



LUMEN HOUSING LIMITED

COMPLAINTS POLICY



Document Information

Issue Date		4th October 2022
Version/Issue Number		2
Document Status		Final
Effective From Date		1st April 2024
Objective	To provide an overview of how Lumen Housing will provide a fair and accessible complaints service to its customers.	
Who needs to know?	All	
Documentation	Stage 1 Complaint Handler Guidance, Stage 2 Complaint Handler Guidance, Lumen Staff FAQ's, Unacceptable Behaviour Policy; Dealing with Abusive and Aggressive Behaviour Procedure, Reasonable Adjustments Policy	
Document Sponsor	Name	David Galvin
	Job Title	Chief Executive
Author	Name	Helen Binks
	Job Title	Head of Business & Customer Services
	Contact Tel:	01253 476112

Amendment Record

Date	Issue No.	Section/Page	Details of Change	Authorised By:
06.12.22	1	What is not a complaint page 5	Added to the first point in this section: Repeated service requests that are not adequately dealt with will be dealt with as a complaint	Board
06.12.22	1	What is not a complaint page 5	Added to Anonymous complaints: (it may not be appropriate to rely on this exclusion where complaints concern safeguarding or health and safety issues)	Board

06.12.22	1	What is not a complaint page 5	Amended the section on 'Things that happened more than 6 months ago which have not been raised since' this would exclude complaints where there is a safeguarding concern or health and safety issues which would remain an active case until a confirmed resolution is in place.	Board
06.12.22	1	Added a section on self-assessment pages 14-15	Added this section as per the revised self-assessment guidance	Helen Binks
23.10.23	1	Added to Monitoring & continuous learning Page 14	Complaints that have been reported to the Housing Ombudsman will be reported and monitored by the Operational and Senior Management Teams.	Helen Binks
05.12.23	1	Amended a section on page 13 'Housing Ombudsman and Designated Person'.	That a complainant "will need to wait eight weeks after you have exhausted our internal complaint process" before contacting the Housing Ombudsman. This is no longer the case and complainants can go directly to the Housing Ombudsman if they are not satisfied with the outcome of a complaint at Stage 2.	Helen Binks
14.03.24	2	All	Full review and amendment in line with updates to the Housing Ombudsman, revised complaint handling code, effective from April 2024.	Helen Binks

Amendment Notes

- Notification of the amendment must be sent to the person maintaining the Central Register.

Table of Contents	Page
Complaint Policy	5
Purpose	5
Definition of a Complaint	6
Types of Complaint	6
Service Requests	6
What Lumen Housing do not consider to be a complaint	7
Survey Feedback	7
Who can make a complaint	8
How to make a complaint	8
Accessibility	8 - 9
Confidentiality	9
Protecting the vulnerable	9
Early and local resolution	9 - 10
Stage 1 – Formal Complaint	10 - 11
Stage 2 – Final stage for internal resolution	11 - 13
Putting Things Right	13 - 14
Closing a Complaint	14
Reporting and Self-Assessment	14 - 15
Scrutiny & Oversight: continuous Learning & Improvement	15 - 16
Housing Ombudsman	16 - 17
Compliance	17 - 18



1. Lumen Housing Complaint Policy

Lumen Housing does not view complaints as negative and see them as an opportunity to learn from the issues raised by our residents and to take steps to improve the services we provide. We accept there will be occasions when this is not always achieved. Complaint handling is a priority for us, and we want our residents to feel heard and understood. We understand that things can go wrong, so when this happens, we want to know so that we can try to put things right.

2. Purpose

The purpose of this Policy is:

- To provide a fair complaints procedure which is accessible, clear and easy to use for anyone wishing to make a complaint and is resident focused
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone that provides housing management services for Lumen Housing knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way with clear timeframes set out for responses
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired
- To gather information which helps us to improve what we do, creating a positive complaint handling culture through continuous learning and improvement
- As members of the Housing Ombudsman Scheme, we commit to follow the Housing Ombudsman Dispute Resolution principles of being fair, putting things right and learning from outcomes. This Policy has been developed in line with the Housing Ombudsman's Complaint Handling Code. We will at all times co-operate with the Housing Ombudsman or other regulatory body with responsibilities for oversight of complaints handling.

