

Complaints Policy and Procedure

1. Purpose

- a) This document represents our policy towards complaints, how a consumer can make them and how as a company we handle them.
- b) This policy and procedure have been created to meet general standards and requirements and complies with standard complaint handling procedures, including the Financial Ombudsman Service (FOS) and FCA regulations such as CONC and DISP.
- c) We take our responsibilities seriously, in addition to the legal and regulatory requirements we have as a financial firm.
- d) We are committed to ensuring the fair treatment of our consumers and ensuring they face no post sale barriers with our service, and we have effective and transparent procedures in place.
- e) As a business we ensure that complaints can be made using any reasonable means and recognise complaints require a resolution.

2. Definition

As per FCA material, they define a complaint as the following –

‘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 alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.’

3. Customer Complaints Procedure

‘Our aim is always to provide an exceptionally high level of service to all of our customers. Where customers are unsatisfied, it’s important to us that this is dealt with objectively, fairly and as quickly as we are able to.

The following procedure explains how we deal with complaints, our commitments to you and what action to take if you think your complaint has not been resolved to your satisfaction.

If you have a complaint about any aspect of our service, then we would like to hear from you. Please use the below details to let us know –

E: sales@bvgautomotive.co.uk

T: 0161 425 5022

P: Unit 1 Hawksley Industrial Estate, Hawksley Street, Oldham, United Kingdom, OL8 4PQ.

We kindly ask, so we can look into your complaint as quickly as possible. You include as much detail as you can, however if we are missing anything we will be in touch. We will aim to come back to you within 48 working hours of receiving your complaint.

If we are able to investigate and resolve your complaint within 3 days, you will receive a summary resolution response from ourselves, which will detail our outcome and findings.

In the event our investigations take longer than 3 days, we will issue you a Final Response within the 8-week timescale. Whilst we try to close any complaint before this 8-week time frame, we do need

to make you aware we do have this time. Our final response will include detailed information of your complaint, our investigation and the resolution we have come to. If you are not satisfied with our Final Response or the handling of your complaint within the 8-week time frame, you can contact the Financial Ombudsman service using the details below. You must do this within six months of our final response.

W: www.financial-ombudsman.org.uk

T: 0800 023 4567

P: Exchange Tower, Harbour Exchange, London, E14 9SR

4. Processes and Responsibilities

1. Record Keeping

- a) As per DISP 1.9 and to ensure that we handle our complaints efficiently and effectively, any correspondence or notes from phone communication will be documented on our systems.
- b) This will allow the complaints handler to review the whole complaint and refer back to any point in the investigation if they are required to do so.
- c) Any documentation received regarding the complaint will also be uploaded to the application.
- d) All records of complaints will be kept as per our retention periods, only employees that require access to customer complaint notes will be granted this information.
- e) We aim to resolve all complaints as soon as possible to minimise the number of open complaints (DISP1.4.3).

2. Training

- a) Staff will receive complaints training within their initial induction and at least once a year.
- b) Training will ensure our team understands the processes that we have in place and the regulatory importance of following these processes.
- c) At any time, staff have the opportunity to request further training on any aspect of our business.

3. Treating Customers Fairly (TCF)

- a) As a company, we ensure that we follow all regulatory guidelines, including treating customers fairly.
- b) When it comes to complaints, we guarantee that our customers will not face any post sale barriers.
- c) Our staff are aware that they need to assist customers as much as possible when they wish to make a complaint, and they should not receive a different service to any other customer.
- d) As per DISP 1.3.2 customers are made aware they can make a complaint verbally or in writing and these contact details are provided in our complaint's procedure for ease for the customer.
- e) We will ensure that our complaints procedure is in a clear location so our consumers can access it with ease. To ensure we are in compliance with DISP 1.2, our

complaints procedure is clearly listed on our website and a copy will be sent via email.

- f) Specifically, to meet DISP 1.2, our complaints procedure will also detail contact details for the FOS.
- g) Customers will have their expectations managed, and staff will explain the complaints process so a customer can understand the next steps.
- h) As per DISP 1.4.1, we will thoroughly investigate any complaint competently, diligently and impartially, ensuring that any evidence obtained is saved to the customers application for record.
- i) In line with 1.4.2 all factors of the customer journey and outcome will be considered in our investigations.
- j) We will keep in constant communication with all parties, including our finance partners, ensuring we keep in touch at least once a week whilst investigations are taking place.
- k) We will assess fairly, consistently, and promptly
 - the subject matter of the complaint.
 - whether the complaint should be upheld.
 - what remedial action or redress (or both) may be appropriate.
 - if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint.
- l) All communication received will be acknowledged within 48 hours, as per DISP 1.6.1.
- m) If a customer makes a complaint about a specific member of the team, that employee will not have any involvement in handling the customer's complaint.
- n) Customers will never be charged for making a complaint, no matter what method of communication they use (DISP 1.3.1).
- o) Where a customer has referred a complaint to the FOS, we will fully comply with any further investigations and comply promptly with any settlements or rewards in line with DISP1.4.4.
- p) At any point in our trading future, we are required to publish our complaints data due to the number of complaints received, we will ensure this is easily available to our customers and contains all the required information and in the time limits required. We will inform the FCA in writing as and when this has been actioned.
- q) As per DISP 1.8, should we receive a complaint which is outside of the time limit (as detailed in DISP 2.8) for referral to the FOS and we reject the complaint, we will provide a full explanation of this to the complainant.
- r) For reference these time limits are as follows -
 - *more than six months after the date on which we sent our final response, redress determination or summary resolution communication*
 - *More than six years after the event complained of*
 - *three years from the date on which the complainant became aware (or ought reasonably to have become aware) that they had cause for complaint*

4. Summary Resolution

- a) In line with DISP 1.5 we have put in the following process should we resolve the complaint within 3 working business days.

