COMPLAINTS PROCEDURE

August 2023

GLEVUM WINDOWS LTD

COMPLAINTS CONTACT DETAILS

- **Name:** Paul Collier
- **Title:** Operations Manager
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POLICY STATEMENT

At Glevum Windows Ltd, we believe that if a customer wishes to file a complaint or express dissatisfaction, it should be easy for them to do so.

It is Glevum's policy to receive complaints and consider them as an opportunity to learn, adapt, improve, and provide a better service.

In addition, a quick resolution of a complaint, in a way that respects and values the person's feedback, can be one of the most important factors in recovering the person's confidence in our products and services. It can also help prevent further escalation of the complaint. A responsive, efficient, and fair complaint management procedure can assist us in achieving this on each complaint.

The purpose of this policy is to ensure that complaints are dealt with consistently and properly and that all comments and complaints are taken seriously. This organisation expects staff at all levels to be committed to fair, effective and efficient complaint handling.

OUR PRINCIPLES

Glevum will ensure that our customers have a right to:

- Be treated fairly and sensitively
- Be kept informed about what is happening with their complaint
- And be advised of the service standards they should expect
- The timescale for acknowledging and responding to a complaint
- And any right of appeal.

All staff representing Glevum will:

- Be sensitive to the particular needs of customers
- Treat complaints as confidential, where possible
- Be accessible and clearly identified.

Our policy will:

- Be open, easily accessible, and widely promoted to all our customers and those who represent them
- Be easy to understand and use by all customers and employees
- Set out how to complain and how a complaint should be handled.

PURPOSE

This policy is intended to ensure that Glevum handle complaints fairly, efficiently, and effectively.

The company's objective is to ensure that its complaints procedures are properly implemented effectively, and that complainants feel confident that their complaints, worries, or concerns are listened to and acted upon promptly and equitably.

Our complaints management system aims to:

- Record the customer complaint on their individual file and on the complaints register
- Allow us to respond to questions raised by people who file a complaint in a timely manner
- Increase the confidence of the person making a complaint or providing feedback and comments in our administrative procedures, and
- Provide information that we can improve the quality of our products and services, staff training and complaint handling
- This policy provides guidance to all our staff and to individuals who wish to file a complaint about our key principles and concept of our complaints management system.

SCOPE

This policy applies to all staff who receive or manage complaints from customers made to us or about us, regarding our products, services, staff, and complaint handling.

WHAT IS A COMPLAINT?

A complaint is an expression of dissatisfaction about our products, services, our staff, our actions, or lack of actions taken regarding operations, facilities, advertising and marketing information and anybody or company acting on our behalf.

A formal complaint means a complaint that has not been successfully resolved through our complaint management systems outlined in this policy. The complainant has chosen to formalise the complaint by completing our complaint form, or by writing to us.

An informal complaint means a complaint that has been received by us, by phone, email, postal mail or in person, which has not been submitted on our complaint form.

COMPLAINT MANAGEMENT SYSTEM

All complaints will be recorded on both the client file and the complaint management system. This is a software system we have designed in-house to enable us to track the complaint and use the management information for future developments and improvements.

We will confirm the complaint details to the customer in writing (this may be email/text message or letter depending on the customer's choice) within 3 working days of receipt.

We will continue to keep the customer informed on the progress of the complaint weekly, in writing, in their preferred method of contact, i.e., email or post.

If the complaint involves a third party, such as a manufacturing fault, we will hold the complaint as we see the customer as our customer and work with the manufacturer to resolve the fault. We will inform the customer of the third party promptly, including the third-party contact details where applicable.

Oral Complaints

Glevum staff who receive a verbal complaint should try to resolve this immediately if possible.

Information is to be recorded on the customer's file, including the completion of the complaints form and a letter or email sent to the customer clarifying the complaint and action to be taken, including estimated time frames. This can also be communicated verbally but will always be followed up in writing. This is to be done within three days of the oral complaint being received.

The complaint is to be discussed with the company complaints manager, Paul Collier.
Paul Collier will be a named person who deals with the complaint through the process. When staff or management receive an oral complaint, both should listen sincerely to the issues raised by the complainant. Any contact with a complainant must be polite, courteous, and sympathetic. At all times, staff and management must remain calm and respectful.

