

## OUR COMPLAINT HANDLING PROCEDURES – INFORMATION FOR CUSTOMERS

**This procedure is written in accordance with the Financial Conduct Authority (“FCA”) Complaint Handling Rules and is issued in the event of a customer complaint.**

We will consider all complaints received from an Eligible Complainant, who the FCA has classified as a person who is:

- (a) A consumer (this is an individual acting for purposes outside their trade, business or profession); or
- (b) A ‘micro-enterprise’ which employs fewer than 10 persons and has a turnover or annual balance sheet of less than €2 Million; or
- (c) A charity, which has an annual income of less than £1m; or
- (d) A trustee of a trust, which has a net asset value of less than £1m; and
- (e) Who is or has been a customer of the firm; and
- (f) The complaint arises out of matters relevant to being or having been a customer; or
- (g) The complaint arises out of our actions or failure to act where the complainant is a potential customer of the firm.

### **Notes:**

1. A complaint may be made on behalf of an eligible complainant by another party authorised in writing by you.
2. Where we believe another firm is at fault we will promptly advise you in writing and provide contact details of the firm responsible.
3. Where we receive a complaint from a non-eligible complainant we will deal with this in accordance with the process enclosed, however where reference to the Financial Ombudsman Service (FOS)\* is made, these elements will not apply and you will not be entitled to refer the matter to the FOS if you disagree with our findings.

In the event of a complaint we will review all the relevant documentation from our files and systems. Additionally we may, as required, interview any employees or other persons involved in the matter.

We will then endeavour to respond to and resolve your complaint as soon as possible; however we may need to carry out further investigations. If these are required, we will send you in writing, an acknowledgement of your complaint promptly.

This letter will include:

- The name and job title of the individual handling your complaint;
- A timescale for when we will correspond further, which will normally be no more than 4 weeks from the receipt of your complaint; and
- A copy of our complaint handling procedures (this document)

We will keep you informed of the progress of your complaint, where we are unable to provide a response within 14 days. If, after **8 weeks** of receiving your complaint, if we are still not in a position to make a response, we will write to you and give reasons for the delay and an indication when we expect to provide a full and final response

Otherwise, within **8 weeks**, we will provide a **final response** to your complaint.

After 8 weeks, whether we have sent you a final response, or not, we will include details of the Financial Ombudsman Service\*, whose website address is [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk) and to whom you can refer your complaint if you remain dissatisfied.

We will also at this stage enclose a copy of the FOS’s explanatory leaflet ‘your complaint and the ombudsman’\*

### **A Final Response is:**

- Where we believe we have fully addressed your complaint;
- Notified you that you may refer the complaint to the FOS\* if you remain dissatisfied with our final response and that you must do so within 6 months (from the date of the final response) however please note;
- If you do not refer your complaint to the FOS\* 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.”
- Enclosed a copy of the FOS\* explanatory leaflet
- Reminded you of the FOS \*web address
- Where we consider that you are entitled to some redress and believe that we have fully addressed your complaint we will include details of this within the letter
- Where redress is agreed by us, unless you reject our offer, we will provide this within 28 days of our final response

### **We will consider a complaint closed when;**

- We have sent you a final response; and
- You have not written, rejecting our offer or response within 28 days; or
- Following our final response, you have provided a written acceptance of our response to your complaint, including; where appropriate any financial or other redress.