

Complaints Policy
Curo Group (Excluding Enterprise)

Policy Owner:
Chief Governance Officer

Accountable Lead:
Head of Complaints & Improvement



Policy Control	
Policy Level	Operational
Policy Reference	CS/CE/001/2019 (Corp)
Link to Strategy	Trusted Customer Service
Version Control	V1 – Dec 2012: updated Group policy V2 – Feb 2016: Policy Review V3 – Feb 2022: Policy Review V4 – Oct 2022: Policy Review V5 – Dec 2022: Change in 6.1 (20-10 days) V6 – Oct 2023: Change in 4.6 (policy complaints) and in 7 (Associated documents) V7 – Apr 2024: Policy Review V8 – Jul 2024: Removed 4.6 and amended 5.4 (policy complaints) V9 – April 2025: Policy Review
Approved by	Chief Governance Officer
Consultation	Customer Services Leadership Team and Governance Leadership Team
Equality analysis	April 2025
Next review date	April 2028

Complaints Policy

1. Policy Statement and Aims

- 1.1** One of our main strategic priorities is Trusted Customer Service. This focuses on delivering high-quality, reliable services that meet the needs of our customers and communities.
- 1.2** We recognise that customers can be dissatisfied with our services. When this happens, the way we manage, resolve, and learn from our mistakes is an important part of providing Trusted Customer Services.
- 1.3** At Curo, we value the experiences of our customers. We are committed to listening to customers when something has gone wrong and working with them to reach a resolution.

- 1.4.** We recognise that complaints provide us with valuable insight to drive learning and improvement of our services, in line with our strategic priority of Solid Foundations.
- 1.5** This policy outlines the principles of how we manage complaints. The accompanying procedure details how we put these principles into practice.
- 1.6** Our complaints policy is published on our website, along with our self-assessment against the Housing Ombudsman Service's Complaint Handling Code and our annual Service Improvement Report. These are available in alternative formats upon request.
- 1.7.** Our website and any formal correspondence issued in response to a complaint will provide customers with the contact information for the Housing Ombudsman, who can be contacted at any stage of the process.

[Curo Website - Complaints Page](#)

2. Definitions

- 2.1** Curo means any or all organisations in the Curo Group, with the exception of Curo Enterprise Ltd, who maintain their own separate complaints policy.
- 2.2.** A service request is a request from a customer for Curo to act. This could be a report of antisocial behaviour by a neighbour or a repair which is needed to a customer's home. If a customer expresses dissatisfaction with our response to their service request, they will be given the option to raise a formal complaint, even while the service request is still being addressed.
- 2.3.** A complaint is any expression of dissatisfaction, however it is made, about the standard of service we have provided, actions or lack of action on our part, our colleagues, or those acting on our behalf, affecting an individual or group. A customer does not have to use the word 'complaint' for it to be treated as such. Whenever a customer expresses dissatisfaction, we will give them the option to make complaint.
- 2.4.** Unacceptable behaviour refers to action or conduct which is not appropriate or acceptable and may cause alarm, harassment or distress. This may include being aggressive, making demands in a threatening way, excessive contact or not giving the other party the opportunity to respond. We give more examples in our Acceptable Behaviour Policy.

2.5. A senior manager is defined as anyone who manages a manager, a Senior Manager, Head of Service, Assistant Director, Director, or Chief Officer.

2.6. Complaints Handling Code means the Housing Ombudsman Service's Complaints Handling Code unless otherwise stated.

3. Scope

3.1. The policy applies to all Curo organisations, except for Curo Enterprise Ltd.

3.2 The policy applies to any parties who we have appointed to deliver services, such as external contractors.

3.3. This policy applies to complaints made by anyone who we have a contractual agreement with, provide services to, or has been unreasonably affected by a service we provide.

4. Roles and responsibilities

4.1 The Board and Executive, through the Policy Owner, make sure that the policy delivers Curo's strategic objectives and reflects corporate values including by ensuring strategic decisions are informed by the learning from complaints and by allocating resource as appropriate to address complaints.

4.2 The Accountable Lead is responsible for reviewing and implementing the policy in Curo, so that the principles are achieved through appropriate team plans and objectives, and procedures translate the policy objectives into practice. They will also manage the Complaints and Improvement Team and promote continuous improvement to our services.

