

Complaints Policy

Introduction

1. This policy explains how we deal with complaints (except where the complaint relates to issues that are dealt with in separate statements, including for example insurance claims, complaints about use of personal data, and GDPR Subject Access Requests). Our approach to handling complaints relating to building safety in Higher Risk Buildings, is covered in Appendix 1.
2. The policy applies to The Guinness Partnership Ltd including: Guinness Developments Ltd., Guinness Homes Ltd, Guinness Housing Association Ltd., and Guinness Property (“Guinness”).
3. We have separate statements on:
 - Compensation
 - Reasonable Adjustments and Aids & Adaptations
 - How we respond to unacceptable behaviour.
4. We value all forms of feedback, including complaints, as these help us to identify areas where we need to improve, and all feedback supports the performance of colleagues and others who deliver services on behalf of Guinness.
5. The policy supports the delivery of the following strategic objectives:
 - To be a customer service organisation, working continuously to improve our services;
 - To ensure our residents’ voices are clearly heard and listened to; and
 - To meet our legal and regulatory requirements.
6. When we receive any complaint, we will make residents aware of this policy, the Housing Ombudsman Service and the Complaint Handling Code. We will advise them that Guinness licensees, tenants and leaseholders have the right to seek advice from the Housing Ombudsman Service throughout the life of their complaint. Guinness licensees, tenants and leaseholders will also be advised of their right to refer their complaints to the Housing Ombudsman Service once they have exhausted the Guinness complaints process. The Housing Ombudsman can be contacted via their website: www.housing-ombudsman.org.uk or by telephone on 0300 111 3000. Their address is: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ.
7. All complaints submitted by a third party or representative will be treated in line with this policy.

The Policy

8. Our policy is that we will:
 - Comply with all legal, regulatory, and contractual requirements when handling complaints and meet the requirements of the Housing Ombudsman’s Complaint Handling Code.
 - Ensure compliance by conducting and publishing an annual self-assessment of our complaints handling.
 - Address complaints fairly, impartially, objectively, and professionally.
 - Continue to develop and maintain a culture of openness and transparency to create positive relationships and promote trust when handling complaints.
 - Keep the person who complained informed and regularly updated with progress in addressing their complaint (even if there is no new information to provide.)
 - Aim to resolve the complaint at the earliest opportunity, and in any case within the timescales in Housing Ombudsman’s Complaint Handling Code.
 - Use learning from complaints to inform policy development and service improvement.

- Treat all people fairly, sensitively and with respect, and take into account the individual and diverse needs of residents, including those covered by the Equality Act 2010 or people with other vulnerabilities.
- Not tolerate harassment, or hate speech, or unreasonable behaviour, from residents and/or their representatives towards other residents or our staff when addressing a complaint.

What is a complaint?

9. We have adopted and expanded on the Housing Ombudsman's definition of a complaint:

'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Guinness, our staff, or those acting on our behalf, affecting an individual resident or group of residents or person who is affected by Guinness's services'.

10. We have expanded on the Housing Ombudsman's definition to enable anyone affected by Guinness's services (i.e. those with whom we do not have a contractual relationship) to make a complaint, although complaints made by third parties who are not representatives of a resident fall outside the jurisdiction of the Housing Ombudsman.
11. We will not consider the complaint if the issue giving rise to it occurred over twelve months ago, or it has been over twelve months since the resident became aware of the issue, unless there is a recurring issue or where complaints are related to safeguarding concerns or health and safety matters, or where it is agreed that there are exceptional circumstances (which will be considered on a case-by-case basis.) Further details about complaints we will not consider can be found in paragraphs 17 – 21.
12. Whenever a customer expresses dissatisfaction with our service we will always ask if they wish to make a complaint. However, there is a difference between a service request and a complaint. A service request is when a resident asks us to provide a service or do something to put something right. This might be a call from a resident reporting a repair for the first time or a call saying that a contractor has not arrived at the agreed time. When we receive such a request, we will seek to resolve it as a service request in the first instance.
13. If a resident expresses dissatisfaction with the response to their service request, or specifically states that they want their service request to additionally be treated as a complaint, we will always raise a complaint. We will continue to try to put things right at the earliest possible opportunity and resolve the issue for our resident quickly.
14. Expressions of dissatisfaction from people who are not Guinness residents (e.g. a neighbour in a property in proximity to one of our homes) will be registered and treated as a complaint.
15. Where an expression of dissatisfaction with our service is made through the response to a satisfaction survey this will not be treated as a complaint. However, we will make the person completing the survey aware of how they can make a complaint if they wish to.
16. A resident does not have to use the word "complaint" for it to be treated as such.
 - If, as a Guinness employee you are unclear whether a resident wishes to complain, please ask them to clarify.
 - If, as a resident, you wish to make a complaint and you are unsure whether your expression of dissatisfaction is being registered and treated as a complaint, please clarify that this is what you wish to happen.

