PC-0048

Complaints Policy

Revision: B

APPROVAL

The signatures below certify that this EQMS manual has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
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AMENDMENT RECORD

This EQMS manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
All	First release	A	20/2/2025
3 & 4	Wording updated to include harassment	B	04/11/2025

COMPANY PROPRIETARY INFORMATION

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this EQMS manual is uncontrolled, except when provided with a document reference number and revision in the field below:

Document Ref.	PC-0048			Rev	B
Uncontrolled Copy	✓	Controlled Copy		Date	

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1 Introduction

pureLiFi (the Company) aims to foster a culture in which external parties can raise any complaints or concerns in a supportive environment, knowing that all genuine issues will be dealt with quickly and fairly.

This policy outlines the complaints process and the roles of those involved.

We reserve the right to amend or withdraw this policy at any time.

2 References

In addition to ISO 9001:2015, ISO 14001:2015 and ISO 27001:2022 we also make reference to other relevant British and/or international standards as well as customer specifications appropriate to our products and market.

Standard	Title	Description
BS EN ISO 9000:2015	Quality management systems	Fundamentals and vocabulary
BS EN ISO 9004:2000	Quality management systems	Guidelines for performance improvements
BS EN ISO 14004:2015	Environmental management systems	Guidelines for implementation
BS EN ISO 19011:2011	Auditing management systems	Guidelines for auditing

3 Purpose of this Policy

pureLiFi is committed to providing quality products and creating value for our customers. We pride ourselves in giving our customers our best every day and being easy to do business with.

We are a diverse team working in an open and accountable way that builds trust and respect. We do not tolerate any forms of bullying, harassment or discrimination by, or towards, our team members.

One of the ways in which we continue to improve our business is by listening and responding to the views of our customers and stakeholders, and in particular by responding positively to complaints, and by putting mistakes right.

Therefore, we aim to ensure that:

- Making a compliment or complaint is as easy as possible
- We welcome compliments, feedback and suggestions
- We treat a complaint as a clear expression of dissatisfaction with our products or service which calls for an immediate response
- We have a zero-tolerance approach to complaints related to harassment
- We deal with it promptly, politely and, when appropriate, confidentially
- We respond in the right way - for example, with an explanation, or an apology where we have got things wrong, or information on any action taken etc.
- We learn from complaints, use them to improve our business, and review annually our complaints policy and procedures

We recognise that many concerns will be raised informally, and these will be dealt with quickly.

The formal complaints policy is intended to ensure that all complaints are handled fairly, consistently and wherever possible resolved to the complainant's satisfaction.

4 Harassment

Harassment includes all inappropriate conduct that creates a disrespectful, intimidating, hostile degrading, humiliating, sexually harassing or offensive environment. Harassment may involve verbal or physical conduct including comments, actions or gestures that affect someone's dignity or psychological or physical safety.

Harassment can range from extreme forms such as violence, threats or physical touching to less obvious interactions such as ridiculing, teasing, repeatedly bothering others, or refusing to engage with them. Harassment can both be a series of incidents or a single incident that has a lasting effect on someone.

Someone can be harassed even if they are not the intended target. For example, they may feel harassed by racist jokes about a different ethnic group if these jokes create an offensive work environment for them.

Common types of harassment include:

- Sexual harassment
- Psychological harassment
- Physical harassment
- Verbal harassment
- Bullying
- Cyber bullying
- Micro-aggressions

This list of harassments is not exhaustive.

All acts of harassment will not be tolerated. They will be dealt with promptly and seriously. pureLiFi will involve the Police when a harassment complaint is too serious to be dealt with internally.

5 Who does this policy apply to?

The policy applies to all those we serve or have dealings with, whether visiting in person or through communications channels such as email, letter, telephone and social media. These include customers, contractors, self-employed individuals working for the Company, suppliers, job applicants, members of the public and any other individual or organisation that has business with our company.

