

Complaints Policy

PURPLEBRICKS

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1 Scope

- 1.1 This Policy defines what is meant by a “complaint”, describes the role of complaint handling in the context of working with or for Purplebricks and sets out the roles and responsibilities for managing complaints at each level of the organisation.
- 1.2 This Policy applies to all Purplebricks staff (including Directors) temporary and contract staff, and also to Territory Owners and Licensed Business Partners (LPEs / LLEs) and any relevant third parties.
- 1.3 This Policy can be located on the Policies section of the Intranet.

2 Purpose

- 2.1 The objective of this Policy is to provide guidance to relevant individuals on identifying and handling complaints that may arise in the conduct of business that Purplebricks undertakes. Whilst we do not wish customers to have cause to do so, we recognise that, on occasion, we may fall short of their expectations. In the event we do so, we will take seriously the complaint and seek to deliver a resolution to the customer’s satisfaction.
- 2.2 Estate Agents are required to subscribe to an Alternative Redress Scheme to enable consumers to appeal a complaint. Purplebricks is a member of The Property Ombudsman Scheme (TPOS) and as such agrees to abide by their Code of Practice which can be found at https://www.tpos.co.uk/images/codes-of-practice/TPOE27-8_Code_of_Practice_for_Residential_Estate_Agents_A4_FINAL.pdf
- 2.3 This Policy also sets out how Purplebricks maintains and operates effective organisational and administrative arrangements to handle any complaints it receives from customers.

3 Policy Principles and Process

- 3.1 All individuals to whom this policy applies have a responsibility to identify a complaint, however it arises. Such situations must be identified and carefully managed to ensure that any complaint is resolved fairly and is consistent with TPO’s code of conduct.

3.2 How to identify a complaint:

- 3.2.1 A complaint is any oral or written expression of dissatisfaction, whether justified or not, from or on behalf of a customer (as defined below) about the provision of, or failure to provide, any services by Purplebricks which:
- alleges that the customer has suffered (or may suffer) a financial loss, material distress or material inconvenience; and
 - relates to an activity of Purplebricks which falls under the Code of Practice as set out by The Property Ombudsman.
- 3.2.2 A customer, for the purposes of this Policy, is a buyer, seller, tenant or landlord or a potential buyer, seller, tenant or landlord, and may be a private individual or businesses.
- 3.2.3 Customers who are identified as being vulnerable will be dealt with in a way that is sensitive to the vulnerability identified and in accordance with The Property Ombudsman's Code of Practice.
- 3.2.4 Upon identification of a complaint however received, the allocated complaint handler, will:
- 3.2.4.1 acknowledge receipt of complaint, in writing (which may be in email format or otherwise transmitted electronically);
- 3.2.4.2 investigate the complaint competently, diligently and impartially in accordance with the requirement of this Policy;
- 3.2.4.3 aim to resolve the complaint at the earliest reasonable opportunity;
- 3.2.4.4 assess the complaint fairly, consistently and promptly, taking account of all relevant factors including the subject matter of the complaint and the merits of the complaint relative to the service standards which customers are entitled to expect from us.
- 3.2.4.5 where appropriate offer redress or remedial action in accordance with the limits set out in Appendix 1;
- 3.2.4.6 explain promptly to the customer in a way that is fair, clear and not misleading, our assessment of the complaint and our decision including any redress or remedial action; and
- 3.2.4.7 promptly provide any redress or take such remedial action when accepted by the customer.
- 3.2.5 All complaints referred to TPOS are dealt with by the Customer Experience Team or Lettings Management Team, who will co-operate fully with TPOS and comply promptly with any settlements or awards made by it.

