

Complaints Policy

1.0 Introduction

Although receiving complaints is always disappointing, Grand Union recognises that they provide valuable management information, helping it to improve its processes and to ensure it treats its customers fairly. This Policy assists Grand Union in handling complaints positively, in a timely manner and in a way that benefits both its business and its customers. The handling of complaints is governed by the Financial Conduct Authority ('FCA') Dispute Resolution Rulebook (DISP). The procedures Grand Union has in place for compliance with this Rulebook are detailed below.

2.0 What is a complaint?

A complaint is any expression of dissatisfaction, regardless of how it is expressed and whether justified or not, that alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience. Rather than attempt to ascertain whether material distress or inconvenience is being alleged, Grand Union treats all complaints received in accordance with the procedures contained in this Policy.

3.0 Complaint Handling Procedure

Grand Union will attempt to settle the complaint as quickly and fairly as possible. If it resolves the complaint to the customer's satisfaction within 3 working days of the complaint being received, the complaint is recorded for management information purposes, but the rest of this procedure is not followed.

If it is unable to settle the complaint within 3 working days of receipt, then an acknowledgement will be sent to the customer.

The Compliance function will take responsibility for investigating the complaint and will do so using all the information at their disposal, ensuring the investigation is competent, diligent and impartial.

If the Compliance function believes the complaint is justified, bearing in mind all the information they have available to them (which may include other, similar, complaints), they will uphold the complaint, offering appropriate redress where appropriate.

If the Compliance function believes the complaint is not justified, they will reject the complaint. In either case, they will send a final response letter, detailing the outcome of his investigation and his proposals for settling it (if upheld), plus the contact details of the Financial Ombudsman Service ('FOS') to whom the customer may refer their complaint if they are not satisfied with the response. The final response will include a copy of the FOS explanatory leaflet and will inform the customer that they have six months to take their complaint to FOS, should they wish to do so.

3.1 Time Limits

The Compliance function has a total of eight weeks from receiving the complaint in which to conduct their investigation and send a final response to the customer. If they fail to complete their investigation within four weeks, as a courtesy to the customer, they will send a holding letter. If they fail to complete the investigation within eight weeks, they will tell the customer and let them know that they have the automatic right to refer their complaint to FOS.

4.0 Complaints about Third Parties

If it appears to the Compliance function that the complaint is not about the conduct of Grand Union but about a third party (e.g. the relevant lender), then they will forward the complaint to that third party and tell the customer that they have done so. Grand Union' responsibility in respect of the complaint finishes at the point it is forwarded.

5.0 Time Barred Complaints

If the complaint is time-barred, then the Compliance function will not investigate it and will tell the customer they are rejecting it because it is outside of the FOS jurisdiction due to time-barring. They will include an explanation that the complaint has not been investigated, but that the Ombudsman may decide to waive time-bars in exceptional circumstances.

A complaint is time-barred if it is received by Grand Union more than:

- (a) six years after the event complained of; or (if later)
- (b) three years from the date on which the complainant became aware (or ought reasonably to have become aware) that he had cause for complaint.

FOS may not (unless the circumstances are exceptional) consider a complaint made to it more than six months after Grand Union sends the customer the final response.

6.0 Complaints Recording

All complaints are recorded in the Complaints Register, even if they are settled within 3 days of receipt. The Register contains sufficient information to establish whether response time limits are met, what the complaint matter was, whether the complaint was upheld and how and when it was resolved. Complaints referred to FOS, together with the FOS outcome, are recorded by additional notes to the Register.

7.0 Complaint Analysis and Reporting

Complaints handling is reported by the Directors as part of the treating customers fairly management information. A root cause analysis is undertaken, which takes into account any similar complaints, with corrective action proposed and taken as necessary to prevent future complaints of a similar nature. Where the complaint illustrates a fault in Grand Union' systems and controls, these will be changed as necessary. This includes retraining of staff if lack of competence is shown to be the root cause. In extreme cases, for example where the complaint shows the customer was deliberately misled by the member of sales staff, then disciplinary action may ensue.