Complaints Policy

Audience:	Customers, stakeholders and colleagues
Policy Owner:	Executive Director of Housing & Customer Experience
Policy Lead:	Head of Customer Resolutions
Approved by:	Executive Team
Approved date:	1 April 2026
Next review date:	1 April 2029

1. Context, purpose and scope of the policy

Context

Complaints are a vital source of insight into where our services fall short and where customers experience frustration, inconvenience or harm. When customers feel we have let them down, it is important that we investigate thoroughly, put things right and learn from the experience, in line with the Housing Ombudsman's Complaint Handling Code and relevant consumer standards.

In recent years, the regulatory focus on complaint handling has increased, alongside clearer expectations about transparency, timeliness, remedies and learning. To ensure consistent, fair and resident-focused handling and to strengthen how we evidence learning and improvement we need a clear policy that sets the standard for how Moat responds when things go wrong.

Purpose

This policy sets out how we will handle complaints so that:

- Customers experience a fair, accessible and timely process.
- Service failures are acknowledged and put right appropriately.
- Remedies are proportionate and consistent.
- We learn from complaints and prevent repeat issues.
- We can clearly evidence compliance, accountability and improvement.

This policy focuses on improving consistency, strengthening accountability and embedding learning across the organisation.

Scope

This policy applies to complaints about services delivered by Moat or on our behalf (for example, by contractors or managing agents), raised by customers including:

- Tenants
- Residents
- Leaseholders
- Shared owners
- Applicants
- Other stakeholders affected by our services.

It covers our two-stage complaints process (stage one and stage two), and signposting to the Housing Ombudsman Service or the Building Safety Regulator where applicable.

This policy does not apply where:

- Legal proceedings have commenced (this is defined at the point where Particulars of Claim have been served).
- An alternative statutory or contractual appeal route applies.
- The issue falls outside our complaints scope as defined in this policy.

Where a complaint relates to a managing agent appointed by Moat, we will log and investigate it in line with our policy. Where the managing agent is appointed by a third party, we will not log the service issue as a landlord complaint, but we will support the customer by liaising with the managing agent /freeholder and explaining our limited authority. If the customer is unhappy with our communication or support, that element will be treated as a complaint about our service.

There are occasions where we will not accept complaints. We will always explain why, but below are some examples of the most commons reasons:

- The issue occurred more than 12 months ago
- Customer are making an initial request for service
- Initial contact to chase up a service request, however, if you're unhappy with the resolution offered, we'll progress this as a complaint.
- Where legal proceedings have started (determined by the serving of a particulars of claim) or there's an ongoing insurance claim.
- Reports of neighbour dispute or anti-social behaviour issue. Complaints can be made about the handling of such incidents
- A dispute about the level of service charges. Complaints can be made about the handling of such enquiries.
- Feedback received through surveys.

Further operational detail and additional exclusions are set out in the Complaints Procedure.

We will not use exclusions to unreasonably refuse complaints. If we do refuse to handle an issue as a complaint, we will explain why (in writing) and signpost customers appropriately.

Building Safety Complaints

This policy recognises that complaints relating to building safety require particular care and attention. A building safety complaint is one that relates to a higher risk residential building as defined under the Building Safety Act 2022.

We will clearly identity and record building safety complaints and handle them in line with this policy and the Housing Ombudsman's Complaint Handling Code.

Using the complaints process does not limit a customer's right to raise concerns directly with the Building Safety Regulator. Where appropriate, we will provide clear information about the role of the Building Safety Regulator and how a customer can contact them.

Awaabs Law

All complaints related to Awaabs Law will follow our normal complaints process.

2. Definitions

- **Complaint:** An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Moat, its staff, or those acting on its behalf, affecting a resident or group of residents.
- **Service request:** A request requiring action to put something right or fix a problem.
- **Stage one / Stage two:** The two formal stages of Moat's complaints process.
- **Commitments:** Actions agreed as part of resolving a complaint that are delivered after the formal written response.
- **Building safety complaint:** A complaint relating to a higher-risk residential building as defined under the Building Safety Act 2022.
- **Unreasonable behaviour:** Behaviour managed in line with our Unreasonable Behaviour Policy.
- **Managing agent:** A company appointed to manage a block, estate, or land on behalf of the freeholder, a Resident Management Company, or us. They are responsible for maintaining communal areas and the wider building, including cleaning, gardening, repairs, and general upkeep. This often includes structural elements like roofs, lifts, fire alarms, and CCTV. If there's a communal boiler or heating system and no separate Energy Services Company (ESCO), the Managing Agent typically oversees day-to-day operation, servicing, and coordination of repairs.

3. How this policy supports our strategy

This policy directly supports our Corporate Strategy and Moat Offer by setting clear standards for fairness, accountability and service recovery when things go wrong.

It also supports:

- **Customer Strategy:** By identifying service failures (for example repairs, damp and mould, safety issues) and driving corrective action to prevent recurrence.
- **Customer Influence Strategy:** By ensuring customers are listened to, treated fairly and informed of outcomes, and by using complaints insight to shape service improvement.
- **Existing Homes Strategy:** By using complaints and compensation insight to shape community offers improving the lived experience of our customers and considering similar trends which could emerge in other communities.
- **New Homes Strategy:** By using complaints and compensation insight to bring forward learnings from our new homes and estates to ensure these are considered as part of our design and tenure for future developments.
- **People and Culture Strategy:** By setting clear expectations, training standards and accountability for colleagues involved in complaint handling.
- **Value for Money Framework:** By reducing repeat failures, improving early resolution and using data insight to address root causes rather than symptoms.

