

## COMPLAINT POLICY & PROCEDURE

### Definition of a complaint

A complaint is defined as 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.

### Who can complain to us

- A Consumer
- A Micro-Enterprise
- A charity which has an annual income of less than £6.5 million at the time the customer refers the complaint to us; or
- A trustee of a trust which has a net asset value of less than £5 million at the time the customer refers the complaint to us; or
- A CBTL consumer; or
- A small business at the time the customer refers the complaint to us; or
- A guarantor.

### How our customers can complain to us

We recognise that some of our customers may find some channels of communication challenging or stressful and that recognising vulnerability and understanding our customers' needs is crucial to delivering a good outcome, whatever channel they choose to use. We have a multi-channel strategy and raise awareness to meet different communication needs through our digital platforms and literature allowing our consumers to communicate through a channel that they can use effectively.

Customers can write to us at:

Leasetech Limited, Moorsbarrow Hall Farm, Brereton lane, Middlewich, CW10 0JX

Complaints received by letter are forwarded to Richard Bayliss / Gavin Tedstone (Directors) for a written response.

Customers can email us at:

[props@weareleasetech.com](mailto:props@weareleasetech.com) Complaints received by email are forwarded to Richard Bayliss / Gavin Tedstone (Directors) by email and flagged as high importance.

Customers can call us on:

0203 960 2216 Calls are charged at the local rate.

Complaints received by telephone are handled with empathy and consideration with a focus on potential vulnerability. If there is any doubt whether the call is a complaint or not, the customer is asked if they wish their call to be logged as a complaint. The details are then forwarded to Richard Bayliss / Gavin Tedstone (Directors).

All complaints are recorded on our Complaint Recording Log.

### The Complaint Procedure

On receipt of a complaint the customer is sent a prompt written acknowledgement providing early reassurance that the complaint has been received and that it is being dealt with. We aim to provide this within 5 working days. The customer is kept informed of the progress and of the measures being taken to reach a satisfactory resolution.

Where complaints are resolved by close of business on the third business day following the day on which the complaint is received, a Summary Resolution Communication is sent promptly to the customer.

If the complaint is not resolved under the third day rule as stated above, we aim to send the customer a written statement providing our findings within 4 weeks following the date of receipt of the complaint. If, however the complaint proves more complex, an explanatory holding response will be sent within 4 weeks advising that additional time is required to investigate the complaint.

### Final response

We provide a final response within 8 weeks or a further explanatory letter advising of the reasons for the delay. This letter will inform the customer that he is entitled to contact the Financial Ombudsman Service (FOS) if he is not satisfied with the delay.

The final response letter will either:

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

- Indicate if Leasetech Limited consents to waive the relevant time limits for referral to the Ombudsman.

It will also:

- Include a copy of the Financial Ombudsman Service's standard explanatory leaflet;
- Provide the website address of the Financial Ombudsman Service;
- Inform the customer how, if he remains dissatisfied with our response, he may refer the complaint to the Financial Ombudsman Service.

### Financial Ombudsman Service

The Ombudsman can investigate any complaint we have not been able to settle to the customer's satisfaction or where we have failed to resolve the complaint within the relevant timescales. The Ombudsman is unlikely to consider a case which has not first been referred to us in the first instance. In some circumstances the Ombudsman may decide to investigate the complaint before we have completed our investigation in full, through its internal complaints' procedure as long as both the customer and we agree to this.

The customer has the right to refer the complaint to the Financial Ombudsman Service within six months of our final response.

The contact details of the Financial Ombudsman Service are:

The Financial Ombudsman Service,

Exchange Tower,

London E14 9SR

Telephone Number: 0800 023 4567

Email: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)

Website: <http://www.financialombudsman.org.uk/>

### Publicising our Complaint's Procedure

Details of our Complaint's Procedure are publicised on our website [www.weareleasetech.com](http://www.weareleasetech.com). A copy is available to customers on request.

### Monitoring and Evaluation

The need to demonstrate good outcomes means that learning lessons from our complaints monitoring is particularly important. If we identify but fail to remedy harm, then we will not be complying with the Consumer Duty. This is confirmed by PRIN 2A.2.5 R which states "If a firm identifies, through complaints, its internal monitoring or from any other source, that retail customers have suffered foreseeable harm as a

result of acts or omissions by the firm, it must act in good faith and take appropriate action to rectify the situation, including providing redress where appropriate". If we fail to identify harm and / or fail to take appropriate action when we reasonably should, we will also fail to comply with the Consumer Duty. Our complaints recognition and escalation procedures should therefore achieve the expected consumer outcomes.

### How will we deliver the Consumer Duty Outcomes

Our increasing focus on vulnerable customers is translated into our complaints handling process, to ensure that our customers do not face any unreasonable barriers when seeking support.

All complaints are recorded on our Complaint Recording Log. This Log records details of our response and what action is to be taken. All measures taken are recorded on the Complaints Rectification Log. Records of complaints will be retained for three years from the date the complaint was received.

These records of measures taken for the resolution of complaints are used to assist us in the collection of Management Information and regular reporting to Senior Management.

Analysis takes place of all complaints received to identify root causes. The analysis identifies any patterns in complaints; records lessons learned; raises staff awareness and understanding of the complaint procedure and identifies training needs. Any recurring issues are therefore identified and resolved.

By identifying any recurring or systemic problems that require remediation, we may consider proactive customer contact with customers who have not complained.

We consider previous complaint outcomes / FOS decisions (or patterns) when reviewing and considering current complaints and root cause analysis.

We regularly review our complaint communications to ensure they are sufficiently clear and understood by our target market. Part of this includes the recording and monitoring of calls and collecting customer feedback on the customer journey experience.

If part of the customer journey is causing significantly more complaints (as a statistically important proportion), we will consider whether that part of the journey is performing as expected and amend our procedures accordingly.

### References

[DISP Dispute Resolution: Complaints](#)

<https://www.financial-ombudsman.org.uk/>

<https://www.fca.org.uk/publication/finalised-guidance/fg22-5.pdf>