Corporate Complaints Handling Policy

Ashford Borough Council

September 2025

Contents:

1. Policy Statement.....Page 1
2. Scope of the Policy.....Page 1
3. Relationship with Other Existing Policies.....Page 1
4. Responsibilities.....Page 2
5. Definitions.....Page 2
6. Complaints Handling.....Page 4
7. Complaints Process.....Page 6
8. Exclusions and Exceptions.....Page 11
9. Social Media.....Page 13
10. Unreasonable Complaints.....Page 14
11. Accessibility and Awareness.....Page 14
12. Performance Monitoring and Reporting.....Page 15
13. Scrutiny and Oversight.....Page 16
14. Confidentiality and Data Protection.....Page 16
15. Policy Review.....Page 17

1. Policy Statement

1.1. Ashford Borough Council is committed to delivering high-quality services and values feedback from individuals and businesses in our community to improve our services. Having a positive complaints approach across our service is of upmost importance. We aim to resolve complaints quickly, fairly, and transparently, ensuring that residents and businesses are treated with respect and dignity throughout the process. We are committed to using the complaints process as a learning experience to drive service improvement and put things right where we need to.

1.2. This policy explains our approach to managing complaints, ensuring consistency, reducing dissatisfaction, and fostering trust in the council's services. The policy is designed to mitigate risks by managing issues before they escalate, providing clear procedures for resolution, and promoting a culture of learning and accountability. By understanding the reasons behind complaints, the council aims to proactively address issues, reducing the likelihood of recurrence and improving service quality. The policy sets out clear expectations for both complainants and staff, ensuring transparency in performance and approach.

2. Scope of the Policy

2.1. This policy applies to all council services, staff, contractors, and agents acting on Ashford Borough Council's behalf. The complaints process can be utilised by any residents, businesses, and visitors impacted by council services or their representative acting consensually on their behalf. Matters that are not covered by this policy are listed under section **8. Exclusions and Exceptions**.

2.2. The complaints process relating to the council's Housing Service is covered by a separate Housing Service Complaints Handling Policy.

3. Relationship with Other Existing Policies

3.1. This Policy is part of a wider framework of council policies designed to ensure consistent, effective, and high-quality service delivery across all areas. The following policies and procedures are closely linked to this policy and should be referred to where relevant:

a. Housing Service Complaints Policy (The Housing Ombudsman is responsible for all complaints about social housing and so the council has a separate complaints policy for social housing complaints).
b. Unreasonable Conduct Policy

3.2. This policy ensures we are in compliance with the Local Government and Social Care Ombudsman (LGSCO) Complaint Handling Code.

4. Responsibilities

4.1. A clear delineation of responsibilities is essential to ensure the effective operation of the complaints handling process. This section outlines the roles and responsibilities of all parties involved in managing complaints, fostering accountability and consistency throughout the council.

a. **Council staff:** ensure dissatisfaction is recognised and recorded, distinguish complaints from service requests, provide clear process guidance, and promptly refer complaints to the appropriate team.
b. **Senior leadership:** establish mechanisms within their departments to monitor performance, ensure officers are familiar with the complaints process, and identify who will handle the complaints process at varying stages.
c. **Complaints handling team:** manage the process, ensure compliance, and provide training.
d. **Council members:** scrutinise and monitor complaints performance ensuring the council is improving services.
e. **Complainants:** provide clear details about the issue, engage respectfully, respond promptly, and follow escalation procedures accordingly if dissatisfied with outcomes.

5. Definitions

5.1. The definitions below provide clarity on key terms used throughout this policy to ensure a shared understanding of the terminology used in the policy, facilitating effective communication and consistent application of the complaints process.