This policy strengthens the golden thread between customer feedback, service performance, governance oversight and organisational improvement.

4. Policy principles

Our approach to complaint handling is guided by the following principles:

- We consider each complaint impartially and base decisions on evidence.
- We are honest about what has happened, what we can do and where we are at fault.
- We make it easy to complain and provide reasonable adjustments where needed.
- We respond promptly and keep customers informed.
- We treat customers with empathy, fairness and respect, even when conversations are difficult.
- We use complaints to improve services and prevent repeat failure.

5. Aims and objectives

Aim: To provide a fair, accessible and timely complaints process that puts things right when they go wrong and drives meaningful service improvement.

Objectives:

1. Make it easy for customers to complain and access the complaints policy in a format that needs their needs and provide reasonable adjustments where needed.
2. Improve timeliness and reduce avoidable delays at both complaint stages.

3. Improve customer satisfaction with how complaints are handled.
4. Strengthen consistency and quality of complaint responses.
5. Improve how we identify, track and resolve service failures and commitments.
6. Embed learning from complaints to reduce repeat issues.

6. Policy actions

To deliver these objectives, we will:

Objective 1: Make it easy for customers to complain and access the complaints policy

- Complaints will be accessible and can be made through multiple channels without the need for written submission.
- Complaints may also be made by a representative, advocate, family member, support worker or elected official on behalf of a customer, with appropriate consent.
- Complaints can be escalated to stage two on request without further explanation or justification.
- Our Complaints Policy and the Housing Ombudsman Service will be publicised within appropriate customer communications and our website.

Objective 2: Improve timeliness

- We will monitor compliance with complaints timescales:
  - Stage one: 5 working days to acknowledge and 10 working days from acknowledgement to provide a full response.
  - Stage two: 5 working days to acknowledge and 20 working days from acknowledgement to provide a full response.
- Extensions may be used where necessary but will not exceed 10 working days at stage one and 20 working days at stage two. Extensions will always be confirmed in writing and include Housing Ombudsman contact details.
- We will address recurring causes of delay and review the use of extensions to ensure they are applied appropriately and consistently.

Objective 3: Improve customer satisfaction

- Our responses will give clear explanations, apologies (where appropriate) and details of any remedy.
- Review customer feedback on complaint handling and use it to improve our approach.
- Analyse dissatisfaction at stage two to strengthen stage one investigations.

Objective 4: Strengthen consistency and quality

- Quality check a proportion of complaint responses against internal standards to improve clarity, fairness and consistency.
- Provide guidance and training where patterns of inconsistency are identified.
- Ensure customers are consistently informed of their right to escalate complaints to the Housing Ombudsman Service.

Objective 5: Improve resolution and commitments

- Record and track all commitments to ensure agreed actions are delivered.
- Monitor recurring issues where commitments are not completed as expected.
- Provide appropriate remedies as part of our resolutions to customers. These may include:
  - Apologising
  - Acknowledging where things have gone wrong
  - Providing an explanation, assistance or reasons
  - Taking action if there has been delay
  - Reconsidering or changing a decision
  - Amending a record or adding a correction or addendum
  - Providing a financial remedy
  - Changing policies, procedures or practices

Objective 6: Embed organisational learning

- Review complaint themes regularly to identify root causes and service improvements.
- Track agreed improvement actions and report progress annually.
- We will share performance, learning and improvement insights with customers via appropriate mechanisms throughout the year.

7. Monitoring, reporting and review

We will monitor:

- Complaint volumes and themes
- Stage one and stage two timeliness
- Use of extensions
- Customer satisfaction with complaint handling
- Types of remedies awarded
- Delivery of commitments
- Housing Ombudsman determinations and compliance actions.
- Issues we have refused to handle as complaints

Performance will be reviewed monthly at service level and reported quarterly through governance arrangements.

Learning and improvements will be identified and included in future training and guidance.

The annual self-assessment against the Complaint Handling Code will be reviewed by the Board Member Responsible for Complaints prior to publication.

This policy will be reviewed every three years, or sooner if legislation, regulatory expectations or service delivery changes.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy.
An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data to ensure that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Accessibility

This policy is available on our website and can be provided in alternative formats or languages upon request. We will make reasonable adjustments to support customers in accessing and using our complaints process.

11. Related legislation and regulations

- Equality Act 2010
- General Data Protection Regulation (GDPR) and Data Protection Act (2018)
- Building Safety Act 2022
- Housing Ombudsman Complaint Handling Code

12. Related policies and procedures

- Data Retention Policy
- Unreasonable Behaviour Policy
- Anti-Social Behaviour Policy
- Compensation Policy
- Data Protection Policy
- Unreasonable Behaviour Policy
- Equality, Diversity and Inclusion Policy
- Managing Agent Policy

13. Customer engagement

We engaged with our customers during February 2026 and applied feedback prior to publication.

Document revision history

Date	Changes approved by	Details of changes made
June 2026		• Added list of exclusions • Clarification that survey feedback is not considered a complaint • Under Policy Actions: - Objective 1: how the Complaints Policy and Housing Ombudsman Service will be publicised - Objective 5: added remedies - Objective 6: how we will share learning and performance with customers.