



Etico Group Complaint Handling Guide

1. Context of the Complaint Handling Guide

Background

Etico Group Ltd is committed to handling complaints received from its customers fairly and promptly. This guide is intended to support our employees in achieving this goal.

Aim

The aim of this guide is to provide clear guidance for those handling complaints within the business and to assist them when reviewing and resolving customer complaints. Using this guide will help to ensure:

- Customer concerns are resolved fairly, promptly and consistently;
- All regulatory requirements are adhered to; and
- Complaints are recorded appropriately.

Scope

This Complaints Handling Guide must be used for handling all complaints received by Etico Group.

2. What does a complaint mean to Etico Group?

At Etico our aim is to always exceed the customer's expectations and to get things right on time, every time. However we also recognise that sometimes, we don't get things right for our customers and errors or omissions can occur.

A customer telling us something is wrong must always be seen as an opportunity to put things right for them and use this to improve the service we offer in the future.

When a customer is unhappy, some simply choose not to make a complaint and decide to dispense with our services, without telling us why. This is why at Etico it is important to listen to the customers who do get in touch to resolve their complaint with the aim to find the right outcome, every time.

Having a balanced complaint handling process in place means we can always aim to deliver the right outcome, take learning from the complaints we receive and help to build stronger relationship with our customers.

3. Our Complaint Handling Principles

For all complaints, Etico has a set of key principles which must always be followed:

- We will never place a restriction on how a customer can contact us to raise a complaint;
- We will always aim to acknowledge the complaint promptly and provide clear information on how we will review and resolve this for the customer;
- We will always aim to carry out an individual review, appropriate to the concerns raised by the customer;
- We will always aim to resolve the complaint at the earliest opportunity for the customer and where we can't, tell them our next steps;
- We will always communicate the outcome of the complaint to the customer, clearly and fairly;
- We will always pay redress, where it is appropriate to the outcome of the complaint;
- We will always aim to record accurate information about the complaint; and
- We will use the information about the complaints we receive to help improve our products and services.

4. What is a complaint?

Etico Group Ltd are authorised and regulated by the Claims Management Regulator and define a complaints as:

“Any expression of dissatisfaction, whether oral or written and whether justified or not, from, or on behalf of a complainant about the business’s provision of a regulated claims management service”

For Etico, this means a customer could be unhappy about a service, process or documentation.

Customer concerns may result from:

- A charge they have to pay or have incurred;
- Unhelpful or poor attitude of our staff;
- Delays in dealing with claims on behalf of our customers;
- Not returning customers calls or answering them;
- Lack of support during a claim; and
- Providing incorrect advice or information about a service.

When understanding if the customer is unhappy or has concern, it is important that we always remember to actively listen to what the customer is saying or telling us. This means looking beyond waiting for a customer to say "I want to make a complaint" as the trigger. It can be expressed in many forms and phrases, such as for example:

- "I'm unhappy about this"
- "This cannot be right"
- "I was never told this"
- "You didn't tell me this is what would happen"
- "You assured me this would be carried out"

For example:

"When I agreed for you to deal with my PPI Claim you did not tell me that I would be charged for your services and I'm unhappy about the amount you say I now owe you"

"The person I spoke to at you offices sounded like they couldn't be bothered to speak to me, when I wanted to provide further information that you had asked for"

"I really didn't feel the member of staff I spoke to understood what I wanted and kept getting it wrong"

**If you are unsure, always replay what the customer has told you
and confirm with them if they would like to make a complaint**

5. What isn't a complaint?

As part of our day to day work, customers will often contact us with general queries or specific questions about their claims or services we offer.

This section of the guide is to provide you with clear guidance to help you with your understanding so we are confident in capturing what really are complaints.

A common example can be when a customer may say "this charge is a bit high". This may occur when talking to a customer about our fee during the course of a claim or at the very outset. This is feedback from a customer in relation to what they were expecting or perhaps in comparison to other claims management companies they have heard about. They may choose not to deal or continue to deal with Etico because of the level of the fee but it is not an "expression of dissatisfaction", or a complaint.

