

Complaints Policy

1. Purpose

The purpose of this policy is to provide a clear statement of intent with regards to the assessment, handling and investigation of customer complaints as our complaint handling policy and procedure has been created to meet the standards and requirements of both the Financial Conduct Authority (FCA) and The Financial Ombudsman Service (FoS).

The aim of this policy is to ensure that all customer complaints, either written or verbal, are handled in a consistent and regulated manner and that further complaint incidents are mitigated against and prevented.

The Company complaints handling procedure has been created to meet the requirements of both the Financial Conduct Authority (FCA) and The Financial Ombudsman Service (FoS) DISP rules and utilises rules and guidelines from both bodies in its complaint handling procedure and policy.

Where a customer has cause to complain, the complaints handling procedure will be followed in every instance and a log will be made of the complaint nature and details to help improve our services and mitigate against further complaints of similar nature.

2. Policy Statement

We are committed to delivering a fair, open and clear process for complaints and ensure a satisfactory outcome for all customers who raise a complaint. We provide thorough staff training in our internal complaint handling procedures and support staff in how to handle complaint situations in a face-to-face, written and/or telephone environment.

This policy sets out our intent and objectives for how we handle complaints, from offering a clear and approachable system for

customers to complain, through to conducting root cause analysis on all complaints received to identify the how and who of the complaint and to implement measures to prevent reoccurrences where applicable.

3. Scope

The policy relates to all staff (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged The Company in the UK or overseas*) within the organisation and has been created to ensure that staff deal with the area that this policy relates to in accordance with legal, regulatory, contractual and business expectations and requirements.

Our objectives are laid out below in regards to customer complaint handling. For the purposes of this policy, a complaint is defined as any customer contact whereby a negative communication or outcome has occurred. The customer does not have to formally address their communication as an official complaint or to request a response for the Company to treat the incident as a complaint and to follow the related procedures.

Our objectives for internal complaint handling are: -

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To ensure that our complaints procedure is fully accessible so that people know how to contact us to make a complaint
- To make sure all staff know what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely way
- To gather information which helps us to improve what we do

Our objectives for the complaint handling process are: -

- Complaints will be investigated and responded to within a maximum of 8 weeks from the initial customer contact.
- Customers will be sent a copy of the formal complaints procedure along with the FoS Consumer Leaflet.
- Ensure a supply of FoS Consumer Leaflets are available (*ordering*).
- Complaint responses will always be provided in writing.
- Complaint procedures and forms will be available via the company website as well as via written or verbal request.
- All complaints will be investigated by a trained member of staff and a full outcome summary provided to Senior Management.
- Complaint records will be used to revise company procedures and to improve communication and business practices where applicable.
- Customers will be advised of their rights and provided with the FoS and FCA contact information should they wish to take the complaint further.

4. Procedure Details

1. Raising a Complaint

Customers who request the complaint handling procedure will be provided a copy of the procedure and form either by email in a .pdf format or in the post and will be asked to raise their complaint in writing as soon as possible after the incident.

NOTE: Complaints are to be raised in writing, however verbal complaints will be accepted and dealt with as per the same procedures.

If a customer telephones the Company and wishes to raise a complaint, they should be passed through to a senior member of

staff or the Complaints Officer who will try to resolve the complaint then and there.

Even if the complaint is resolved at the time, the customer must still be offered the option of receiving the complaints handling procedure and form prior to ending the call and the call recording must be retained and logged in the complaints record.

2. Complaints Resolved by Close of the Third Business Day

The following DISP rules do not apply to a complaint that is resolved by a respondent by close of business on the third business day following the day on which it is received: -

1. The complaints time limit rules
2. The complaints forwarding rules

The Company acknowledges that complaints falling within this time-period are still subject to the DISP complaints resolution rules.

Where a complaint has been resolved by close of the third business day (a complaint is resolved where the complainant has indicated acceptance of a response from the respondent), we will ensure that a Summary Response Communication letter is sent, which: -

- Refers to the fact that the complainant has made a complaint and informs the complainant that we now consider the complaint to have been resolved
- Tells the complainant that if they subsequently decide that they are dissatisfied with the resolution of the complaint, they may be able to refer the complaint to the Financial Ombudsman Service
- Indicates whether or not we consent to waive the relevant time limits in DISP 2.8.2R or DISP 2.8.7R by including the appropriate wording set out in DISP 1 Annex 3R
- Provides the website address of the Financial Ombudsman Service

- Refers to the availability of further information on the website of the Financial Ombudsman Service

We confirm that any information provided to complainants regarding the Financial Ombudsman Service, are set out clearly, comprehensibly, in an easily accessible way and prominently, within the text of any responses.

