



Trust



Kindness



Hope

**“Together, we will end poverty”**

**CLWYDALYN POLICY**

# Complaints Policy

**GOV-POL-19**

**Version 2**

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## About ClwydAlyn

Our mission is to beat poverty, and we strive to support our residents into work, training and volunteering.

## How we do things



Trust



Kindness



Hope

## Contact us



Customer Services

Monday to Friday 08:00 to 17:00 Freephone from a landline 0800 183 5757 or 01745 536800

Out of hours  
emergency repairs

0300 1233091 or text 07786 202533  
(please remember to include your name, address and telephone number in your message).



E-mail

help@clwydalyn.co.uk



Postal address

72 Ffordd William Morgan  
St Asaph Business Park  
St Asaph  
Denbighshire LL17 0JD

## Policy Information/Document Control

This Policy is an agreed statement which contains the set of principles acting as guidelines for achieving the goals of ClwydAlyn. This Policy is agreed and owned by the Committee and or the Executive Management Team. This document cannot be changed unless authorised to do so using the document change authorisation note QF-F-10.

The master copy is held by the Document Controller, the PDF version is held in ClwydAlyn's SharePoint.

For further information please contact document control [hsqe@clwydalyn.co.uk](mailto:hsqe@clwydalyn.co.uk)

## Equality, Diversity, and Inclusion

Every care has been taken to make this document inclusive. If you have any suggestions or would like this document in an alternative format, please contact document control on [hsqe@clwydalyn.co.uk](mailto:hsqe@clwydalyn.co.uk)

## Issue Number and Revision History

Version No.	Revision Details/Reason for change	Author	Date
V0	Original Document.		
V1	Updated Policy following scheduled review	L. Orger	18 Nov 2022
V2	Updated Policy following scheduled review and Onboarding of CSA Model Policy approved at Resident Committee.	L Orger	25 Feb 2026

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# 1 Complaints Policy

## 1.1 Overview of complaints

**ClwydAlyn:** is committed to dealing well with any concerns or complaints raised by our Residents or customers about our services. We will provide any service they are entitled to which we have failed to deliver. If we get something wrong, we will apologise and put things right. We also aim to learn from our mistakes and use the information we gain to improve our services. ClwydAlyn welcomes complaints as an opportunity to scrutinise and improve performance.

**When to use this Policy/make use of the Information Pack:** When a person tells us of their concerns or complains to us, we will respond in the way explained in the Policy/Information Pack. However, sometimes they may have a statutory right of appeal. If this is the case, rather than investigate their concern we will guide them on how they can appeal. Sometimes concerns may be expressed about matters that cannot be decided by ClwydAlyn, such as with Care Homes. In these instances, we will advise on how to make such concerns known to the appropriate third party.

This Policy does not apply if the matter relates to a data protection, disrepair or insurance claim. In these circumstances, contact should be made directly with ClwydAlyn’s Data Protection Officer, Assets Team or Insurance Officer respectively.

**Have they asked us yet?** If the Complainant is approaching us about a service for the first time (e.g. reporting a faulty boiler, requesting an appointment etc) then this Policy does not apply. The Complainant should first give us a chance to respond to their request. If they make a request for a service and then are not happy with our response, then they will be able to make a complaint.

What is NOT a complaint?
A request for information or explanation.
Policies or procedures that come under separate appeals procedures.
Insurance claims, including personal injury.
A Data Protection complaint.
A Disrepair Claim that is being dealt with by ClwydAlyn’s Assets Team.
A complaint which the Ombudsman has already investigated and decided on.
A first request for a service.
Complaints that are already in Court, have been heard in Court or at a Tribunal.
A means to seek change to legislation or a ‘properly made’ decision (when laws or policies have been correctly applied, such as with the setting of rent payments).

