

## **COMPLAINTS POLICY AND PROCEDURE**

### **1. COMPLAINTS POLICY**

Within any organisation it is normal for complaints to arise. Foundation East welcomes constructive comment from its users and will always aim to use such comments positively. This will enable Foundation East to remedy and improve any weakness or failure identified.

It is a requirement of the Financial Services Authority (FSA) that organisations authorised by it have in place a complaints procedure and that customers/clients of such organisations must be made aware that a procedure is in place and is available for their use, if required. The procedure must also incorporate an escalation process that can be followed in the event that the original complaint is not resolved in the first instance. Foundation East is not authorised by the FSA but agreed in its Rules to have systems relevant to the nature, scale and complexity of its business.

It is the Policy of Foundation East that any complaint received will be handled in a professional manner and will be dealt with fairly and speedily.

#### **1.1 Definitions**

A complaint is defined as any expression of dissatisfaction, whether verbal or written, from anyone using the Foundation East services and which requires a response.

#### **1.2 Acknowledgement**

Where a full response to a written complaint cannot be provided to the complainant on the day of receipt, an acknowledgement letter will be sent. This will acknowledge the receipt of the complaint, include the expected time for response, the name of the person dealing with the complaint and it will be signed legibly. More importantly, however, it communicates to the complainant that Foundation East accepts that there may be an issue that requires attention.

#### **1.3 Ownership**

The Chief Executive will own this Policy and its supporting Procedure on a day-to-day basis. She will also be responsible for its annual review and updating as required.

The Chief Executive is responsible for ensuring that all complaints are investigated and responded to within a timely manner and for ensuring that all complaints are filed in one central location and that details are reported to the Directors each quarter.

Where the person complained against is the Chief Executive, the complaint will be referred to a member of the board of directors who is not directly involved in the matter.

#### **1.4 Complaints Procedure**

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The availability of this Policy and the accompanying Complaints Procedure will be highlighted in:

- Membership (Investment) Pack
- Loan Disbursal Pack
- Website

This information along with a tracking document must be stored in the Complaints File.

#### 1.5 Escalation

Foundation East recognises and accepts that there will be occasions that a complainant may find the response to a complaint unacceptable. Should such an event arise, the escalation of the complaint will be as follows:

- In the first instance – The Finance and Investment Manager
- The Chief Executive
- Board of Directors

It would normally be expected that the Board of Directors would only be called upon to comment on matters of policy, principle or standards.

#### 1.6 Expectations

Meeting the expectations of its customers is an integral part of the Foundation East work ethic.

Action taken by employees and responses made by them are on behalf of Foundation East. Employees must, therefore, ensure that they are in line with the current standards and practices required by Foundation East.

In the event that a complaint proves to be well founded, a process of remedy and improvement will be instigated immediately. Under these circumstances, an apology for the failure or weakness will be made.

If the complaint is not justified or found to be capricious, no apology will be warranted or made.

#### 1.7 Training

Training will be provided to all employees that are involved with or come into contact with clients, members or any customer of Foundation East.

#### 1.8 Communication

All employees will be made aware of the importance of this Policy and its supporting Procedures.

Details of all complaints, i.e., number and reason for complaint, will be reported at the Directors' quarterly meetings for discussion. A comment will be provided on the validity of the complaint.

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The existence of the Policy and Procedure will also be made known to customers of Foundation East, e.g. Foundation East website, Membership Packs, etc. and will be made available to other interested associations, organisations and trade bodies.

#### 1.9 Supporting Procedures

Procedures and guidelines are in place to support various aspects of this Policy. Specially, employees can refer to the following documents:

- Data Protection Policy
- Confidentiality Policy

#### 1.10 Documentation

The following statement is included on the website, in the membership pack and in the loan disbursement letter:

"We are fully committed to providing you with the highest standard of service. We have a complaints policy and you can help by letting us know if you're unhappy with the service we have provided. Please address any complaint to Katy Ford, Finance and Investment Manager"

The following is an example of a full initial response statement:

"Your complaint will be fully investigated and we hope to resolve it to your satisfaction. If, however, you are not satisfied with our response, you may escalate your complaint to the Chief Executive:

- Send details of your original complaint and the reason for your continued dissatisfaction to the Chief Executive at the above address
- Finally and in the rare event that we have not been able to resolve the matter to your satisfaction, please contact the Chair directly at the address above. The response that you receive from the Chair will be our final communication on the matter.

