

## LEISURE COMPLAINTS POLICY

### STATEMENT

Malhotra Group PLC (the “**Company**”, “**we**”, “**our**”) believe that if a customer wishes to make a complaint or register a concern, they should find it easy to do so. It is our policy to welcome complaints and look upon them as an opportunity to learn, adapt, improve, and provide better services. This policy is intended to ensure that the complaints are dealt with appropriately and that all complaints or comments from our customers and employees are taken seriously.

### AIMS OF THIS POLICY

Our aim is to ensure that our complaints procedure is properly and effectively implemented and that the public feel that their concerns are listened to and acted upon promptly and fairly.

We strive to ensure the following:

1. Our customers, our staff and the general public are aware of how to complain or can find this information easily.
2. We provide appropriate and accessible opportunities for individuals to register concerns or complaints.
3. Written complaints are acknowledged within **7 days**.
4. Investigations into written complaints should be carried out and the findings communicated within **28 days** of receipt. Where the findings cannot be communicated within 28 days, the Company should contact the customer to advise of the delay and provide a revised deadline for response. This should be reasonable in light of the circumstances.
5. All complaints are responded to, in writing, by a senior member of staff.
6. Complaints are dealt with promptly, fairly and sensitively.

Wherever possible, we believe complaints are best dealt with using the Company’s complaints procedure. However, If either party is not satisfied, it may be necessary to refer the case to a relevant body or authority specific to the nature of the complaint.

### DEALING WITH COMPLAINTS

Sometimes it can be difficult to discern whether a customer wishes to make a formal complaint as occasionally we receive feedback on our services which may not be complimentary but also may not warrant or require a full response under this policy. The Company will adopt a common sense approach to these instances and we will be led by our customers when dealing with such situations. In any event, the Company will look to all feedback to help improve its services and customer experience.

## Verbal Complaints

1. All verbal complaints, no matter how seemingly unimportant, will be taken seriously.
2. Front-line staff who receive a verbal complaint should seek to resolve the issue immediately.
3. If the staff member cannot resolve the complaint, then they should offer to get the duty manager, supervisor or team leader to deal with the matter.
4. Complaints involving site managers should be raised in writing to Simon Wright (Head of Operations) at **Malhotra House, 50 Grey Street, Newcastle upon Tyne, NE1 6AE**. Alternatively, complaints can be sent by email to [Simon@malhotragroup.co.uk](mailto:Simon@malhotragroup.co.uk).
5. After discussing the matter, the member of staff dealing with the complaint may suggest a course of action aimed at resolving the complaint.
6. If the suggested resolution is not acceptable, the customer may wish to put their concerns in writing and provide them with a copy of this Complaints Policy. Formal complaints should be made in writing to **Malhotra House, 50 Grey Street, Newcastle upon Tyne, NE1 6AE** and marked for the attention of Customer Care. Alternatively, complaints can be sent by email to [customercare@malhotragroup.co.uk](mailto:customercare@malhotragroup.co.uk).

## Formal Written Complaints

### **Preliminary steps**

1. When a complaint is received in writing it should be escalated to the site manager who should record it and send an acknowledgement letter within **7 days**. A copy of this Complaints Policy should be provided to the customer with the letter of acknowledgement.
2. Where appropriate, further details should be obtained from the customer.
3. More serious concerns should be immediately escalated to the Operations Team and where applicable, the HR Department and/or Legal Department.
4. The Company will then appoint an individual to investigate the complaint (the “**Nominated Person**”).

### **Meeting (if appropriate)**

5. In some cases, the Nominated Person may find it useful to set up a meeting with the customer in order to collect information and understand the nature of the complaint.
6. If a meeting is arranged the customer should be advised that they may, if they wish, bring a friend, relative or representative. Where a face-to-face meeting is elected, it may be useful, upon request, for the meeting to take place in a neutral environment away from the site where the issue occurred.
7. Meetings give the Company the opportunity to demonstrate to the customer that the matter is being thoroughly investigated and taken seriously.

## Investigation

8. The Nominated Person should make reasonable enquiries and investigations into the complaint. This includes but is not limited to:
  - (i) The review of documentation or CCTV;
  - (ii) Interviewing staff and witnesses;
  - (iii) Reviewing booking information or receipts;
  - (iv) Reviewing previous correspondence; and/or
  - (v) Considering information from third-party sources.
  
9. The Nominated Person should then consider the collated evidence and form a well-reasoned opinion of the complaint based on the information and evidence available. The Nominated Person should then formulate a response in which they clearly communicate their findings to the Customer. This will usually involve the Nominated Person deciding on whether they 'uphold' the complaint.
  
10. Investigations into written complaints should be carried out and the findings communicated within **28 days** of receipt. Where the findings cannot be communicated within 28 days, the Company should contact the customer to advise of the delay, before providing a revised deadline. Delays should only arise where it has not been practical or realistic to respond to the concerns within the standard timescale.

## APPEALS

Where a Customer believes their complaint or concerns have not been properly considered in the first instance or that the findings and/or decision of the Nominated Person was unfair, the customer has the right to appeal against the decision reached.

Details of an **Appeal Officer** should be included within the initial complaint response advising of where appeals should be submitted and the prescribed time limit for doing so.

Whilst appeals can be made verbally, it is best practice to submit an appeal in writing, so an accurate record of concerns can be recorded and to make sure that all the issues raised are fully investigated.

The appeal should outline the reasons why the decision was not acceptable (the "**Grounds**") and any further information that had not previously been considered.

The appeal should be acknowledged within **7 days** of receipt and a formal response provided within **28 days** of receipt.

There is no further right of appeal.

<b>Issue Date:</b>	July 2019
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<b>Reviewed by:</b>	<b>Revisions</b>
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Operations, HR, Legal	May 2021
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