

# Watlington Community Property Limited

## Grievance and Complaints Policy

*Community Benefit Society registered under the Co-operative and Community Benefit Societies Act 2014*

<b>Version</b>	1.0
<b>Date adopted</b>	13 May 2026
<b>Adopted by</b>	Management Committee
<b>Next review date</b>	May 2027 (or following any material change in circumstances)
<b>Policy owner</b>	Secretary

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### 1. Purpose

This policy sets out how Watlington Community Property Limited (the Society) receives, considers, and resolves complaints and grievances. It applies to complaints from members, prospective members, tenants, and members of the wider community in which the Society operates.

The Society is committed to being open, accountable, and responsive. When something goes wrong, the Society wants to know, put it right where possible, and use the experience to improve. This policy provides a clear, fair, and proportionate process for doing that.

This policy should be read alongside the Society's Conflict of Interest Policy and the Society's Dispute Resolution Policy. Where a complaint cannot be resolved under this policy, or raises a question about the interpretation of the Society's Rules, the Dispute Resolution Policy applies. Both policies operate within the framework set by Rules 9.12–9.13 of the Society's registered Rules.

### 2. Scope

#### 2.1 What this policy covers

This policy covers complaints and grievances about:

- the conduct, decisions, or communications of the Management Committee or the Secretary
- the Society's management of its properties, including tenancy matters
- the Society's handling of membership applications, withdrawals, or share transactions
- any failure to comply with the Society's Rules, policies, or stated commitments
- the conduct of any person acting on behalf of the Society

#### 2.2 What this policy does not cover

This policy does not apply to:

- member expulsion proceedings, which are governed by Rule 3.8 of the Society's Rules
- Management Committee removal proceedings, which are governed by Rule 5.11 of the Society's Rules
- employment disputes, which are subject to separate employment law procedures
- complaints that are part of ongoing legal proceedings

Matters falling outside this policy will be directed to the appropriate process. The Secretary will confirm in writing which process applies within five working days of receiving a complaint.

### 3. Principles

The Society will handle all complaints in accordance with the following principles:

- **Accessibility:** any person within scope of this policy may make a complaint, and no formality or legal knowledge is required to do so.
- **Impartiality:** complaints will be investigated by persons with no personal interest in the outcome. Where a conflict of interest exists, an alternative investigator will be appointed.
- **Confidentiality:** complaints will be handled discreetly. Information will be shared only with those who need it to resolve the matter. Records will be retained securely.
- **Fairness:** both the complainant and any person about whom a complaint is made will have the opportunity to put their account before any decision is reached.
- **Timeliness:** the Society will acknowledge and respond to complaints within the timescales set out in this policy. Where an extension is needed, the complainant will be notified with reasons.
- **Learning:** the Management Committee will review complaints annually and use the findings to improve the Society's policies and practices.
- **No detriment:** no complainant will suffer any disadvantage in their membership or relationship with the Society as a result of making a complaint in good faith.

### 4. Who Can Complain

A complaint may be made by:

- any current or former member of the Society
- any applicant for membership
- any tenant of a property owned by the Society
- any member of the public who has been materially affected by the Society's actions or decisions

Where a complainant has difficulty making a written complaint (for example due to a disability or language barrier), the Society will assist them in setting out their complaint, or will accept a complaint made orally and confirm the details in writing.

### 5. How to Make a Complaint

Complaints may be submitted:

- by email to the Society's registered email address
- by letter addressed to the Secretary at the Society's registered office
- in person or by telephone, to be confirmed in writing within five working days

A complaint should set out:

- the name and contact details of the complainant
- the nature of the complaint and the events giving rise to it
- any relevant dates
- what outcome the complainant is seeking

The Society does not require a specific form to be used. If a complaint is unclear, the Secretary will contact the complainant to seek clarification before proceeding.

## 6. The Three-Stage Process

Complaints are handled in up to three stages. Most complaints will be resolved at Stage 1 or Stage 2. Stage 3 is reserved for complaints that cannot be resolved internally.

### Stage 1 — Informal Resolution

**Handled by:** Secretary (or, if the complaint concerns the Secretary, the Chairperson)

**Timescales:** Acknowledged within 5 working days. Response within 10 working days.

The Secretary will contact the complainant to understand the concern and seek to resolve it informally — through explanation, apology, correction of an error, or other appropriate action. Many complaints can and should be resolved quickly at this stage without the need for formal investigation. A written record of the complaint and its resolution will be kept.