Examples

17. Examples of issues that residents may complain about include:

- Failure to deliver a service within expected or reasonable timescales, including failure to respond to an initial request for service.

- Unsatisfactory quality of service.
- Dissatisfaction or disputes about how rents or service charges are set or managed.
- Failure to answer reasonable questions or giving misleading or unsuitable advice.
- Unacceptable behaviour of a member of staff or other party acting on behalf of Guinness (which may include discourtesy, disrespect, or dismissiveness).
- Failure to follow Guinness policies, rules or procedures or legislation.
- Failure to consider all available relevant information in coming to a decision.
- Bias, prejudice, or unfair acts that result in discrimination on the grounds of protected characteristics defined in the Equality Act 2010.
- Inappropriate use of personal information.

Exclusions

18. Examples of issues we do not consider to be complaints are:

- A first-time request for a service or an enquiry about a service.
- A first-time request for Guinness to intervene in the behaviour of others (e.g., a first-time report of ASB).
- A request for information or explanation of a Guinness policy or practice.
- Disagreeing with a Guinness strategy, policy, or service target.

19. We will not take a blanket approach to excluding complaints. Instead we will consider the individual circumstances of each complaint before making a decision. Matters not considered as a complaint may include:

- The issue giving rise to the complaint occurred over twelve months ago, or it has been over twelve months since the resident became aware of the issue, unless there is a recurring issue or where complaints are related to safeguarding concerns, health and safety matters or it is agreed that there are exceptional circumstances (which will be considered on a case-by-case basis.)
- A complaint that has previously been considered and no substantive new information is provided.
- A complaint where the issues or the services are outside Guinness's control (for example they are provided by a local authority.)
- A complaint 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. Instruction of solicitors does not constitute legal proceedings.
- A complaint where the issue relates to ongoing or possible insurance claims.

20. Complaints about use of personal data, and insurance claims will be dealt with under a specific process. Subject Access Requests under GDPR are not considered to be a complaint although they may be made in the context of a complaint.

21. Anonymous complaints will not be considered unless there is a clear and strong reason for doing so, which may include:

- The seriousness of the issue raised, where it, for example, relates to a significant risk to health and safety, legal or regulatory compliance, or other public interest.
- The credibility of the concern and the likelihood of confirming the allegation from attributable sources.

22. The lists above are not exhaustive. Where we decide not to consider a complaint, we will provide an explanation setting out the reasons why we do not think the matter is suitable for consideration under the complaints process. If the resident is unhappy with our decision we will refer them to the Housing Ombudsman. If the Housing Ombudsman does not agree that the exclusion has been fairly applied they may tell us to consider the complaint.

Who can complain?

23. The following can complain to us:

- Any resident who rents a home from us
- Any resident who pays for use and occupation for one of our homes
- Anyone acting on a resident's behalf
- Any leaseholder or homeowner who lives in a home where Guinness is the freeholder or intermediate leaseholder
- Former licensees, tenants, leaseholder, or homeowners
- Prospective licensees, tenants, leaseholders, or homeowners
- Anyone who is adversely impacted by the service we provide or our failure to provide services, or by the behaviour of a Guinness employee or anyone acting on behalf of Guinness including our contractors.