This policy applies to all Lumen services and activities. This policy also applies where the complaint relates to a contractor that has been instructed by Lumen Housing. Where the complaint is in relation to a contractor, responsibility for investigating, resolving and responding to the complaint remains with Lumen, in line with this policy and the complaint handler will be a member of staff member from the parent company, Blackpool Housing Company who provide tenancy management services on behalf of Lumen Housing. This policy does not apply to any Lumen personnel grievances or recruitment complaints. Such complaints are subject to the Human Resources policies and procedures of the parent, Blackpool Housing Company.

Residents will not be treated differently by Lumen Housing should they raise a complaint and all complaints will be actioned fairly and consistently in line with this policy.



This Policy has been developed in line with the Housing Ombudsman’s Complaint Handling Code. We will at all times co-operate with the Housing Ombudsman or other regulatory body with responsibilities for oversight of complaints handling.

3. Definition of a complaint

A complaint is defined as:

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

A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction we must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with this policy.

4. Types of complaint

The type of complaint we can consider may include, but is not limited to:

- Failure to provide a service
- Provision of a poor standard of service
- Mistakes in the way we have provided the service
- Failure to meet our existing service standards or comply with our policies

Where applicable, a complaint can also be raised as formal appeal to actions or decisions, for example a lettings offer we have chosen not to proceed, or a rechargeable repair.

We will first try to resolve expressions of dissatisfaction as early resolution, outside of this Policy where possible. This means putting something right quickly at the first point of contact and offering an apology where necessary. However, if further enquiries or actions are needed to resolve the matter, or if a customer exercises their choice to make a complaint, it will be logged as a formal complaint and dealt with in line with this policy.

Any complaint about the behaviour or conduct of a staff member or contractor in relation to Lumen duties or service provision will always be dealt with formally in line with this Policy and logged at Stage 1.

5. Service Requests

Lumen Housing recognises the difference between a service request and a complaint. A service request is a request from a resident to Lumen Housing requiring action to be taken to put something right.



We do not treat service requests as complaints, however service requests are recorded, monitored and reviewed regularly by the appropriate service.

A complaint will be raised if a resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. We will continue efforts to address the service request if a resident complains.

6. What Lumen Housing do not consider to be a complaint

Each complaint will be considered on its own merits, along with the individual circumstances of each complaint. Grounds for which a complaint would not be suitable for the complaints process are outlined below:

- Reports of anti-social behaviour or breaches of tenancy
- Complaints concerning the level of rent or service charge or the amount of the rent
- Complaints about the actions of an organisation that is not working for, or supported by, Lumen Housing
- Personnel matters including issues about staff employment or former employment and applications for employment
- Cases 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
- Insurance claims; these will be handed to relevant services within both Lumen Housing and the Council
- The issue giving rise to the complaint occurred over 12 months ago (Lumen Housing may exercise discretion to accept complaints made outside this time limit where there are good reasons to do so)
- Matters that have previously been considered under the Complaints Policy
- Anonymous complaints

Although we do not treat these issues as a complaint under this procedure, we will deal with them in an appropriate manner.

If we decide not to accept a complaint as there is a valid reason not to do so, we will evidence the reasoning and provide a written explanation to the customer setting out why we consider there is a valid reason not to accept a complaint. We will provide the customer with a written explanation of how we have come to that decision within 10 working days of the request being made.

This letter will include advice of the customer's right to challenge this decision by contacting the Housing Ombudsman.

7. Survey Feedback

An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to.



Where Lumen ask for wider feedback about our services, we will provide details of how residents can complain.