## 1.2 Definition of a complaint

A complaint can be defined as an expression of dissatisfaction or concern. It can be written or spoken or made by any other communication method. A complaint can be made by one or more members of the public (someone or a group having received or been denied a service to which they are entitled). It can be about a lack of action, or the standard of service provided. A complaint is something that requires a response. It can be about ClwydAlyn or a Contractor working on its behalf.

Complaints can be dealt with in writing, by email, face to face, via the website, Resident Portal, social media or by telephone. All complaints are processed by the **Resident Support & Resolution Team (RS & RT)**, dealt with by an appropriate Officer and monitored/reported on by the **Resident Support & Resolutions Manager**.

What is a formal complaint?
Where there has been delays in responding to enquiries and requests.
Where there has been a failure to provide a service, or it is not of an acceptable standard.
Where there has been a failure to carry out a repair within the designated timescale.
Where there has been a refusal to give advice or answer a question.
Where poor treatment or attitude has been experienced from a staff member.
Where we have failed to follow proper procedure.

## 1.3 Dealing with concerns or complaints

- 🏠 We will formally acknowledge a concern or complaint within 5 working days. If we can resolve it quickly to the Resident's satisfaction, we will do so.
- 🏠 We will ask them how they would like us to communicate with them and check whether they have any other requirements.
- 🏠 We will deal with their concern/complaint in an open and honest way.
- 🏠 We will make sure that their dealings with us in the future do not suffer because they have expressed a concern or made a complaint.
- 🏠 We will let them know the outcome of the complaint they have raised, and any service improvements made as a result.

## 1.4 What if there is more than one organisation or agency involved?

If the complaint covers more than one organisation, we will usually work with them to decide who should take a lead in dealing with the matter. We

will provide the name of the person responsible for communicating with the various parties whilst considerations are underway and designate a Lead Complaint Officer.

If the complaint is about an organisation working on our behalf, such as a Contractor etc, we will look into this ourselves and respond. The timeframes and process for these complaints will align with our Complaints Procedure, and we will outline these to any External Partners.

### **1.5 What if there is more than one Team within ClwydAlyn involved?**

Complaints can cover multiple departments within the Organisation. To ensure that this is co-ordinated appropriately and that there is a single point of contact for the Complainant, the RS & RT will take the lead in co-ordinating, ensuring that the response is provided in full, with all points of concern answered, and is presented in a consistent and appropriate format.

### **1.6 Investigation**

We will inform the Complainant of who we have asked to look into the concern or complaint. If the concern is straightforward, we'll usually ask an appropriate Officer from the specific service to look into it and reply. If it is more serious, (and always when at Stage 2), the complaint will be referred to a senior staff member.

We will set out and summarise our understanding of the concerns and ask the Complainant to confirm that we've got it right. We'll also ask what outcome is hoped for. The Investigating Officer looking at the complaint will usually need to see the files we hold relevant to it. If the Complainant does not want this to happen, it is important that we are informed. However, they must be made aware that this could potentially impact on the investigation we can undertake.

The RS & RT are always on hand to provide assistance to Investigating Officers. No extension is available to a Stage 1 complaint. Should an extension to the 20 working days for a Stage 2 complaint be needed, we will:

-  Let it be known within this time why we think it may take longer to investigate and say how long we expect it to take.
-  Give regular updates, including saying whether any developments might change our original timeframe. The person who is investigating the concerns will aim first to establish the facts. The extent of this investigation will depend on how complex and how serious the issues raised are.

- 🏠 In most instances, we will ask to meet to discuss the issues. Occasionally, we might suggest mediation or another method to try and resolve disputes.
- 🏠 We'll look at all relevant evidence. This could include files, notes of conversations, letters, emails or whatever may be relevant to the matter in question. If necessary, we'll talk to staff or others involved and look at our policies and any legal entitlement and guidance.