But if the customer expressly states for example "I want to make a complaint about the level of the fee", (this would normally happen at conclusion of a claim) the normal complaint process as described in this guide should be followed. Another similar scenario may occur when the customer may initially say they were unhappy about the amount of the fee, but go on to say we did not inform them of it correctly. This would constitute an allegation and so again should be dealt with as a complaint.

Other common phrases which may not indicate a complaint:

- "Can you tell me about"
- "I wanted to ask you"
- "Do you know if"
- "You said you were going to"
- "How can I"
- "I thought you said it might be possible to"

Examples:

"Has the change to my personal details now been completed?"

"I wanted to ask you about a section of the terms of business you sent to me"

"Are you going to charge me if I cancel my claim early?"

Sometimes you may find a complaint is raised after an initial query or question from the customer, as they are unhappy with the information we have provided — this should be treated as a complaint, using the process set out in this guide.

6. Customers who complain in person or by telephone

In most cases, we will always aim to resolve verbal complaints as soon as is possible and particularly complaints of a minor nature. In these instances details of the complaint should be recorded in FLG including what you did to investigate the issues and what you did to resolve it.

Each employee is ultimately responsible for dealing with complaints and recording them however, Managers and Team Leaders should normally seek to manage complaints themselves or at least be on hand to provide guidance where necessary.

Remember - A complaint cannot be handled by the individual, if they are the subject of the complaint

When receiving a complaint you should always:

- Address all the customer's points and summarise your understanding of the customer's situation;
- Take ownership and give your name and relevant contact details;
- Be polite, courteous, friendly and professional;
- Apologise. Telling the customer you are sorry that they have cause to complain, is not an admission of liability. We have an unhappy customer and should acknowledge that;
- Always keep promises made and return calls when agreed; and
- Use plain English, avoiding jargon and technical terms.

If during your review you feel you need guidance and support, while investigating the customer's concerns always obtain support from your Line Manager.

Part of the complaint review may include assessing if a redress payment should be made as part of the complaint resolution.

This could relate to the customer's expectation, to acknowledge any distress & inconvenience they have suffered, such as the number of telephone calls they have had to make or refunding money they should not have paid.

Any redress should always be authorised by a Senior Manager.

Once you have made your decision on the outcome for the complaint, this should be communicated to the customer. If the customer confirms they are happy with your decision, this must be also recorded within FLG.

If the customer is not happy with your decision, the complaint cannot be closed. You should inform the customer you are sorry they don't agree with your decision and that they will receive confirmation of this in writing.

This will be our "Final Response" This will include a summary of the complaint, information about the review carried out, our decision and how they can refer their complaint to the Legal Ombudsman Service if they are still unhappy with the decision.

Final Response letters will be issued by the appropriate Senior Manager.

It is very important that the information you enter in FLG is clear, correctly dated and includes all of the key information about the complaint.

7. Customers who complain in writing

All written complaints received within the business must always be reviewed and resolved by an appropriate Senior Manager. This includes letters:

- Received by post;
- Faxed by the customer to the office; and
- Received by email directly to the office.

Written complaints should be acknowledged electronically or by post within 5 working days of receipt. In line with all complaints not resolved at first point of contact a further communication should be sent to the complainant at 4 weeks (if not resolved in the meantime) with an update if a final response is not possible and finally within 8 weeks an actual final response should be sent to the customer. If a final response cannot be sent after 8 weeks the customer must be updated further with the reasons why this is not possible.

8. Reviewing your Complaint

As you are aware, our overall aim is to handle, resolve and close the majority of complaints at the first point of contact.

Remember we can only do this if the customer has confirmed to us they are happy with the outcome and no further action is needed.

This means when we tell the customer about the decision we have reached, they must tell us they are happy with how we have resolved their complaint, which we must always include as part of our complaint summary in FLG.

For each individual complaint, we must always carry out a balanced review of the customer's concerns and that our investigation is always appropriate to the issues they have raised.

Our review should consider as appropriate:

- What event or action caused the customer to complain;
- The customer's circumstances (are they vulnerable);
- What information was provided to the customer;
- Customer recollection;
- Documentation in place and provided to the customer;
- Are any call recordings accessible which may help with your review; and
- If an Etico employee is involved, do they have any recollections in relation to the concerns raised?

