

## Complaint Handling Policy & Procedure

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### Our Complaint Policy

Our aim is to ensure we offer all our customers an excellent level of service across all areas of our business. If at any time we have given you a less than satisfactory service, we shall try to do everything reasonable to put it right.

If you find yourself dissatisfied with any of our services, please contact us in the first instance on the details below and we will do our best to resolve the complaint.

If you wish to make a complaint about the service, you have received please contact us using the details below –

FAO: Martin Holden

By Phone: 0330 113 4660

By Email: [office@gleaminginsurance.co.uk](mailto:office@gleaminginsurance.co.uk)

By Mail or in Person: Gleaming Insurance, Wigan Investment Centre, Waterside Drive, Wigan, WN3 5BA

### Complaint definition

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, claims management service or a redress determination, which:

- (a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- (b) relates to an activity of that respondent, or of any other respondent with whom that respondent has some connection in marketing or providing financial services or products or claims management services, which comes under the jurisdiction of the Financial Ombudsman Service.

### Eligible Complainant

- (1) a consumer; or
- (2) a micro-enterprise (employs fewer than 10 persons; and has a turnover or annual balance sheet that does not exceed €2 million)
- (3) a charity which has an annual income of less than £6.5 million at the time the complainant refers the complaint to the respondent; or
- (4) a trustee of a trust which has a net asset value of less than £5 million at the time the complainant refers the complaint to the respondent

## What information do you need to make a complaint?

Please have the following information available when you call, or include them in any email or letter that you send us:

- Your full name, address and where applicable reference number
- Details of your complaint
- Copies of any correspondence or documents relating to your complaint
- How you wish us to resolve the complaint

## What happens once you have made a complaint?

If we are unable to resolve your complaint at first contact, or you or someone on your behalf, would prefer to submit your complaint in an alternative medium, your concerns will be fully investigated by our complaint handler.

Once your complaint is submitted, we shall send you an acknowledgment correspondence within **5** working days. A final response will be issued to you within **eight** weeks of the initial receipt of your complaint. It will explain our reasons for the conclusion or alternatively, why we are not able to issue a final response at this time.

During this time, our complaint handler may need to contact you to seek additional information or clarification to ascertain the facts surrounding your complaint.

If we uphold your complaint, we will take all appropriate steps to rectify the error promptly, offer an apology for the error and where appropriate, may offer redress or remedial action.

## The Financial Ombudsman Service

If you are not satisfied with our final response you have the right to escalate the complaint to the Financial Ombudsman Service, their contact details can be found below. You must do this within **six** months of our final response. Conversely, you are unable to escalate a complaint until the full 8 weeks has lapsed.

When we send you our final response, we will also provide you with a copy of the Financial Ombudsman Service's explanatory Leaflet. Alternatively, you can obtain a copy from:

Post: Financial Ombudsman Service, Exchange Tower, London E14 9SR

Online: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

By freephone: 0800 023 567 \*

Or Standard Telephone: 0300 123 1 123 \*

Outside of the UK: +44 20 7964 0500

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

## **Time Restrictions**

The Financial Ombudsman Service will only consider complaints that have received a final response from the firm. The Financial Ombudsman Service is 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.

## **Updates**

We may change this policy from time to time by updating this page. This may occur due to change in regulatory framework or a change in contact information. Any changes to this policy will be made here.

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## **When will the complaint be resolved?**

We will consider a complaint resolved when we have received a confirmation from the complainant that explains they have accepted the findings in our final response. Should the complainant be unhappy with our final response, they may escalate their complaint to the Financial Ombudsman Service as detailed above.

## **The Complaint Investigation**

The nominated complaint handler will always be responsible for the investigation of complaint. Input will be sought from other employees or external support, where the nominated complaint handler is in connection with the allegations made.

We will retain a log of all complaints received and the outcome. A complaint file will be created for each complaint, reference to the log, and which will contain all communication with complainants, the actions taken to investigate the complaint, the findings and a copy of the final response to the complainant.

## **Root Cause Analysis**

Upon completing the investigation of a complaint, the nominated complaints handler shall conduct a root cause analysis of the complaint to ascertain the cause of the complaint and the risk of that cause reoccurring. Where the cause is compliance system or operational processes the nominated complaint handler shall submit a report to the Directors and heads of departments.

## **Trend Analysis**

Each month the nominated complaint handler shall compile MI in reflection of any complaints received into the firm; inclusive of the resolution or otherwise of those complaints, and sufficient analysis to enable the board to understand any causes of those complaints including any trends which may exist within those complaints and other current or historic complaints. This will enable the firm to assess whether there may be a systemic problem within the firm.

## **Complaints Register**

We will maintain a complaint register which will be the subject of periodic review. A lack of complaints recorded may indicate that we do not recognise what a complaint is or have concerns that recording a complaint may reflect negatively upon themselves. Conversely, due to the volume of business in which we will be dealing with initially it may be any complaints are minimal to start with. We welcome feedback and accept that complaints play a positive role in furthering the firm often acting as a valuable tool for future product or service development.

## **Storage**

We shall store our complaint register within a secure server, accessible via restricted users. Any additional access is to be confirmed by the firms nominated complaint handler. There will be no access by *any* external persons, unless a lawful basis exists and such a request is made in writing.

## **Retention**

We will retain all complaint data for 6 years.