## 1.7 The Complaints Process

The RS & RT is responsible for the administration of complaints. Once a complaint has been received, it will be submitted to the Team for the Complaints Officer to co-ordinate. The Officer will be responsible for acknowledging the complaint, ensuring we have the correct details and ensuring that the complaint is investigated by the appropriate Officer. They will act as the direct point of contact throughout the complaint process, and will be available to help assist where possible, both the Complainant and Officers to reach the right outcome.

## 1.8 Stage 1 – Informal Investigation

Stage 1 is typically dealt with at management level. We believe that it is always best to try and resolve issues as quickly as possible and in agreement with the Complainant. All concerns or complaints will be formally logged. Where we can resolve a complaint quickly and at first point of contact, we will do so, without the need for any formal administration such as outcome letters, etc.

The aim is to resolve a Stage 1 complaint within 10 working days. If the complaint is particularly complicated, it may be that it will need to be investigated directly at Stage 2. If this is the case, we will need to contact the Complainant to explain the reasons for this. The Investigating Officer should ensure that they keep in contact with the Complainant during the complaint process, to keep them fully informed of progress.

For a stage 1 complaint, there is no facility to extend the 10-working day period. Should additional time be required, the complaint will automatically transition over to Stage 2. This will be coordinated by the RS & RT Manager, working with both the Stage 1 and Stage 2 Investigating Officers to establish on a case-by-case basis, who should take the lead on the investigation. Should a complaint transition over to a Stage 2, the Complainant will be kept fully updated.

## 1.9 Stage 2 – Formal Investigation

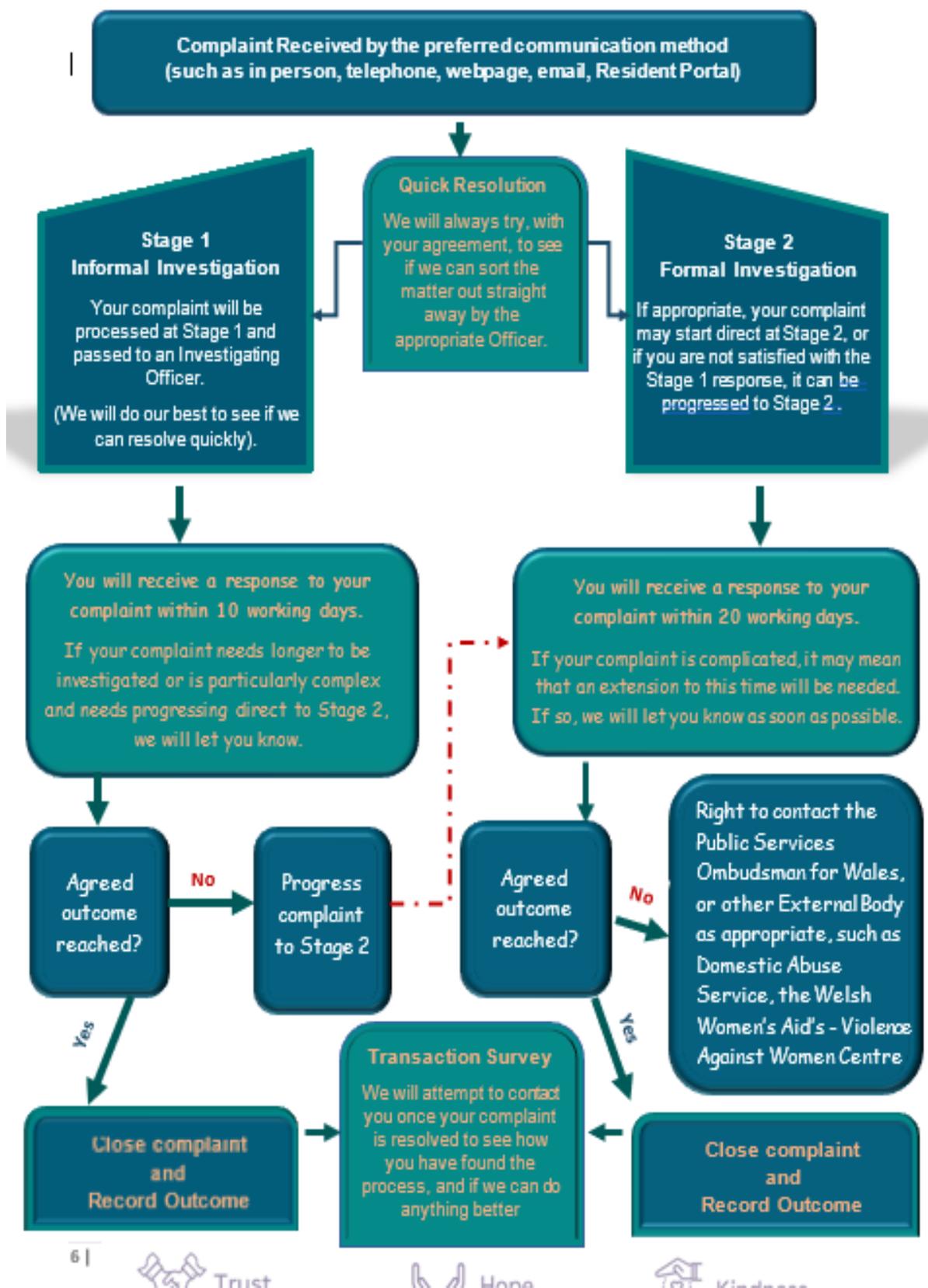
A Stage 2 complaint is typically dealt with at Senior Management/Director level. If the Complainant is unhappy with the response received from us at

