**Koze** **Complaint Handling Policy & Procedure**

POLICY STATEMENT

Koze Group Ltd complaint handling policy has been created to meet general standards and requirements. We take all concerns and issues seriously and use our robust and structured complaint processes to ensure a satisfactory resolution is reached.

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 and where possible, prevented. Where a customer has cause to complain, the complaints handling procedure will be followed in every instance and a record will be made of the complaint nature and details to help improve our services and reduce the occurrence of similar complaints.

We follow specific codes of conduct. We have an obligation to provide our customers with compliant complaint handling procedures. This policy and our associated customer complaint procedures are aligned with the rules and requirements set out by the FCA

1. REVISION AND APPROVAL

|  |  |  |  |
| --- | --- | --- | --- |
| **Rev.** | **Date** | **Nature of Changes** | **Approved By** |
| 1.0 | 11/10/22 | Initial release |  |
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1. PURPOSE

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 complaint handling procedures and support our staff in how to handle complaint situations in a face-to-face, written and 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 cause, issues and corrective actions regarding the complaint, and to implement measures to prevent reoccurrences where applicable.

1. SCOPE

This policy applies to all staff within Koze Group Ltd. Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

1. OBJECTIVES

Our objectives are set out below regarding 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 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. We ensure it is available through our website.
* To make sure everyone Koze Group Ltd knows what to do if a complaint is received
* To make sure all complaints are investigated fairly and in a timely manner
* To gather information which helps us to improve what we do and how we do it
* To comply with any obligations for complaint handling rules as applicable to our industry.

***Our objectives for our customer complaint procedures are: -***

* Complaints will be investigated and responded to within 8 weeks from the initial customer contact
* Customers will be sent a copy of our complaint procedures with the initial acknowledgement
* We will enclose any relevant information with the initial acknowledgement.
* Complaint responses will always be provided in writing (unless the complainant makes a specific request for an alternate form of communication, which will be provided in addition to the written format)
* Complaint procedures and forms will be available via the company website as well as upon written and/or verbal request
* All complaints will be investigated by a trained member of staff and a full outcome summary provided to Graham Weir
* Complaint records will be used to gain valuable management information to revise company procedures and to improve communication and business practices where applicable
* Complainants are advised of their rights and provided with any relevant right to refer/lodge the complaint and the applicable contact details (i.e. FOS, FCA, the ICO)

1. PROCEDURES & GUIDELINES

5.1 Raising a Complaint

Customers who request our 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 us and wishes to raise a complaint, they should be passed through to the Complaints Person who will try to resolve the complaint then and there.

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

5.1.1 Data Protection Related Complaints

Where a complaint is related to the processing of personal data, this policy ensures that we comply with the data protection laws and notification requirements.

Every individual has the right to lodge a complaint with the supervisory authority where they consider that the processing of personal data relating to them infringes GDPR/DPA18 or we have breached data protection law. All individuals using our products or services and those employed by us are notified of this right via our Privacy Notice, in our complaint handling procedures and in our information disclosures.

The Complaints Person with which the complaint has been lodged is responsible for informing the complainant on the progress and the outcome of the complaint, including the possibility of a judicial remedy where the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

5.2 Informal Complaint Resolution

We consider and respond to all complaints and issues, no matter how they are raised or what they refer to. Some issues and complaints we can resolve immediately or within a **3-working day** timeframe and are referred to as ***informal complaints***.

Such instances are where an investigation is not required because the nature of the complaint is clear, and a resolution can be obtained without further review of the facts. Where we resolve a complaint within the timeframe, the details are still logged on our complaint log, and the complainant is still informed of their rights.

We take every opportunity to resolve complaints at the first initial point of contact where possible. Informal resolution is always attempted where the issues raised are straightforward and potentially easily resolved, requiring little or no investigation.

However the complainant is always offered the option of making the complaint formal if the resolution is not to their satisfaction.

Where an informal complaint is received, it is acceptable for the point of contact or addressed employee to attempt to resolve the issue without involving the Complaints Officer. However, any issue relating to data protection infringes or breaches, no matter how small or informal, are always brought to the attention of the DPO or appointed person.

Frontline staff are trained to deal with basic issues and informal complaint resolution and are aware of their obligations and the subsequent reporting lines. Such employees are equipped to attempt to resolve a complaint relevant to their area of service or expertise, wherever possible.