8. Who can make a complaint?

A complaint can be raised by any person or group of people affected by an activity or service provided by, or on behalf of Lumen Housing including but not limited to:

- Current tenants/licensees and members of their households
- Former tenants/licensees
- Housing applicants
- Leaseholders
- MPs and Councillors
- Advocates of the complainant such as friends, relatives or other representatives (prior written consent from the complainant is required)
- A resident or group of residents who have been affected by our activities and/or services in the locality

9. How to make a complaint

We offer a range of ways for our customers to make a complaint.

In writing:

Lumen Housing, 348-350 Lytham Road, Blackpool, FY4 1DW

Email: hello@myblackpoolhome.co.uk

By telephone: 01253 477222

Making a complaint in person:

We are able to accept complaints in person, our office opening hours are Monday to Friday 9am to 5pm, or customers can book an appointment in advance at a mutually convenient location (customers home or the office).

Making a complaint via the Website:

You can make a complaint via the contact us page: <https://lumenhousing.co.uk/contact-us/>

10. Accessibility

We are committed to making our complaints process accessible to all and can offer help and support to ensure any concerns from customers are listened to and understood. On receipt of a complaint, our Complaint Officers will provide one to one assistance



throughout the process. Complainants can also seek assistance or advice through external agencies.

In line with the Equality Act 2010 our Reasonable Adjustments Policy sets out our commitment to equality of opportunity for all and what types of assistance we can provide to support customers to make a complaint.

Lumen Housing will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.

Customers may prefer to have a representative deal with their complaint on their behalf, or to be or accompanied at any meeting with us. This may be by an advocate, carer, family member, friend, elected member, agency, or professional body. Where a representative makes the complainant's case we must receive or hold a signed authority from the customer which authorises us to communicate with the customer's appointed advocate or representative.

A customer may contact the Housing Ombudsman at any time throughout the course of their complaint for advice and support.

11. Confidentiality

All complaint information will be handled sensitively and in accordance with relevant data protection requirements.

Where a customer posts on social media pages, we will ensure privacy at all times by directing the complaint to private message to ensure privacy and confidentiality. If a customer posts personal details on a public post, this will be removed to protect their privacy and confidentiality.

12. Protecting the vulnerable

Some complaints received by Lumen Housing may have "safeguarding" issues. This could be where someone's life is at risk or a serious crime has been committed. When complaints of this nature are received, Lumen Housing staff will be required to make a safeguarding referral in line with Lumen Housing Safeguarding Policy and Procedure.

Whilst the details of the complaint will be considered, the safety of the service user is paramount and takes precedent over any other procedures.

13. Early and local resolution

Due to the nature of our services, our residents may present a wide range of problems or queries to staff members on a daily basis. In many cases, issues raised by our customers are



best resolved by the service responsible for the problem arising, as they may be able to resolve it swiftly to the satisfaction of the complainant. These matters will be dealt with outside of this Policy as Early Resolution cases, however records will be kept for audit and learning purposes. In such cases the customer will be advised of their choice to make a formal complaint.

If the customer remains dissatisfied, or requests complaint is made, we will log the issue as a formal complaint in line with this Policy.

14. Stage 1 – Formal Complaint

If a formal complaint is received, a member of the Lumen Housing Team, will take responsibility for facilitating the complaint and be the 'Complaints Officer' and all complaint actions are recorded. Any urgent issues that relate to safeguarding or health or safety will be flagged by the Complaint Officer to the relevant service manager.

The Complaints Officer will:

- Act sensitively and fairly
- Be trained to handle complaints and deal with distressed and upset residents
- Access staff at all levels to facilitate quick resolution of complaints
- Have the authority and autonomy to resolve disputes quickly and fairly

Complaints will be acknowledged, defined and logged at stage 1 of our complaints procedure within five working days of the complaint being received.

Within the complaint acknowledgement, we will set out our understanding of the complaint (the complaint definition) and the outcomes the complainant is seeking. If any aspect of the complaint is unclear, we will ask the complainant for clarification and agree the complaint definition.

