



Windows Plus Roofs Limited Customer Complaints Policy & Process

Introduction

The purpose of this policy is to stipulate how we will identify, manage and respond to any complaints received. This will include our regulatory obligations as an FCA regulated firm, but also our commitment to our customers and our endeavour to always provide the best possible service.

Complaint handling forms a key part of our staff training programme and we ensure that all customer facing staff have been trained in how to identify and manage complaints accordingly.

We firmly believe that we provide a first-class service to all of our customers, however, we do understand that sometimes things may go wrong leaving our customers not entirely satisfied.

When we are made aware of any shortcomings in our products or services, we will always respond in a professional and courteous manner, ensuring that all complaints are handled objectively and without undue delay.

The responsibility for complaint handling in our business sits with Alexis Ruttley.

The person named above is referred to as the **Complaints Manager** throughout this policy.

Our Policy Statement

We believe that we provide a first-class service to our customers.

To ensure that this statement remains true we will proactively:

- Provide each Customer with a copy of our “How to Complain” leaflet when they first do business with us;
- Train all of our staff to identify and handle complaint, but also to understand the importance of our complaint management system;
- Respond positively and professionally if our customers do complain; and
- Learn from any feedback provided by our customers and amend our processes if appropriate to avoid repeat complaints.

This policy will cover the handling of both eligible and ineligible complaints. The FCA define an eligible complaint as, *‘Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the firm’s provision of, or failure to provide, a financial service’*.

For our business, eligible complaints will only be complaints relating to the finance products we offer to our customers as a credit broker. For these complaints we have strict regulations and time limits which we are aware of and must adhere to. This policy stipulates how we will ensure we are meeting these regulatory requirements.

Eligible complaints must also be from an eligible complainant, which would be one of our customers, or someone who has been appointed to act on behalf of our customer.

Ineligible complaints are all other complaints which do not meet the FCA definition and are not linked to our regulated activity of credit broking. These are not covered by FCA regulations, however we will endeavour to handle these in much the same way as we would an eligible complaint, to ensure complainants are kept informed of the status and progress of their complaint. Ineligible complaints can include but are not limited to; complaints about the

standard of customer service or complaints about the timeliness and tidiness of our installation or delivery staff. Our intention is to follow the timeframes stipulated in the FCA's Dispute Resolutions handbook on unregulated complaints, as well as regulated, to ensure of a consistent approach to communicating with customers whilst handling their complaints.

Handling Complaints

Customers can make a complaint free of charge by any reasonable means (letter, email, telephone call, personal visit).

When we receive a complaint from a customer, we will immediately start to collate the information we need to complete the Complaint Management Form (appendix i).

All staff are trained to identify complaints. When a complaint is raised, it is passed to the complaints team the same day to ensure that it is dealt with in line with this policy and our regulatory obligations. They are responsible for the logging and ongoing management of the complaint and have the knowledge and experience to do so in a competent manner.

Customers are able to complain directly to us using a dedicated complaint email address and telephone number. These are routed directly to the Complaints team, who alone who will determine whether or not the complaint is an eligible complaint and concerns a regulated activity and review the complaint accordingly.

Our first step is to assess whether the complaint points raised relate to us or a 3rd party, such as the lender who provides the loan to the customer and whether the complaint is an eligible complaint from an eligible complainant.

After the initial information has been collected, the Complaints Manager will assign the complaint to an appropriate member of staff or deal with it themselves. The rationale for deciding who will handle each complaint is determined on a priority level (discussed below). The designated person will be independent of the subject matter of the complaint and will not have any conflicts of interest in managing and investigating the complaint. All complaints will be investigated competently, diligently and impartially so we can be sure that we are able to treat our customers fairly.

Following the steps shown on the 'process flow' below the complaint will be thoroughly investigated and the Customer will be kept apprised by the agreed communication method on a regular basis.

Once the complaint has been fully investigated the **Complaints Manager** will review and authorise the outcome to the complaint and any action to be taken. A final response will be issued to every customer.

Priority-Rating & Logging Complaints

When a complaint is received by the complaints team, it is logged on their tracker and the internal CRM system, both of which are kept up to date as the complaint is investigated and managed to conclusion. Full details of all aspects of the complaint investigation will be retained on the relevant client folder to support the decision reached.

