



Complaints Policy & Procedure

Company Confidential

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Version Control

Once the document in its initial or proposal stage has been approved, the changes must be tracked and reviewed by senior management. All footers and version control tables must be updated on the current version. Minor changes to layout or branding will be tracked by decimals (e.g., version 1.0, 1.1, 1.2) any amendments or deletions to content or the creation of a brand-new policy or procedure will be tracked by whole integers (1.0, 2.0, and 3.0)

Date	Author	Change Description	Authorised by
04.03.2020	Stella Hepburn – Group Compliance Manager	V1 Creation	The Board
29/10/2020	Stacey Smith – Compliance Monitoring Officer	V2 – Time barring rule included in 7.4	The Board
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16/09/2022	Natalie Mills – Compliance Manager	V3. Ofcom complaint definition added	Mike Oxtan – Head of Support Services
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1.0 Introduction & Scope

- 1.1 The purpose of this policy is to clarify the way Intelling Group companies (the Group) receives and manages a complaint. The Group are committed to dealing with complaints promptly and with a balanced view, in accordance with the Financial Conduct Authority (FCA) regulations to ensure a fair outcome is achieved for the customer.
- 1.2 This policy refers to a complaint from a consumer, either where the Group is acting on its own behalf or where the Group manages the complaint on behalf of a client (B2C). This policy is not applicable to complaints received from clients (B2B), as these complaints are managed through our Client Services team.
- 1.3 This policy is applicable to all employees, permanent and temporary including any associated third parties such as agency workers, casual workers, seconded employees, suppliers, agents and consultants.
- 1.4 The list of applicable employees is non exhaustive, and it is the responsibility of the Directors and Management of the Group to ensure that all employees are aware of and understand this document.
- 1.5 All employees will need to sign to indicate they have read and understood the contents of this policy when joining the Group.

2.0 Definition of a Complaint

- 2.1 The FCA define a complaint as **“Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service.”**
- 2.2 The Ofcom definition of a complaint is “
- (a) An expression of dissatisfaction made by a customer who is a Consumer, Microenterprise, Small Enterprise Customer or Not-For-Profit Customer to a Communications Provider related to either:
- i. the Communications Provider’s provision of Public Electronic Communications Services to that Customer;
 - ii. the complaint-handling process itself; or
 - iii. the level of customer service experienced by that customer; and
- (b) where a response or resolution is explicitly or implicitly expected.
- 2.3 An eligible complaint is an expression of dissatisfaction by a customer relating to a service, or failure to provide a service, by the Group.
- 2.4 An eligible complainant is a customer, a person authorised by the customer to complain on their behalf, or a guarantor only to the extent that their complaint arises from matters relevant to their relationship with the Group.
- 2.5 Where the Group believes another respondent to be solely or jointly responsible for the matters raised in the complaint, it shall forward the relevant information to the respondent as per the Dispute Resolution rules of the FCA (DISP 1.7).

2.6 If the Group receives an eligible complaint from another respondent, it shall manage the complaint as if it were received directly from the customer.

3.0 Receiving a Complaint

3.1 The Group is committed to making it as easy as possible for a customer to raise a concern and achieve this by being transparent about the Company's Complaints Process, and ensuring the customer faces no barriers when attempting to make a complaint. Details on how to raise a complaint and what information is required can be found in the '*Customer Complaints Code*,' which is available on all relevant Group websites.

3.2 If a customer is dissatisfied with the level of service provided by the Group, they can in the first instance raise their concerns with the staff member they are dealing with.

3.3 If the customer is not comfortable raising their complaint directly with a staff member, there are three other ways a customer can complain.

- Via phone by contacting 0161 804 5987 with the option of leaving a voicemail
- Via email by contacting us at complaints@intelling.co.uk
- Via a letter addressing the letter to the Complaints department, Intelling LTD, Southmoor House, Southmoor Road, Manchester, M23 9XD

3.4 If the Group receive a complaint verbally and consider it appropriate, the customer may be asked for further details in writing to help the Group resolve the matter as quickly as possible.

3.5 If the Group are unable to resolve a complaint at point of receipt, the aim is to send an acknowledgement, either in writing or via email, within 2 working days including a copy of the '*Customer Complaints Code*,' next steps involved, timescales as to when the customer can next expect to hear an update, and any referral rights that may be applicable to the nature of the complaint.

4.0 Recording Complaints

4.1 A reference number will be allocated to each complaint.

4.2 When recording a complaint, the Group will record the customer's name and contact details. They will also record all relevant details pertaining to the complaint, including the facts and cause/s of the complaint, the outcome and any actions taken following the investigation of the complaint.

4.3 The Group will record the customer's personal information solely for the purpose of addressing the concerns raised. Where a third party participated in the services provided, the Group may be required to share details and consult with them to fully investigate the matter.

4.4 All complaints are recorded, whether forwarded to another respondent (for example, a client of the Group) or managed internally, unless the customer has specifically asked not to receive a response or has asked to have their personal information removed from Intelling's systems.