5.2. Effective complaint handling enables individuals to be heard and understood. The starting point for this is a clear distinction between the type of action that is

being requested of the council. By clarifying the difference between a service request and a complaint the council can ensure it follows the correct procedure for the action requested and provide the most efficient and effective outcome. In most cases the council should be able to put things right through normal service delivery processes.

a. **Service request:** a request that the council provides or improves a service, fixes a problem, or reconsiders a decision. Service requests are distinct from complaints and are typically addressed through standard operational procedures. Service requests are not complaints, but they may contain expressions of dissatisfaction. The council should be allowed the opportunity to deal with a service request before a complaint is made. However, a complaint may be raised when the individual expresses dissatisfaction with the response to their service request, even if the handling remains ongoing. The council will not stop its efforts to address the service request if the individual does raise a complaint.
b. **Complaint:** an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the council, its staff, or those acting on its behalf, affecting an individual or group of individuals.
c. **Complainant:** an individual, group, or organisation expressing dissatisfaction with the council's actions, services, or decisions. This includes residents, service users, visitors, businesses, or their representatives, such as advocates, councillors, or MPs, who raise concerns on their behalf.
d. **Remedy:** a resolution offered to address and rectify an issue raised in a complaint, aimed at putting things right where possible. Remedies may include actions such as an apology, explanation, compensation, policy or procedure changes, or specific corrective measures to prevent similar issues in the future.
e. **Stage 1 complaint:** the first formal step in the council's complaints process. At this stage, the complaint is handled by the service area directly involved, with the goal of providing a prompt resolution. The focus is on understanding the concerns raised, investigating the issue, and providing a clear response within the council's target timescale. Stage 1 aims to resolve issues informally and swiftly, ensuring the complainant is satisfied without the need for escalation.
f. **Stage 2 complaint:** the second and more formal stage of the council's complaints process. It is initiated when a complainant is dissatisfied with the response provided at Stage 1. At this stage, the complaint is escalated for an independent review, typically conducted by a senior officer or

designated investigator who was not involved in the initial response. The focus is on conducting a thorough investigation, addressing unresolved concerns, and providing a detailed response within the council's specified timescale. Stage 2 represents the final stage of the internal complaints process.

5.3. When an individual expresses dissatisfaction that meets the criteria for a complaint as set out above, they will be given the opportunity to make a complaint. The council recognises that individuals may be reluctant to raise complaints out of fear it may impact services they receive in future, however, we can assure you that raising complaints will not impact the services you receive.

6. Complaints Handling

6.1. The council will ensure that sufficient and dedicated resources are assigned to oversee complaint handling, facilitate effective liaison with the relevant Ombudsman, and ensure that complaints are appropriately reported to the council's Cabinet.

6.2. The council will prioritise complaint handling and foster a culture of learning from complaints. All relevant staff will receive appropriate training on the importance of complaint handling, ensuring that complaints are treated as a core service and resourced adequately. All staff involved in the complaint handling process will be trained on and follow the LGSCO Guide for Complaint Handlers.

6.3. When responding to a complaint, the council will:

a. Work with the complainant to clarify any unclear aspects of the complaint.
b. Address complaints objectively, impartially, and with an open mind.
c. Provide complainants a fair opportunity to present their case.
d. Make reasonable adjustments under the Equality Act 2010 as needed, ensuring these adjustments and any disclosed disabilities are documented and actively reviewed.
e. Proactively address any actual or perceived conflicts of interest.
f. Thoroughly consider all relevant information and evidence in reaching a decision.

g. Ensure that the complainant is informed and provided with updates in accordance with the council's timescales.

6.4. Stage 1 complaints will be allocated to an appropriate officer who will conduct the investigation and communication for the complaint. Stage 2 complaints will be escalated to a more senior officer or manager to handle and will not be the same person that handled the complaint at Stage 1.

6.5. Complaints will be resolved as early as possible by identifying the necessary evidence, determining what outcome would satisfactorily address the issue for the complainant, and addressing any urgent actions promptly.

6.6. Officers assigned to investigating a complaint will have access to staff at all levels to facilitate a prompt resolution.

6.7. A complaint response will be provided to the complainant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will still be tracked and actioned promptly after the response has been provided, with appropriate updates provided to the complainant.

6.8. The officer handling the complaint will manage the complainant's expectations, clearly communicating if their desired outcome is unreasonable or unachievable.

6.9. The council will liaise with a complainant's representative, provided appropriate authority has been granted by the complainant for the representative to act on their behalf. If a complainant appears to be struggling to engage with the complaints process the council may reach out to discuss whether they might benefit from additional support such as advocacy.

6.10. If a response cannot be delivered within the time frames specified in section **7.15**, the complainant will be informed of the revised timeline and the reasons for the delay.

6.11. Responses will address all aspects of the complaint, providing clear and well-reasoned decisions with references to relevant policies, legal frameworks, and good practice as appropriate.