In addition to sending a complainant a Summary Resolution Communication, we also utilise alternate methods to communicate the information referred to in DISP 1.5.4R(1) to (5) where: -

- We consider that doing so may better meet the complainant's needs
- The complainant and the Company have already been using another method to communicate about the complaint

Responding to a Complaint

Where an official complaint has been received, a written acknowledgement must be sent to the customer within 3 working days. The response should detail the complaint handling procedure and provide approximate timelines and expectations for the investigation and future responses.

A trained manager or the Complaints Officer are the only staff members who should respond to customers regarding their complaints.

3. Investigating the Complaint

The Complaints Officer or a trained staff member will be assigned the role of investigating complaints and will gather all necessary documents, recordings and information to make an independent review of the incident.

If internal interviews are to be conducted, a note taker will be present alongside the investigator and interviewee and a copy of the

interview notes will be written up and signed by the interviewer and interviewee prior to them being added to the complaint history.

All investigation must take place within 6-weeks of the initial complaint being received so that a final response (*decision letter*) can be sent to the customer within the FoS designated 8-week period.

Investigations must utilise all the facts and any previous, related information to produce an unbiased outcome and an expected course of action. A complaint reference should be assigned and all documents relevant to the complaint should have the reference written on them for continuity. The reference will also be added to the Complaints Register so that complaint and document can be audited and traced back in the future.

4. Decision Letter (Final Response)

After the complaint, has been investigated in full and an outcome and action decision has been arrived at, the investigator or Complaints Officer will draft a final response letter to the customer with both their findings and their decision on any action to be taken or compensation awarded.

The final response must be sent within 8 weeks of the initial response being raised and should also contain the below information should the customer be unhappy with the decision received.

a) The Financial Ombudsman Service telephone number, address and consumer leaflet should accompany the final letter, providing the customer with their options for taking the matter further.

b) The customer must be advised that they have only 6 months to log the complaint with the FoS.

5. Summary Response Communication

In addition to the content and regulations already covered in section 5.2 of this policy and procedure document, where we send a

Summary Response Communication Letter to a complainant, we confirm that the below wording is used, as applicable to the complainant and the Company. **Where the respondent does not consent to waive the six-month time limit as referred to in DISP 2.8.2 R of the FCA Handbook: -**

“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge – but you must do so within six months of the date of this letter.

If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances.”

- **The complaint was received outside the time limits referred to in DISP 2.8.2R of the FCA Handbook and the Company does not consent to waive those time limits or the six-month time limit in DISP 2.8.2 R: -**

“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge. The Ombudsman might not be able to consider your complaint if:

- *what you’re complaining about happened more than six years ago, and*
- *you’re complaining more than three years after you realised (or should have realised) that there was a problem.*

We think that your complaint was made outside of these time limits but this is a matter for the Ombudsman to decide. If the Ombudsman agrees with us, they will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances (see below).

If you do decide to refer your complaint to the Ombudsman, you must do so within six months of the date of this letter. If you do not refer your complaint to the Ombudsman within six months of the date of

this letter, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances.

The very limited circumstances referred to above include, where the Ombudsman believes that the delay was as a result of exceptional circumstances.”

- **The complaint was received outside the time limits referred to in DISP 2.8.2 R of the FCA Handbook and the Company does not consent to waive those time limits but does consent to waive the six-month time limit in DISP 2.8.2 R: -**

“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge. The Ombudsman might not be able to consider your complaint if:

- *what you’re complaining about happened more than six years ago, and*
- *you’re complaining more than three years after you realised (or should have realised) that there was a problem.*

We think that your complaint was made outside of these time limits but this is a matter for the Ombudsman to decide. If the Ombudsman agrees with us, they will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances.

The time limit for referring complaints to the Ombudsman is usually six months but we will consent to the Ombudsman considering your complaint even if you refer the complaint later than this.”

“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge — but you must do so within six months of the date of this letter. The Ombudsman might not be able to consider your complaint if:

- *you received a letter warning you that there was a high risk that your mortgage endowment policy would not produce a sum large enough to repay the target amount at maturity; and*
- *you're complaining more than three years after you received that letter, and*

5. Complaint Recording

All complaints, whether formal or informal, are recorded on a Customer Complaint Register. The register should consist of the below information and should be audited on a frequent basis to ensure that incidents are not being repeated and improvements are being made.

- **Date**
- **Nature of Complaint**
- **Department(s) Involved**
- **Complaint Reference**
- **Lead Investigator**
- **Decision Letter Sent (Y/N)**
- **Date Complaint Closed**

The log should be made available to the FCA and FoS when requested as well as being discussed with the local Trading Standards should a representative work alongside the organisation.

6. Responsibilities

We will ensure that all staff are provided with the time, resources and support to learn, understand and deal with customer complaints and that full training will be provided for new and existing employees on the complaint handling policy, procedures and expectations.

The Compliance Officer or a dedicated Complaints Officer will be appointed the role of overseeing, investigating and recording all customer complaints and is responsible for regular auditing of the complaints log to ensure mitigating actions and improvements are put into place where possible.