After discussing the issues raised, each staff member or management handling the complaint should suggest an action plan to resolve the complaint. If this action plan is acceptable, staff or management should clarify the agreement with the complainant and agree on how the results of the complaint will be communicated to the complainant; this may mean a meeting or in writing.

If the proposed action plan is not acceptable to the complainant, staff or management should ask the complainant to make their complaint in writing to Glevum and provide a copy of our complaint's procedure and a complaint form.

Written Complaints

When a complaint is received in writing, it must be forwarded to the named complaints contact, Paul Collier, Operations Manager of Glevum, who must enter the details into the complaints log and then send an acknowledgement of receipt within three working days, to establish a relationship of confidence with the person who has raised the complaint.

If necessary, further clarification should be obtained from the complainant. If the complaint is not made by our customer, but is made on their behalf, the customer's consent, preferably in writing, must be obtained in advance.

After receiving the complaint, a copy of the complaint's procedure must be given to the customer. Clearly and politely explain the complaints process, the time it may take and realistic expectations. We may have to arrange a visit to the customer's home. This must be arranged within 14-days and confirmed in writing.

Immediately on receipt of the complaint, Glevum will launch an investigation and within 28 days should be in a position to provide a written explanation to the complainant, either in writing or by arranging a meeting to visit the individuals concerned. On some occasions this may not be possible. We will write to the customer and explain that we are still investigating, why there is a delay and propose a date by which we hope to provide them with an explanation.

MANAGEMENT INFORMATION

Complaints are an important management tool which allows us to learn about the products and services we provide. They are a useful source of information about how the customers see our services and how we are serving our customers.

To ensure that Glevum can learn from its complaints, the following data should be collected for every complaint received:

- The name, address and contact details of complainant
- The name and role of the person internally dealing with the complaint
- The dates on which the complaint was received and on which it was responded to
- The nature of the complaint
- The outcome of the complaint
- How the complaint was received
- Remedial/Redress action carried out in response to the complaint
- Lessons learnt from the complaint.

It is important that complaints information is reported and considered regularly and shared at all levels with Glevum. The following methods will be used to report complaints information:

- A weekly report to the management
- A monthly overview report compiled by the management team
- A 6-monthly report to show the data, causes, and actions taken to avoid these complaints in the future.

We use some core principles that help us to provide effective management data and effective root cause analysis. Not only will these help the analysis quality, but these will also help the analyst gain trust and buy-in from staff and customers:

- Focus on correcting and remedying root causes rather than just symptoms
- Do not ignore the importance of treating symptoms for short-term relief
- Realise there can be, and often are, multiple root causes
- Focus on HOW and WHY something happened, not WHO was responsible
- Be methodical and find concrete cause-effect evidence to back up root cause claims
- Provide enough information to inform a corrective course of action
- Analysing guidance produced by agencies such as the FCA, regulators and FOS, and communicating it to the individuals dealing with complaints.
- Consider how a root cause can be prevented (or replicated) in the future.

The above principles illustrate that when we analyse deep issues and causes, it is important to take a comprehensive and holistic approach. In addition to discovering the root cause, we should strive to provide context and information that will result in an action or a decision. Good analysis is actionable analysis.

COMPLAINTS REPORTING

Glevum understands that, as an authorised and regulated firm of the Financial Conduct Authority (FCA), we must report to the FCA annually. We will need to report on all complaints received in relation to credit-related regulated activities.

All customer complaints are recorded on our complaints log, including how the customer paid for the goods. We can then easily recognise those customers who must be provided with information about the FCA and FOS.

DATA PROTECTION

To process a complaint, Glevum will hold personal data about the complainant. This includes data the complainant provides us and information that other people provide about the complaint, in response to our enquiries. Glevum will hold this data securely and only use it to help process the complaint.

The identity of the person making the complaint will only be made known to those who need to consider the complaint and will not be revealed to any other person or be made public by us. However, it may not be possible to preserve confidentiality in some circumstances, for example, where relevant legislation applies, or allegations are made which involve the conduct of any third parties, for example delivery of the goods from a manufacturer. Under the Freedom of Information Act 2000, customers have a right to obtain a copy of their personal data. However, there are exceptions to this right. We normally destroy our complaint files six years after the complaint has been closed. We will maintain records for finance customers for a maximum of ten years.