Complaints received through residents' representatives

24. We will accept complaints from others acting on the resident's behalf but can only respond to a party acting on a resident's behalf where we have the resident's express authority or clear evidence of there being a suitable legal arrangement in place to do so. We will consider each case on its own merit. During the handling of the complaint, we will enable the representative to deal with the complaint on behalf of the resident and for them to be represented or accompanied at any meeting with us. Potential representatives include:

- Trustees, legal guardians, and people appointed under a Power of Attorney
- People who are expressly authorised to act on a resident's behalf (such as family members) or have been authorised by the resident to act on their behalf (for example a Councillor/MP)
- Organisations such as Tenants and Residents Associations, or other groups of residents, which can reasonably demonstrate that they have authority to act on behalf of a Guinness resident or residents.

How to make a complaint

25. We want to make sure that it is easy for our residents and their representatives and third parties to make a complaint and to use our complaints service. We publish this policy and information about how to make a complaint on our website, in our Guinness resident magazine ("Your Guinness"), in leaflets and in other resident communications. This will include information about the Housing Ombudsman's Complaint Handling Code.

26. We accept complaints made through different channels, including:

- Using the online complaint form on our website
- By telephone, email, online contact form, or letter
- By contacting us through our presence on social media platforms
- In person.

27. In each case we will verify the identity of the person making the complaint and their relationship to Guinness (this may be particularly necessary for complaints received through social media.) All complaints will be managed confidentially and in line with the Data Protection Act 2018.

28. In line with our Reasonable Adjustments Policy, we will provide additional support to residents if they have difficulty accessing our complaints service. This may include providing information in appropriate alternative formats, text relay, or a home visit.

Unacceptable behaviour

29. We recognise that sometimes residents will be upset, angry or frustrated. We will seek to continue to engage with residents in such circumstances, but we have a duty of care to our staff and contractors, and we will not tolerate unacceptable behaviour from residents or their representatives towards our staff or anyone providing services on our behalf.
30. Examples of unacceptable behaviour include:
- Verbal abuse, aggression, violence (this is not just limited to actual physical or verbal abuse but can include derogatory remarks, and threats of violence.)
 - Malicious or otherwise inflammatory statements, or unsubstantiated allegations about our employees or other residents.
 - Unreasonable demands (e.g., requesting large volumes of information, excessive volumes of letters, calls, emails or other communications, asking for responses within a short space of time, refusing to speak to an individual or insisting on speaking with another.)
31. In such cases, we will advise the resident of how we need to engage with each other.
32. If appropriate we will discuss a contact management plan with the resident (which may include restricting the resident to a single point of contact within Guinness but will never include a complete ban on them contacting Guinness.) Restrictions placed on a resident's contact will be appropriate to their needs and have regard to the provisions of the Equality Act 2010. We will continue to seek a resolution where there are serious concerns relating to our statutory duties including for health and safety. We will keep any restrictions under regular review.

Resolving a complaint

33. We have a two stage process for handling complaints. At each stage we will:
- Deal with the complaint on its own merits, act independently, and have an open mind
 - Give the resident a fair chance to set out their position
 - Consider all relevant information and evidence carefully, and
 - Take measures to address any actual or perceived conflict of interest.

Stage one

34. We will acknowledge, define and log the complaint within 5 working days of receiving it. This means we will:
- Verify the identity of the complainant and, if not a resident, their relationship to Guinness
 - Decide whether to accept the complaint, and if we do not, we will explain the reasons why
 - Draw the resident's attention to the service provided by the Housing Ombudsman, and to this policy
 - Ensure that we fully understand the nature of the complaint and what outcome the resident is seeking. This is referred to as the "complaint definition". If any aspect of the complaint is unclear, we will ask the resident for clarification.
35. A Complaints Officer will be assigned to manage the complaint. As part of the investigation, we may allocate the complaint handling to another person with the appropriate skills and knowledge.
36. We will aim to resolve complaints as quickly as possible, at first point of contact where possible.
37. We will ensure that the resident is given an opportunity to set out their position and to make any comments on our findings and conclusions before a final decision is made.
38. Where a resident raises additional complaints during the investigation, these will be incorporated into our stage one response, if they are related. The exception to this is if the complaint has already been investigated and we have provided our stage one response, or the new issues are unrelated to the issues already being investigated or these additional complaints would unreasonably delay the

response. In these cases, a new complaint will be logged. Where the problem is a recurring issue, we will consider any older reports as part of the background to the complaint if this helps to resolve the issue for the resident.

