Complaints Procedure

Residential estate agency complaints handling policy

Company: Liberate Homes Limited
Registered office: 05 Dubai Suite Ground Floor Prospect House, Columbus Quay, Riverside Drive, Liverpool, Merseyside, L3 4DB
Contact: sales@liberatehomes.co.uk | 0330 223 8001
Redress scheme: The Property Ombudsman | Registration number: E03283

1. Purpose and commitment

We aim to provide a professional, fair, clear and courteous estate agency service. We take complaints seriously and use them to put things right, improve our systems and prevent similar issues from happening again.

This procedure explains how consumers, clients, prospective buyers, viewers, suppliers or other affected persons can raise a complaint with us, how we will investigate it, the timescales we will follow, and how a complaint can be escalated if it is not resolved.

This procedure should be read alongside our Estate Agency Terms of Business and our Privacy Notice and Referral Fee Disclosure.

2. Scope of this procedure

This procedure applies to complaints about our residential estate agency work, including sales marketing, valuations and appraisals, property particulars, viewings, offers, communication, sales progression, referral arrangements, fees, conflicts of interest, anti-money laundering checks, complaint handling, and the way we handle personal data.

A complaint may be made by a seller/client, buyer, prospective buyer, viewer, authorised representative, or another person affected by our service. Where someone complains on behalf of another person, we may need evidence of authority before discussing personal information or confidential transaction details.

3. Legal and regulatory framework

We will handle complaints with regard to the laws, regulations and industry standards relevant to residential estate agency work in the UK, including where applicable:

- **Estate Agents Act 1979** and associated estate agency requirements;
- **Consumers, Estate Agents and Redress Act 2007**, including the requirement for residential estate agents to belong to an approved redress scheme;
- **Consumer Protection from Unfair Trading Regulations 2008**, including duties not to mislead consumers or omit material information;
- **Business Protection from Misleading Marketing Regulations 2008**, where business-to-business marketing issues arise;
- **Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013**, where off-premises or distance contracts are relevant;
- **Consumer Rights Act 2015**, including the requirement to perform services with reasonable care and skill;
- **Equality Act 2010**, including reasonable adjustments and non-discriminatory service standards;

- **Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017** and related AML obligations;
- **UK GDPR**, the **Data Protection Act 2018** and, when in force, the data protection complaint-handling provisions introduced by the **Data (Use and Access) Act 2025**;
- **Privacy and Electronic Communications Regulations 2003**, where a complaint involves cookies or electronic marketing;
- **The Property Ombudsman Code of Practice for Residential Estate Agents**, TPO General Member Obligations and applicable TPO scheme rules.

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4. How to make a complaint

We will try to resolve concerns as early as possible. If you are unhappy with our service, please contact us and explain what has happened and what you would like us to do to put things right.

Method	Details
Email	sales@liberatehomes.co.uk
Telephone	0330 223 8001
Post	Liberate Homes Limited, 05 Dubai Suite Ground Floor Prospect House, Columbus Quay, Riverside Drive, Liverpool, Merseyside, L3 4DB
Subject line	Please mark written complaints as: **Formal Complaint**

5. What to include in your complaint

Please provide as much information as possible so we can understand and investigate the issue efficiently. Useful information includes:

- your full name and contact details;
- the property address or transaction reference, if relevant;
- the names of any staff members or third parties involved, if known;
- a clear summary of what you are unhappy about;
- key dates, conversations, emails, messages, documents or screenshots;
- the outcome you would like, such as an explanation, apology, correction, refund, goodwill payment or change to our process;
- whether the complaint involves personal data, discrimination, accessibility, vulnerability, referral arrangements or a conflict of interest.

Please send copies of relevant documents rather than originals. We may ask for further information if we need it to investigate fairly.

6. Accessibility and reasonable adjustments

We will make reasonable adjustments where needed. Please tell us if you need information in a different format, extra time to respond, assistance submitting a complaint, communication through a representative, or a specific communication method because of a disability, vulnerability, language need or other personal circumstance.