Once you have carried out the review, you should be in a position to reach a decision and confirm whether you feel the complaint is Justified or Not

Justified - Based on your review, you agree with the concerns raised by the customer and the complaint should be upheld

Not Justified - Based on your review, you feel Etico has acted correctly and the complaint should be rejected

9. Complaint Do's & Don'ts

Below are some Key Do's & Don'ts which if followed, will help you to handle each complaint you receive correctly.

Do

- Remember to record every complaint in FLG. The information you record about each individual complaint helps to provide us with an invaluable insight into what our Customers complain about and will allow us to make changes to processes and procedures;
- Remember to review the information you have added to FLG;
- Always include a summary of the complaint itself, what your review consisted of, the decision you reached and confirmation whether the customer was happy with this; and
- Record how you have progressed a complaint and any outcome you have reached where you have been unable to resolve at first point of contact.

Don't

- Don't delay in dealing with a complaint, this will only make the situation worse;
- Leave a complaint if you are unsure what to do or your Manager is out of the office. Either refer to another Manager, or the General Manager for guidance; and
- Think a complaint will resolve itself if left. Acknowledge written complaints promptly and pass to an appropriate Senior Manager to resolve.

10. Serious Complaints

An unfortunate side of customer service is the possible exposure to threats of violence, racial allegations, abusive language or media interest.

This section offers guidance which should be followed in the event of a serious complaint.

Threats of violence

Etico operates a zero tolerance approach towards customer threats of violence.

Make a careful note of what has been said and what threats have been made. Advise the customer that we will not tolerate threats of violence and report the matter to your Manager.

Abusive language

Etico operates a zero tolerance approach to the use of abusive language by customers towards its staff. No employee is expected to suffer or tolerate verbal abuse e.g. swearing and/or the use of profane language. In such cases tell the customer that you will terminate the call unless they speak to you in a reasonable manner. A suggested response would be "you are using language which I am not prepared to listen to any further. I will try and help you but only on the understanding you will not swear otherwise I will terminate the call without further notice". Make a note of what was said and report the matter to your Manager.

Allegations of discrimination

Make an accurate note of the allegation and then report the matter to your Manager.

Media exposure

Customers are becoming more and more media conscious and as a consequence may threaten media exposure. While we need to prevent any damage to our brand image we must not tolerate unwanted customer pressure. If you feel a threat of media exposure is genuine please contact advise a Senior Manager. If you receive a call from the media you must not discuss anything about the customer or the complaint. Take contact details and advise you will arrange for a Director to call them back.

Other enquiries

All correspondence received from external bodies must be passed to an appropriate Senior Manager on the day of receipt at the branch. Some examples of external bodies are:

- Ministry of Justice;
- Solicitors & Court correspondence;
- Summons where Etico are shown as the defendant;
- Citizens advice bureau (CAB);
- Trading standards; and
- Debt management companies

11. Recording and Reporting Complaints

- An important element of complaint handling is how we record and report the complaints we receive. This enables us to have an accurate picture of the volumes we are receiving, what issues our customers are complaining about and how quickly we are resolving them;
- All complaints received, including those received and resolved at first point of contact must be recorded to allow us to capture, monitor and manage them to ensure we deliver excellent service. It also allows us to capture the root causes, which helps us to understand where we have gone wrong and what we need to do to improve as a business;
- It is important that we record accurate information. This means every time a complaint is recorded, it must always include the exact nature of the complaint, a summary of the investigation, the outcome reached and whether the customer was happy with the decision made, within the customer record;
- For each complaint we receive, FLG must always be updated; and
- Recording and reporting complaints is a mandatory requirement of the CMR rules we must always follow so it is important this is done correctly.

Complaint descriptions should be clear. Anyone should be able to read the description and understand the nature of the complaint and what was done to resolve it:

Here are some examples:

- **Limited detail** "Customer rang as unhappy we've closed claim down"
- **Clear detail** "Customer rang as unhappy we've closed claim down and says he did not receive our requests for information/LOA's".
- **Limited detail:** "Customer called office to complain about receiving a letter chasing him for our fees".
- **Clear detail:** "Customer called office to complain about receiving a letter chasing him for payment of our fees". We had previously tried to collect the payment and our system failed but we didn't tell the customer. He is happy to pay but not happy about the tome of the letter. Payment has now been taken successfully.