39. Within 10 working days from the date the complaint is acknowledged we will provide the resident with our response to the complaint in writing, confirming in clear, plain language:
- The complaint stage
 - The complaint definition
 - The decision on the complaint
 - The reasons for any decisions made
 - The details of any remedy offered to put things right, including where appropriate a summary of lessons learnt
 - Details of any outstanding actions, and
 - Details of how to escalate the matter to stage two if the individual is not satisfied with the response.
40. We may extend our timescale for responding to the complaint but this will not exceed a further 10 working days without good reason. We will explain this to the resident and inform them of the expected timescale of the response, together with details of the Housing Ombudsman.
41. If all or part of the complaint is not resolved to the resident's satisfaction, they may escalate the complaint to the next stage. We may refuse to escalate a complaint for the same reasons we may refuse to accept the original complaint. These reasons are set out in paragraph 18. If we refuse to escalate a complaint we will set out our reasons for doing so.

Stage two

42. If the resident decides to escalate the complaint to stage two it will be acknowledged, defined and logged within 5 working days of the escalation request being received. It will be reviewed by a person within Guinness who has not previously considered the complaint. When a complaint is escalated to stage two we will set out our understanding of the complaint and the outcomes the resident is seeking (the "complaint definition"). If any aspect of the complaint is unclear, we will ask the resident for clarification.
43. We will ensure that the resident is given an opportunity to set out their position and to make any comments on our findings and conclusions before a final decision is made.
44. Within 20 working days from the date the stage two is acknowledged we provide the resident with a final response in writing, confirming in clear, plain language:
- The complaint stage
 - The complaint definition
 - The decision on the complaint
 - The reasons for any decisions made
 - The details of any remedy offered to put things right, including where appropriate a summary of lessons learnt
 - Details of any outstanding actions
 - Details of how to escalate the matter to the Ombudsman Service if the resident remains dissatisfied.
45. We may extend our timescale for responding to the complaint but this will not exceed a further 20 working days without good reason. We will explain this to the resident and inform them of the expected timescale of the response, together with details of the Housing Ombudsman.

Complaints process exhausted

46. If a resident remains dissatisfied with our final response we will remind them of their rights to refer their case to the Housing Ombudsman who will consider the complaint under their own formal assessment

process. This service is available to residents who have an occupation agreement with us, that is, they are either tenants, leaseholders, or licensees. The jurisdiction of the Housing Ombudsman does not extend to other residents.

47. For those complaints that fall outside the jurisdiction of the Housing Ombudsman Service, once our process has been exhausted, the appropriate referral will be made based on the specific complaint. For instance, when a purchaser of a new build property for outright sale makes a complaint and exhausts our process, we will follow the requirements contained in the Consumer Code for Homebuilders to resolve the complaint.
48. The Housing Ombudsman can be contacted via their website: www.housing-ombudsman.org.uk or by telephone on 0300 111 3000. Their address is: Housing Ombudsman Service, PO Box 152, Liverpool, L33 7WQ

Communication

49. We will ensure that we keep residents regularly updated with the progress of the complaint even if there is no new information to provide. We may arrange with the resident as to the frequency and method of communication.
50. We will use plain language when communicating with the resident.
51. We will write to the resident with the outcome of the complaint giving clear reasons for our decisions made and how we will put things right.

Remedies

52. Complaints can be resolved or remedied in a number of ways. We will always acknowledge where things have gone wrong, apologise and provide an explanation. We will set out the actions we have taken, or intend to take, to put things right. We may:
 - Agree an action plan with the resident
 - Complete agreed work or actions
 - Reconsider or change a decision
 - Amend our records if there is an error
 - Change our policies, procedures, or practices
 - Make an offer of compensation.
53. Any remedy offered will reflect the impact on the resident as a result of any failing identified. We will have processes in place to ensure that a complaint can be remedied at any stage of the complaints process without the need for escalation.
54. The remedy offer will clearly set out what will happen and by when, in agreement with the resident where appropriate.

Remedies for complaints about staff/representative conduct or behaviour

55. Remedies in respect of complaints about the conduct or behaviour of staff or other parties acting on our behalf will be addressed in line with human resources and contract management policies. Residents will be given relevant information about the outcome of their complaint, noting whether it has been upheld or otherwise, but personal data and employment-related information will not be shared in line with our duties around staff confidentiality and data protection.