5.2.1 Timeframe for Informal Resolution

It is the aim of the Company to resolve informal complaints immediately, or at least within the first 24-hours. Such complaints and issues will have a quick, but informative response and do not need to have an investigation or enter the formal complaint process.

No matter how small or informal the complaint, if a satisfactory resolution has not been achieved within 3 working days of the complaint being raised or identified, the issue will enter the formal complaint process.

5.3 Formal Complaint Resolution

We have specific procedures in place for the receipt of a formal complaint, regardless of the medium in which it was received. This includes the progression of an informal complaint that we were unable to resolve during the initial point of contact.

For acknowledgements made by post, the procedures are enclosed in a hard-copy letter format. Where the customer has requested to correspond via email, we provide the complaint procedures.

The Complaint Person is the only staff members who respond to customers regarding their complaints. They have been provided with the time, resources and training to communicate effectively with customers regarding concerns and formal complaints.

* + 1. **Response Time for Formal Response**

For all formal complaints, a written acknowledgement is sent to the customer **within 3 working days**. We provide approximate timelines and expectations for the investigation and future responses within initial acknowledgement response.

All investigations take place within 6-weeks of the initial complaint being received. We aim to send our final response (decision letter) to the customer within our designated 8-week period. Where this is not possible, the customer will be updated using our 8-Week Holding Letter response to provide them with an update and reason(s) for the delay.

**5.3.2 Investigating the Complaint**

The **complaints person** 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 **investigations 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 our 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 log so that complaint and document can be audited and traced back in the future.

All employees are provided with clear guidelines of when a complaint is formal and requires an appropriate investigation. ***Complaints must be referred to the Complaints Officer where:***

* The complainant has requested such a referral or investigation
* The complaint involves any type of personal data issue
* The informal complaint resolution stage failed or was inappropriate
* There is a conflict of interest between the complainant and an employee
* The issues are complex and require an investigation
* The complaint represents a high or serious risk to the company
* The facts are unclear, or the complaint will require additional time to resolve
* The complainant is identified as being vulnerable
* There has been any media contact or attention
* Child protection issues are involved
* The issues do or may affect more customers (whether identified or not)
  1. **Decision Letter (Final Response)**

After the complaint has been investigated in full and an outcome decision has been reached, the **Complaints Person** will draft a final response letter to the complainant with their findings and decision regarding any action(s) to be taken or compensation awarded.

The final response will be sent within 8 weeks of the initial complaint being raised and will also specify the complainants right to refer to or lodge the complaint with the appropriate body (where applicable) should the customer be unhappy with the final decision.

1. For complaints to firms regulated by **The Financial Ombudsman Service** (FOS), the final response will detail the FOS’s telephone number and address and the ombudsman’s consumer leaflet will also accompany the final letter. The complainant will be provided with the options for taking the matter further and that they have only 6 months to log the complaint with the FoS.
2. For complaints related to personal data and/or breaches of the data protection laws and regulations, the final response will reiterate the complainants right to lodge a complaint with the supervisory authority (the Information Commissioners Office) and will detail the ICO’s telephone number and address, along with the possibility of seeking a judicial remedy.
   1. **Complaint Forwarding**

If we have reasonable grounds to be satisfied that another party may be solely or jointly responsible for the matter detailed in the complaint, we will forward the complaint or the relevant part, in writing, to the other party. We will do so

1. Promptly
2. informing the complainant promptly in a final response of why the complaint has been forwarded by it to the other respondent and of the other respondent’s contact details; and
3. where jointly responsible for the fault alleged in the complaint, it complies with its own obligations under this chapter in respect of that part of the complaint it has not forwarded.
4. When a respondent receives a complaint that has been forwarded to it under [DISP 1.7.1 R](https://www.handbook.fca.org.uk/handbook/DISP/1/7.html#D159), the complaint is treated for the purposes of [DISP](https://www.handbook.fca.org.uk/handbook/glossary/G302.html) as if made directly to that respondent and as if received by it when the forwarded complaint was received.
5. On receiving a forwarded complaint, the standard time limits will apply from the date on which the respondent receives the forwarded complaint
6. **COMPLAINT RECORDING**

All complaints, whether formal or informal, are recorded on a Customer Complaint Register. The register consists of the below information and is audited on a **monthly** 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 register is made available to any relevant authority, ombudsman or body who relates to or oversees the firms’ complaints, as well as being made available with the local Trading Standards should a representative work alongside the organisation.