6.12. When complaints relate to recurring issues, the investigation will consider, where possible, historical reports available to the complaint handler if doing so will aid in resolving the matter effectively.

6.13. If new, relevant issues are raised during the investigation, they will be included in the ongoing process if the response has not yet been finalised. If the response has already been issued, or addressing the new issues would unreasonably delay resolution, they will be logged separately as a new Service Request or Stage 1 complaint.

6.14. If a complainant alleges discrimination at either Stage 1 or Stage 2 of the complaints process, the investigating officer will consult with the council's Equalities Officer to ensure a thorough and informed investigation.

6.15. Complaints will not be denied escalation through all stages of the process without valid justification. If escalation is refused, the reasons will be clearly explained in the response, as outlined in section **8. Exclusions and Exceptions.**

6.16. At the conclusion of each stage, the council will provide a detailed response to the complainant, which will include:

a. An explanation of the complaint process and stage.
b. A summary of our understanding of the complaint.
c. Our decision regarding the complaint.
d. The reasons supporting our decision.
e. Clear information on any remedies offered, including agreed timescales.
f. A summary of any outstanding actions required and how we will monitor their progress.
g. Guidance on how to escalate the complaint if they remain dissatisfied with the outcome.

6.17. The council keeps a full record of any complaints in line with the council's data retention policy.

7. Complaints Process

7.1. The council follows a two-stage complaints procedure, aligned with Ombudsman guidance, referred to as Stage 1 and Stage 2 in this policy. This ensures a structured and transparent process, allowing complaints to be

addressed thoroughly and resolved at any stage while providing a clear escalation path for unresolved issues.

7.2. If the council's complaint response is handled by a third party (e.g. a contractor) or independent adjudicator at any stage, it will form part of the two-stage complaints process set out in this policy. Complainants will not be expected to go through two complaints processes. The council is responsible for ensuring that any third parties handle complaints in line with our policy.

7.3. The council will consider factors such as complexity of the complaint and whether the complainant is vulnerable or at risk during the initial stages of a complaint. This information will guide the council on which complaints can be responded to as early as possible, and which require further consideration.

How to Make a Complaint

7.4. We want to ensure that our complaints process is accessible and that complaints are easy to make. A complaint can be raised in several ways and with any member of our staff. To help us swiftly allocate complaints to the correct person we promote the following ways to get in touch:

a. **Online**: through the complaints form on our website: How to make a formal complaint to Ashford Borough Council.
b. **In Writing**: email to customer.care@ashford.gov.uk or by post to Ashford Borough Council, International House, Dover Place, Ashford, TN23 1HU.
c. **By Phone**: call 01233 331111 during business hours.
d. **In Person**: visit our offices or speak with a member of staff.

7.5. The complaints process can be utilised by any residents, businesses, and visitors impacted by Ashford Borough Council services or their representative acting consensually on their behalf. Matters that are not covered by this Complaints Handling Policy, such as those subject to statutory processes, are listed below under section **8. Exclusions and Exceptions.**

7.6. Complainants can seek advice and support from the Local Government & Social Care Ombudsman at any stage of the complaints process by visiting the following: Make a complaint - Local Government and Social Care Ombudsman.

Stage 1: Formal Complaint

7.7. **Acknowledgement:** complaints will be logged and acknowledged at Stage 1 of the complaints process **within 5 working days** of the complaint being received. The acknowledgement will confirm that the complaint has been received and is being investigated. The complainant will be provided the name and contact details of the officer handling the complaint.

7.8. **Investigation and Response:** the council will handle the complaint in line with the process listed under section **6.3** and will provide a full response to Stage 1 complaints **within 10 working days** of the complaint being acknowledged.

7.9. **Resolution:** once the investigation has concluded, the council will respond to the complaint providing all the information listed under section **6.16** and any additional information relevant to the complaint.

Stage 2: Complaint Escalation

7.10. **Request for Review:** if the complainant is dissatisfied with the Stage 1 response, they can request an escalation to Stage 2 within **6 months** of receiving the response. This request can be made through any of the contact methods listed in section **7.4** of this policy.

7.11. **Acknowledgement:** Stage 2 complaints will be logged and acknowledged **within 5 working days** of the escalation being received. The complainant will be provided the name and contact details of the officer handling the complaint.