7. Our complaints process and timescales

We will follow the process below for service complaints. If your complaint also raises a data protection issue, section 10 explains how we will handle that aspect.

Stage	What happens	Target timescale
Initial resolution	Where possible, we will try to resolve the issue informally and promptly. If the issue cannot be resolved, or you ask us to treat it as formal, we will start the formal complaints procedure.	As soon as reasonably possible

Stage	What happens	Target timescale
Stage 1 - Formal complaint	We will acknowledge the written complaint, open a complaint record and investigate. The investigation should normally be carried out by a senior person or a complaints handler who was not directly involved in the issue where practicable.	Acknowledge within 3 working days. Written Stage 1 response within 15 working days.
Stage 2 - Senior review	If you remain dissatisfied, you may ask for a further review. A different senior person, where practicable, will review the complaint, the evidence and the Stage 1 response.	Written review response within 15 working days of escalation.
Final viewpoint	We will issue a final viewpoint letter setting out our final response, any remedy offered, and your right to refer the matter to The Property Ombudsman if you remain dissatisfied.	No later than 8 weeks from receipt of the written complaint.

If we cannot meet a target date because the complaint is complex or we are waiting for information, we will explain the reason and provide an updated timescale. We will still aim to complete the whole in-house process within 8 weeks.

8. Investigation standards

When investigating a complaint, we will act fairly, proportionately and objectively. We will consider the written complaint, relevant file notes, emails, calls, marketing material, offers, terms of business, referral disclosures, identity/AML records, property particulars and any relevant legal or regulatory duties.

We may contact staff members, third parties, solicitors, mortgage brokers, surveyors, portal providers or contractors where this is necessary and lawful. We will avoid disclosing personal or confidential information unnecessarily.

9. Possible outcomes and remedies

Depending on the circumstances, our response may include one or more of the following:

- an explanation of what happened and why;
- an apology where appropriate;
- correction of inaccurate information;
- a practical step to put matters right;
- a change to our internal process, training or communication;
- a goodwill gesture or fee adjustment where appropriate;
- confirmation that we do not uphold the complaint, with reasons.

Making a goodwill offer does not necessarily mean that we accept legal liability. Any settlement offer will explain whether it is made in full and final settlement of the complaint.

10. Data protection complaints

If your complaint is about how we have handled personal information, we will treat it as a data protection complaint. This includes concerns about access to personal data, inaccurate data, use of data for the wrong purpose, excessive retention, disclosure, security, cookies, marketing or failure to uphold data protection rights.

Data protection complaints should be sent to sales@liberatehomes.co.uk and marked "Data Protection Complaint". We will verify identity where needed before disclosing or changing personal information.

Our data protection complaints handling process is as follows:

- we will acknowledge the complaint within 30 days of receipt;
- we will investigate without undue delay and may ask for further details if needed;
- we will keep you informed where a complaint is complex or requires more time;
- we will provide our outcome without undue delay, and normally within one calendar month where practicable;
- we will tell you how to contact the Information Commissioner's Office if you remain dissatisfied.

If a complaint includes both service issues and personal data issues, we may handle the parts together or separately depending on what is fairest and most efficient. Escalation to The Property Ombudsman does not prevent you from contacting the ICO about data protection concerns.

ICO contact: *The ICO is the UK regulator for data protection and information rights. You can complain to the ICO if you are unhappy with how we have handled your personal information or how we responded to a data protection complaint. Website: ico.org.uk | Telephone: 0303 123 1113 | Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF*

11. Referral to The Property Ombudsman

Liberate Homes Limited is a member of The Property Ombudsman (TPO). Our registration number is E03283. TPO provides an independent redress service for eligible complaints about property businesses.

