

Incident Support Group Limited



**COMPLAINTS HANDLING POLICY
AND PROCEDURE**

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1 REGULATORY REQUIREMENTS

- 1.1. The Financial Conduct Authority requires the Firm to have internal procedures for the reasonable and prompt handling of complaints.
- 1.2. Principle 6 of the FCA's Principles for Businesses requires the Firm to treat customers fairly. TCF Outcome 6 requires the Firm to ensure that customers do not experience any post-sale barriers such as experiencing difficulties in making complaints.

2 PURPOSE

- 2.1. The purpose of this document is to set out the policies and procedures that the Firm must follow to ensure the reasonable and prompt handling of complaints.
- 2.2. This document is to be used by all of the Firm's staff who have interaction with customers and who can potentially receive customer complaints. This document provides a written framework to assist all relevant staff identify customer complaints and deal with such in accordance to the policies and procedures set out herein.

3 DEFINITION OF AN ELIGIBLE COMPLAINT

- 3.0. An eligible complaint is a complaint which should be handled in accordance to the policies and procedures set out in this document. There are two components that determine whether a complaint is an eligible complaint, namely (1) the complaint must satisfy the definition in paragraph 3.1.1. below and (2) the complaint must be made by an eligible complainant.

3.1 DEFINITION OF A COMPLAINT

- 3.1.1. An eligible complaint is defined by the FCA as *any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of a customer or potential customer about the provision of, or failure to provide, a financial service which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience and relates to an activity of the Firm or any other organisation that the Firm has some connection to in marketing or providing financial services or products.*

In other words, a complaint is any expression of dissatisfaction about the provision of the Firm's *assisting in the administration and performance of a contract of insurance*, whether justified or not.

3.2 ELIGIBLE COMPLAINANT

3.2.1. In order for a complaint to be an eligible complaint it must be made by an eligible complainant. An eligible complainant can be a consumer (i.e. a natural person acting for purposes outside his trade, business or profession).

3.2.2. The Firm provides its regulated products and/or services to consumers and therefore all of its customers are potentially eligible complainants.] In light of this, all complaints that fall within the definition set out in paragraph 3.1.1. above that are made by the Firm's customers are eligible complaints that should be handled according to the policies and procedures set out in this document.

3.2.3. It is to be noted that reference to a customer includes a potential customer.

4 MEANS OF MAKING A COMPLAINT

We endeavour to provide you with an excellent customer service however we acknowledge that, at times, we may fail to meet your expectations. Should you be dissatisfied with the how we have *assisted in the administration and performance of your contract of insurance*, you can make a complaint through any of the below channels:

You can complain by email, letter or telephone.

Email: info@isgfleet.co.uk

Letter: 8, Kiln Park, Middleton Little Rd, Allerton Bywater, West Yorkshire WF10 2FX

Telephone 01977 325147

5 TIME BARRED COMPLAINT

The Firm will consider any complaint made outside of the statutory time limits of six years after the event or (if later) more than three years from the date the client became aware (or ought reasonably to have become aware) on an individual basis. This will be to assess whether the client may not have been aware they had the right to complain or had/continue to have a vulnerability impacting their ability or capacity to log the complaint within the limitation period. The firm will consider accepting a time barred complaint from a Principle 6 perspective.

When the customer does not have a justifiable rationale for a time-barred complaint the firm may reject the complaint on that basis

6 COMPLAINTS AWARENESS

6.1. The Firm makes consumers aware of its internal complaints procedure by publishing the same on its. Please see Annex 1 for a copy of the Firm's consumer facing complaints procedure.

7 COMPLAINTS ACKNOWLEDGEMENT

7.1 The Firm endeavours to send complainants a written acknowledgement of complaints within 3 business days

8 COMPLAINTS FORWARDING

Any complaint received that is determined to be partially or wholly the responsibility of another firm, this will be communicated to the customer in the first instance. We will then assist by forwarding the complaint to the relevant firm, and ensuring the customer receives the assistance they require in dealing with their complaint. This will then be recorded in our complaints log. For example, if a customer was to have a complaint about a Bodyshop poor repair, we would explain to the customer that this is the responsibility of the bodyshop. We would forward this complaint to the Bodyshop, making the appropriate introduction and ensuring the customer has the correct contact details for the Bodyshop's complaints team. We would communicate with the customer to ensure that the complaint was resolved, and record this in our complaints log.

9 COMPLAINTS INVESTIGATION

Any complaints received will be acknowledged by Veronica Whittingham in the first instance within 3 working days. At this point if the complaint is resolved within 3 working days of receipt, she will issue a summary resolution communication acknowledging the complaint and setting out that it has been resolved. She will also make the customer aware of their right to refer the complaint to the FOS should they be dissatisfied with the resolution. If unable to resolve the complaint by the end of the 3rd business day, we will issue a written complaint acknowledgment within 3 days of receipt, stating that in the course of investigating the complaint further we may need to contact you in order to obtain further information about the complaint and allegations raised. During the course of the complaint, we will update the complainant about the progress and a likely resolution date. We will endeavour to issue a final written response within 8 weeks of receipt of the initial complaint. Veronica whittingham will record this in the complaints log and ensure that any lessons learned are raised and changes to process and procedures implemented as soon as possible.

10 COMPLAINTS RESOLUTION

10.1 FINAL RESPONSE

10.1.1. The Firm will endeavour to issue a final written response to the complaint within 8 weeks.

10.1.2. The Firm's final response will either:

- 10.1.2.1. Accept the complaint and, where appropriate, offer redress or remedial action;
- 10.1.2.3. Offer redress or remedial action without accepting the complaint; or
- 10.1.2.4. Reject the complaint and give reasons for doing so.

