Complaints Code of Practice

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1 PURPOSE OF THE POLICY

The purpose of this Complaints Code of Practice is to provide a fair, transparent, and consistent framework for managing and resolving complaints. It ensures that all concerns are managed promptly, respectfully, and effectively, with a focus on learning from feedback to improve our services, strengthen accountability, and maintain trust with customers, stakeholders, and the wider community.

2 POLICY STATEMENT

At Connexin we aim to provide all customers with exceptional service, however we appreciate that there may be a time when customers feel that we have not met expectations or that customers are not happy with the service that they have received.

This Complaints code of Practice aims to make customers and consumers aware of how a complaint can be made and when and how to escalate the complaint further if required. If a customer or consumer is unhappy with any part of our service, we ask that in the first instance that we are contacted and will do our best to resolve the issue in a timely manner.

We provide products that are both regulated and unregulated, details of which products are regulated and unregulated are listed at the end of this document. For those that are under regulation, we are required to abide by regulations as set down by the UK Communications regulator, Home - Ofcom.

We are members of the UK Internet Service Providers Association (ISPA) and the https://www.commsombudsman.org who are an independent alternative dispute resolution service (ADR).

Details of all these services are available at the end of this policy.

Pricing and charges may change subject to the terms and conditions of your product/service. You will be advised of these changes. Prior to making a complaint regarding any changes to your charges/additional fees, please refer to the terms and conditions that have been agreed for the product/service that you are receiving.

For any billing queries that are not within the terms and conditions please refer to a member of the Service Delivery team who can assist you.

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This complaints code covers all products and services that Connexin Group of Companies provides.

3 APPLICABLE LEGISLATION

Consumer Rights Act 2015

The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015

The Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013

Communications Act 2003

Data protection: The UK's data protection legislation - GOV.UK

Digital Economy Act 2017

Equality Act 2010

The Consumer Protection from Unfair Trading Regulations 2008

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation) (Text with EEA relevance)

4 SCOPE OF THE POLICY

This policy applies to all complaints received by the organisation from customers, service users, partners, and members of the public regarding our services, communications, and staff conduct. It covers the end-to-end handling of complaints, including how they are received, assessed, investigated, resolved, and recorded. The policy applies to all employees, contractors, and representatives acting on behalf of the organisation and outlines the standards and responsibilities required to ensure fair, accessible, and effective complaint management.

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5 DEFINITIONS/ABBREVIATIONS

Complaint: Any expression of dissatisfaction, whether justified or not, regarding a product, service, staff member, process, communication, or business activity, where a response or resolution is explicitly or implicitly expected.

Complainant: The individual or organisation making the complaint.

ADR: Alternative Dispute Resolution.

Deadlock Letter: Written confirmation that Connexin and the complainant have been unable to reach a mutually acceptable resolution.

Vulnerable Customer: A customer who, due to personal circumstances, may be especially susceptible to harm or disadvantage if additional support is not provided.

Corrective Action: Action taken to eliminate the cause of a nonconformity or issue and prevent its recurrence.

6 RESPONSIBILITIES

6.1 Our Responsibilities

We are committed to handling complaints, fairly, transparently, and efficiently. Our responsibilities include:

- Ensuring complaints are managed fairly and consistently through the correct channels.
- Acknowledging complaints within published timescales.
- Keeping customers informed of the progress and outcome of their complaint.
- Conducting impartial and proportionate investigations.
- Ensuring all customer-facing staff are trained to identify and log complaints, even where the word *"complaint"* is not expressly used.
- Regularly reviewing our complaints process to improve the quality of our service.

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6.2 Customer Responsibilities

To assist us in investigating and resolving complaints, customers should:

- Provide accurate and complete information.
- Respond to requests for clarification where necessary.
- Treat employees and representatives with respect.
- Advise us if they appoint an authorised representative.

7 ACCESSIBILITY & SUPPORT FOR VULNERABLE CUSTOMERS

We are committed to ensuring that our complaints process is accessible to all customers, including those who may be vulnerable due to personal circumstances such as disability, illness, age, bereavement, or communication difficulties.

We can:

- accept complaints from an authorised third party or representative.
- make reasonable adjustments to our complaints process.
- provide information in alternative formats where reasonably requested.

Please let us know if you require any additional support when making or progressing a complaint.

Customers requiring additional assistance may request communication via alternative methods including email, large print documentation, authorised representatives, or other reasonable adjustments where practicable.