7.12. **Investigation and Response:** An Assistant Director or Head of Service will review the complaint. If the original complaint was handled at this level then a more senior director will review the complaint. A thorough investigation will be conducted and a final response provided **within 20 working days** of the Stage 2 complaint acknowledgement. If an extension is required, we will inform you in line with the process outlined in section **7.17**.

7.13. **Final Resolution:** Once the investigation has concluded, the council will respond to the complaint providing all the information listed under section **6.16** and any additional information relevant to the complaint.

7.14. The complainant will be advised that this marks the final stage of the council's internal complaints process and will be provided with information on how to

contact the Local Government and Social Care Ombudsman if they remain dissatisfied with the outcome.

Timescales

7.15.

	Acknowledgement	Investigation & Response
Stage 1	Within 5 working days.	Within 10 working days.
Stage 2	Within 5 working days.	Within 20 working days.

7.16. A working day excludes weekends, public holidays, and any days that the council offices are closed. If a complaint is submitted outside of normal working hours (between 4:00 PM and 9:00 AM or over the weekend), it will be treated as received on the next working day, and the response time frame will begin from that date.

7.17. In certain cases, the council may determine that an extension to the standard response time frame is necessary due to the complexity of the complaint. In such instances, the complainant will be notified of the revised expected response time frame within the original response time frame. Any extension should **not exceed 10 working days** at Stage 1 and **20 working days** at Stage 2 without a valid reason, which will be clearly communicated to the complainant.

7.18. Valid reasons for an extension may include, but are not limited to, the need to obtain information from third parties, the complexity of the issues involved, or additional time required to thoroughly complete the investigation.

7.19. When informing the complainant about the extended time frame, the council will also provide them with details of the relevant Ombudsman for reference.

Remedies

7.20. When the council identifies that something has gone wrong, it will acknowledge the issue and outline the actions it has taken or plans to take to resolve the matter.

7.21. Actions to put things right may include:

a. Providing a written apology.
b. Acknowledging the mistake or issue.
c. Offering an explanation, assistance, or reasons.
d. Addressing delays or taking corrective action.
e. Reconsidering or altering a decision, where possible.
f. Amending records or adding corrections or addendums.
g. Providing financial compensation if appropriate.
h. Delivering additional training to staff.
i. Revising policies, procedures, or practices.
j. Taking any other appropriate remedial action.

7.22. Any remedy offered will reflect the impact of the issue on the individual or resident and be proportionate to the fault identified.

7.23. The proposed remedy should include clear details of what actions will be taken and by when, ensuring agreement with the resident or individual where possible. The council is committed to following through with all remedies to completion.

7.24. If a proposed remedy cannot be delivered, the complainant will be informed of the reasons for this, provided with details of any alternative remedy and reminded of their right to complain to the Ombudsman.

Ombudsman Escalation

7.25. If the complainant has completed all stages of our complaints process and remain dissatisfied, they have the option to refer their complaint to the Local Government and Social Care Ombudsman. The Ombudsman provides a fair, independent, and free service. While they generally expect the complainant to allow the council the opportunity to resolve the complaint first, they may consider investigating if a response from us has not been received within a reasonable time. Contact details for the relevant Ombudsman are provided below, and they can be contacted at any time for advice or guidance.

7.26. **Local Government and Social Care Ombudsman**
Website: https://www.lgo.org.uk/
Telephone: 0300 061 0614
Postal Address:

Local Government & Social Care Ombudsman, PO Box 4771, Coventry, CV4 0EH

7.27. **Housing Ombudsman** (The Housing Ombudsman is responsible for all complaints about social housing and we have a Housing Service Complaints Policy).
Website: https://www.housing-ombudsman.org.uk/
Telephone: 0300 111 3000
Postal Address:
Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET

7.28. Occasionally, the Ombudsman may review a complaint and determine that it cannot investigate because the complainant has not completed the council's internal complaints procedure. Such cases are referred to the council as a "Premature Complaint." When this occurs, the council will proactively open a complaint record and contact the customer. Depending on the stage of progression within the council's complaints process, the case will either be logged as a Stage 1 or Stage 2 complaint.

8. Exclusions and Exceptions

8.1. The council will accept complaints unless there is a valid reason not to do so. Each complaint will be assessed individually, and if a complaint is deemed unsuitable for the complaints process, the council will provide a clear explanation of the reasons for this decision.