- b) Once resolved, we will send the customer a Summary Resolution using our templates.
- c) This will include details of how the customer can refer their complaint to FOS should they wish to if they are not satisfied with our response, the time limits able to do this and that we consider the complaint closed.
- d) Depending on the customer's circumstance, and if it is deemed easier or preferred for the customer, we may communicate this resolution via other methods such as telephone.

5. *Redress and Compensation*

- a) Compensation or redress will be decided on an individual basis and detailed to the customer in our final communication.
- b) Management will take into account all aspects of the complaint and any suffering caused to the customer and offer compensation based on these aspects and per regulation.
- c) Where Compensation and redress is considered or decided, we will ensure all factors have been taken into account including all evidence obtained and regulation set out by the FCA and FOS.
- d) Compensation or redress may also involve agreements with lenders or brokers, to determine an overall decision, and where application all communication and decision will be documented.
- e) As with all complaint records, redress and compensation will be recorded so we are able to report amounts to the regulator.

6. *Point of Contact*

- a) As per DISP 1.3.7, the firm has appointed Raf to currently handle all complaints and SQ issues.
- b) We will ensure this information remains clear and up to date on our FCA register.
- c) As the firm grows and moves forward, we will consistently review Raf's ability to carry out this responsibility and regularly review their knowledge and training to ensure they are competent in their responsibilities.
- d) We will request an email or detailed description over the phone to handle the complaint further.
- e) They will then liaise with the customer and any third parties as required (and in line with DISP 1.7.1) and issue a final response letter or summary resolution.
- f) If in the event or circumstance we are required to forward the complaint, we will do so promptly and inform the customer that we have done so.
- g) We are committed to ensuring that we are in control of all complaints and complete them as soon as possible.
- h) Raf will ensure all complaints are updated on the complaints log, system and compliance monitoring plan.
- i) Templates will be used when liaising with customers for acknowledgement (including initial and holding letters), Summary Resolution and Final Response Letters to ensure that the customer receives information required in DISP such as (but not limited too) 1.6.1 and 1.6.2.
- j) This will include:
 - a. Acceptance or rejection of the complaint
 - b. Information on any redress offered and agreed on

- c. Information on how the customer can contact FOS and the time limits applicable
 - d. FOS explanatory leaflet
- k) If we cannot provide the customer with a final response in 8 weeks, we will ensure a holding letter is provided that will include:
 - a. Why we are unable to provide this
 - b. A timeframe of when we believe we will be able to
 - c. Informing they are able to contact FOS and the contact details to do so
 - d. FOS explanatory leaflet
- l) If we are able to resolve the complaint before the 8-week period, the final response will be sent as soon as possible.
- m) All correspondence with customers will be clear, fair and not misleading. Where information such as FOS details is required to be prominent, this will be done so.

7. *SQ vs. Complaint*

- a) It is important that we can differentiate between a complaint and an SQ issue.
- b) Whilst they are different, we do adopt the same principles, and try to assist our consumers rectify any issues they have with their vehicle.
- c) We provide this service as an extension to our offerings in the hope we can make the consumer's journey as easy as possible.
- d) We will assist liaising with the broker/lender if necessary, to try to come to an arrangement to provide our consumer with the vehicle they desire.
- e) All SQ's will be documented on our complaints log for management information purposes, which assists in providing additional information on our service/business activities.
- f) Root analysis may be conducted on specific issues, which will be reviewed by management and Salma.
- g) To ensure we meet DISP 1.3.2A, we are committed to learning from all complaints and SQ issues received, ensuring we are analysing any patterns produced or guidance received.
- h) As per DISP 1.3.3 we will ensure appropriate management controls are in place to identify and remedy any recurring or systematic problems, both with regulated and SQ complaints.
- i) The following processes and training have been implemented to include:
 - a. How to identify a root cause
 - b. How to prioritise
 - c. to consider whether any information could impact other aspects of our process and policies, and if action is required
 - d. if action needs to be taken to amend a certain process and implement a timeframe and actions as to when and how this will be done
 - e. keeping records of all changes and ensure version control rules are met
- j) Should issues or problems be identified and other customers who may not have come forward be (or suspected to be impacted) we will take appropriate action to contact those customers and if applicable, take steps to remedy the problem, obtain a solution or calculate redress (as per DISP 1.3.6)

Monitoring and Compliance

It is extremely important that this policy is complied with to protect our consumers. As a company we will ensure that we keep up to date with regulatory and legal requirements, and that our processes and policies are updated accordingly to meet regulation (DISP, CONC, TCF)

We may conduct root analysis on our complaints to identify any patterns that may potentially form, therefore limiting risk to our consumers.

All complaint information will be reported within our RegData as per DISP 1.10 rules and guidance or upon request. We will ensure that all information requested by the FCA including but not limited to total amount, amount closed, amount open and redress paid, is accurate, honest and up to date as per the Reg Data system. We do not anticipate meeting the 500-complaint threshold in the near future but will continue to review processes and implement necessary reporting requirements when required.

In the event a complaint identifies an area of concern within our procedure, this will be assessed and rectified where applicable.

Review

This policy will be reviewed on at least an annual basis with any updates will be reissued on this policy.

All policy changes are approved by Salma.

Confirmation

By signing the below I can confirm that I have fully read the above policy, been provided the opportunity to ask any questions and understand my responsibilities to abide by the terms set within the policy, along with the consequences if I do not.

SIGNED:**NAME:****DATE:**