We will retain all complaint documentation for 3 years from the date of the complaint.

1. **PATTERNS AND ANALYSIS**

The complaint register and forms are reviewed monthly by the Graham Weir and the **Complaints Person** to identify any patterns or reoccurring issues. We are dedicated to improving our performance, services and functions through the auditing of our complaint records and our investigation process.

If a gap or pattern is identified we use Root Cause Analysis to detect the root of the problem. We use the ‘5 Whys’ technique to achieve our 3 goals.

1. Identify the problem
2. Fully understand the nature of the problem and learn of any underlying issues
3. Correct the issue and prevent the problem recurring

We put corrective actions into place as soon as possible and keep the function, process or person under a weekly review until a satisfactory improvement is noted.

1. **PUBLISHED COMPLAINTS PROCEDURES**

We have a user-friendly version of its complaint procedures that are made available to customers. This provides them we easy to access and understand guidance on how to raise a complaint and the process and timeframes for resolution. The customer complaint procedures are published on our website at **www.hasselfreeboilers.co.uk**

We also provide a hard-copy complaint procedure letter and a PDF digital version for responses by post and email.

1. **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 **complaints person** will be appointed the role of overseeing, investigating and recording all customer complaints and is responsible for regular monitoring of the complaint register to ensure mitigating actions and improvements are put into place where required.

* 1. **The Complaint Officer**

We have appointed **Complaints Person** who deals with all complaints and is provided with the training and support to understand, investigate and respond to complaints of all types. Where the complaint involves personal data, the Complaint Person is assisted by the Data Protection Officer/Appointed Person to ensure that the relevant data protection regulations and laws are adhered to, and the individuals’ rights are exercised and complied with.

We ensure that the person assigned to handle complaints can complete their duties independently and without bias and is afforded adequate resources to review each complaint effectively. In the absence of the assigned complaint officer, or if a conflict of interest is identified *(i.e. the complaint involves the investigating person),* we have a nominated deputy who is fully trained to handle complaints.

The Complaint Person has full authority and internal credibility to ask questions, carry out investigations and interviews, obtain and analyse evidence, recommend policy and process changes and be involved in department functions for the purposes of complaint handling.

* 1. **Complaint Reporting**

As a smaller consumer credit firm, Graham Weir will report our complaints data **annually** through the Regdata system.

**Sample Complaints Correspondence**

**Complaint Handling Letter Suite**

* Informal Acknowledgment & Final Response (*where response is within 3 days of complaint receipt and has followed the informal process, being quickly/easily resolved*)
* Complaint Acknowledgement
* 4-Week Holding Letter
* 8-Week Holding Letter
* Final Response – Complaint Upheld
* Final Response – Complaint Rejected

**Informal Acknowledgment & Summary**

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**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Thank you for your ***[visit/phone call/letter/email]*** received on ***[date]*.** As discussed with you after receipt of the initial complaint, I was sorry to learn that *[insert complaint issue]* and that you had cause to raise your concerns with us.

As you are aware, I was able to review your complaint immediately and concluded that your concern(s) were valid and have now been addressed. Because of the complaint, we agreed to ***[insert the actions taken/response given to the complainant]*.** This outcome was agreed to be in final resolution to your concerns and you have confirmed that the complaint can now be closed.

Please note that, under the terms of our Complaints Procedure and with your agreement, this is our final response and we now consider the complaint to be closed. However, if you are dissatisfied with the agreed outcome or this decision, you have the right to ask us to reopen the complaint and complete a formal investigation. Please find enclosed a copy of our internal Complaints Procedure for your information. Please take the time to read this as it explains what your rights are.

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

*Enc:* ***[Name of company]*** *Complaints Procedure leaflet*

**Written Complaint Acknowledgment Letter**

**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Thank you for your ***[letter/email]*** received in our office on ***[date]*.**

I am most sorry to learn that ***[insert complaint issue]***and can confirm that we take this matter most seriously and will be conducting a thorough investigation into your concerns. Once we have completed this, we will write to you again.

Please find enclosed a copy of our internal Complaints Procedure for your information. Please take the time to read this as it explains how we will deal with your complaint and when we will contact you again.

In the interim if you have any queries, please do not hesitate to contact me.