4.3 Complaints and Improvement Specialists are responsible for triaging and allocating new complaint submissions, as well as completing quality assurance checks and engaging with the Housing Ombudsman Service.

4.4 Complaints Support Advisors are responsible for assisting complaint-handling colleagues with administrative tasks in relation to the complaint or any efforts made to resolve it.

4.5. All operational managers and team leaders are responsible for handling complaints at Stage 1. We recognise that the majority of complaints can be resolved at this stage through good communication and timely resolutions.

- 4.6.** If a customer is dissatisfied with our response to or handling of their complaint at Stage 1, they have the option to escalate their complaint. A relevant senior manager is responsible for managing the complaint at Stage 2. This is the final stage of our internal complaints process.
- 4.7.** If a complaint is about the behaviour or conduct of an individual colleague, their line manager is responsible for managing the complaint at Stage 1. If a complaint of this nature is escalated to Stage 2, it will be addressed by the relevant senior manager. Our Human Resources department will offer support at Stage 2 but will not address the complaint with the customer directly, so as not to prejudice any formal investigation which may be conducted.
- 4.8.** If a complaint is about the behaviour or conduct of one of our contractors, the relevant Contract Business Partner is responsible for addressing the complaint at Stage 1. If a complaint of this nature is escalated to Stage 2, it will be addressed by the relevant senior manager.
- 4.9.** If a complaint is about the structural stability or spread of fire or smoke in communal areas of one of our Higher-Risk Residential Buildings, our Property Safety department are responsible for addressing the complaint in accordance with our usual two-stage process. Customers can refer complaints of this nature to the Building Safety Regulator, as well as the Housing Ombudsman, if they are dissatisfied with our response to or handling of their complaint.
- 4.10.** If a complaint is about our use of a customer's personal data, the Data Protection Manager is responsible for addressing the complaint. Complaints of this nature are addressed in a single stage and quality assurance is conducted by a senior manager.
- 4.11.** All managers and senior managers are responsible for learning from complaints (including from recommendations made by the Complaints and Improvement Team) to improve their services.
- 4.12.** All colleagues are responsible for recording complaints in a timely fashion, making all efforts to assist in delivering resolutions and understanding the Complaint Handling Code.

5 Principles

- 5.1** The way we manage complaints reflects our core CROFT values.
- Caring: we support customers who make a complaint, making the process easy for them.

- Respectful: we listen to our customers and act on what they tell us.
- Open: we keep customers informed and where we can't resolve a complaint in a way that satisfies the customer we'll explain why.
- Fair: we review the outcomes of complaints with customers and colleagues to make sure we're consistent in the way we approach and resolve complaints.
- Trusting: when we agree a resolution, we'll do what we say we'll do.

5.2. Our complaint values reflect the experience we want our customers to expect when they make a complaint. These are:

- Speed: we will act swiftly to prevent issues escalating and provide timely resolutions when possible.
- Empathy: we will listen to customers to understand how the issues are affecting them and their homes.
- Certainty: we will build trust by addressing complaints fairly communicating what can do to resolve them.
- Ease: we will ensure our complaints process is accessible and easy to navigate, to prevent further inconvenience to our customers.

5.3. When responding to a complaint, we will consider what impact the issue is having on the customer. We recognise that issues affecting a customer's home can be particularly impactful, especially when the issue impacts their day-to-day life. Any resolution offered to a customer should be reflective of the impact on them and the extent of any service failings identified.

5.4. We will consider each complaint on its own merit, with respect to the customer's individual needs and circumstances. The accompanying procedure ensures consistency in our approach, but we encourage complaint handlers to use their discretion in agreeing suitable resolutions with customers.

5.5. We will use complaints as an opportunity to rebuild trust with our customers, with the goal of returning them to the position they were in before the issue began.

5.6. It's important that colleagues are impartial when dealing with a complaint. Colleagues should declare to their line manager if they feel they are unable to fairly address the complaint. Any reasons for doing so could include having a family relation to the customer or being directly involved in an event that gave rise to the complaint. If the complaint is reassigned, we will notify the customer.

5.7. We make it easy for customers to make a complaint. Customers can make complaints through any of Curo's communication channels.

