

COMPLAINTS POLICY

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The Debt Movement Compliance Function has responsibility for the Client Complaints Policy, as failure to meet applicable regulatory standards in relation to complaints-handling may lead to regulatory censure and in the worst-case scenario, loss of licence to operate.

The policy also embeds the Financial Conduct Authority (FCA) Treating Clients Fairly (TCF) outcomes.

Purpose

The Debt Movement Client Complaints Policy is designed to ensure that a consistent set of complaints principles are embedded to cover situations when existing and potential clients feel they have cause to complain.

By creating an environment that deals sensitively, swiftly and fairly with complaints, we increase the potential for maintaining a long and mutually rewarding relationship with clients while minimising avoidable complaints and driving business change through comprehensive root cause analysis.

In line with the rules contained within the FCA's Dispute Handbook (DISP) it is Debt Movement's intention to allow persons (consumers or otherwise) to be able to make a complaint to the business whether justified or not.

Debt Movement must assist such complainants by providing clear and transparent instructions of how to do so, along with reasonable timeframes and clear communication throughout.

This document is to be used all staff at Debt Movement who have interactions with customers (i.e., clients, creditors and other interested parties) and who may potentially receive customer complaints.

This document provides a written framework to help all relevant staff identify customer complaints and deal with them in line with this policy and Debt Movement's expectations.

Provisions of the Policy

Debt Movement is committed to comply fully with our local regulatory requirements. However, where local regulatory standards differ from the complaint definition and complaint principles, we will adhere to which ever represents the higher standard.

Definition of a complaint

An eligible complaint is defined as:

“Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about any aspect of our business, relating to whether the client may have (or may perceive they have) suffered financial loss, material distress or material inconvenience.”

All of Debt Movement's customers are capable of making an eligible complaint and by any means. This includes correspondence in writing and that made during verbal communication. Where any customer expresses concern about the service, steps will be taken to resolve that matter and it will be treated as a complaint.

Complaints may be received directly from customers or from third party representatives. In the event of any complaint the matter must be recorded, logged and referred to the nominated

complaint handler in accordance with the complaint handling process.

Internet and social networking

Debt Movement do not create barriers to prevent our clients complaining. However, a complaint must be directed to Debt Movement as an organisation for our complaints process to be engaged.

Complaints posted on non-Debt Movement sites such as social media (e.g., Facebook, Twitter, Instagram, etc...) do not need to be recorded or treated as complaints.

Expressions of dissatisfaction submitted or posted on Debt Movement web pages, sites etc. which are aimed specifically at clients, and through which clients might reasonably expect to interact with us in relation to their complaint, shall be treated as complaints against Debt Movement.

Where a client is not identifiable from the information posted on Debt Movement web pages, sites etc, we shall inform the client how they can raise their complaint (e.g., by phone, on-line form or by letter) and provide the relevant Debt Movement contact details. Where a client is identifiable, their complaint should be referred to the complaints handling team.

Non-clients

Complaints may be received from clients and non-clients.

Both are referred to as 'Clients' for the purpose of this policy.

How to make a complaint

Debt Movement advise any potential complainants how to make a complaint to the firm.

As such, the Complaint Process is published on Debt Movement's website and provided in writing to clients throughout the core processes (i.e., Nominee) or is available following a request from the customer or a third party acting on their behalf.

For an individual or business to make a complaint they need to provide the following information in a letter/email or over the phone:

- Their full name and address
- Reference number (where applicable)
- Details of the complaint
- Copies of correspondence relating to the complaint (if applicable)
- How they wish us to resolve the complaint

Minimum Requirements for Complaints Handling

All staff must operate to an agreed and documented complaints handling process.

The complaints process must be easy to understand and made available to existing or potential clients.

Complaints must be resolved in a timely fashion, within timescales prescribed by regulators if applicable. Complainants must be provided with regular progress updates.

Complaints must be fully investigated and resolved to deliver fair outcomes to clients. Each complaint must be treated on individual merits, all aspects fully and fairly investigated and addressed, and where appropriate, remedial action and/or redress offered (e.g., redress offered in recognition of any financial loss, material distress or material inconvenience).

All employees must ensure they understand the importance of handling complaints fairly and effectively, and are trained, competent and empowered to apply the Debt Movement complaints handling process.

Debt Movement must operate appropriate oversight, controls and monitoring arrangements, including quality assurance, to ensure compliance with the complaints handling process, the regulatory requirements and achieve fair outcomes to clients.