8 REGULATED AND UNREGULATED PRODUCTS

8.1 Regulated Products

A regulated product is any service that meets the legal definition of an electronic communications service or electronic communications network under the Communications Act 2003. Providers delivering such services must comply with Ofcom's General Conditions of Entitlement and other regulatory obligations.

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Examples

- Residential and Business Broadband
- Residential and Business Telephone and VoIP Services
- Leased Lines
- Mobile SIM Services

8.2 Unregulated Products

A non-regulated product is a service that does not fall within the definition of an electronic communications service and is instead treated as an information society service under Section 32A of the Communications Act 2003. These products do not trigger telecoms regulatory obligations and are not subject to Ofcom's General Conditions

Examples

- IoT Solutions
- CCTV
- Door Access Control
- Managed Wi-Fi

9 HOW TO MAKE A COMPLAINT

To register a complaint against our products and/or services you can do so using any of the following methods.

- Telephone – 01482 363738
- Via Live chat link available on the website
- Email – complaints@connexin.co.uk
- Post to : -

  Connexin Ltd
  Complaints team
  K3 Business Park
  Unit 28/29
  Clough Road
  HULL
  HU5 1SW

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For IoT product and service complaints please contact us via iotcomplaints@connexin.co.uk

As part of the initial investigation, we may contact you for clarification or any additional information that may be required. This will ensure that the nature of your complaint is logged correctly, as such we advise that written communication may be best course of action for this purpose.

When registering your complaint please provide the following information: -

- Name of the account holder
- Full address of the postcode where the services are delivered to.
- A clear and full description of the complaint or issue.
- Let us know how you would like the matter to be resolved.

9.1 Complaint Records and Personal Data

Information provided as part of a complaint will be processed in accordance with applicable data protection legislation and the Connexin Privacy Policy. Complaint records, correspondence, call recordings, and investigation notes may be retained for legal, regulatory, quality assurance, customer service, and business improvement purposes. Access to complaint records will be restricted to authorised personnel with a legitimate business need.

10 MALICIOUS, UNREASONABLE OR ABUSIVE COMPLAINTS

We are committed to investigating all complaints fairly, impartially, and professionally. However, where a complainant's behaviour is abusive, threatening, discriminatory, harassing, or unreasonably persistent, or where repeated complaints are made without new information or evidence being provided, Connexin reserves the right to take reasonable steps to manage communications and the complaints process. Any such decision will be reviewed and approved by an appropriate member of management to ensure it is fair and proportionate.

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11 INTERNAL RECORDING REQUIREMENTS

All complaints shall be recorded within the designated customer management or ticketing system. Records shall include:

- Date received
- Customer details
- Nature of complaint
- Investigation activities
- Outcome
- Resolution date
- Any corrective actions identified.

12 HANDLING YOUR COMPLAINT

12.1 Regulated Products

(Regulated and Unregulated products are listed in Section 8)

- Complaints will initially be managed by our Customer Excellence, who will aim to resolve the issue as quickly as possible.
- If the matter cannot be resolved, it will be escalated to our Complaints Team.
- Your complaint will be acknowledged within **ten working days**.
- We aim to resolve all regulated complaints within **6 weeks** of the complaint being first raised.
- During our investigation, we may review relevant correspondence and call recordings.
- If a complaint is complex and requires additional time, we will keep you informed of progress.
- You will receive confirmation of the outcome in writing once the investigation is complete.

Please contact us using one of the methods set out above. Our aim is to resolve complaints at the first point of contact wherever possible.

You may appoint an authorised representative to act on your behalf. Please advise us if you do so.

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12.1.1 Step One – Front Line Resolution

If you have a complaint regarding your Connexin product, package, service, installation, or our network build in your community, then please contact us using one of the prescribed methods. Our objective is to resolve queries or complaints within your first contact with us (wherever possible).

If you would prefer you can appoint an authorised representative to interact with us on your behalf. Should you wish to do so then please let us know when you contact us/ You may also refer to our Accessibility Policy for further assistance.

12.1.2 Step Two – Internal Escalation

If you are dissatisfied with the proposed resolution, you may request escalation to a senior member of Customer Excellence.

- The escalation will be acknowledged in writing.
- A further impartial review will be conducted.
- We aim to provide a resolution within **two weeks** of escalation.

12.1.3 Step Three – Alternative Dispute Resolution (ADR)

If your complaint remains unresolved, you may refer it to the **Communications Ombudsman**, an independent and free ADR service approved by Ofcom.