Stage 1, they can ask for their complaint to be progressed to Stage 2. Alternatively, should the Stage 1 complaint become more complex or additional time is needed, the complaint will automatically transition to a Stage 2, as outlined in 1.8 above.

Having been advised by the Complainant, the RS & RT will arrange for the complaint to be progressed to Stage 2 and investigated by the relevant Senior Officer. We will tell the Complainant who has been asked to look further into their complaint and ensure we have clarity on the outcome being sought. It is strongly advised that where appropriate, the Investigating Officer should meet face to face with the Complainant.

The aim is to resolve Stage 2 complaints within 20 working days. However, if the complaint is more complicated or becomes protracted, it may take longer to consider. If this is the case, the RS & RT will notify the Complainant, explaining why and how long we expect the full investigation to take.

### 1.10 At a glance.... the different stages of a complaint



### **1.11 Timescales for making a complaint**

Normally we will only consider concerns or complaints, if informed of them within 12 months of them taking place. This is because it is better to look into concerns whilst the issue is still fresh in everyone's mind. In exceptional cases we may look outside of this timeframe, but we would have to be provided with strong reasons to do so. In any event, regardless of the circumstances, we will not consider any concerns that took place more than 3 years ago.

### **1.12 What if help is needed making a complaint?**

We will always aim to help Residents and customers tell us of their concerns. If they need extra support, we will try to put them in touch with someone who can help, such as Citizen's Advice, Age Concern, Shelter Cymru, etc.

### **1.13 What happens once a complaint is made?**

Complaints are recorded along with any action taken. Complaints can be dealt with in writing, by email, face to face, via the website, Resident Portal, social media or by telephone. All complaints are processed by the RS & RT, dealt with by the appropriate Officer and monitored/reported on by the RS & RT Manager.

### **1.14 Outcome of Complaint**

Once we have investigated a complaint, we will let the Complainant know what we have found, using their preferred method of communication, explaining how and why we came to our conclusions.

If we find that we got it wrong, we will tell the Complainant what happened and why. If we find that there is a fault in our systems or the way we do things, we will state what it is and how we plan to change things to stop it from happening again. If we get it wrong, we will always apologise.

### **1.15 Putting things right**

If it is established that we didn't provide a service that we should have, we will aim to rectify this. If we didn't do something well, we will aim to put it right. If a Complainant has lost out as a result of a mistake on our part, we will try to correct it; to get it to the position it would have been in if we had got it right.