Continuous learning and improvement

56. We will ensure that there is a positive complaint handling culture which promotes individual and organisational learning, the improvement of services, and a good relationship with and trust from residents.

57. We will look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. We will report back on wider learning and improvements from complaints to colleagues and relevant committees.
58. We recognise the importance of resident involvement and will ensure that residents are consulted as part of service improvement processes.
59. The Executive Director of Customer Services is accountable for complaint handling. They will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. They will ensure the Executive Team and our Board receive regular information on complaints and performance and that the annual self-assessment is made available for scrutiny.
60. A member of the Board has lead responsibility for complaints to support a positive complaint handling culture. They are the "Member Responsible for Complaints" (the "MRC") as required by the Complaint Handling Code. They are responsible for ensuring the Board receives regular information on complaints that provides insight on our complaint handling performance.
61. The MRC and the Board will receive:
 - a) Regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance
 - b) Regular reviews of issues and trends arising from complaint handling
 - c) Regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and
 - d) The annual complaints performance and service improvement report. This report will include our self assessment against the Complaint Handling Code.
62. We will regularly feed back to the Customer Committee, and this will be discussed, alongside scrutiny of the annual complaints performance and service improvement report.
63. The annual complaints performance and service improvement report will be published on the website along with the Board's response to the report.

Period of review

64. Our review programme is driven by service improvement initiatives, changes to legislation, regulation, evolving good practice or feedback from residents and other key stakeholders. We will review this policy every three years.

Key legal and regulatory references

- Housing Act 1996
- Data Protection Act 2018
- Equality Act 2010
- Building Safety Act 2022
- The Higher-Risk Buildings (Management of Safety Risks etc) (England) Regulations 2023
- The Housing Ombudsman's Complaint Handling Code 2024
- The Housing Ombudsman Scheme
- The Regulator of Social Housing Regulatory Standards, April 2024
- Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025

Related policies

- Code of Conduct
- Compensation Policy
- Data Protection Policy
- Diversity and Inclusion Policy

- Reasonable Adjustments Policy

Version number		5.3	
Policy approved by		The Guinness Partnership Board	
Policy approval date		5 th February 2025	
Policy effective from		5 th February 2025	
Policy review date		February 2028	
Equality analysis approval date		27 th March 2024	
Policy author		Darren Collings, Head of Policy & Training	
Lead Director		Scott Morrison, Group Director of Customer Contact and Repairs	
Policy owner		Scott Morrison, Group Director of Customer Contact and Repairs	
Version history			
Version number	Review trigger	Date of approval	Brief description of the main changes
3.0	Cyclical review, Housing Ombudsman Complaint Handling Code revision and Tenant Scrutiny Panel review	21 st July 2021	Significant update following resident engagement, cyclical policy review and Tenant Scrutiny Panel Complaints Handling Review, including further alignment with Housing Ombudsman Complaint Handling Code.
3.1	Amendments made in response to the updated Housing Ombudsman’s Complaint Handling Code	9 th June 2022	Further amendments following the publication of amendments to the Housing Ombudsman Complaint Handling Code which includes the mandatory annual self-assessment, the extension of the 20 day time period, and definition of legal proceedings and the discretionary introduction of a 15 working day time scale to request a stage two review.
3.2	Amendments made in response to the updated Housing Ombudsman’s Complaint Handling Code	30 th September 2022	References to the ‘democratic filter’ have been removed. Residents are no longer required to wait eight weeks before referring their case to the Housing Ombudsman or to approach a ‘designated person’ to do so on their behalf.