Complaint's handling performance must be tracked and reported against standards and targets agreed annually by the Board, with appropriate oversight and engagement by senior management.

Root Cause Analysis

Debt Movement will perform Root Cause Analysis of complaints to ensure identification and rectification of recurring or systemic issues including those not directly complained of.

Root Cause Analysis must include identification, prioritisation, corrective actions (where appropriate) and regular reporting to senior management.

Employees can seek advice from Compliance and other appropriate subject matter experts. Senior management may designate a responsible person(s) or area to carry out Root Cause Analysis on Debt Movement's behalf.

Complaints management information and Root Cause Analysis must be considered in New Product Approval and ongoing Product Review processes. The information from complaints must be used to improve products, services and operational processes including complaint handling. Consideration will also be given to clients who may be affected by a complaint root cause but who have not yet complained.

Time frame to address a complaint

The expected standard timeline for Debt Movement to respond to a complaint is detailed below:

Complaint Stage	Expected Service level
Upon receipt of complaint	Issue acknowledgement by no later than the next business day
Mid-investigation letter (where applicable)	Within 4 weeks of the date the initial complaint was received
8 week holding letter* (Only in exceptional circumstances where a final response cannot yet be issued due to ongoing investigations)	Between 4 – 8 weeks of the date the initial complaint was received
Final response letter	Within 8 weeks of receipt of the date the initial complaint was received

Complaints resolved by the close of the Third Business Day

However, where Debt Movement deals with a complaint by the close of the third business day, it does not have to adhere to the following guidance detailed within this policy.

It does however need to undertake the following in the form of a 'Summary Resolution Communication' –

- The fact that a complaint has been made
- Informs the complainant of the outcome – i.e., it is now resolved and sets out the complainants right to defer the complaint to the Financial Ombudsman Service and Debt Movements RPB (the IPA) including providing the contact details

A log of such complaints is to be made in order to record the number of such complaint's vs that of a formal complaint.

Escalation

Where the complainant is not satisfied with the final response issued, they are able to escalate their complaint.

This can involve the complaint being sent to the Insolvency Practitioners Association (IPA) through the insolvency gateway or to the Financial Ombudsman Service (FOS).

Details of the escalation routes are included in the complaints policy provided to complainants with their final response and on the Debt Movement website.

Complaints escalated to the Insolvency Practitioners Association (IPA)

As a firm with Insolvency Practitioners, Debt Movement is regulated by our recognised professional body the Insolvency Practitioners' Association (IPA).

Complaints can be made to our regulator through the Insolvency Gateway at www.gov.uk/complain-about-insolvency-practitioner or written complaints can be sent to IP Complaints, Insolvency Service, 3rd Floor, 1 City Walk, Leeds LS11 9DA.

The IPA will then investigate the complaint and raise the matter directly with Debt Movement. Where the complaint is upheld, this can result in sanction and financial penalties being imposed on the Insolvency Practitioner's working for Debt Movement.

Complaints escalated to the Financial Ombudsman

Complainants can also choose to escalate a complaint to the Financial Ombudsman Service (FOS).

The FOS can then investigate the complaint in line with the requirements of the financial conduct authority's (FCA) regulations which apply to Debt Movement as an FCA regulated firm. Where the complaint is upheld, this can result in financial penalties being imposed on Debt Movement and in serious cases could result in FCA authorisation being withdrawn.

Any complaint escalated to the FOS must be sent by the complainant within 6 months of the final response issued by Debt Movement.

Complainant's can escalate their complaint to the FOS using the following methods:

- Post: Financial Ombudsman Service, Exchange Tower, London E14 9SR
- Online: www.financial-ombudsman.org.uk
- By freephone: 0800 023 567 *
- Or Standard Telephone: 0300 123 1123 *
- Outside of the UK: +44 20 7964 0500

* calls are charged at the same rates as 01/02 number on mobile tariffs.

The FOS will **not action** an escalated complaint until the 8-week period Debt Movement have to issue a final response to a complaint has elapsed.

The FOS is also **unable to accept** complaints more than 6 months after the final response was issued or more than six years after the event complained or (if later) three years from the date on which the complainant became aware (or ought reasonably to have become aware) that he had cause for complaint; unless the complainant referred the complaint to the respondent or to the Ombudsman within that period and has a written acknowledgement or some other record of the complaint having been received.