Stage 1 formal complaints will be investigated by a Lumen Housing Senior Officer/Manager who will act as the complaint handler and must:

- deal with complaints on their merits, act independently and have an open mind;
- give the resident a fair chance to set out their position;
- take measures to address any actual or perceived conflict of interest; and
- consider all relevant information and evidence carefully

A complaint response will be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Records are maintained to ensure that agreed actions are taken.

Where complainants raise additional matters during the investigation, these will be incorporated into the Stage 1 response if they are relevant and the Stage 1 response has not been issued.

Where new issues raised relate to separate matters, the Stage 1 response has been issued, or it would unreasonably delay the response, the complaint will be logged as a new complaint.

Any outstanding actions required to address issues will be allocated to Service Managers to track action promptly, keeping the complainant updated appropriately.

The Stage one will response will confirm in writing, in plain language, the following:

- 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
- details of any outstanding actions
- details of how to escalate the matter to stage 2 if the complainant is not satisfied with the answer.

A full response to Stage 1 complaints will be issued within 10 working days of the complaint being acknowledged.

We will consider the complexity of the complaint and if an extension to the expected timescale is required we will inform the complainant of the expected timescale for response. An extension will be no more than 10 working days without good reason and will clearly explain any reasons to the complainant.

Whenever we inform a complainant about an extension to response timescales, we will provide the contact details of the Housing Ombudsman.

15. Stage 2 Final stage for internal resolution – Appeal Panel

Once a Stage 1 response has been issued, if all or part of the complaint is not resolved to the complainant's satisfaction, it will be progressed to stage 2 of this procedure, unless an exclusion ground now applies that did not apply at stage 1.

Each request for escalation will be considered on its own merits, along with the individual circumstances of each complaint.

We will not progress to stage 2 of this procedure if the exception reasons outlined in section 6 of this policy apply.

If we decide not to escalate a complaint as there is a valid reason not to do so, we will evidence the reasoning and provide a detailed written explanation to the customer setting out the reasons why the matter is not suitable for the complaints process within 10 working days of a request being made.



All customers have the right to challenge this decision by bringing their complaint to contacting the Housing Ombudsman.

We will only escalate a complaint to Stage 2 once it has completed Stage One and at the request of the resident.

In instances where we decline to escalate a complaint, we will clearly communicate in writing our reasons for not escalating. The complainant will have the right to approach the Housing Ombudsman about our decision and this will be confirmed in the written response, along with information on how to contact the Housing Ombudsman.

The complainant has 25 working days from the date of the Stage 1 response to request an escalation, however discretion will be applied and escalation requests that have gone beyond 25 days will be considered on a case by case basis.

Once an escalation request has been received, it will be acknowledged within 5 working days, confirming our understanding of the complaint (the 'complaint definition') and the outcomes the resident is seeking. Complainants are not required to explain their reasoning for requesting escalation and Lumen Housing will make reasonable efforts to understand why the complainant remains unhappy. The acknowledgement letter will also provide confirmation of the Appeal Hearing date and the complainant's right to attend.

The Stage 2 consideration will not be conducted by the same person that completed the Stage 1 investigation and response.

Stage 2 consists of an Appeal Panel, including the Director responsible for the service area and a Head of Service that has been trained to deal with complaints and provide an independent impartial view. If the relevant Director is unavailable in the timescales or has already had involvement that may impact on their impartiality another Director will substitute for them.

All customers and/or their representative will be extended an invite to attend the Appeal Panel meeting or will be offered the opportunity to provide evidence to the panel again in a way that suits their needs. This means that the customer can ask that the panel is held virtually, or at a venue other than Lumen Housing's Head Office.

The response to the Stage 2 complaint will be provided to the complainant in writing within 20 working days of the escalated complaint being acknowledged.

We will consider the complexity of the complaint, and if an extension to the expected timescale is required we will inform the complainant of the expected timescale for response.