			Note: reference to Guinness Care has also been removed.
3.3	Transfer of engagements from Guinness Care to The Guinness Partnership Ltd	29 th March 2023	Removal of references to the Guinness Care complaints process. Complaints relating to regulated care will be dealt under a specific process for such complaints. Approval date: 29th March 2023 Approved by: TGPL Board
4.0	Publication of the Housing Ombudsman's statutory Complaint Handling Code (due to take effect from 1 April 2024)	27 th March 2024	Significant update following changes to the HOS Code which became statutory from 1 April 2024. Also, changes to incorporate Shepherds Bush Housing Association which joined Guinness in December 2023.
5.0	Amendments made in response to Building Safety Act 2022 and Guinness's withdrawal from regulated care services.	5 th February 2025	Inclusion of Appendix A covering handling of complaints relating to building safety in Higher Risk Buildings. Removal of references to regulated care services.
5.1	Transfer of Engagements from Shepherds Bush Housing Association (SBHA) to Guinness	12 th May 2025	Removal of references to SBHA following the Transfer of Engagements.
5.2	Change to Lead Director and Policy Owner	September 2025	Updated to Scott Morrison, Group Director of Customer Contact and Repairs
5.3	Amendments made as a result of Awaab's Law coming into force from 27 th October 2025	November 2025	As residents are able to seek redress through this policy, "Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025" has been included in the "Key Legal and Regulatory References" section of the policy.

Appendix 1: Handling complaints relating to building safety in Higher Risk Buildings

Introduction

- i. We are required by the Building Safety Act 2022 to operate a complaints system to enable residents in Higher Risk Buildings (HRBs) to make a complaint about building safety risks (this is referred to as “a **Relevant Complaint**”). This appendix sets out how we will handle such complaints and supplements the Complaints Policy.
- ii. HRBs (which are also referred to as Higher Risk Residential Buildings – HRRBs) are defined in the Building Safety Act 2022 as buildings that:
 - a) Are at least 18 metres in height or have at least 7 storeys, and
 - b) Contain at least 2 residential units.
- iii. Where Guinness is the owner of the building or where we have a legal obligation to repair the structure or exterior of the building we are known, in law, as the “Principal Accountable Person” (PAP). For more information about Principal Accountable Persons and Accountable Persons, please see “definitions” at the end of this Appendix.

Definition of a Relevant Complaint

- iv. A complaint will be considered as a building safety Relevant Complaint under Section 93 of the Building Safety Act 2022 if the complaint relates to:
 - A building safety risk relating to structural failure and spread of fire, for instance:
 - Flammable cladding on the outside of a building
 - Fire doors or smoke extraction that are not working or missing, increasing the risk of a fire spreading
 - Failure of the building’s structure, such as parts of the building collapsing, or cracks or
 - Our performance as a PAP of our duties under the Building Safety Act 2022 for instance:
 - Our communications with residents
 - Our responses to raised concerns
 - How we manage building safety risks.
- v. Service or maintenance requests which do not relate to structural failure or the spread of fire will not be considered as Relevant Complaints. Complaints which do not fall within the definition of a Relevant Complaint will be handled as set out in paragraphs 32 – 47 in the body of the Policy above.
- vi. Any complaint which is a Relevant Complaint will be dealt with in accordance with this appendix where we are the PAP, even where the complaint is made to another Accountable Person of the building, such as a Managing Agent. Where we are the Accountable Person of a building but not the PAP, we will engage with the PAP and ensure a written response is issued to the resident.
- vii. A person does not have to specify that a complaint is a Relevant Complaint for it to be treated as such.

- viii. If we cannot accept a complaint as a Relevant Complaint we will explain the reason for this and how we will deal with the concerns raised, in writing. If the person making the complaint does not agree with our decision on whether it is a Relevant Complaint, they can refer the issue to the Building Safety Regulator (BSR) to make a final determination.

Who can make a Relevant Complaint?

- ix. Anyone can make a complaint about how we manage structural and fire safety issues in an HRB. This includes but is not limited to: a resident, their appointed representative (see paragraph 23 of the Complaints Policy), or anyone visiting or working in the building.

How to make a Relevant Complaint

- x. A Relevant Complaint can be made via any reasonable method, including the following:
- Using the online complaint form on our website
 - By telephone, email, online contact form, or letter
 - By contacting us through our presence on social media platforms
 - In person.
- xi. Relevant Complaints can also be made by contacting the team of Building Safety Managers: buildingsafety@guinness.org.uk. The names and contact details of our Building Safety Managers are displayed on the noticeboard of our HRBs and will be outlined in our Building Safety Resident Engagement Strategy.
- xii. In line with our Reasonable Adjustments Policy, we will provide additional support to residents if they have difficulty making a Relevant Complaint. This may include providing information in appropriate alternative formats, text relay, or a home visit.