Best Practice

Appendix 1 contains the best practice principles for use by employees in their Complaint Handling processes and procedures.

Policy Governance

Roles and responsibilities

ROLE	RESPONSIBILITY
The Board	Review and approval of Debt Movement Client Complaints Policy
Compliance Function	Responsible for oversight and monitoring of policy requirements
All employees	Responsible for compliance with the policy minimum standards and additional requirements imposed by local law and regulations (where these exist)

Adherence

The provisions of this policy are mandatory.

Dispensations to this policy are not expected to be required other than in exceptional circumstances. Any deviations from these provisions must be escalated to the policy owner in the form of a breach notification (for actual deviations), or waiver application forms (for anticipated deviations).

A register of approved and pending (approval) waiver applications and a register of material breaches notified is maintained by the Compliance Function. A breach of this policy may result in disciplinary action, which could lead to dismissal.

Waiver / Breach Process

There is a separate process covering the application, grant and monitoring of waivers and the notification of breaches.

Reputational Impact

Any action or inaction taken relevant to this policy which may have potential to incur reputation risk for Debt Movement (i.e., likely to result in material criticism by regulators, officials, law enforcement agencies or the media), must be escalated to the Head of Training & Compliance.

APPENDICES

Appendix 1 - Best Practice Principles

CLIENT EXPERIENCE

Our complaints process is both easy to understand and access by existing and potential clients.

- The existence of a complaint process is publicised together with advice on how to submit a complaint both internally and externally, i.e. information on the official website and within key product information.
- The complaints process is accessible, and no charge will be levied on clients for raising a complaint. Information about our complaints process is also made available free of charge.
- We are capable of making the process accessible to individuals with specialised needs e.g. visual or hearing impaired clients.

We resolve complaints in a timely fashion, providing regular updates on progress.

- We aim to respond to all complaints in a prompt, consistent and fair manner, paying attention to applicable regulatory rules, guidance and timescales.
- We'll do all we can to resolve your complaint by close of the third working day. If we can't do this, we'll attempt to write to you within five working days to acknowledge your complaint and let you know when you can expect a full response. We'll also let you know the name and contact details of the representative dealing with your case.
- Your complaint will be investigated by a suitably trained representative who was not directly involved in the matter that is the subject of your complaint. The member of staff will either have the authority to settle your complaint or will have ready access to someone who has the authority.
- We will keep you informed of progress made and measures taken to resolve complaints within approximately four weeks.
- In the unlikely event that your complaint has not been resolved within eight weeks of original receipt, we will send you a letter explaining why we have still not resolved your complaint and tell you when we will make further contact.
- Our final response will advise of our findings and, where appropriate, what action is being taken to resolve the matter. We will address the subject matter of your complaint, and where the complaint is upheld, we will offer a resolution that is consistent with treating all of our clients fairly.
- If you telephone us during our investigation and the member of staff handling your complaint is not available, then another member of our team will be able to help you.

We treat each complaint on its individual merits, ensuring all aspects have been fully and fairly investigated and addressed, and where appropriate remedial action and/or redress offered.

- We investigate each complaint fully, taking into account all factors including the client's recollections, previous correspondence, our records, relevant guidance published by

regulators or any arbitration service and any other information relevant to the complaint.

- Where we have made a financial error, the client will be reimbursed to the position they would have been in if the error had not occurred, or compensated if this is not achievable. Where we have caused material distress or material inconvenience, a gesture of goodwill and/or financial compensation may be appropriate.
- We focus on the quality and completeness of the response, with speed of delivery being an important but not overriding factor. Standardised wording can be used in letters, but consideration should always be given to ensuring that any such wording is appropriate to the individual circumstances of each complaint.
- Our correspondence must clearly state whether or not we are upholding the client's complaint, or if a complaint is partially upheld, the elements we are upholding and those we are not.
- Decisions should normally be communicated to clients in writing, except for simple complaints where the resolution can be communicated to the client by phone (in these cases detailed notes of all conversations will be kept as a minimum).
- When we are communicating the outcome of a complaint investigation by letter we will clearly state if it is our final decision and will include details of any relevant appeal service (if applicable).
- We offer remedial action and/or redress where appropriate. We promptly execute any offer of remedial action or redress accepted by the complainant.

OPERATIONAL REQUIREMENTS

We ensure that all complaints are captured and supporting information retained.