4.5 The Group will retain a record of the complaint for three years from the date the complaint was received.

5.0 Our 6 step Complaint Process

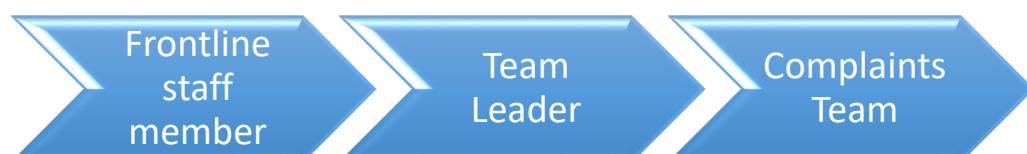
- 5.1 1) We record: the complaint to ensure concerns are documented and referred to the relevant person/s for investigation. The customer's personal information will be recorded in accordance with GDPR.
- 2) We acknowledge: the complaint within two working days of receipt.
- 3) We review: the complaint and determine what, if any, additional information, or documentation may be required to complete an investigation.
- 4) We investigate: the issues raised objectively and impartially, by considering the information provided by the complainant, our actions in relation to any dealings with the customer, and any other information that could assist us in investigating the complaint.
- 5) We respond to the customer within 8 weeks or provide an update if it will take longer to investigate. We will notify the customer of our findings and any action taken.
- 6) We report we conduct root cause analysis of any complaints received and take appropriate action as a result to ensure the Group's continuous improvement of its service to customers.

6.0 Responding to a Complaint

- 6.1 Following the Group's investigation, the aim is to respond to the customer within 8 weeks.
- 6.2 On occasion, it may take longer than 8 weeks to fully investigate a complaint. In this event, the Group will provide an update, either via email or in writing, as to the progress of the complaint, why it has taken longer than expected, and include any relevant referral rights. They will also provide timescales as to when the customer can next expect to hear an update.
- 6.3 The customer has the right to make enquiries about the status of their complaint at any time by contacting the Group.
- 6.4 The Group will notify the customer of the complaint findings clearly, fair, and not misleading. The Group will provide this response, either in writing or via email, specifying whether the complaint is upheld or rejected, outlining any remedial action taken regarding the complaint, and provide any relevant referral rights outlining how the complainant may contact the referral body should they be dissatisfied with the outcome.
- 6.5 In resolving a complaint, the Group will consider whether remedial action and/or redress is appropriate and promptly act on any offers or acceptance of remedial action and/or redress.

7.0 Escalation

- 7.1 Where possible, the Group will attempt to resolve complaints at the first point of contact. If the staff member is unable to resolve the complaint, they must refer the complaint to their line manager. If the line manager is unable to resolve the complaint, they must escalate the complaint to the Complaints Team via the Complaint Log.



- 7.2** If the customer is not satisfied with how their complaint has been managed, or the resolution provided by the Group, they may have the right to escalate the complaint to an independent body. If the customer is eligible to do this, the Group will provide details of the customer's referral rights, including how to contact the independent body.

Complaints can be made to the Financial Ombudsman by visiting <https://www.financial-ombudsman.org.uk/make-complaint>, or by calling 0800 023 4567.

Complaints can be made to the Information Commissioners Office by visiting <https://ico.org.uk/make-a-complaint>, or by calling, 0303 123 1113.

- 7.4** Where we receive a complaint which is outside the time limits for referral to the Financial Ombudsman Service, or any other appropriate independent review bodies, we may reject the complaint without considering its merits. If this is the case, we will explain this to the complainant in a final response, referencing the relevant sections of regulation.

8.0 Reporting & MI

- 8.1** All information regarding customer complaint data will be shared with the relevant management to identify trends. Management will be able to assess, monitor and act upon this data to ensure customers are being provided with the correct outcome.

- 8.2** As part of our continuous improvement, management will also take reasonable steps to ensure any recurring or systematic problems are remedied, by analysing complaint data and considering whether the root causes impact other business processes.

- 8.3** The monitoring systems in place to ensure the adherence to the policy, procedure and processes include but are not limited to:

- Quality Assurance monitoring
- Compliance Monitoring, and.
- Management oversight

9.0 Staff Understanding

- 9.1** All employees within policy scope should ensure that they read and understand this document in its entirety. If there should be any misunderstanding, it is the responsibility of the employee to ask an appropriate colleague to explain. It is the individual's responsibility to sign that they have read and understood the document. It is the individual's line manager who owns the responsibility to keep records of employee understanding.

10.0 Equal Opportunities

- 10.1** The Group is an equal opportunities employer and is committed to ensuring that all employees can exercise their rights under all company policies. Feedback is welcomed through proper channels. If you do need any assistance in relation to this policy, please inform a member of the Compliance Team.

11.0 Amendments & Deletions

- 11.1** It is understood that amendments and deletions to all or part of this policy may occur at any time and without warning. The policy owner agrees to inform relevant parties of any amendments within a reasonable timeframe and distribution to all employees will occur when an updated version is saved.