8.2. The individual circumstances of each complaint will be taken into account, and complaints will be considered on their own merits; however, potential exclusions may include:

a. **Delayed complaints**: issues that the complainant has been aware of for more than 12 months, unless there is a valid reason for the delay, or the matter involves safeguarding or health and safety concerns.
b. **Legal or statutory processes**: matters for which there is a statutory right of appeal, can be referred to a tribunal (e.g., Housing Benefit Appeals Service), or can be taken to court, unless there is a compelling reason why the individual should not be expected to pursue those avenues.
c. **Ongoing legal proceedings**: issues where legal proceedings have already commenced.

d. **Previously considered complaints**: complaints that have already been addressed under the council's Complaints Handling Policy or by the Ombudsman.
e. **Anonymous complaints**: normally, anonymous complaints are not accepted as it would not be possible to respond appropriately. However, the council may decide on a case-by-case basis whether an anonymous complaint warrants investigation.
f. **Complaints about councillors**: allegations that a councillor has breached the Code of Conduct for Members are handled under a separate procedure.
g. **Issues outside council jurisdiction:** complaints about matters that do not fall within the council's authority or responsibility (e.g., private disputes or services provided by other organisations) are excluded.
h. Matters relating to Data Protection, Freedom of Information and Environmental Information Regulation Requests fall within the jurisdiction of the Information Commissioner Office(ICO). Complaints that fall within the ICOs jurisdiction will follow processes governed by them. This includes an internal review procedure and the right to appeal to the ICO. More information including how to escalate any concerns can be found on the Transparency page on the council's website and directly within any issued replies.
i. **Service requests:** requests for service improvements, repairs, or basic inquiries are not considered complaints unless dissatisfaction with the council's handling of the matter arises.
j. **Unreasonable complaints:** complaints deemed vexatious, abusive, or intentionally disruptive may fall outside the policy. Further details on this are provided in our Unreasonable Conduct Policy.

8.3. When a complaint is not accepted, the council will provide the complainant with a clear explanation of the reasons and inform them of their right to challenge this decision with the appropriate Ombudsman. If the Local Government and Social Care Ombudsman disagrees with the council's decision not to accept the complaint, the council may be instructed to review or accept the complaint.

8.4. If a complaint is not accepted under this policy, the council will make every effort to direct the complainant to the most appropriate alternative process, whether internal or external, to ensure their concern is addressed effectively.

9. Social Media

9.1. The council is committed to making the best use of all available technology and innovation to improve the way we provide services. This includes using all reasonable and cost-effective means to improve the way we communicate, reach out and interact with the different communities we serve.

9.2. The council embraces social media as a powerful tool through which we can achieve our objectives. Complaints raised on council-managed social media accounts will be acknowledged and redirected to formal complaint channels where appropriate.

9.3. Due to the far-reaching nature of social media, it is not possible for our communications team to see every post or comment that is made regarding Ashford or the council, however we will endeavour to seek out posts and comments that are related to issues under our jurisdiction. However, we would advise that if you have any questions or concerns you want to raise via social media then you should contact us directly via direct message or a post directly on our feed.

9.4. When handling complaints or expressions of dissatisfaction via social media, the council will assess them and categorise them under one of the following:

a. **Negative comments:** this is when a user makes a negative remark on social media in the form of an untargeted post or a comment in reply to a thread. The council is unable to guarantee they will see all of these. However, we will endeavour to respond to these when they are identified, usually with a comment sign-posting the user to formal avenues for complaint.
b. **Repeated issues:** this is when there are several negative comments about the same issue, or the communications team recognises a recurrence or trend in concerns. In this scenario, the team will raise this issue internally and consider sharing a public statement noting that it has recognised this issue and the steps it is taking to rectify this. Occasionally we may reach out to individual users regarding this if it has had significant impact on them which may lead to opening a formal complaint.
c. **Complaint:** this is when a user directs an actual issue of complaint at the council, usually via a direct message or a post we are tagged in. This will be treated as a complaint and the user will be contacted regarding the issue and offered avenues of escalation to ensure that the complaint is

processed accordingly.

9.5. Despite social media being an acceptable avenue to raise a complaint, social media will not be used to discuss complaint details. If an individual posts personal details (e.g. name, address, phone number, email, circumstances) in open forum the council will not enter discussion about the issue in these circumstances but will seek, were possible, to continue the conversation outside the open forum.

