nos através do número 0800 479 7979 ou envie um e-mail para: info@wheatley-group.com

یمکننا إنتاج معلومات عند الطلب مجاناً مطبوعة بأحرف كبيرة أو بطريقة برايل أو على شريط أو بتنسيق آخر غير مكتوب. یمکننا أيضاً ترجمة هذا إلى لغات أخرى. إذا كنت بحاجة إلى معلومات بأي من هذه التنسيقات، فيرجى الاتصال بنا على 0800 479 7979 أو إرسال بريد إلكتروني إلى info@wheatley-group.com

در صورت درخواست، می توانیم اطلاعات را در چاپ بزرگ، خط بریل، روی نوار یا در فرمت غیروشتاری دیگری ارائه دهیم. همچنین می توانیم اطلاعات را به سایر زبانها ترجمه کنیم. در صورت نیاز به اطلاعات بیشتر در هریک از این فرمتها، لطفاً از طریق شماره 0800 479 7979 با ما تماس بگیرید یا ایمیلی به info@wheatley-group.com ارسال کنید.

ہم درخواست پر معلومات کو بڑے حروف، بریل، ٹیپ پر یا کسی اور غیر تحریری صورت میں بغیر کسی لاگت کے مہیا کر سکتے ہیں۔ ہم اس کا دوسری زبانوں میں ترجمہ بھی کروا سکتے ہیں۔ اگر آپ کو ان میں سے کسی صورت میں یہ معلومات درکار ہوں تو براۓ کرم ہمیں 0800 479 7979 پر کال کریں یا info@wheatley-group.com پر ای میل کریں۔

Approval body	Group Board
Date of approval	June 2026
Review Year	2029
Customer engagement required	Yes – to support implementation
Trade union engagement required	Yes – for information
Equality Impact Assessment	Yes

1. Introduction

1.1 Our 2026-31 Strategy, 'Making Homes and Lives Better' clearly demonstrates our commitment to evolve our services to be seamless and personalised. However, it is recognised that there may be times when customers are not happy with the services provided. When this occurs, Wheatley actively encourages customers to contact staff so that action can be taken.

1.2 In line with the Scottish Public Service Ombudsman's (SPSO) Model Complaint Handling Procedure for Registered Social Landlords (2012), re-launched by the SPSO in 2020 (effective from 1 April 2021), , Wheatley defines a complaint as:

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

1.3 When handling complaints, Wheatley commits to putting customers at the heart of the process by:

- Accepting complaints in any format, including verbal, written and online;
- Making it clear that a service request is not a complaint and that the word 'complaint' does not need to be used for an issue to be raised as a complaint;
- Making reasonable adjustments so customers can access the process;
- Recognising and respecting the rights of individuals and children under the law;
- Giving customers opportunities to share evidence and suggest solutions;
- Using records and evidence to inform decisions rather than speculation; and
- Signposting customers to other organisations for support where needed.

1.4 We recognise that complaints may arise from issues affecting not only individual customers but also their families, including children and young people. Our approach considers the broader impact on the household and ensures that all affected parties are treated with dignity and respect.

1.5 Wheatley uses all customer feedback, including complaints, to inform service delivery and has specifically put the following processes in place to ensure that lessons are learned from customers' complaints:

- Records of any service failures and the actions taken in response;
- Regular reports detailing performance to relevant management teams;
- Reference as part of our staff Communities of Excellence, Group Scrutiny Panel thematic reviews and Customer Voice panels as applicable; and
- Annual published performance report, including lessons learned.

1.5 More broadly, Wheatley looks for opportunities to work with the wider sector to identify, share and embed best practice through:

- Actively engaging with the SPSO, including through the RSL Complaint Handler's Network, and using their published insight reports to review and improve services as required;
 - Taking part in recognised training and development activities where appropriate; and
 - Participating in sector-wide reviews, assessments and feedback activities wherever the opportunity arises.
- 1.6 The Group Complaints Policy and Complaint Handling Procedure outlines our two-stage complaints process which is compliant with the requirements of the SPSO Model Complaint Handling Procedure (MCHP) and the requirements of the Scottish Housing Regulator (SHR). Our Complaints Policy and Complaint Handling Procedure has been reviewed to ensure that it complies with the SPSO's statement of principles from June 2025 (including the child-friendly complaints handling principles).
- 1.7 Effective complaint management is critical to the successful delivery of our five-year corporate Strategies. It is vital that we ensure consistent and robust arrangements are established and maintained for handling complaints, including recording, investigating, responding to and learning from complaints.
- 1.8 The analysis of qualitative and quantitative information from complaints received across the Group is vital to support service delivery and drive continuous improvement. This customer insight will enable the Group to better understand all sections of its customer base and set the benchmark in Scotland, and beyond, for outstanding customer satisfaction in housing and property management.
- 1.9 Building and maintaining our customers' trust is at the heart of our approach. This policy explains how we will take issues reported by our customers seriously and make it easy for customers to tell us when our services have not met their expectations or gone wrong. It also explains how we will resolve complaints and use the lessons learned and customer feedback to drive continuous improvement in our service delivery.

