

Customer Care & Complaints Policy & Procedures



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Complaints Policy

Introduction

identeco is committed to providing a high quality service that treats all users of the service fairly and views complaints as an opportunity to learn and improve for the future as well as putting things right for the person or organization that has made a complaint.

This policy outlines in broad terms our core aims and intended approach for the management of complaints.

identeco is a trading style of Controlaccount plc.

Definition of a Complaint

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of identeco.

Objectives

Our aims are to:

- Ensure complaints are processed in a consistent way enabling identeco to learn and continually improve the service we provide.
- Ensure that complaints and subsequent actions are clearly communicated to complainants, clients and staff in acceptable timeframes.
- Adopt an approach that reflects 'best practice and meets the requirements of The Credit Services Association (CSA) and our clients
- Ensure it is a fair, transparent and easy to use complaints procedure
- Ensure it is monitored by an independent Complaints Department to make sure that staff adhere to the process through training and monitoring
- Reduce the number of complaints by pro-active learning, changing, improving, re-designing and creating new initiatives as a result of our clients input
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint
- To make sure everyone at identeco knows what to do if a complaint is received.

Scope

Minimum service standards for complaint handling have been developed in order to ensure consistency of service. The following represents the minimum complaint standard:

- Relevant details will be logged on the internal 'complaint handing' register
- The complaint will be acknowledged
- The complaint will be dealt with in a timely manner, and the complainant will be kept aware of its progression
- A written response will be sent upon completion of a full investigation.
- Identification and correction of process errors



identeco procedures fully support this policy, thus enabling staff to understand their role within the process. This aids the continual education cycle which enables us to learn from complaints received, enabling us to analyse trends and performance.

This policy is intended to represent a practical means by which identeco can demonstrate its determination to manage the complaints process effectively for the benefit of our clients, complainants, Staff and the organization as a whole.

Complaints Procedures

Responsibility

The Client Services Manager is responsible for this function.

- 2. Detailed Procedure
- **2.1** Receipt and recording (by any person receiving a complaint).
 - 2.1.2 Customers, and their representatives may contact the company to complain in a variety of ways (i.e. telephone, letter, fax, e-mail or visit).
 - 2.1.3 The person receiving the complaint must confirm the following details are correct:
- i) Name (person and company)
- ii) Postal Address
- iii) Telephone Number
- iv) Account Number/Case Number
- v) Record nature of the complaint
 - 2.1.4 A copy of the Complaints Policy and Procedure must be sent upon request.

At all times the General Data Protection Regulation (EU 2016/679), the Data protection Act 2018 or any subsequent legislation will apply.

2.2 Registration (to be completed by the Client Services Manager)

- 2.2.1 Enter summary details on the database.
- 2.2.2 Record the account number on the complaint report.
- 2.2.3 Notify the issue to the relevant Manager/Director as appropriate.
- 2.2.4 Agree a course of action to investigate and resolve the complaint.
- 2.2.5 Where the complaint is not in writing, request written details before taking action.
- 2.2.6 Issue a standard acknowledgement letter / e-mail within 48 working hours in the case of written complaints.



- 2.2.8 Request a full written report from the relevant department Manager and Agent within 24 hours if applicable.
- 2.2.9 Should the nature of the complaint constitute gross misconduct, the member of staff will be placed on suspension with full pay until the complaint has been fully investigated and resolved.
- 2.2.10 Take a copy of any relevant documentation and pass to the person who is to carry out any investigation or take action to resolve the complaint.

2.3 Investigation and Resolution

Investigation and resolution will be completed within a period of four weeks from the registration of the complaint. Should longer than this be required, the complainant will be contacted in writing to advise of the reasons for this.

- 2.3.1 The person instructed to investigate or to resolve a complaint must take action promptly.
- 2.3.2 If the required action is to carry out an investigation:
- i) Record findings in writing
- ii) Discuss findings with the appropriate Line Manager if needed and provide a summary to the Client Services Manager in order a response can be formulated
- iii) Carry out further actions as agreed to resolve the problem
- iv) Proven gross misconduct will lead to summary dismissal (i.e. dismissal without notice or pay in lieu)
- v) Legal action will be considered
- 2.3.3 If the investigation shows the complaint is not justified:
- i) The Client Services Manager will contact the customer by telephone if appropriate and / or confirm in writing
- ii) Any Agent suspension lifted
- 2.3.4 Where required under the terms of a contract, the appropriate Manager will ensure that clients receive copies of all complaint responses and other relevant documentation

2.4 Validation

- 2.4.1 Before the complaint can be considered closed it should be confirmed that the corrective action has solved the problem.
- 2.4.2 Ensure the client has full details of actions taken and result of any investigation if applicable.
- 2.4.3 When the validation is completed, close off details in the complaints file.



2.5 CSA Complaint Procedures

- 2.5.1 Should the complainant not accept the findings of the investigation and remedial actions taken, details of the CSA complaint escalation process will be sent to the complainant which details how they may be entitled to refer the matter to the appropriate body.
- 2.5.2 Where a complaint is received via one of these bodies it will be dealt with in line with the relevant organisation's guidelines alongside those detailed within this procedure with a copy of any response to the customer sent to the relevant personnel.

2.6 Dealing with Complaints from the CAB and other Third Parties

2.6.1 The Citizens Advice Bureau and a number of other agencies provide free, confidential advice to help people resolve many issues including debt problems. Identeco recognises the importance of developing and maintaining relationships with these agencies as they provide a gateway through which the company can liaise with defaulters; liaison ensures identeco maximises contact, which in turn ensures effective debt recovery. All complaints received will be dealt with in accordance with identeco Complaints Policy and in line with CSA complaints procedure. In exceptional circumstances a case may be put on hold whilst the agency investigates the complaint. identeco will share information as required in line with the Data Protection Act 1998.

2.7 Audit and Compliance

- 2.7.1 The Compliance Department will regulate and monitor standards within the business. This will be achieved by ensuring that the business identifies, understands and efficiently manages the risks that threaten and affect it.
- 2.7.2. The Compliance Department will operate a rolling programme of inspections and audits on a routine monitoring basis in accordance with the requirements of our Compliance Plan. In addition, they may be directed by the Board to carry out additional inspections and audits as precautionary measures following receipt of, for example, complaints or other information suggesting that a problem might exist within a particular area.
- 2.7.3 The Compliance Department will report to the Board of Directors and issue a quarterly report on complaint levels within the business.
- 2.7.4 The complaints process will meet BSI ISO9001:2015 standard and will be audited.