This includes by telephone, email, social media, letter, webchat, WhatsApp, SMS, webform, MyCuro online portal or face to face.

- 5.8.** We accept complaints made on behalf of customers by third-party representatives who have the necessary permissions. We will need a signed consent form from the customer confirming that they wish for the third party to act on their behalf, and confirmation from the third party of their details so that we can communicate with them about the complaint. We will only accept complaints from one third party on behalf of a resident per complaint. We will not liaise with multiple representatives
- 5.9.** When communicating regarding a complaint, we will use plain language and, where necessary, make reasonable adjustments to our service based on the customer's communication requirements. This can include offering large print, Braille, translation services or an in-person meeting.
- 5.10.** We encourage our colleagues and customers to engage in adult-to-adult conversation with an emphasis on being open, fair and working together to reach resolutions.
- 5.11.** We expect our customers to treat our colleagues with respect. We recognise that experiencing issues in your home can be frustrating. However, if a customer displays unacceptable behaviour, we may apply our Acceptable Behaviour Policy and a communication plan.
- 5.12.** We will not generally identify individual members of staff or contractors when communicating with customers, except where this information is pertinent to the resolution of a complaint.
- 5.13.** We record all complaints and use the information to improve our services. We carry out analysis of complaints to identify root-cause, trends and underlying reasons for things going wrong.
- 5.14.** We will send digital surveys to customers who have made a complaint once it is closed to ask if they are satisfied with our handling of the complaint and gather feedback on our performance.
- 5.15.** We may offer resolution (which may include compensation) without admission of liability.

6 Application

- 6.1** We will address complaints in a two-stage process (other than as explained above and below) and in accordance with the Complaints Handling Code.

Stage 1:

- We will acknowledge a complaint within 5 working days of receiving it. The acknowledgement will include a complaint reference, the customer's reason for their complaint, the name of the colleague responsible for handling the complaint and the contact details for the Housing Ombudsman.
- We will send our Stage 1 response within 10 working days of the complaint being acknowledged.
- In some instances, we may require an extension to this deadline. If we do, the extension will be no more than 10 working days without good reason, and the reason will be clearly explained. We will also provide the customer with the contact details for the Housing Ombudsman.
- Sometimes a customer will raise additional issues before we have sent our Stage 1 response to their original complaint. In these instances, if the additional issues are relevant to the complaint, we will address them in our Stage 1 response.
- Where the Stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.
- After sending our Stage 1 response, customers will generally be given 10 working days to respond. This is to ensure that the complaint is being progressed in a timely fashion.
- If a customer does not engage in the complaints process and we are unable to reach them, their complaint will be closed due to no contact. We will clearly communicate this to the customer and update our records.
- Customers can escalate their complaint if they dissatisfied our response to or handling of their complaint at Stage 1 through any of Curo's communication channels. Customers are not obligated to provide an explanation for their decision.

Stage 2:

- The colleague responsible for the complaint at Stage 2 will not be the same colleague who responded to the complaint at Stage 1.
- We will acknowledge a complaint at Stage 2 within 5 working days of receiving the customer's escalation request. The

acknowledgement will include a complaint reference, the customer's reason for their complaint, the name of the colleague responsible for handling the complaint and the contact details for the Housing Ombudsman.

- We will send our Stage 2 response within 20 working days of the complaint being acknowledged.
 - We may require an extension to this deadline. If we do, the extension will be no more than 20 working days without good reason, and the reason will be clearly explained. We will also provide the customer with the contact details for the Housing Ombudsman.
 - Sometimes a customer will raise additional issues before we have sent our Stage 2 response. If the additional issues are relevant to the complaint, we will address them in our Stage 2 response.
 - Where the Stage 2 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.
 - After sending our Stage 2 response, customers will generally be given 10 working days to respond. This is to ensure that the complaint is being progressed in a timely fashion.
 - If a customer does not engage in the complaints process and we are unable to reach them, their complaint will be closed due to no contact. We will clearly communicate this with the customer and update our records.
 - Stage 2 is the final stage of our complaints process. Customers can refer their complaint to the Housing Ombudsman Service if they are dissatisfied with response to or handling of their complaint at Stage 2.
- 6.2.** If a complaint is received about our use of customer's personal data, these will be addressed in a single stage process by the Data Protection Manager, who is Curo's designated Data Protection Officer. With complaints of this nature, we will signpost customers to the Information Commissioner's Office should they remain dissatisfied. The Information Commissioner's Office is an independent body established to uphold information rights and investigate complaints regarding use of personal data. Quality assurance of these complaints will be completed by a senior manager.