Resolving a Relevant Complaint

- xiii. In line with the Building Safety Act 2022 and associated guidance, we have adapted the two-stage process set out in paragraphs 32 - 47 to handle Relevant Complaints.
- xiv. We will aim to resolve complaints as quickly as possible in a timely manner. Where we are unable to adhere to the timescales set out below, we will notify the resident and explain the reason why.
- xv. Relevant Complaints will be assessed and prioritised by the Building Safety Manager taking account of the level of risk involved. Relevant Complaints relating to the spread of fire may be processed more quickly than Relevant Complaints relating to our performance as PAP.
- xvi. A Relevant Complaint will only be excluded for consideration as a Relevant Complaint where it consists of issues which have already been determined or which are already under consideration in relation to the same resident.
- xvii. Residents may make representations and comments on any findings at any point during an investigation.

Stage one

- xviii. We will acknowledge, define and log the complaint within 5 working days of receiving it. This means we will:

- Verify the identity of the resident and, if not a resident, their relationship to Guinness
- Confirm whether the complaint falls within the definition of a Relevant Complaint
- If we cannot accept a complaint as a Relevant Complaint we will explain the reason why
- Ensure that we fully understand the nature of the Relevant Complaint and what outcome the individual is seeking (“the complaint definition”). If any aspect of the Relevant Complaint is unclear, we will seek clarification.

xix. A Complaints Officer will be appointed to manage the Relevant Complaint but the Relevant Complaint will be overseen by a Building Safety Manager.

xx. Within 10 working days from the date the Relevant Complaint is acknowledged we will provide the resident with our response to the complaint in writing, confirming in clear, plain language:

- The complaint stage
- The complaint definition
- The decision on the complaint
- The reasons for any decisions made
- The details of any remedy offered to put things right, including where appropriate a summary of lessons learnt
- Details of any outstanding actions including timeframes for the outstanding actions to be carried out and completed
- Details of how to escalate the matter to stage two if the resident is not satisfied with our response.

Stage two

xxi. If a resident wishes to escalate the Relevant Complaint to stage two, it will be acknowledged, defined and logged within 5 working days of the escalation request being received. When a Relevant Complaint is escalated to stage two, we will set out our understanding of the Relevant Complaint and the outcomes the resident is seeking. If any aspect of the Relevant Complaint is unclear, we will seek clarification.

xxii. Within 20 working days from the date the stage two is acknowledged we will provide the resident with a final response in writing, confirming in clear, plain language:

- The complaint stage
- The complaint definition
- The decision on the complaint
- The reasons for any decisions made
- The details of any remedy offered to put things right, including where appropriate a summary of lessons learnt
- Details of any outstanding actions
- Details of how to escalate the matter to the BSR where an agreed outcome cannot be reached.

xxiii. If at any stage the resident has any concerns with how we are dealing with their complaint they can contact the BSR. Residents can also contact the BSR where an agreed outcome cannot be reached under this policy.

xxiv. At any point during the complaints process the BSR can be contacted using the details below.

Building Safety Regulator
Health & Safety Executive
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

Tel: 0300 790 6787

Online via this website: [How can the Building Safety Regulator help you?](#)

Relevant Complaint Referral

xxv. Where there are other identified Accountable Persons within our buildings and we are unable to agree on an appropriate response to a Relevant Complaint, we will seek the resident's consent to refer the Relevant Complaint to the BSR for consideration.

Data Processing

xxvi. Personal data will be processed in accordance with our Data Protection Policy.

Definitions

Term	Description
Accountable Persons	An accountable person is either a person or organisation that owns or is responsible for repairing any of the common parts of the building, or a person or organisation required under the terms of a lease, or by an enactment, to repair or maintain any part of the common parts. Common parts include the exterior and structure, corridors, or lobbies.
Principal Accountable Persons	All occupied high-rise residential buildings are required to have one clearly identifiable Accountable Person, known as the Principal Accountable Person who is responsible for ensuring that fire and structural safety is being properly managed for the whole building. When buildings have a single Accountable Person, that organisation or person is also the Principal Accountable Person. When there are multiple Accountable Persons, then whoever owns or has a legal obligation to repair the structure and exterior of the building is the Principal Accountable Person. Accountable Persons and the Principal Accountable Person can be accountable for the fire and structural safety risks of more than one building.