The tracker is a live document, showing the up-to-date picture of all complaints. We use this to log when and how a complaint was received, what it relates to and document our latest position in the handling/ investigation process. Recording it in this manner makes it easy for key stakeholders to see the up-to-date position and for root cause analysis to be performed.

The tracker makes it very easy to identify where an action is required and monitor whether all timeframes are being adhered to.

The tracker also clearly records whether a complaint is reportable to the FCA and therefore whether the customer is entitled to Financial Ombudsman Service rights. If the complaint relates solely to the products and customer service/ installation the customer received, and there is no element of the complaint which relates to finance or our regulated credit broking activity, then the complainant would not receive FOS rights in this case. FOS rights are given wherever the complaint relates to finance or our regulated credit broking activity.

Only complaints that are eligible complaints will be reported to the FCA. Complaint reports will be issued to the FCA every six months.

The CRM system is used to log all interactions with customers and record all notes/ updates for complaints.

When a complaint is logged, it is given a priority rating based on the severity of the issue the customer is experiencing. Many complaints relating to the products we have sold will require some parts and a tradesperson to carry out remedial work. So we can prioritise the most serious of issues, the below is used as a basis for the priority rating:

Low – Minor issues and imperfections with products which do not affect their performance, such as surface scratches and chips.

Medium – Issues which do affect the performance of the product but do not pose a safety threat, such as missing products or blown window units.

High – Issues which could pose a safety concern, such as gas leaks, plumbing leaks and potentially unsafe building work. All finance related complaints are treated as high risk by the complaints team.

Steps Taken to Resolve Complaints

We will endeavour to resolve complaints in a timely manner and to the satisfaction of all concerned.

This means we will aim to resolve all complaints quickly while making certain they are also investigated thoroughly, to reassure customers that their complaints have been reviewed fully and the resolution is well founded.

The following standards have been agreed throughout our business and are in line with our regulatory obligations:

- If a 3rd party is solely responsible for the complaint or the reasons for the complaint, we will refer the complaint to them within 5 business days and write to the customer with a final response letter to make them aware of this.
- If a 3rd party is jointly responsible for the complaint with us, we will refer the complaint to them within 5 business days, write to the customer to acknowledge the complaint and to make them aware of this, and then investigate and handle the complaint points relating to us as per our normal process.
- If we are able to resolve a complaint within 3 business days, we will issue the complainant with a summary resolution letter detailing our resolution and advising the customer of their right to refer the complaint to the Financial Ombudsman Service. An acknowledgement letter will not usually be issued in these instances.

- For every complaint received that cannot be resolved within 3 business days, we will issue the complainant with an acknowledgement letter within 5 business days, along with a copy of our complaints procedure.
- We will advise the complainant on each communication when they can expect to hear from us next (appendix iii).
- If after 4 weeks we are still not in a position to resolve a complaint, we will issue the complainant with a '4 week holding letter' advising why we are not yet in a position to resolve the complaint.
- We will endeavour to resolve complaints in a timely manner and **within 8 weeks** as a maximum.
- If we cannot resolve a complaint within 8 weeks then we will remind complainants of their right to refer their complaint to the Financial Ombudsman Service where applicable (see final response letter templates). A written response will explain why we have been unable to resolve the complaint within this period and will indicate when we expect to do so, we will then ensure the complainant is kept informed of the progress of the investigation.
- All complaints received and resolved will be recorded so we are able to identify trends through root cause analysis and make the necessary business changes to improve the services to our customers and prevent repeat occurrences.
- By the end of eight weeks (unless the complainant has previously accepted a response in line with DISP 1.6.4) after receipt of a complaint from an eligible complainant we are required to send either a 'final response' or a 'written response'.

A final response will contain our decision e.g. offer remedial action, rejection of the complaint etc. and must be accompanied by:

- the FOS standard explanatory leaflet;
- details of the FOS website address; and
- explain that the complainant can now refer the complaint to the FOS if they remain dissatisfied.

There are time limits outside of which the FOS cannot consider a complaint e.g. six months following issuance of the final response. However, under DISP 1.6.2(1)(f) we are able to waive this time limit. Use of this waiver will be considered on a case-by-case basis and the complainant must be informed of our decision. Ordinarily we will not consent to the waiving of this time limit.

Where the complaint does not relate to finance or our credit broking activities, we will not provide details of the FOS or indicate that the complainant may be able to refer their complaint to the FOS.