Obviously, we hope that this escalation will not be necessary as our aim will always be to resolve your complaint as soon as we hear about it."

#### 1.11 Timing

A crucial factor in the satisfactory settlement of all complaints is the speed of response. Foundation East responses will be as follows:

- if an immediate response cannot be provided, an acknowledgement letter, (see 1.2) will be sent to the complainant on the day the complaint is received;
  - the acknowledgement will advise the expected timeframe for the fuller response;
  - a full response will be despatched within 7 days of the receipt of the complaint;
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- in the event that the full response is not completed within the 7 day period, then a further acknowledgement will be sent;
- the complaint will be monitored and each 7 day period that elapses will require that the complainant be sent a further update.

If the complaint is in respect of a loan made in accordance with the consumer credit rules then if no satisfactory resolution is reached within 8 weeks of the complaint, the customer will have an additional right to complain to the Financial Ombudsman Service.

As a fee is payable to the FOS on a case by case basis, it is in the interests of the Foundation East to resolve all complaints through the internal procedures.

## **2. Complaint Handling Procedure**

Foundation East recognises that different management and communication skills may need to be employed when investigating a complaint, dependent upon its origin. One of the following procedures should therefore be followed:

### **2.1 Client Procedure**

In the vast number of cases, a written or emailed complaint from an individual client, prospective or otherwise (or their authorised representative) will be received. These should be date stamped and ultimately forwarded to the Chief Executive in accordance with one of the following procedures:

- 2.1.1 the complaint is investigated, an appropriate response sent to the client and a copy of the original complaint and response letter sent to the Chief Executive within 2 weeks of the original receipt date. No further action should be required;
- 2.1.2 the complaint is investigated, main points are documented and sent along with the original complaint letter to the Chief Executive who will then respond directly to the client. An acknowledgement letter must be sent to the client on the day of receipt and all documentation sent to the Chief Executive within 4 days of the original receipt date.

It is the responsibility of the Chief Executive to ensure that the complaint is investigated and appropriate response delivered in accordance with established timescales. A copy of the original complaint, the subsequent response and a tracking document must be stored in the Complaints File.

In relation to complaints arising in relation to loans made in accordance with the Consumer Credit Rules a copy of these procedures should be sent to the client.

### **2.2 Member Procedure**

All written Member complaints should be date stamped and forwarded to the Chief Executive for investigation and response. Once the initial facts are known and the relevant data has been gathered, a written response will then be sent. Investigation may involve liaison with Finance and Investment Manager.

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### 2.3 All Other Sources

Written complaints from any other source should be directed, in the first instance, to the Chief Executive. The complaint will be investigated initially and the relevant data gathered. The complaint may then be handed over to the Chair if appropriate, for a full response to be delivered. A copy of the original complaint, the subsequent response and a tracking document must be stored in the Complaints File.

### 2.4 Verbal Complaints

In the first instance, and unless the caller requests to speak with a Manager, an attempt should be made by the call handler to resolve the complaint. Where resolution is not possible, the call should be escalated to the Finance and Investment Manager, or in her absence the Chief Executive. Once the issue has been resolved and the complainant is satisfied, a brief overview of the complaint and subsequent outcome should be recorded in the complaints file.

### 2.5 Non-Service Users

This Complaints Policy and Procedure applies to complaints made by those using Foundation East Services. Complaints received from non-services users will be acknowledged and, where possible, passed on to any relevant organisation with no further action taken by Foundation East.

Approved by the Board: 15<sup>th</sup> October 2007

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