If a Resident had to pay for a service themselves, which should have been covered by us, we will make good what they have lost.

### 1.16 What happens if unhappy with Stage 2 outcome?

If the Complainant remains unhappy with the outcome of Stage 2, then for housing-related matters, they have the right to approach the Public Services Ombudsman for Wales, the Energy Ombudsman for any heat network complaints, or other External Body as appropriate. The Ombudsman is independent of all Government Bodies and can look into a complaint if they believe that the Complainant personally, or the person on whose behalf they are complaining:

- 🏠 has been treated unfairly or received a bad service through some failure on our part.
- 🏠 has been disadvantaged personally by a service failure or has been treated unfairly.

The Ombudsman will expect the Resident or customer to bring their concerns to our attention first, affording us the opportunity to resolve the issue internally through our Complaints Procedure.

### 1.17 Disrepair

Disrepair is where the Landlord has failed to duly put right a problem with a let property within a reasonable timeframe (generally 20 days but can be longer). We are aware that there are Law Firms/Solicitors actively contacting Residents; in effect cold calling and misinforming them, encouraging Residents to pursue legal proceedings against their landlord. They may even apply pressure and threatening tactics where Residents decide that they wish to withdraw. They will advise that the claim will be on a 'no win/no fee' basis. However, it is extremely important to note that in the majority of cases, claims that progress to Court against Landlords are unsuccessful. If this is the case, the Resident could potentially be responsible for all the Landlord's legal expenses incurred. Not only this, but a County Court Judgement could be lodged against them.

At ClwydAlyn, we want to avoid this and work with our Residents to ensure all repairs are carried out in a timely and satisfactory manner. We therefore encourage Residents to contact us if they have any concerns or complaints over the length of time being taken to carry out their repairs. If Residents are approached by one of the Law Firms/Solicitors described above, or a representative encouraging them to bring action, we would suggest that they obtain their own independent legal advice to check any claim made by one of the Firms that have approached them.

### 1.18 Welsh Language Standards

We welcome communications in Welsh, and our Residents and staff have the right to be able to communicate with us through the medium of Welsh. Should a Complainant wish to communicate with us in Welsh, we will

ensure that this is facilitated, both verbally and in any written communications.

Should a meeting be requested to be facilitated in Welsh, we will ensure that this request is acted upon, either being conducted in Welsh or through the assistance of a simultaneous or consecutive translation service from Welsh to English. Where this has been requested, any correspondence will be communicated in Welsh.

A copy of this Policy is available in Welsh, alongside the English version.

### **1.19 Data Protection**

The Data (Use and Access) Act 2025 (DUA Act) section 103 amends the Data Protection Act 2018 to add a new requirement - data subjects must now first raise their complaint with the data controller (i.e. the organisation handling their personal data, in this case, ClwydAlyn Housing Ltd) before escalating it to the ICO (which will become the "Information Commission" under the DUA Act, but will still use the initials ICO).

We will take steps to help the Complainant if they wish to make a complaint about how ClwydAlyn uses their personal information. We will acknowledge the complaint within 30 days and respond to it 'without undue delay'. We will investigate the complaint, including making relevant enquiries, keeping them informed of progress, and we will notify the Complainant of the outcome once the investigation is complete. The DUA Act requires the Complainant to allow us to complete our response to the complaint before they can escalate the matter to the ICO.

These new requirements are expected to commence around June 2026. In anticipation of the new rules, ClwydAlyn's data protection complaints will be dealt with by our Data Protection Officer in accordance with the statutory complaints process under the DUA Act, rather than our usual complaints procedure.

If the complaint, or any element of it, is about data protection and how ClwydAlyn uses their personal information, we will let the Complainant know that we have passed their complaint (or the data protection parts of it) to our Data Protection Officer to investigate, and that they will acknowledge that part of their complaint separately.