An extension will be no more than 20 working days without good reason and we will clearly explain any reasons.

Whenever we inform a complainant about an extension to response timescales, we will provide the contact details of the Housing Ombudsman.

Where a response to a complaint will fall outside the timescales set out in this policy we will agree with the resident suitable intervals for keeping them informed about the progress of the complaint investigation.

A complaint response will be sent to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.

Where complainants raise additional matters during the investigation, these will be incorporated into the Stage 2 response if they are relevant and the Stage 2 response has not been issued. Where new issues raised relate to separate matters, the Stage 2 response has been issued, or it would unreasonably delay the response, the complaint will be logged as a new complaint.

Any outstanding actions required to address issues will be allocated to Service Managers to track action promptly, keeping the complainant updated appropriately.

When the Stage 2 investigation has been completed, a written response to the complainant will be provided in clear, plain language: The Stage 2 response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. The Stage 2 response will also confirm:

- 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
- details of any outstanding actions
- details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.

The Stage 2 is the final response and marks the end of Lumen Housing's complaints process.

16. Putting things right

Where something has gone wrong, we will acknowledge this and set out the actions we have already taken or intend to take to put things right. This 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

Any remedy offered must reflect the impact on the resident as a result of any fault identified. The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. Lumen Housing will take account of the guidance issued by the Housing Ombudsman when deciding on appropriate remedies.

17. Closing a complaint

A complaint will be considered closed under the following circumstances:

- After sending a Stage 1 response and there is no further contact from the customer after 25 working days from the issue of the response. (If a complainant makes contact with the same issue, additional evidence or requesting to escalate beyond 25 days then the circumstances will be considered and if appropriate the complaint will be re-opened and escalated. If new matters are raised then this will be opened as a new Stage 1 complaint.)
- When a Stage 2 response has been issued.

We have the discretion to close a complaint early if we believe that it is better dealt with through another channel and it is in the complainant's interest to do so, or where it is suspected that the complaint is based on fraudulent information and/or activity. This will be communicated to the complainant along with their right to approach the Housing Ombudsman about our decision.

18. Reporting and Self-Assessment

We will produce an annual complaints performance and service improvement report for scrutiny and challenge, which will include:

- the annual self-assessment against the Housing Ombudsman Complaint Handling Code to ensure this policy remains in line with its requirements



- a qualitative and quantitative analysis of Lumen Housings' complaint handling performance. This will also include a summary of the types of complaints we have refused to accept;
- any findings of non-compliance with the Complaint Handling Code by the Housing Ombudsman;
- the service improvements made as a result of the learning from complaints;
- annual report about the landlord's performance from the Ombudsman; and
- any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

The annual complaints performance will be reported to the Lumen Housing Board and published on the resources section of our website relating to complaints. The Board's response to the report will be published alongside this.

Lumen Housing will carry out a self-assessment following a significant restructure, merger and/or change in procedures, or should the Housing Ombudsman request.

If Lumen Housing is unable to comply with the Housing Ombudsman Complaint Handling Code due to exceptional circumstances, such as a cyber-incident, we will inform the Ombudsman, provide information to residents who may be affected, and publish this on their website. We will provide a timescale for returning to compliance with the Code.

19. Scrutiny & oversight: continuous learning and improvement

On completion of a complaint, an evaluation will be completed to assess the root cause of the complaint, what lessons have been learned and what, if any, actions need to be taken to prevent reoccurrence. Stage 1 evaluations will be completed by Heads of Service and Stage 2 evaluations will be completed by the Director responsible for the service. This is to ensure that Lumen Housing 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.

A satisfaction survey will be conducted with complainants upon the closure of their case to help us identify whether there are any wider steps that we can take to improve our complaint services. This survey may be undertaken by a Lumen Housing team member.