- We ensure all complaints received are recognised and recorded through all delivery channels, including face to face interactions, telephony channels and Debt Movement internet sites.
- We will accurately log the reason for the complaint occurring.
- We ensure complaint records are updated and maintained to provide a complete record of date of complaint notification, progress, client contact, actions taken, redress made, complaint outcome, date of resolution/closure etc.
- We retain information relating to complaints in line with regulatory requirements.

We operate to an agreed and documented complaints process.

- Documented internal procedures are in place that cover the end-to-end complaint handling process, meet the minimum requirements of the Debt Movement Complaints Policy and any regulatory requirements, whichever is the higher standard.
- All policies, procedures and controls focus on outcomes (i.e. making fair decisions, taking the right action and/or offering the appropriate level of redress) as well as process (e.g. providing appropriate disclosure about relevant arbitration referral rights, adhering to any applicable complaints time limit rules, conducting appropriate root cause analysis, etc).

We advise clients where and how to appeal if their complaint is not settled satisfactorily within eight weeks.

- Clients are asked to allow us to complete our Internal Complaints Procedure before referring concerns to the Insolvency Service and are advised of their right to refer the complaint after eight weeks, whether we have replied or not.

We ensure that our people understand the importance of handling complaints fairly and effectively and are fully competent and empowered to apply the Debt Movement complaints process.

- All employees with direct client contact (oral or written) must be trained and must Debt Movement have read this Complaints Policy before unsupervised client contact.
- Training must be tailored to reflect the differing responsibilities of employees and cover as appropriate the complaint handling process, root cause analysis, complaint systems, behavioural elements and relevant regulatory requirements (including where guidance has been issued by local regulatory authorities).
- Training must be reviewed annually as a minimum to ensure they remain appropriate, up to date and support competency requirements.
- Wherever possible, no employee should investigate any complaint about their own conduct. Where this is unavoidable, a record must be maintained of the potential conflict and of the controls / actions to ensure a fair outcome to the client (e.g. the investigation and final outcome is reviewed by another employee prior to final decision).

BUSINESS PLANNING AND OVERSIGHT

We ensure compliance with our complaints process.

Controls are in place to ensure:

- The delivery of fair outcomes to clients;
- The timeliness, consistency and effectiveness of the complaint handling process;
- That employees are trained and competent in the application of the process;
- That a good client experience is delivered;
- The investigation, decision making, redress, record keeping, clarity and quality of response is appropriate.
- The effectiveness of these controls and their operation are reviewed at least annually.

We track and report complaint handling performance against agreed standards / targets.

- Management information highlighting the handling quality, volume and root cause of complaints is provided to senior management on a monthly basis to allow the monitoring and improvement of standards including delivering fair outcomes to clients.
- Management information covers all complaints, including those resolved on the same day or by close of the third business day.
- Management information at local levels is sufficiently granular to cover all complaints and complaint handling employees, is produced frequently and supports effective root cause analysis.
- The complaint handling policy is owned by the Compliance Function who has control over its day to day operation, however the Board has ultimate responsibility for the oversight of the policy.
- Complaint handling is discussed as a standing item at management meetings, with the Compliance Function accountable for ensuring delivery of any actions as a result of these meetings.
- Standards / targets are agreed by senior management, and their on-going relevance reviewed at least annually.

We use the information from complaints to improve our products, services, operational processes and complaint handling processes.

- All employees dealing with complaints must perform Root Cause Analysis. Root Cause Analysis is completed and tracked at an aggregate level by complaint type or grouping to understand underlying issues. Action plans will be put in place and monitored to address these issues.
- Within Debt Movement, we have processes in place to identify and remedy any recurring or systemic problems revealed by complaints through Root Cause Analysis and action planning, even if there is a cost incurred.
- We identify key trends relating to the quality of complaint handling at each stage of our

complaint handling process, including the reasons for clients escalating their complaints for further investigation and action. We analyse the reasons for complaints being referred to external arbitrators / regulators with particular focus on those where we are required to change our position. We will provide feedback to case handlers as required and take into account any potential wider application to other parts of Debt Movement.

- We use our knowledge about common causes of complaints to influence the development and implementation of services and processes.
- As part of our Root Cause Analysis process we consider as appropriate whether any remedial action is required for clients who have been impacted by the same root cause but who have not (yet) complained.
- Any key changes in stance / key decisions from a relevant arbitration service as well as any key relevant Regulatory guidance is discussed at senior management level as appropriate.