### **1.20 Energy Ombudsman**

The Energy Ombudsman was founded to provide an independent and impartial dispute resolution service within the Energy Sector, including Heat Networks (also known as district heating). Heat Networks supply heat from a central source to multiple consumers via a network of underground pipes carrying hot water.

All businesses who are deemed a Heat Network Supplier, were urged to register to comply with the new legislation for Heat Networks which came into effect on 1 April 2025. ClwydAlyn operates some heat networks within its homes portfolio, and as such has signed up to the scheme, with all complaints received that relate to heat network systems, now falling under the remit of the Energy Ombudsman.

The administration of these complaints does differ to that under the Housing Ombudsman, requiring only the one stage to be completed. Upon notification of a complaint, ClwydAlyn will work with the Complainant to try and resolve the matter, within a set timeframe of up to 8 weeks. Should a resolution not be reached within this timeframe, the Complainant has the right to refer their complaint to the Energy Ombudsman.

### **1.21 Compensation**

Compensation is offered in the first instance as recompense for any out of pocket expense that the Resident has incurred, or in recognition of damage caused. A Compensation Table is included (Appendix 1), outlining a number of parameters to guide the applying of compensation payments. This is not an exhaustive list and should be considered on a case-by-case basis, and where necessary in conjunction with the RS & RT Manager.

Compensation can also be offered in recognition of any delays, distress or upset caused. These payments usually fall under the remit of a 'good will' gesture, and will be determined on a case-by-case basis.

Where compensation has been agreed upon, and where it has been identified that the Complainant is in rent arrears, ClwydAlyn reserves the right to consider on a case-by-case basis, whether all or part of the compensation payment should be assigned to offset the rent arrears.

### **1.22 Our commitment to the Complainant**

Their complaint will be processed in accordance with our Complaints Policy. We will respond to a complaint within the stated timeframes. If this is not possible, due to their complaint being more complex, we will advise the Complainant of this, explain why, tell them how long we expect it to take and provide them with updates. We will deal with their complaint in a professional, honest and consistent way and make sure that their dealings with us in the future will not suffer as a result of their expressing concern or making a complaint. Where lessons have been learnt, we will let them know.

### **1.23 What we expect from the Complainant**

We believe that all Complainants have the right to be heard, understood and respected. However, we also consider that our staff have the same

rights. We will not accept aggressive or abusive behaviour, unreasonable demands or unreasonable persistence. In accordance with this, ClwydAlyn has an Unacceptable Behaviour Policy to provide clarity and guidance to staff and Residents ([Unacceptable Behaviour Policy](#)).

### 1.24 The use of Artificial Intelligence (AI)

We are aware that Complainants may choose to submit their complaint assisted by generative AI. Whilst Complainants are entitled to choose how they submit, review and respond to our correspondence, it is important to note that AI-generated content can sometimes include inaccurate or unsupported claims.

### 1.25 Lessons learned

We take our Residents/Customers' concerns and complaints very seriously and take actions to learn from any mistakes we've made. Our Executive Leadership Team receives quarterly reports on complaints. Complaints are also reported to our Complaints Panel, Resident Committee and Board.

Where there is a need for change, we will develop an Action Plan setting out what we will be done, by whom, and target timescales. We will feed back to the Complainant when any changes we've promised have been implemented.

### 1.26 Satisfaction Survey / Follow Up

In order that we can learn from Residents/Customers and their experiences, once their complaint has been dealt with, we will contact them. With their consent, they will be asked some confidential questions to see how they felt their complaint was handled. Any feedback/information provided will be treated confidentially and feed into any lessons learned, or service improvements that can be implemented.