10.1.3. If the Firm is not in a position to issue a final response within 8 weeks, the complainant will be provided with a written response explaining why the Firm is not in a position to issue a final response and set out the date by which the Firm expects to be able to issue one. At this point, complainants have the right to refer their complaint to the Financial Ombudsman Service should they choose to not wait beyond the 8-week timescale for the Firm to issue a final response.

10.2 SUMMARY RESOLUTION

10.2.1. The Firm does not provide complainants with a written complaints' acknowledgement and a written final response where the Firm resolves the complaint by close of business on the third business day following the day on which the complaint is received. The Firm instead provides complainants with a summary resolution communication. A summary resolution communication sets out:

- 10.2.2. The fact that a complaint has been made;
- 10.2.3. Informs the complainant that the complaint has now been resolved; and
- 10.2.4. Sets out the complainant's right to refer the complaint to the Financial Ombudsman Service should they subsequently be dissatisfied with the resolution and sets out the contact details of the Financial Ombudsman Service including its website.

11 GOVERNANCE

11.1 APPROVAL

The policies and procedures set out in this document have been approved by Veronica Whittingham, Sales Director and Brett Whittingham Managing Director at a document review meeting

11.2 DESIGNATED COMPLAINTS HANDLER

Veronica Whittingham, Sales Director is the designated complaints handler and will take ownership of ensuring that the policies and procedures set out here are followed. All complaints will be investigated and resolved as appropriate and recorded accurately in the complaints log. All complaints will be discussed with the board on a monthly basis.

Veronica Whittingham is responsible for liaison with the FOS.

11.3 ROOT CAUSE AND TREND ANALYSIS

The firm will analyse all complaints, investigating the root cause and trends appearing on a monthly basis, or at the request of Veronica Whittingham, Sales Director should it be deemed that more urgent action is required. This will be undertaken by the board at the monthly directors' meeting

11.4 FINANCIAL OMBUDSMAN SERVICE PAST DECISIONS

The Firm will carry out a quarterly review of any past FOS decisions at board meetings. This will be run by Veronica Whittingham, Sales Director and will give an opportunity to discuss any complaints relating to the firm or decisions that affect products and services similar to those offered by the firm.

11.5 INTERNAL AUDIT

The firm will conduct a quarterly internal audit, checking a sample of the complaints log. This will then be assessed against the procedures and relevant templates set out here. This will be carried out by Brett Whittingham and Veronica Whittingham

11.6 REVIEW

The policies and procedures in this document will be reviewed on an annual basis unless regulatory or structural changes dictate that this must be done earlier. This will be reviewed by Brett Whittingham, Managing Director.

If deficiencies arise in this document, then it will be reviewed, changes will be implemented at the earliest convenience and update training will be rolled out to all staff

12 RECORD KEEPING

12.1 RECORD STORAGE

The Firm will record all eligible complaints in a complaints log held on the company Microsoft Office shared drive. A detailed record of the investigation, resolution and a log of dates and times to ensure compliance with policies and procedures set out in this document and compliance with the requirements under the regulator.

12.2 RECORD RETENTION

In alignment with the complaints record rule (DISP 1.9; DISP Sch 1.2G), Incident Support Group Limited keeps a record of each complaint received and the measures taken for its resolution, and retain that record for a minimum of six years from receipt of the complaint.), Incident Support Group Limited will retain a copy of the previous version of the complaints handling policy and procedure document for a period of six years to enable effective supervision from the FCA and CCC should either organisation seek to review the historical processes), Incident Support Group Limited followed in relation to complaints handling in particular instances.

13 REVIEW AND AMENDMENT LOG

Version	Date	Author	Amendment Comments	Reviewed and Signed-off By	Sign-off Date

ANNEX 1 – CONSUMER FACING COMPLAINTS PROCEDURE

Making a complaint

We endeavour to provide you with an excellent customer service however we acknowledge that, at times, we may fail to meet your expectations. Should you be dissatisfied with the provision or our failure to provide *assistance in the administration and performance of your*

contract of insurance, you can make a complaint through any of the below channels:

- Telephone:
- Email:
- Post:

What to expect from us?

We try to resolve complaints as soon as possible. Should we resolve your complaint by the close of the third business day following the day on which we receive your complaint, we will issue you with a written communication called a summary resolution communication acknowledging that you made a complaint and setting out that the complaint has been resolved and making you aware of your right to refer the complaint to the Financial Ombudsman Service should you be dissatisfied with the resolution.

Should we consider that we are not able to resolve the complaint by the close of the third business day, we will issue you with a written complaint acknowledgement within [3 business days. Thereafter, we will investigate your complaint in order to reach a fair resolution. [Please note that investigating your complaint may require us to contact you in order to obtain further information about your complaint and the allegations raised.]

We endeavour to issue you with a written final response within 8 weeks of receipt of the initial complaint

What options do you have should you be dissatisfied with our final response?

Should you be dissatisfied with our final response, you have the right to refer your complaint to the Financial Ombudsman Service ('FOS'). The FOS is an independent body established to settle disputes between UK-based financial companies and consumers. You are able to refer your complaint to the FOS on any of the below contact details:

Telephone: 0300 123 9 123

Email: complaint.info@financial-ombudsman.org.uk

Post: Exchange Tower, Harbour Exchange Square, London, E14 9SR

Complain Online: <https://www.financial-ombudsman.org.uk/contact-us/complain-online>

It is to be noted that complaints must be referred to the FOS within six months of receiving a final response or a summary resolution communication.

You can find out more about the FOS by visiting <https://www.financial-ombudsman.org.uk/>.