You can escalate to ADR if:

- **6 weeks** have passed since you first raised your complaint and it remains unresolved; or
- We have issued a **deadlock letter** confirming that agreement cannot be reached.

Communications Ombudsman contact details

- Phone 0330 440 1614
- Email enquiry@commsombudsman.org
- By Post Communications Ombudsman
  P.O Box 730
  Warrington
  WA4 6WU

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The Ombudsman will **NOT** accept complaints that do not meet at least one of the above conditions.

The Ombudsman is a free, independent service approved by Ofcom (the communications regulator), that individuals and small businesses can use to help settle disputes where companies are members.

12.2 Unregulated products

- Contact us using one of the prescribed complaint methods.
- Complaints will first be received and documented by our team.
- Your complaint once received will be acknowledged within two working days.
- A full investigation will be conducted by our Team; we aim to resolve your complaint within five working days.
- Occasionally we may require more time to resolve complex complaints. If this is the case, then we will contact you and keep you informed of the progress of your complaint.
- We will email you with the outcome of your complaint once a full investigation has been completed.

12.2.1 Step One

If you have a complaint regarding your Connexin product, package, service, or installation then please contact us using one of the prescribed methods. Our objective is to resolve queries or complaints within your first contact with us (wherever possible).

12.2.2 Step Two

When we have a solution with regards to your complaint, you will receive confirmation of this in writing. If you are unsatisfied with the outcome of your complaint you can request your complaint to be escalated to the Head of Major Partnerships & Client Success.

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12.2.3 Step Three

Once our Head of Major Partnerships & Client Success confirms the resolution, if you are still unhappy then you have the right to escalate your complaint further, routes of escalation will be confirmed by the Head of Major Partnerships & Client Success.

Please note unregulated products are not covered by Ofcom or Alternative Dispute Resolution schemes.

12.3 Data Protection Complaints

Any complaint relating to the collection, use, disclosure, security, retention, accuracy, or other processing of personal data shall be referred to the Compliance Team for investigation.

The complaint shall be recorded within the complaints management system and investigated in accordance with applicable data protection legislation and internal policies.

Where appropriate, root cause analysis, corrective actions, or improvement actions shall be implemented to prevent recurrence.

Data protection complaints will be acknowledged within five working days, and a response will be provided within 30 calendar days where reasonably practicable.

The complainant will be informed of the outcome of the investigation and advised of their right to raise concerns with the Information Commissioner's Office (ICO) if they remain dissatisfied with the outcome.

Further information can be found at www.ico.org.uk.

13 COMPLAINTS CLOSURE

A complaint will be considered closed when one of the following applies:

The complainant has confirmed their acceptance of the proposed resolution.

- A final response has been issued by Connexin and no further correspondence or request for escalation has been received within a reasonable period.

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- The complaint has been referred to an external dispute resolution body, regulator, or other independent authority for consideration.
- Connexin has completed all reasonable investigation activities and communicated its final position to the complainant.

Records relating to the complaint, including any investigation findings, actions taken, and correspondence, shall be retained in accordance with applicable legal, regulatory, and business requirements.

14 LEARNING & CONTINUOUS IMPROVEMENT

Connexin recognises complaints as a valuable source of customer feedback and an opportunity to improve products, services, and business processes. Complaint trends, customer feedback, investigation outcomes, recurring issues, root causes, and lessons learned shall be reviewed periodically to identify opportunities for improvement.

Where appropriate, corrective actions, process improvements, training activities, or policy updates shall be implemented to address identified issues and reduce the likelihood of recurrence. Where a complaint identifies a systemic issue, process failure, recurring trend, nonconformity, or information security concern, the matter may be escalated through the company's corrective action, nonconformance, or improvement processes for further investigation and resolution.

Lessons learned may be shared with relevant teams to support continual improvement and enhance the overall customer experience.

15 MONITORING & AUDIT

This Complaints Code of Practice shall be reviewed at least annually to ensure ongoing compliance with legal, regulatory, and organisational requirements. Additional reviews may be undertaken where significant changes occur that could affect the effectiveness of the complaints process.

Adherence to this Code may be monitored through internal audits, management reviews, complaint file reviews, performance metrics, and other assurance activities.

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Records relating to complaints handling may be examined to verify compliance with documented processes, regulatory obligations, and customer service standards.

Findings arising from monitoring and audit activities may result in corrective actions, recommendations, or improvements to the complaints management process.

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