### 1.27 Contact Details

#### ClwydAlyn Housing Ltd

By telephone: 01745 536800

By the Website: [www.clwydalyn.co.uk](http://www.clwydalyn.co.uk)

By Email: [Resident.Resolution@clwydalyn.co.uk](mailto:Resident.Resolution@clwydalyn.co.uk)

By the Portal: myclwydalyn

By Letter: ClwydAlyn Housing Ltd, FREEPOST, Venue 72, St Asaph Business Park, St Asaph, Denbighshire, LL17 0JD

### **Public Services Ombudsman for Wales (PSOW)**

By Letter: PSOW, 1 Ffordd yr Hen Gae, Pencoed, CF35 5LJ

By telephone: 0300 790 0203 (local rate)

By the Website: [www.ombudsman.wales](http://www.ombudsman.wales)

### **Energy Ombudsman**

By Letter: Energy Ombudsman, PO Box 966, Warrington, WA4 9DF

By telephone: 0330 440 1624

By email: [enquiry@energyombudsman.org](mailto:enquiry@energyombudsman.org)

By the Website: [www.energyombudsman.org](http://www.energyombudsman.org)

### 1.28 Complaints Form

<b>Your details or details of the person you are completing this form on behalf of</b>	
<b>Title:</b>	<b>Name:</b>
<b>Surname:</b>	
<b>Address:</b>	
<b>Postcode:</b>	
<b>Email address:</b>	<b>Preferred contact/mobile number:</b>
<b>Department/service/staff member you wish to complain about.</b>	
<b>When did you first become aware of the problem?</b>	
<b>If this was over 12 months ago, please say why you have not complained before.</b>	
<b>Have you already reported this?</b>	
<b>If so, please give brief details of how and when you complained, and what happened afterwards.</b>	
<b>What do you believe has gone wrong?</b>	
<b>How have you been affected?</b>	
<b>What do you think should be done to put things right?</b>	

Please include any supporting documentation/photos. If you need any help in completing this Form, please get in touch with us (details at 1.27 of the Pack). If needed, please use the additional page provided to expand on your complaint.

Your signature: \_\_\_\_\_ Date: \_\_\_\_\_

Additional supporting information concerning your complaint:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

### 1.29 Compensation/Discretionary Table

- Proof of cost required, where applicable.
- Aim to be consistent across all claims.
- Compensation amounts provided in the table are a guide. Please liaise with the RS&R Team to agree the appropriate compensation. All compensation will be treated on a case-by-case basis.
- For complaint situations only, where ClwydAlyn accept that they are at fault.
- Decant costs and allowances detailed in Temporary and Permanent Decant Policy

COMPENSATION ELEMENT	AMOUNT	COMMENTS
Replacement: carpet/laminate flooring	£500.00	Reasonable amount for voluntary excess on an accidental damage flooring insurance claim.
Replacement: white goods per item	£500.00	Deemed a reasonable amount for voluntary excess on an accidental damage contents insurance claim on such items.
Replacement: large furniture per item	£500.00	Per large furniture item such as a settee, lounge chair, dining room table and chairs. Deemed reasonable amount for voluntary excess on an accidental damage contents insurance claim.
Replacement: bedding/towels Duvets/pillows Clothing	£150.00 £150.00 £150.00	Cost to cover either replacement of, or cleaning of, items claimed for. If, in any one case, all sets of items are claimed for, then a total of £150.00 should be claimed.
Extra electrical usage / provision of electrical heaters	£200.00 (max)	Fixed daily amount. Distinction made between warmer/colder months, typically: Warmer months: April – September (£4.50 per day – hot water only) Colder months: October – March (£9.00 per day – hot water/heating)
DISCRETIONARY ELEMENT	AMOUNT	COMMENTS
Recognition of upset and inconvenience	£200.00	At the discretion of the Investigating officer.
Rent/Service Charge refunds	Determined: case by case	At Officer discretion. If complainant in arrears – seek to reach compromise to offset this. For those up to date, option to provide rent credit.
Other/discretionary payments	Determined: case by case	For all other items/circumstances that fall outside of the above, to be considered on an ad hoc basis at Officer discretion in conjunction with the RS & RT to ensure fair and due process adhered to.