2. Background

- 2.1 Our Complaints Policy and operational Complaint Handling Procedure support our aims to help us 'get it right first-time'. We want quicker, simpler and more streamlined complaints handling, promoting early resolution by capable, well-trained staff. In doing so, complaints are less likely to escalate to the next stage of the procedure.
- 2.2 Our Group Complaints Policy and operational Complaint Handling Procedure reflect our commitment to valuing complaints and support us to resolve customer dissatisfaction at the earliest opportunity. This will be achieved by conducting thorough, impartial and fair investigations of customer complaints so that, where appropriate, we can make evidence-based decisions on the facts of the case.

- 2.3 Complaints give us valuable information we can use to improve customer satisfaction and drive continuous improvement. Our Complaints Handling Procedure enables us to address a customer's dissatisfaction and will help to prevent the same problems that led to the complaint from happening again.
- 2.4 For our staff, complaints provide a first-hand account of the customer's views and experience of our services and can highlight problems we may otherwise miss. Complaints can also give our customers a form of redress when things go wrong.
- 2.5 Resolving complaints at the earliest opportunity builds our customers' and stakeholders' trust. Our Complaints Policy and operational Complaint Handling Procedure will help us do our job better, improve relationships with our customers and in doing so, helps to enhance public perception of the Wheatley Group.

3. Objectives of the policy

- 3.1 Our aim is to develop an approach to complaints management which embeds a consistent methodology across the Group.
- 3.2 We aim to ensure that the procedure designed to manage complaints embeds best practice handling of and learning from complaints in our operational practices. This is described in more detail in our Complaint Handling Procedures and guidance notes.
- 3.3 In this way, seeking early resolution to issues and managing complaints effectively is not the responsibility of senior management alone, but more appropriately the responsibility of all colleagues and stakeholders.
- 3.4 To achieve awareness across our Group and to help manage the delivery of our business objectives in an effective manner, we aim to:
- Promote a Group wide customer centric 'Think Yes' culture ;
 - View complaints as an opportunity to resolve dissatisfaction at the earliest opportunity where possible;
 - Adopt a uniform approach to the management of complaints which is captured through our customer relationship management system and reported through our performance management framework;
 - Ensure that management decisions taken are informed by the complaints we receive and learning from complaints is communicated effectively across the Group;
 - Ensure that complaints raised by or on behalf of children and young people are handled in a manner consistent with children's rights and taking into account the SPSO's child friendly complaints handling principles and the SPSO's associated guidance on child friendly complaints;
 - Ensure that complaints handling reflects a rights-based approach;

- Encourage all staff to consider how their work practices can contribute towards a favourable approach to the effective management of complaints; and
- Focus on the opportunities that the effective management of complaints can provide.

4. Roles and Responsibilities

- 4.1 The Group Director of Business Solutions and Governance is responsible for ensuring adoption of, and adherence to, this policy across the Group.
- 4.2 This is supported by the Customer Resolution Manager, who provides guidance and support to staff and maintains independent oversight of all complaints handled through this policy. Additionally, the Customer Resolution Manager is responsible for ensuring that complaints are used to inform service delivery, and that action is taken in response to lessons learned.
- 4.3 Managers and Leaders have day-to-day responsibility for implementation of the Policy and associated procedure in practice. They are responsible for ensuring:
- Our complaints policy and procedures are communicated to all staff;
 - Suitable and sufficient training and direction is provided;
 - Adherence to the policy by all staff;
 - The provision of the necessary equipment, resources, and the monitoring of record management to make sure that compliance is achieved; and
 - The monitoring of performance and lessons learned, and the associated improvements required.
- 4.4 Communication with customers is centred around the concept that all enquiries are actioned and where possible resolved at the first point of contact.. This is particularly pertinent for our Customer First Centre which is built on this premise. Communication about complaints is centred upon a person-centred and rights-based approach to complaints handling.
- 4.5 Customer-facing staff are:
- Made aware of this policy and associated procedure;
 - Made aware of when to treat something as a complaint and when something is best dealt with under another policy or procedure (e.g. child protection concerns should ordinarily be processed under our Child Protection Policy and not the Complaints Handling Procedure);
 - Supported to resolve complaints and concerns at the first point of contact where possible;
 - Required to provide assistance to colleagues handling complaints where requested;
 - Understand what is required of them by participating in training that the Group makes available to support effective complaint handling and management; and