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

*Enc:* ***[Name of company]*** *Complaints Procedure leaflet*

**4-Week Holding Letter**

**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Further to my letter dated **[insert date of latest correspondence],** I am still investigating the details of your complaint and wanted to keep you informed of our progress and continued efforts in this matter. The investigation is still ongoing due to **[insert reason for delay/prolonged investigation].**

I apologise for the delay and thank you for your patience. I will write to you again as soon as our investigation into your complaint has been finalised, and at the latest, within eight weeks of the date from which we received your complaint.

If you need to contact me in the meantime, please do not hesitate to do so. My contact details are below.

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

**8-Week Holding Letter**

**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Further to my letter dated **[date of latest correspondence],** I am sorry that I have still been unable to write to you with the results of my investigation.

This is due to **[insert reason for the delay/prolonged investigation].** I apologise for the delay and hope to be able to respond to you within **[insert expected response time].** Thank you for your continued patience.

If you are dissatisfied with the progress of the investigation into your complaint, you may refer your complaint to the **Financial Ombudsman Service**

**Write - Financial Ombudsman Service, Exchange Tower, London, E14 9SR**

**Telephone - 0300 123 9 123 or 0800 023 4567**

**E-mail:**[**complaint.info@financial-ombudsman.org.uk**](mailto:complaint.info@financial-ombudsman.org.uk)

Please do not hesitate to contact me in the meantime using the contact details below.

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

**Enc:** *[enclose any ombudsman leaflets or required material if applicable]*

**Final response Letter – Complaint Upheld**

**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Further to my letter dated **[insert date of latest correspondence],** I have now investigated your complaint fully and would like to apologise for **[short summary of mistake/poor service/issue],** and for any inconvenience/distress this has caused you.

As a result of our investigation we have concluded that **[enter your final response/investigation outcome and actions taken].** As we have upheld your complaint, we will **[insert what compensation/actions are to be taken/offered].**

Please note that, under terms of our Complaints Procedure, this is our final response.

If you are dissatisfied with it, you may refer your complaint to the **Financial Ombudsman Service**  You need to do this within six months from the date of this letter.

**Write - Financial Ombudsman Service,  Exchange Tower,  London,  E14 9SR**

**Telephone - 0300 123 9 123 or 0800 023 4567**

**E-mail:**[**complaint.info@financial-ombudsman.org.uk**](mailto:complaint.info@financial-ombudsman.org.uk)

Once again, we are sorry for the inconvenience we caused you and hope you will find that the points above offer an appropriate explanation and fair resolution.

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

**Enc:** *[enclose any ombudsman leaflets or required material if applicable]*

**Final Response – Complaint Rejected**

**[Enter Date]**

**[Enter Complaint Reference]**

Dear ***[Enter Name]***

Further to my letter dated **[insert date of latest correspondence],** I have now investigated your complaint fully. While I understand the **[inconvenience/distress]** that this has caused you, I regret that I am unable to **[summary of customer’s request/demand].** The reason for this is **[give full detail/results in investigation/final response].**

Please note that, under terms of our Complaints Procedure, this is our final response.

If you are dissatisfied with it, you may refer your complaint to the **Financial Ombudsman Service**  You need to do this within six months from the date of this letter.

**Write - Financial Ombudsman Service,  Exchange Tower,  London,  E14 9SR**

**Telephone - 0300 123 9 123 or 0800 023 4567**

**E-mail:**[**complaint.info@financial-ombudsman.org.uk**](mailto:complaint.info@financial-ombudsman.org.uk)

I acknowledge the **[inconvenience/difficulties/distress]** this situation has caused you, but considering my comments above, I am sorry that we are unable to **[offer the response you were looking for/take this matter further].**

Yours sincerely,

**[Enter Name Complaint Officer/Person handling complaint]**

**[Enter Job title of person handling the complaint]**

**[Enter direct contact methods (i.e. direct dial, direct email, extension etc)]**

**Enc:** *[enclose any ombudsman leaflets or required material if applicable]*

**Complaints Procedure for Website:**

**Complaints Procedure**

Koze Group Ltd strive to meet our customers' expectations in every aspect of our business. However, we understand that sometimes things go wrong. We take all concerns and complaints seriously and will work with you to resolve any issues that you raise with us. We encourage feedback from our customers and welcome the opportunity to put things right where you are not satisfied.