6 Responsibilities

pureLiFi's responsibility will be to:

- Acknowledge the complaint, whether it is informal or formal, in writing;
- Respond within a stated period of time;
- Deal reasonably and sensitively with the complaint; and
- Take action where appropriate.

A complainant's responsibility is to:

- Bring their complaint, in writing, to pureLiFi's attention normally within 4 weeks of the issue arising;
- Raise concerns promptly and directly with a member of staff in pureLiFi;
- Explain the problem as clearly and as fully as possible, including any action taken to date;
- Allow pureLiFi a reasonable time to deal with the matter, and
- Recognise that some circumstances may be beyond pureLiFi's control.

7 Confidentiality

We respect the need for confidentiality when a complaint is made, both for the complainant and for members of the pureLiFi team who have had a complaint made against them. We aim to investigate complaints with sensitivity, preserve confidentiality, and to share information only when it is a necessary part of the investigation. When storing and sharing customer data, we will act at all times in accordance with our Data Protection policy.

8 Complaints Procedure

Stage 1

A complaint can be made by telephone or in writing. It is easier to address complaints when they are made quickly so that we can try to resolve the issue. We aim to try and resolve matters informally in the first instance.

However, the People & Culture Team will establish the seriousness of the complaint and, where an informal approach is not appropriate, we will proceed to the formal process.

When complaining, please tell us:

- Your full name and contact details
- As much as you can about the complaint
- What has gone wrong; and
- What outcome you are seeking

We will acknowledge your complaint (whether it is made verbally or in writing) by email to:

- Confirm receipt of the complaint
- Share a copy of our complaints process with you; and
- Inform you of the next steps and timelines

We aim to respond to complaints quickly. This could mean an on-the-spot apology and explanation if something has clearly gone wrong, or immediate action to resolve the problem.

An informal approach is appropriate when it can be achieved. But if you are not satisfied with the response we give at this stage, you can take your complaint to stage 2.

Stage 2

If the complaint cannot be resolved informally, a formal complaint may be made.

- A formal complaint can be made either verbally or in writing. If verbally, a statement should be taken by a member of the People & Culture Team, or where this is not possible, an impartial Manager.
- There may be exceptional circumstances where someone feels that they only feel comfortable making a complaint anonymously. This can be done via the following link: https://yourvoice.hibob.com/consult/sYENr3t4lZ
- In all cases, the complaint must be passed on to the CEO or COO. In the event of a complaint about the CEO the complaint must be passed on to the Chair of the Trustee Board.
- A complaint will normally be acknowledged in writing within one week of being received.

- The CEO or COO will investigate the complaint, or they may delegate it to an appropriate member of the pureLiFi Team or to an independent external investigator. Any conclusions reached should be discussed with any staff members involved and their Line Manager.
- We will keep the complainant informed of the progress of our investigation by email at 2- and 4-week intervals. Where it has not been possible to conclude the complaint by these times, we will explain the current position and when you can expect our final decision.

9 Unreasonable complaints

We reserve the right to refuse to respond to a complaint if the person making the complaint is insulting or abusive towards our staff or if they refuse to accept that their complaint has been dealt with despite a thorough investigation on our part. We will only do this where it is absolutely necessary, and we will write to the person concerned to explain why we believe this to be the case.

10 Appeals

Should the complainant be dissatisfied with the outcome of the complaint, then they have the right to appeal. They can escalate the issue by writing to the CEO within 10 working days of the decision letter, stating their reasons for the dissatisfaction and the outcome they were seeking. In the event of a complaint about the CEO, the appeal must be passed on to the Chair of the Trustee Board.

The complainant will be notified in writing of the decision, normally within 10 working days of receiving the appeal. Where it has not been possible to conclude the appeal in this time, we will explain the current position and when you can expect our final decision. The decision of the appeal is final.

If, after receiving our final response letter, the complainant is not satisfied with the way in which their complaint has been handled or if they are dissatisfied with the outcome, they have the right to refer their complaint to the Legal Ombudsman Service, an independent arbitration service. A complaint needs to be raised to the Legal Ombudsman within 6 months of the date of the final response.