- Communicate any issues with implementing this policy to their line manager and identify any areas for continuous improvement promptly.

5. Group benefits

- 5.1 Although we strive to provide an excellent service, we understand that there may be times when customers are not happy with the service provided.
- 5.2 By embedding effective complaint management into our culture and across the Group, we can use complaints positively to:
- Provide insight to our leadership, Executive Team and Group Board(s) on the key business issues and inform our objectives;
 - Use lessons learned and insight to drive improvements, providing strong evidence for change in service design and delivery where required;
 - Support our focus across Group on first time resolution; and
 - Enhance customer insight informed decision making.

6. Regulatory and Legal requirements

- 6.1 We adopt and regularly review our requirements for and best practice in the effective management of complaints. We recognise the:
- SPSO Statement of Principles, most recently updated and published in 2025;
 - Associated SPSO specific guidance on complaint handling, including the SPSO child friendly complaints handling principles and associated guidance; and
 - the Scottish Housing Regulator's Framework that sets out their approach to gathering information about complaints.
- 6.2 We recognise that Wheatley Group has relevant duties under the following legislation (in certain circumstances and when exercising certain functions):
- The Equality Act 2010;
 - The Human Rights Act 1998;
 - The UK GDPR and the Data Protection Act 2018;
 - The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024;
 - Relevant housing legislation; and
 - The Heat Networks (Market Framework) (Great Britain) Regulations 2025.
- 6.3 Wheatley Group recognises that individuals have the right to raise concerns about how their personal information has been collected, used, shared, stored or otherwise processed. In accordance with data protection law, Wheatley Group maintains arrangements for handling data protection complaints.

- 6.4 We recognise duties which apply to Wheatley under these laws and will ensure that our complaints processes are inclusive, non-discriminatory, and uphold the dignity and rights of all individuals, including those with protected characteristics. We keep the rights of children in mind in relation to the development of relevant policies and practices including when exercising functions under this policy and accompanying procedure. Our related policies have been developed taking into account of these duties as discussed below.

7. Related policies

- 7.1 This policy is supported by the:

- Social Media Policy;
- Group Equity, Diversity, Inclusion and Human Rights Policy;
- Group Protecting People suite of policies, including our Child Protection Policy;
- Group Data Protection Policy;
- Unacceptable Actions Policy; and
- Heat Networks Complaints Policy.

- 7.2 Reference may also be made to the Terms of Reference for the Group Board within our Standing Orders, which refer to the Group Board's responsibility for approving the Group Policy Framework and Group Policies.

8. Policy Review and Compliance

- 8.1 This policy may only be changed or varied with the specific authority of the Group Board.
- 8.2 We will review this policy every three years. More regular reviews will be considered where, for example, there is a need to respond to new legislation/policy guidance.
- 8.3 If there are significant changes to legislation or regulation or there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations, the Group Director of Business Solutions and Governance will initiate an immediate review.
- 8.4 We will publish this policy on our website. A hard copy is available upon request. Customers can also get a copy of the policy on tape, in Braille, in large print or in translation on request. Information about how to raise a data protection complaint will also be made available within Wheatley's privacy notices and other customer-facing information.
- 8.5 Where appropriate, customers, key stakeholders and interested parties will be engaged as part of any review and implementation of this policy. It should be noted that the SPSO consults widely on the MCHP which we must adopt, and we need to be clear on what engagement can influence.