Our complaints procedure allows us to investigate your concerns and for you to provide additional information so that we can address the problem as quickly and effectively as possible. Our adherence to a structured complaints process enables us to improve our service and ensures that our customers can communicate with us effectively.

**Who Do I Complain To?**

To raise a complaint with us email us at [**info@hasslefreeboilers.com**](mailto:info@hasslefreeboilers.com)Alternatively, if you would prefer to make your complaint in writing,

please contact us at: -

**Graham Weir**

**Koze Group Ltd**

**Airfield Enterprise Park**

**Trafalgar House Kemble**

**Cirencester**

**GL7 6BQ**

**01285703940**

**The Complaints Process**

We take every opportunity to resolve complaints at the first initial point of contact. Immediate resolution is always attempted where possible and where little, or no investigation is required. We aim to resolve most face to face and telephone issues in this manner.

Our frontline employees are trained to deal with your issues and are equipped to resolve your complaint as it relates to their area of service or expertise. However, should you feel that your concerns remain unresolved, you will be offered the option of making a formal complaint.

Our complaint handling process is simple and easy to use. ***Once you have lodged a formal complaint with us, we will: -***

* Assign your complaint to **our Complaint Person** who will record your complaint on **our CRM system**
* Assign your complaint a unique reference number and provide you with a written acknowledgement.
* Assess your complaint and investigate the matter fully.
* *Where applicable,* refer your complaint for further investigation with an expert on subject matter and issues raised.
* *Where applicable,* contact you to request clarification or additional information.
* Provide you with a final written response containing details of our investigation, the findings and any actions taken as a direct result of your complaint.
* Provide you with details of who you can contact should you be unhappy with our final decision.

**What You Can Expect**

When you submit a formal complaint to us, we follow our formal complaints procedure to ensure that all issues and concerns are addressed quickly and effectively. ***When you lodge a complaint with us, you can expect: -***

* To have your complaint resolved in a timely, effective, and fair manner.
* An experienced and trained officer to deal with your complaint.
* A written acknowledgment within 3 working days of your formal complaint being received.
* All responses to be made (*or followed up*) in writing.
* Your complaint to be fully investigated in an independent and compliant manner.
* To receive our findings and final decision within 8-weeks of the initial complaint being received.
* To be provided with the details of our investigation and our findings regarding the issues you have raised. This includes being providing with the measures and actions we have taken as a direct result of your complaint.
* To be kept updated on our progress if we are unable to provide a satisfactory response within our target response times.
* To be provided with details of any relevant ombudsman should you not be happy with our final decision.

**Target Response Times**

We always aim to respond to your complaint as quickly as possible. As soon as a formal complaint has been received, we will send you a written acknowledgement (*or email where requested*), within 3-working days.

Below are our approximate timelines and expectations for investigation, responses and final resolution. However, each complaint is different and there may be times when we, or you, need additional time to ensure a satisfactory response.

All investigations take place within 6-weeks of the initial complaint being received. We aim to send our final response *(decision letter)* to you within 8-weeks. Where this is not possible, you will be provided with an interim update letter. This will provide information on how long we expect the investigation to take and any reason(s) for the delay.

**Not Satisfied With the Outcome?**

If you are dissatisfied with the progress of the investigation into your complaint or our final decision, you may refer your complaint to the **Financial Ombudsman Service**

They can be contacted in the following ways

**Write - Financial Ombudsman Service,  Exchange Tower,  London,  E14 9SR**

**Telephone - 0300 123 9 123 or 0800 023 4567**

**E-mail:**[**complaint.info@financial-ombudsman.org.uk**](mailto:complaint.info@financial-ombudsman.org.uk)

**GDPR & Data Protection Related Complaints**

If your complaint concerns the processing of your personal data and you remain dissatisfied with our actions, you have the right to lodge a complaint with the Commissioner. *The Information Commissioner’s Office (ICO) can be contacted at: -*

**Information Commissioner’s Office**

**Wycliffe House**

**Water Lane**

**Wilmslow**

**Cheshire**

**SK9 5AF**

**Telephone: 0303 123 1113 *(local rate)* or 01625 545 745 *(national rate)***

**Fax: 01625 524 510**

**Email:** [**enquiries@ico.org.uk**](mailto:enquiries@ico.org.uk)