Customer 'grumbles', Expressions Of Dissatisfaction (EODs) and Review Site Feedback

We acknowledge that there will be some instances where a customer may have a grumble or want to provide us some negative feedback, sometimes anonymously, however they are not wanting to complain and their grumble or feedback does not meet the definition of a complaint. We view this as valuable feedback from which we can identify potential issues and

trends, and make improvements in our business practices to ensure we are delivering good customer outcomes and the outstanding customer service we pride ourselves on.

We manage this in the following way:

- Review site feedback is monitored by the Operations and Sales Directors. Where a negative review is left, we try to make contact with the customer or request their contact details so we can better understand the service they received, understand whether their grumble should be a complaint, and look to turn their negative experience into a positive one
- If a customer contacts us directly to provide us with feedback or 'grumble' and this would not be considered a complaint, we record these as an EOD on our EOD log. This enables to spot any trends or issues with processes, policies, products, staff, training etc by performing root cause analysis and taking the required action, as identified by this process.

Root Cause Analysis

We accept that as a home improvement business of our size, we will receive complaints and we are committed to handling these complaints in an objective and professional manner to ensure that the right outcome is reached on every case. We however view complaints as an opportunity to identify issues and trends, enabling us to drive continuous improvements in our operations and deliver consistently good outcomes. To do this we perform root cause analysis of our complaints, online reviews and EODs on a regular basis no less frequently than quarterly.

Root cause analysis will be performed by the Operations Director in the following way:

- Use the information within the complaints tracker and the CRM to identify any recurring issues relating to a product, service, process or individual
- Look to identify:
 - o What has happened?
 - o When did it happen?
 - o Where did it happen?
 - o Why did it happen?
- To identify why an issue has occurred, and determine the ultimate root cause, we will use the simple '5 whys' methodology.
- Wherever gaps or issues with existing policies and procedures are identified, the Operations Directors raises these with the relevant heads of departments and ensures that the required action is taken. This could be changes to processes, training, or potentially disciplinary action.
- The outcome of root cause analysis and the progress on the action being taken as a result of this, are to be a topic of discussion at board meetings.

Monitoring Of Compliance With This Policy

The complaints team are given the necessary tools, support and training to be able to carry out the duties of their role to the required level, however due to how important effective complaint handling is to our business, we have implemented ongoing monitoring of the

activities of our complaints team to ensure that this policy is being adhered to and that right outcomes are being reached.

This will be conducted by the Operations Director and will look as follows:

- Daily reviews of the complaints tracker and the CRM system to ensure that the necessary action is being taken and that all regulatory timeframes will be met.
- Regular spot checks of open complaints to ensure that the action being taken is appropriate and in line with this policy. Feedback is to be provided in writing to the Complaints Manager with any issues raised as an immediate concern.
- Regular case reviews of closed complaints to ensure that the investigation was conducted in an objective manner, timeframes were met and the appropriate outcome was reached. Feedback is to be provided to the Complaints Manager in writing.

The Operations Director will look to review circa 10% of open cases per month as well as 10% of cases closed within the calendar month, ensuring that:

- A sufficient amount of cases are reviewed for all members of the complaints team
- The cases reviewed cover a broad spectrum of complaints in terms of the reason for complaint, the age of the complaint and the whether the complaint was upheld or not.

The frequency of case reviews will increase and decrease:

- Based on complaints volumes. If there is an increase in the number of complaints then case reviews will increase to ensure that cases are still being handled accordingly. Similarly, if complaint volumes drop then the number of cases reviewed may also drop.
- Based on the outcome of previous case reviews. If issues have been identified with the work of a member of the complaints team, they will be subject to increased case reviews until we are comfortable that the action taken, as detailed below, has had the desired effect.

If any instances are identified where this policy has not been adhered to then the Operations Director will address this through feedback, training and if necessary for serious and repeat offences, disciplinary action.

If it is identified that incorrect complaint handling has resulted in a customer receiving the incorrect outcome to a complaint, complaints can be reopened and we will ensure that the customer is put in the position that they should have been, and check to confirm that there are no other similar instances.

Policy Reviews

This Policy Statement, along with any supporting documents, will be reviewed at least once a year and amended as required to ensure it remains up to date with any regulatory or internal business changes.

Dates Reviewed:	Date	Initials
	_____	_____
	_____	_____

Complaints Process Flow