If you remain dissatisfied after receiving our final viewpoint letter, or if more than 8 weeks have passed since you made your written complaint and we have not completed our in-house procedure, you may refer your complaint to TPO.

Important: *TPO normally requires complaints to be referred within 12 months of our final viewpoint letter.*

The Property Ombudsman	Details
Website	www.tpos.co.uk
Consumer telephone	01722 333306
Business registration	Liberate Homes Limited - TPO registration number E03283
What to provide	Complaint details, our final viewpoint letter if available, key evidence, relevant terms, correspondence and any remedy sought.

If TPO accepts a complaint and decides that our service was unreasonable, it may require actions such as an apology, steps to put matters right, limiting fees, or payment of compensation. If a consumer accepts a TPO award, TPO treats that acceptance as full and final settlement of the complaint.

12. Confidentiality, records and personal data

We will keep complaint information confidential and will only share it where necessary to investigate, obtain advice, notify insurers, comply with legal or regulatory duties, respond to TPO or ICO, protect our position, or where you authorise disclosure.

We will keep complaint records for as long as necessary for the complaint, regulatory requirements, legal claims, insurance, audit and business improvement. Our general estate agency records are retained for a minimum of 6 years and AML records for a minimum of 5 years. Personal data is retained no longer than necessary for its lawful purpose, in line with our Privacy Notice.

13. Staff conduct, conflicts and independence

Where practicable, a complaint will be reviewed by a person who was not directly involved in the matter complained about. If this is not possible because of the size of the business, we will take reasonable steps to review the evidence objectively and record our reasons. We will identify and manage any conflict of interest, including complaints involving referral arrangements or connected businesses.

14. Unreasonable, abusive or vexatious behaviour

We will not refuse to deal with a complaint simply because we disagree with it. However, we may take proportionate steps if communication becomes abusive, discriminatory, threatening, repeatedly excessive, or unrelated to the complaint. This may include asking for communication in writing only, limiting repeated contact, or declining to respond to issues already answered unless new evidence is provided.

15. Complaint handling checklist for staff

Step	Action
1	Record the complaint date, channel, complainant details, property/transaction and summary of issues.
2	Identify whether the complaint is a service complaint, data protection complaint, discrimination/accessibility complaint, AML issue, referral-fee issue, or mixed complaint.
3	Acknowledge a written service complaint within 3 working days; acknowledge data protection complaints within 30 days.
4	Preserve relevant evidence: emails, call notes, offers, adverts, particulars, terms, AML checks, referral disclosures and staff notes.
5	Notify insurers or professional advisers where a complaint may involve a claim, negligence allegation, compensation demand or serious regulatory issue.
6	Investigate objectively and request more information where needed.
7	Issue the Stage 1 response within 15 working days, or explain any delay.
8	If escalated, arrange a senior review and respond within 15 working days.
9	Issue the final viewpoint letter within 8 weeks of the written complaint and signpost to TPO where appropriate.
10	Record outcome, remedy, learning points and any process changes.

16. Final viewpoint letter checklist

A final viewpoint letter should include:

- the date of the original complaint and a summary of the complaint issues;
- the evidence considered;
- our decision on each main issue and the reasons for it;
- any remedy offered, or clear reasons why no remedy is offered;
- confirmation that this is our final viewpoint and the end of our in-house complaints procedure;
- details of The Property Ombudsman and the 12-month referral deadline;
- ICO escalation details if the complaint includes data protection issues.

17. Review of this procedure

We will review this procedure periodically and whenever there is a material change in law, TPO rules, ICO guidance, our business model, our complaint trends or our internal systems.

Source materials considered

This procedure was prepared with reference to official and regulatory source materials available at the date of issue, including GOV.UK guidance on property redress schemes, The Property Ombudsman complaint handling guidance and Codes of Practice, ICO guidance on data protection complaints, and the relevant UK legislation listed in section 3. This document is an operational template and should be reviewed by a suitably qualified adviser before publication or if your business model changes.