10. **Unreasonable Complaints**

10.1. The council values complaints and is committed to handling them fairly and in accordance with this Complaints Handling Policy. The council operates on a prevention over treatment policy, which believes unreasonable behaviour can be prevented by ensuring individuals can access services and the information they need and that their interactions with the council are positive and constructive. However, there are instances where complainants may behave in ways the council deems unreasonable.

10.2. To address such situations, the council has established processes for managing unreasonable conduct by complainants. Please see our Unreasonable Conduct Policy for further information.

11. **Accessibility and Awareness**

11.1. The council endeavours to make it easy for individuals to make a complaint by providing several different channels through which they can make a complaint. Section **7.4** of this policy lists these channels in further detail.

11.2. The council will make reasonable adjustments for individuals where appropriate under the Equality Act 2010. A record of any agreed adjustments will be maintained, and these adjustments will be regularly reviewed to ensure they remain effective.

11.3. This Complaints Handling Policy will be available as a downloadable document on the complaints page of our website and summarised version of section **7. Complaints Process** will be included on our main complaints page. Available

here: How to make a formal complaint to Ashford Borough Council.

11.4. This policy is available on our website and can be provided in alternative formats or languages upon request including large print, Braille or audiotape. Assistance will be provided to any complainant needing help to access or understand this policy.

11.5. The council understands that a high volume of complaints should not be viewed negatively, as it may indicate a well-publicised and accessible complaints process. Regularly monitoring the number of complaints received will help us assess whether there are barriers preventing individuals from voicing their concerns and if any changes to our processes are required.

12. **Performance Monitoring and Reporting**

12.1. The council keeps a full record of any complaints, and the outcomes at each stage. This will include information on the original complaint and date received, all correspondence between the council, the complainant, and other parties, and any relevant supporting documents related to the complaint, such as those gathered during the investigation period. This record will be retained in line with the council's data retention policy.

12.2. The council will produce an annual complaints performance and service improvement report for review and scrutiny, which will include:

a. A self-assessment against the Local Government and Social Care Ombudsman (LGSCO) Complaint Handling Code to ensure alignment with its requirements.
b. Any instances of non-compliance with the Code.
c. Qualitative and quantitative analysis of the council's complaint handling performance, including a summary of complaints that were not upheld.
d. Service improvements made as a result of lessons learned from complaints.
e. The annual Ombudsman performance letter regarding the council.
f. Any other relevant reports or publications from the Ombudsman related to the council's work.

12.3. This annual report will be submitted to the council's Cabinet and published on the complaints section of its website, along with the Cabinet's response to the

report.

12.4. The council will conduct a self-assessment of its complaint handling practices following any significant restructure, merger, or procedural changes.

13. Scrutiny and Oversight

13.1. We will report our annual performance on complaints to the council's Cabinet which will serve as the governing body for the Complaints Handling Policy. This does not exclude performance being reported to other officer and members' meetings within the council.

13.2. The performance for the previous financial year will be reported to Cabinet by the end of June in the current financial year.

13.3. Performance on complaints will be reported on the council's website.

13.4. The Cabinet's comments and decisions on the council's performance will be publicly available on the council's website.

13.5. The council's portfolio holder for Performance and Direction is the lead member for Complaints Handling and oversees the implementation of this policy.

14. Confidentiality and Data Protection

14.1. Any information provided will be used solely for the purpose of investigating the complaint. All personal data will be securely stored and managed in compliance with relevant legislation. To effectively investigate a complaint, certain customer details (such as name, contact information, and the nature of the complaint) may be shared with other council services to facilitate a response. Additionally, information may be shared with the relevant Ombudsman if the complaint has been referred to them.

14.2. All complaints will be handled in accordance with the Data Protection Act 2018 and the Freedom of Information Act 2000. The identity of the complainant will only be disclosed to those who need it to address the complaint. While the council strives to be open and transparent in its responses, there may be instances where confidentiality must be maintained, and information about third

parties will generally not be shared.

15. **Policy Review**

15.1. This policy will be reviewed periodically to ensure compliance with current legislation, Ombudsman guidelines, and best practices.

15.2.

Owner	Policy and Performance
Last Review Date	03 September 2025 (v1.3)