### Stage 2 — Formal Investigation

**Handled by:** A member of the Management Committee with no prior involvement in the matter (appointed by the Chairperson)

**Timescales:** Acknowledged within 5 working days of escalation. Written decision within 20 working days.

If the complaint is not resolved at Stage 1, or if the complainant reasonably considers informal resolution to be unsuitable given the nature of the complaint, it will be escalated to Stage 2. The appointed investigator will review all relevant information, give the person(s) about whom the complaint is made a fair opportunity to respond, and issue a written decision setting out findings and any action the Society will take. The complainant will be notified of the outcome in writing.

### Stage 3 — External Resolution

**Handled by:** An independent mediator or, where appropriate, a referral to the relevant regulatory body

**Timescales:** To be agreed with the complainant and mediator within 28 days of escalation.

If the complainant remains dissatisfied following Stage 2, they may request that the matter be referred to an independent mediator in accordance with the Society's Dispute Resolution Policy and Rule 9.13 of the Society's Rules. The costs of mediation will be agreed in advance. If mediation fails to resolve the matter within 28 days of the mediator being appointed, either party may refer the dispute to the

courts. Separately, any person may refer a concern about the Society's compliance with its registered rules or the Co-operative and Community Benefit Societies Act 2014 to the Financial Conduct Authority.

## 7. Escalation Between Stages

A complainant may escalate a complaint to the next stage if:

- the Society has not responded within the applicable timescale
- the response does not address the complaint
- the complainant has reasonable grounds to believe the matter was not handled impartially

To escalate, the complainant should notify the Secretary in writing, stating why they are not satisfied with the Stage 1 or Stage 2 outcome. The Society will acknowledge the escalation within five working days.

A complainant is not required to complete Stage 1 before escalating to Stage 2 if the complaint concerns the conduct of the Secretary, or if informal resolution is clearly inappropriate given the seriousness of the matter. In such cases, the Chairperson will determine the appropriate entry point.

## 8. Complaints Involving Specific Roles

Where a complaint is made about or involves the Secretary, the Chairperson will act in the Secretary's place throughout the process.

Where a complaint is made about or involves the Chairperson, a Vice-Chairperson or another Management Committee member not involved in the complaint will act in the Chairperson's place.

Where a complaint is made about the conduct of the Management Committee as a whole, the matter will proceed directly to Stage 2, with an independent person co-opted to conduct the investigation where no suitable internal investigator is available.

## 9. Unreasonable and Vexatious Complaints

The Society will treat all complainants with respect and expects the same in return. The Society may consider a complaint to be vexatious or unreasonably persistent where:

- it has already been fully investigated and decided under this policy
- it is made primarily to cause disruption or distress, rather than to seek a legitimate remedy
- the complainant pursues it in a manner that is abusive, threatening, or disproportionate to the subject matter

Where the Management Committee determines that a complaint meets these criteria, the Secretary will notify the complainant in writing, setting out the reasons. The Society may thereafter decline to investigate further correspondence on the same matter. This decision itself may be appealed to the Chairperson within 14 days.

## 10. Confidentiality and Records

All complaints and the records arising from them are confidential. Records will be retained for a minimum of six years from the date of resolution. Access to complaint records will be restricted to those directly involved in handling the complaint and the Management Committee (for annual review purposes).

Where a complaint discloses information that the Society is legally required to report to a third party, the Society will fulfil that obligation, and the complainant will be informed where lawful.

## 11. Learning and Improvement

The Secretary will maintain a log of all complaints received, their stage of resolution, and outcome. The Management Committee will review this log annually — and at any time a pattern of complaints emerges — to identify whether changes to the Society's practices, policies, or communication are required. A summary (anonymised where necessary) will be included in the Society's annual report to members.

## 12. Review

This policy will be reviewed at least annually by the Management Committee, and following any material change in the Society's circumstances. Amendments require approval by resolution of the Management Committee and must be recorded in the minutes. This policy must be consistent with Rule 9.12–9.13 of the Society's Rules and, in the event of any conflict, those Rules prevail.

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### Adopted by the Management Committee

Signature	Full name and role	Date
S.Van de Pette	Stephanie Van de Pette Secretary	13 May 2026
J. Riddell	John Riddell Chair	13 May 2026
J. Carlisle Janson	Jessica Carlisle Janson Management Committee Member	13 May 2026