We consider complaints as part of our New Product Approval and Product Review processes.

Complaints management information and Root Cause Analysis must be considered in the processes of New Product Approval and in ongoing Product Review. The information from complaints must be used to improve products, services and operational processes.

Appendix 2 – Complaints Monitoring minimum standards

Objective

The purpose of this document is to aim to continually improve the consistency and quality of complaint handling assessments across Debt Movement.

Reviews

Compliance monitoring reviews will be carried out on a regular basis. Sample selection will be risk-based, volume-related and weighted towards rejected complaints and reopened cases.

Assessment

In assessing whether individual complaints have been handled correctly the monitoring should:

- Pay due regard to the regulations in force.
- Assess whether the right and fair outcome for the client was reached.
- Assess whether the outcome was communicated to the client within the appropriate timeframe (i.e., legislative, regulatory and/or procedural).
- Assess whether the investigation and outcome has been clearly and accurately communicated to the client.
- Take into account any detriment – financial or otherwise – to the client.
- Assess the adequacy of the calculation and payment of any redress.
- Assess the adequacy of any non-financial remedial actions.

Reporting

The results of the Compliance monitoring should consist of the following:

- Total number of complaints determined in the period.
- Total number of complaints reviewed during the period (i.e. the sample size).
- The time period covered in the monitoring review.
- Total number of complaints reviewed during the period (i.e. the sample selection).
- Total number and percentage of complaints assessed as having been 'handled incorrectly', with a breakdown of the main shortcoming(s) and number of cases where an unfair outcome arose.
- Details of any control deficiency identified in monitoring and corrective action recommended. For example, product-specific training for the complaints handling team.

Additional Monitoring

Other tools that should be considered as part of a compliance monitoring review include:

- Interviewing of complaint handlers and supervisors.
- Review of first line supervision results.
- Review of policies and procedures.
- Review of governance arrangements.

Compliance should report any findings from these reviews which indicate that a systemic breach may have occurred in the complaint handling process e.g. where complaints are not been fully logged or recorded, or where key paragraphs such as referral rights have been excluded from the standard text.

Complaint Register template

This format is retained and updated with the progress of each complaint and its outcome.

Individual identifier of the person who made the complaint (Name; Ref number or customer ID etc. or in the case of a third party LOA, probate etc.)	Complaint details (a comprehensive overview of the details of the complaint)	Details of any correspondence or documents relating to the complaint requested	Date the complaint was lodged	Date of either Summary Dispute resolution document or acknowledgement sent	Outcome – Uphold or Reject	Date of final response letter (8 weeks from date the complaint was made)	Resolution – Compensation; FOS right

Complaint's policy

HOW TO MAKE A COMPLAINT

Debt Movement strives to provide the best possible service for our clients. You can help us by telling us when we have done something well, but also if our standards slip below what you would expect.

If you are unhappy with any aspect of the service provided, we would encourage you to contact us to discuss matters in the first instance.

To make a complaint about the service you have received from Debt Movement you can contact us using the following methods:

- By phone on 0330 380 1707
- By email: complaints@debtmovement.co.uk
- By post to: Complaints Officer, Debt Movement Limited, 3rd Floor Marsland House, Marsland Road, Sale, Cheshire, M33 3AQ

A copy of Debt Movement UK Ltd complaints procedure can be viewed at www.debtmovement.co.uk/complaints.

If you are not satisfied with our response, you may make a complaint to the regulatory body that licences our Insolvency Practitioners.

Insolvency Practitioner's regulated work

Any complaints about the Insolvency Practitioner's regulated work should be completed on-line at www.gov.uk/complain-about-insolvency-practitioner

If you need help with the form, you can call the Insolvency Service Enquiry Line on 0300 678 0015 (Monday to Friday 8am to 5pm)

Alternatively, you can send your written complaint to: IP Complaints, Insolvency Service, 3rd Floor, 1 City Walk, Leeds LS11 9DA

Financial Ombudsman Service

Alternatively, you can escalate the complaint to the Financial Ombudsman Service (FOS).

You can contact the FOS using the following methods:

- Post: Financial Ombudsman Service, Exchange Tower, London E14 9SR
- Online: www.financial-ombudsman.org.uk
- By freephone: 0800 023 567*

* calls are charged at the same rates as 01/02 number on mobile tariffs.