3.3 Timescales

- 3.3.1 Where a complaint is unlikely to be resolved fully by close of business on the third working day following its receipt, Purplebricks will provide an acknowledgement of the receipt of the complaint that aims to provide reassurance that the complaint is being dealt with and Purplebricks will keep the customer informed on progress until such times as the complaint is resolved (Clause 3.3).
- 3.3.2 On receipt of a complaint Purplebricks must:
 - 3.3.2.1 within 3 working days of receipt, where the complaint has been resolved, send the customer a written acknowledgement of receipt and final response (at stage 1) with details of Purplebricks' internal complaints handling procedures and how to escalate their complaint should they be unhappy with the resolution
 - 3.3.2.2 within 3 working days of receipt, where the complaint is not resolved:
 - 3.3.2.2.1 send the customer a written acknowledgement providing reassurance that the complaint has been received and is being investigated and including the name of the person handling the complaint together with details of Purplebricks' internal complaints handling procedures.
 - 3.3.2.2.2 continue to investigate the complaint;
- 3.3.3 Where the complaint has not been resolved within 3 working days of receipt and an acknowledgement has been sent, then within 15 working days of receipt of the complaint, Purplebricks must provide a final response at our stage 1 of the process by sending a written response which either:
 - (i) accepts the complaint (in whole or in part) and, where appropriate, offers redress or remedial action; or
 - (ii) does not accept the complaint but offers redress or remedial action; or
 - (iii) rejects the complaint and sets out the reasons why; or
 - (iv) explains why Purplebricks is not able to give its final response and indicates when it expects to be able to provide one. In exceptional cases, where the timescale needs to be extended beyond this limit (15 working days), the customer should be kept fully informed and an explanation provided.
- 3.3.4 If, following stage 1, a customer remains dissatisfied, the customer will be advised to follow our stage 2 process to receive a detached review of the complaint by teams not directly involved in the transaction.
 - 3.3.4.1 Timescales for responding are a replication of the stage 1 process.
 - 3.3.4.2 Stage 2 must provide the customer a final response letter, together with TPOS escalation advice which:
 - (i) accepts the complaint (in whole or in part) and, where appropriate, offers redress or remedial action; or
 - (ii) does not accept the complaint but offers redress or remedial action; or
 - (iii) rejects the complaint and sets out the reasons why; or
 - (iv) in exceptional cases, where the timescale needs to be extended beyond this limit (15 working days), the customer should be kept fully informed and an explanation provided as to why Purplebricks is not able to give its final response and indicates we expect to be able to provide one.

Purplebricks considers a complaint to be resolved where the customer has indicated acceptance of a response from the Purplebricks, with neither the response nor acceptance having to be in writing. In the event that no response is received within 10 days of the final viewpoint Purplebricks will consider the matter to be closed. This does not affect a customer's right to escalate to The Property Ombudsman.

3.4 Ensuring customer awareness

- 3.4.1 To ensure customers know how to complain, Purplebricks will publish a summary of the key elements of its internal procedures for the reasonable and prompt handling of complaints on its website and in relevant literature that is sent to customers. The published information should set out how Purplebricks fulfils its obligations to handle and seek to resolve complaints and confirm that the complainant has the right to refer the complaint to TPOS.

3.5 Complaint Forwarding Rules

- 3.5.1 Where Purplebricks has reasonable grounds to be satisfied that a third party service provider (for example conveyancing services provider) may be solely or jointly responsible for the matters relating to the complaint, Purplebricks shall forward the complaint or the relevant part of the complaint in writing to the supplier and shall ensure:
 - 3.5.1.1 this is done promptly;
 - 3.5.1.2 a final response is sent to the customer setting out why the complaint has been forwarded and giving the supplier's contact details;
 - 3.5.1.3 where there is joint responsibility for the matters relating to the complaint, Purplebricks' internal complaints handling procedures outlined above are followed for that part of the complaint for which Purplebricks is responsible

3.6 Record Keeping

- 3.6.1 Incoming calls are recorded and retained to assist in the investigation of complaints made by customers over the phone. Documentation is stored electronically in accordance with Purplebricks retention policy.

3.7 Quality Control

- 3.7.1 Purplebricks will apply a monitoring process to ensure the quality of the responses given to customers is to an acceptable standard
- 3.7.2 Responses will be reviewed and assessed against set criteria, including
 - 3.7.2.1 Has the complaint been responded to within the permitted timescale?
 - 3.7.2.2 Correct template use if appropriate.
 - 3.7.2.3 Whether the complaint is recorded accurately.
 - 3.7.2.4 That the correct documentation has been issued to the customer.
 - 3.7.2.5 The complaint is resolved.
- 3.7.3 Team leaders also monitor contact centre calls to ensure that staff are complying with the requirements of this Policy.

4 Policy Standards

4.1 Monitoring Structure

- 4.1.1 The Policy Owner is responsible for monitoring and reviewing the effectiveness of this Policy.
- 4.1.2 The output will be used to evaluate the effectiveness of the Policy and enhance policy detail.

4.2 Reporting

- 4.2.1 All breaches of this Policy must be reported to the Policy Owner and the compliance team.
- 4.2.2 Following a breach, the Policy Owner must assess the significance of the breach to determine what remedial action is required and consider whether the Policy itself should be reviewed.
- 4.2.3 Details of complaints and root cause analysis are presented monthly to the Customer Operations Director who provides oversight compliance with this Policy. Where recurring or systemic issues are identified the Customer Operations Director will support the managing and controlling of risks of regulatory concern (and any detriment to customers) by directing resources to correct the root causes of such complaints and escalating to UK Executive team as necessary.

4.3 Training and competencies

- 4.3.1 All customer facing staff (and those likely to come into contact with customers) are trained, both at induction and on an ongoing basis, on how to record, identify and resolve customer complaints however they arise.
- 4.3.2 Any change made to this Policy will be communicated to all employees and third parties who act on Purplebricks' behalf and training provided to ensure ongoing compliance.

5 Further Reading

5.1 Purplebricks Data Retention Policy

5.2 www.tpos.co.uk for all Codes of Practice and assured advice.