OUR PROCEDURE

Any complaint, verbal or written, including electronically, will be referred to the complaints manager, Paul Collier, at the earliest opportunity (max within 24 hours) or to the next senior member of the team if Paul Collier is unavailable. We will also:

- Record details on the customer's file
- Record details on the complaints management system
- We will not delay the complaint by asking for it in writing to us about your complaint
- We will acknowledge the complaint in writing within three days, detailing our understanding of the complaint, our suggested solution, and timeframes. Depending on the complaint, this could take up to 28 days or longer
- We will make contact to seek clarification on any points where necessary
- Disclose to the customer any third parties that may be involved in resolving the complaint
- Fully investigate the complaint
- Keep the customer informed of our progress
- Keep the customer informed on time frames
- Discuss with you our findings and proposed response
- Provide clear deadlines to respond
- Provide the customer with a final response.

The customer will receive contact from us advising on progress if we cannot respond immediately. We will provide the customer with our final response as soon as possible, and no later than eight weeks.

Customers may express dissatisfaction to us about our products, services, staff, or advertising. We will need to establish if the complaint relates to the information given, the firm or the service and installation. If unclear, this must not delay investigation, and we will proceed with our own investigation. Paul will review this matter, continue to investigate, and provide a written explanation and any supporting information. This may include photos, checklists, or remedial satisfaction notes.

INVESTIGATION

Paul Collier will establish the nature and scope of the complaint having due regard to the FCA direction:

- Deal with complaints promptly and fairly
- Give complainants clear replies and, where appropriate, fair redress
- If a third party is involved, such as a manufacturer, we will liaise with them directly. Our customer is always seen as our customer. If we must share any data with the manufacturer, i.e., the customer's name and address in order to arrange a site visit, we will obtain authorisation from the customer beforehand
- We may take up to 8-weeks to provide a response but will provide weekly updates, so the customer is aware we are working to resolve the complaint.

We will:

- Document and report the complaint
- Determine if we need to attend the customer's property where the goods have been installed
- Arrange an appointment to survey the property
- Interview staff/installers
- Gather evidence including photographs
- Involve third parties if required, such as product manufacturers (informing the customer)
- Review and evaluate the information collated
- Take any necessary action
- Document your conclusions
- Follow-up.

ELIGIBLE COMPLAINANTS

Glevum will treat all complainants the same; however, eligible complainants, customers that have purchased goods and services using a lender's finance, are legally defined and have additional rights in law that we must acknowledge and adhere to.

THE FCA RULES APPLY TO COMPLAINTS:

- Made by, or on behalf of an eligible complainant.
- Relating to regulated activity
- Involving an allegation that the complainant has suffered, or may suffer, financial loss, material distress or material inconvenience.

COMPLAINTS SETTLED WITHIN 3 BUSINESS DAYS

Complaints that can be settled to the customer's satisfaction within three business days can be recorded and communicated differently.

Where we consider a complaint to be resolved to the customer's satisfaction under this section, the firm will promptly send a 'Summary Resolution Communication', being a written communication which:

- Refers to the fact that the customer has made a complaint and informs them that they now consider the complaint to have been resolved to the customer's satisfaction

- The firm will tell the customer that if they subsequently decide that they are dissatisfied with the resolution of the complaint, they may be able to refer the complaint back to the firm for further consideration or alternatively refer the complaint to the FOS
- Provide the website address of the FOS
- Refer to the availability of further information on the website of FOS.

In addition to sending a Summary Resolution Communication, the firm may also use other methods to communicate the information where:

- We consider that doing so may better meet the customer's needs; or
- They have already been using another method to communicate about the complaint. This may include recorded calls, emails, or text messages
- All communication will be recorded onto the customer's file.

CLOSING A COMPLAINTS

We will consider a complaint closed when we have made our final response to the customer.

This does not prevent a customer from exercising any rights they may have to refer the matter to FOS.

Our final response must include:

- If we accept the complaint and, where appropriate, offer redress or remedial action
- Offers redress or remedial action without accepting the complaint
- Reject the complaint, and we will give our reasons for doing so
- Provide our customers with a copy of FOS standard explanatory leaflet and the contact details including full postal address, phone number, email, and a link to their online complaint form.