9. Equity, Diversity and Inclusion (EDI)

- 9.1 This policy was developed in line with our Group EDI and Human Rights policy, with due regard to the protected characteristics identified under the Equalities Act 2010.
- 9.2 We do not discriminate against anyone on the grounds of race, ethnic or national origin, language, religion, belief, age, gender, sex, sexual orientation, marital status, family circumstances, employment status, physical ability or mental health, or any protected characteristic. We aim to achieve equitable opportunities for all, threading an EDI approach through our decision-making and service design and delivery.
- 9.3 Wheatley recognises that some customers have disabilities or communication needs, which may make it difficult for them to express themselves or communicate clearly; especially when they are anxious or upset.
- 9.4 Where Wheatley is made aware that a customer has particular needs, staff will make reasonable adjustments to meet their needs. Examples of adjustments that may be made include (but are not limited to):
- Using different ways to communicate to customers;
 - Arranging for translation services, large print or braille where required; and
 - Signposting customers to advocacy or support services if appropriate.
- 9.5 Where the complainant is a child or young person, we will take additional steps to ensure that communication is age-appropriate, and that they are supported to understand and participate in the process.
- 9.5 We also recognise that it is important that hard to reach groups are aware of our complaints process. Our policy and customer information about complaining is available for anyone to access on our websites and we can provide this translated or in an alternative format. Through our staff training, staff will be equipped to support customers who require additional assistance to complain. We can also receive complaints from third parties, for example, if a valid mandate or power of attorney is in place.
- 9.6 For relevant policies, we carry out Equality Impact Assessments (EIA) when we review these. This policy and its implementation have been informed by an EIA. This supports us to take appropriate action to address inequalities likely to result or resulting from the implementation of the policy and procedures.

10. Operational Arrangements

- 10.1 This policy must be read in conjunction with our Complaints Handling Procedure and associated guidance documents. Our Complaints Handling Procedure has been designed in line with the SPSO statement of principles (including the statement of principles on child-friendly complaints handling).

Raising Complaints

- 10.2 Wheatley operates a two-stage complaints procedure in which the first stage, Front Line Response (FLR), focusses on front line staff taking swift action to resolve and rectify customers' concerns effectively and timeously. The second stage, Investigation, focusses on providing an independent investigation into customer concerns and providing a full written report of their findings. Wheatley may tailor or amend its approach to these stages where required (i.e. because a child-friendly approach is required or an approach to account for a particular need of a customer arises).
- 10.3 Complaints will be accepted from anyone who receives, requests or is affected by our services. This includes complaints from or on behalf of children and young people, defined as those under the age of 18 in accordance with the child-friendly complaint handling principles.
- 10.4 Complaints comprise any expression of dissatisfaction from the Group's action, lack of action, or the standard of service provided by us or on our behalf.
- 10.5 Data protection complaints may relate to the handling of a subject access request, concerns about data sharing, alleged unlawful disclosure of personal information, concerns about the accuracy or retention of personal data, concerns about how personal information has been used, or any other alleged infringement of data protection legislation.
- 10.55 There are circumstances in which it is not appropriate for a complaint to be raised because there is another process which is better suited to resolving the problem. These include:
- A first-time request for a service;
 - A request for compensation only;
 - Issues that occurred more than six months previously, unless there are special circumstances for considering complaints beyond this time ;
 - Concerns that have already been investigated through the Group's Complaints Policy and a final response has been given;
 - Matters that are at court or have already been heard by a court or tribunal;
 - Complaints about the behaviour of tenants, their households or visitors to their home – these are handled in line with the Group's Antisocial Behaviour Policy and Procedure;
 - Reports of a hate crime – these are handled in line with the Group's Hate Crime Policy;
 - Disagreement with a decision where there is a statutory process for challenging that decision or an established process, such as our Housing Appeals procedure;
 - Abuse of staff or unsubstantiated allegations about the Group or staff where covered by our Unacceptable Actions Policy;

- Dissatisfaction with the Group's policy or procedure – these are recorded as policy feedback and passed to the policy owner to be considered in the next review; and
 - Personal injury claims or claims for damaged items – these will be assessed and usually passed to the Group Legal Team.
- 10.6 Where the Group decides not to raise a complaint, this will be explained to the customer, and they will be advised of their right to contact the SPSO on this decision. There may be circumstances under which a complaint may be referred to another regulatory body, such as the Information Commissioner's Office when data protection issues are raised.