All complaint information will be recorded and performance information will be produced and provided to Senior Managers. Themes and trends will be assessed by Senior Management to identify any potential systemic issues, serious risks or policies and procedures that may need reviewing. The themes and trends will also be used to inform training requirements for staff and contractors.



Accountability and transparency are integral to a positive complaint handling culture. We will report back on wider learning and improvements from complaints in our Annual Report and more frequently to staff and the Lumen Board.

The Director of Finance and Resources has been appointed as the senior lead person who is accountable for Lumen Housings complaint handling and will assess any themes or trends to identify systematic issues, serious risks or policy and procedures that require revision.

The Member Responsible for Complaints (MRC) has been appointed as the Chair of the Lumen Board who will have lead responsibility for complaints to support a positive complaint handling culture.

The MRC will receive as a minimum:

- Regular updates on the volume, categories and outcomes of complaints alongside complaint handling performance
- Regular reviews of issues and trends arising from complaint handling;
- Regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and
- Annual complaints performance and service improvement report

Lumen Housing is committed to fostering a culture of accountability, collaboration and professionalism in handling complaints. This involves working together with colleagues across teams and departments to address complaints promptly, efficiently and empathetically.

All parties involved in the complaint handling process must take collective responsibility for any shortcomings identified through complaints. Instead of assigning blame to others individuals should focus on understanding the root causes of issues and working collaboratively to implement corrective measures. This collective responsibility fosters a culture of continuous improvement, where feedback from complaints serves as a catalyst for organisational learning and development.

Employees and third parties are expected to act within the professional standards as set out by the Housing Ombudsman.

20. Housing Ombudsman

A customer can complain to the Housing Ombudsman Service at any time but the complaint will usually be referred back to us if it has not been through the full internal complaints process.



The Ombudsman will also only consider the matter if you have contacted them within 12 months of your original complaint.

A customer can refer their complaint to the Housing Ombudsman by:

Visiting <http://www.housing-ombudsman.org.uk>

Telephone: 0300 111 3000

Emailing: info@housing-ombudsman.org.uk

Writing to:
Housing Ombudsman Service
P O Box 1484
Unit D
Preston
PR2 0ET

21. Compliance

As a member of the Housing Ombudsman Scheme, Lumen Housing agrees to comply with the following terms:

- We will establish and maintain a complaints procedure in accordance with any good practice recommended by the Housing Ombudsman and, as part of our procedure, we will inform residents of their right to bring complaints to the Housing Ombudsman under the Scheme.
- We will publish our complaints procedure and make information easily accessible to those entitled to complain on our website and in correspondence with our residents.
- We will manage complaints from residents in accordance with our published policy. The complainant may contact the Housing Ombudsman at any point for guidance or support.
- We will respond promptly to information requests made by the Housing Ombudsman Service as part of the ongoing investigation into complaints from our residents.
- We will carry out an annual, or more frequently if necessary, self-assessment against the Housing Ombudsman Complaint Handling Code and take appropriate action to ensure our complaint handling is in line with the Code.
- The self-assessment outcomes will be reported to elected members, published on the website and included in our Annual Report and complaint handling performance information.



Failure to comply with the conditions of membership may result in a Complaint Handling Failure Order and a requirement to rectify within a given timescale (paragraphs 13 and 73 of the Housing Ombudsman Scheme). Full details of when the Ombudsman will determine that there has been a complaint handling failure can be found here:

<https://www.housingombudsman.org.uk/wp-content/uploads/2022/03/Guidance-ondeterminations-ofcomplaint-handing-failure-and-orders-March-2022.pdf>.

When carrying out a complaint investigation the Ombudsman will consider whether the landlord dealt with the complaint in accordance with the Code. Any failure identified could result in a finding of service failure, maladministration or severe maladministration for complaint handling and orders and recommendations will be made to put matters right and ensure compliance with the Code.

The Ombudsman Complaint Handling Code can be viewed in full here:

<https://www.housing-ombudsman.org.uk/wp-content/uploads/2020/07/ComplaintHandlingCode.pdf>