If the customer remains dissatisfied, they will be informed that they may refer their complaint to FOS.

FINAL RESPONSE

This will be a written response and will set out clearly our decision and the reasons for it. If any compensation is offered, a clear method of calculation will be shown. We must do this within 8-weeks of receipt of your complaint.

If in the event of not concluding your complaint, we will explain why, if we are not in a position to make a final response and indicate when we expect to be able to provide one to you and include the following:

1. informs you, the complainant, that they may now refer the complaint to the Financial Ombudsman Service;

2. indicates whether or not you, the respondent, consent to waive the relevant time limits in DISP 2.8.2 R or DISP 2.8.7 R for example was the complaint referred to the Financial Ombudsman Service in time, if it becomes apparent that the complaint has been made or is referred outside those time limits;

3. encloses a copy of the Financial Ombudsman Service standard explanatory leaflet; and

4. provides the website address of the Financial Ombudsman Service.

We will let you know if we:

1. accept the complaint and, where appropriate, offer redress or remedial action; or
2. offer redress or remedial action without accepting the complaint; or 3. reject the complaint and give reasons for doing so;

- Explain that you must refer the matter to the ombudsman within six months of the date of the final response letter, or the right to use this service is lost
- We will indicate to you whether or not we consent to waive the relevant time limits.

COMPLAINTS FORWARDING

The FCA has specific rules about informing our customers if we believe that their complaint may be solely or jointly the responsibility of another firm, person, a body or regulator. As a business, we must ensure we document this on your customer file and provide you with written communication of this. This may be done via post or email. There may be some circumstances where a customer has communicated their preferred method of communication, and we communicate in the customer's preferred method.

We will communicate this as soon as possible and explain the reasons for our decision in a clear and concise way in a way that the customer can best understand the reason for forwarding on their complaint.

A respondent (the firm) that has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in a complaint may forward the complaint, or the relevant part of it, in writing to that other respondent, provided it: (1) does so promptly; (2)

1. does so promptly;
2. informs the complainant (customer) 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

As a firm, we may receive a Complaint via Complaint forwarding. On receiving a forwarded complaint, the standard time limits will apply from the date on which the respondent receives the forwarded complaint.

FINANCIAL OMBUDSMAN SERVICES (FOS)

We will co-operate fully with FOS in resolving any complaints made against us and agree to be bound by any awards made. The firm undertakes to pay promptly any fees levied by FOS.

The customer will be informed that they have the right to refer their complaint to FOS, free of charge, but you must do so within six months of the date of our final response letter.

If they do not refer their complaint in time, FOS will not have our permission to consider the complaint and so will only be able to do so in very limited circumstances. For example, if FOS believes that the delay was as a result of exceptional circumstances.

FOS might not be able to consider your complaint if:

- Outside the allocated time frame of more than six years ago, and
- The complaint was more than three years after they realised (or should have realised) that there was a problem
- If we think that the complaint was made outside of these time limits, but this is a matter for FOS to decide.
- If FOS agrees with us, they will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances.

CONTACT DETAILS FOR THE FINANCIAL OMBUDSMAN SERVICE

The Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Tel: 0800 023 4567 (free for most people ringing from a fixed line) or 0300 123 9123 (cheaper for those calling using a mobile) or 020 7964 0500 (if calling from abroad). Email: complaint.info@financial-ombudsman.org.uk Website: www.financial-ombudsman.org.uk

You can make a complaint through one of the Financial Ombudsman Services online forms, and find out more about the information you'll need to have to hand before you start filling the form in. Make a complaint online (financial-ombudsman.org.uk)

RESPONSIBILITY FOR THE POLICY

The director and owner of the business is responsible for monitoring the policy annually.

The Managing Director is responsible for the overall policy and its reviews.

To be signed by all members of staff to confirm their understanding of this policy and that they have completed the Complaints Policy.

A signed copy to be kept on your personnel file, and to include annual training as a minimum. This policy will be reviewed and updated annually by the directors of the business.

For staff use only:

Staff Name:	
Staff Signature:	
Date:	