- 6.3.** Complaints which concern the termination of a customer's starter tenancy are addressed using the appeal process outlined in our Starter Tenancy Policy and Procedure.
- 6.4.** Curo Enterprise have a separate complaints process which reflects the different nature of their service.

<https://www.curo-sales.co.uk/complaints>

- 6.5.** We will not process a complaint regarding issues that happened over 12 months ago unless they are still ongoing at the time the complaint is made. We don't hold personal information for longer than we need to, meaning it is challenging for us to address historic issues as relevant information may no longer be available. We will consider extenuating circumstances when applying this principle.
- 6.6.** We will not process a complaint regarding issues which are subject to legal proceedings. This does not include issues being pursued via the Pre-Action Protocol for Housing Conditions Claims.
- 6.7.** We will not process a complaint regarding issues which have already been addressed as a complaint, as doing so could delay the customer's access to the Housing Ombudsman Service. Equally, we will not process a complaint regarding our handling of another complaint, as the Housing Ombudsman Service is responsible for determining whether we handled a complaint appropriately.
- 6.8.** We may change our approach to managing a complaint if the customer is demonstrating unacceptable behaviour, in line with our Acceptable Behaviour Policy. In these instances, we will write to the customer to advise how we will process their complaint and our reasoning for doing so, with consideration to the Equality Act 2010 and our obligations under the Complaints Handling Code. In exceptional circumstances, we may not process a complaint due to unacceptable behaviour.
- 6.9.** If we do not process a complaint for a customer, we will outline our reasoning and provide them with the contact details for the Housing Ombudsman Service.
- 6.10.** If customers remain dissatisfied after their complaint has exhausted our process, we will signpost them to other relevant organisations, as well as the Housing Ombudsman, depending on the nature of their complaint. These could include:
- A local MP or Councillor
 - The Building Safety Regulator
 - The National House Builders Council
 - The New Homes Ombudsman

- The Financial Ombudsman
- A support service commissioner
- The Information Commissioner's Office
- The Equality and Human Rights Commission

6.11. We ensure consistency in complaint handling during both stages of the complaint process by delivering relevant training to all colleagues, monitoring open complaints, completing quality assurance checks on a sample of closed complaints and sharing examples of good and bad practice from the Housing Ombudsman. Our Complaints Review Forum advise on our compliance with this policy and review anonymised complaints. They also advise if we are making fair and right decisions when it comes to resolution, including compensation.

6.12. We publish an annual Service Improvement Report on our website. This includes:

- The number, type and outcome of complaints.
- What we've learnt from complaints.
- What we've done as a result.

7. Associated documents

- Curo Strategic Plan
- Complaints Equality Impact Assessment
- Complaint Handling Guide
- Curo Complaints and Improvement Team Processes
- Enterprise Complaint Procedure
- Starter Tenancy Policy and Procedure
- Relevant Care & Support procedures which may be required by commissioning bodies and regulators.
- Compensation Policy & Procedure
- Curo Acceptable Behaviour Policy
- Housing Ombudsman Self-Assessment

8. Measures of success

We will measure success of this policy by:

- Reviewing customer feedback on our complaints process and monitoring customer satisfaction
- Checking colleague performance through a Quality Assurance process.
- Monitoring our compliance with the deadlines for formal acknowledgement and response outlined in the Complaint Handling Code.

- Monitoring the percentage of complaints that are resolved at Stage 1.
- Using the Complaints Review Forum to check anonymised cases and collate feedback on how we handle complaints.
- Using Housing Ombudsman investigations and determinations to help shape our services and complaint handling.
- Benchmarking our performance against that of our peers, for example by reviewing the relevant Tenant Satisfaction Measures.

9. Equality

We've carried out an Equalities Impact Assessment in April 2025 to identify potential inequalities in the impact of this policy on different sections of the community. Monitoring of the effect of the policy is therefore in place.