Stage 1 – Front-Line Response (FLR)

- 10.7 Stage 1 complaints are mainly registered by the member of staff who receives the complaint. Staff are empowered to undertake the activity they feel is appropriate to achieve resolution at the first point of contact, in consultation and agreement with the customer. This is a critical part of our 'Think Yes' culture.
- 10.8 Staff aim to acknowledge Stage 1 complaints within 48 hours, although we will always attempt to do this sooner, particularly where a customer complains through our Customer First Centre or on one of our digital channels. We aim to respond to the first stage complaint within 5 working days and will confirm the outcome of the complaint, any lessons learned, and what action will be taken to resolve the situation moving forward.
- 10.9 Where customers are unhappy with the proposed action, they have the right to escalate their complaint to the second stage within 2 months of receiving their first stage response. In order to do so, they should explain to the person handling the complaint why they remain unhappy and what recourse they are looking for to resolve the complaint.
- 10.10 If we are unable to confirm the Stage 1 complaint outcome within 5 working days, we will seek agreement from the customer to extend the timeline to a maximum of 10 working days. This decision should be solely based on our desire to ensure a high-quality response that seeks to fully resolve the issue(s) raised. Such complaints will still be considered to have breached our 5-day target. Complaints not closed by day 10 will be escalated to Stage 2, the final stage.

Stage 2 - Investigation – the final stage

- 10.11 The aim of the stage 2 of the process is to resolve the complaint through robust investigation of the issues by an independent and objective team or suitably senior manager.

- 10.12 The Group aims to acknowledge Stage 2 complaints within two working days and respond within 20 working days. Our complaint response will ensure that customers are informed of the outcome of their complaint, any lessons learned from their complaint, and actions that will be taken to resolve the situation. Should we require further time to conclude the complaint, we will explain the reasons with the customer, update them (and any staff involved) at least every 20 days and provide a revised timescale for completion. Once again, this decision should be solely based on our desire to ensure a high-quality response that seeks to fully resolve the issue(s) raised. Such complaints will still be considered to have breached our 20-day target.
- 10.13 If a customer remains unhappy with the outcome of the investigation of the complaint, they can provide any additional evidence which may have not been considered and explain what they are looking for to resolve the complaint.
- 10.14 Once this has been provided, staff will provide a final response to the customer, and this will explain fully the Group's position and the customer's rights should they wish to pursue their complaint further. In all instances, this will confirm details of how to contact the relevant ombudsman including the SPSO, First Tier Tribunal (Housing and Property Chamber), the Care Inspectorate, Financial Services Authority, the Energy Ombudsman, the Information Commissioner's Office and any other agencies should this be appropriate.
- 10.15 Data protection complaints may be submitted through any communication channel including verbally, in writing, online, by telephone, or by email, and individuals do not need to refer to legislation or use specific terminology for their concern to be treated as a data protection complaint. Customers who raise concerns via social media will be signposted to secure channels for making a complaint. Such complaints will normally be captured as part of a Stage 2 complaint and managed by the relevant service area responsible for the matter complained of, with advice and support provided by the Information Governance Team where appropriate. Data protection complaints will be acknowledged no later than 30 calendar days in accordance with applicable data protection legislation, although Wheatley Group will aim to acknowledge these sooner wherever possible. Once acknowledged, Wheatley Group will take appropriate and proportionate steps to investigate and respond to the complaint without undue delay, keep complainants informed where appropriate, communicate the outcome of the complaint, and advise individuals of their right to raise concerns with Wheatley Group's Data Protection Officer and the Information Commissioner's Office (ICO).

Managing Challenging or Unacceptable Behaviours

- 10.15 Whilst staff understand that there are times that customers may become upset, frustrated or anxious and will endeavour to respond positively, timeously and sensitively, there are occasions when customers behave in ways that are challenging or unacceptable.

10.16 Where customer behaviour prevents staff from carrying out their duties effectively or is rude, abusive or threatening, the Group will act in line with our Unacceptable Actions Policy.

Summary Complaints Process

COMPLAINTS PROCEDURE

You can make your complaint in person, by phone, by e-mail, online or in writing.

We have a **two-stage complaints procedure**. We will always try to deal with your complaint quickly. But if it is clear that the matter will need a detailed investigation, we will tell you and keep you updated on our progress.

STAGE 1: FRONTLINE RESOLUTION

We will always try to resolve your complaint quickly, within **five working days*** if we can.

If you are dissatisfied with our response, you can ask us to consider your complaint at stage 2.

STAGE2: INVESTIGATION

We will look at your complaint at this stage if you are dissatisfied with our response at stage 1. We also look at some complaints immediately at this stage, if it is clear that they are complex or need detailed investigation.

We will acknowledge your complaint within **two working days**. We will give you our decision as soon as possible. This will be after no more than **20 working days*** *unless* there is clearly a good reason for needing more time.

*The definition of working days is Monday – Friday, excluding public holidays. Complaints received after 5pm are considered from the next working day.