

SWIG Finance Limited

Complaints Policy

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Version	Date	Reason for update
Version 1	12/03/20	New format of document
Version 1.1	18/07/22	5.iii: Policy contains the incorrect timescale for referring complaints to FOS – now updated.
Version 1.2	07/08/23	6. If a SUL recipient incorporates a company, they may not be able to complain to the Financial Ombudsman Service (FOS). Policy updated to make it clear that FOS may accept complaints
Version 2		

Distribution List

Name	Position
To all staff	At all levels

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1. Executive Summary

This Complaints Policy outlines The SWIG Finance Ltd's (SWIG) approach to capturing, responding to and resolving complaints. It outlines the objectives underpinning SWIG's complaints process, defines what types of complaints are covered by this policy, explains how to submit a complaint and who will be responsible for reviewing complaints; outlines the complaints process including how individuals can escalate their complaints and explains how complaints data is held.

This approach has been developed in accordance with the principles and requirements outlined by the Financial Conduct Authority (FCA) and should be read in conjunction with SWIG's other key policies, including the following:

- Treating Customers Fairly policy
- Data Protection and Privacy policy

2. Purpose and objectives

SWIG strives to deliver a fair and positive experience for all individuals engaging with our services. As part of this endeavour, SWIG is committed to continually reviewing and improving both its offering and the way this offering is delivered. The feedback SWIG receives from customers and other stakeholders, whether positive or negative, is a primary way that the organisation identifies areas for improvement. For this reason, it is essential that there is a clear and effective process for capturing, responding to and resolving complaints.

The purpose of this Complaints Policy is therefore to provide individuals with a clear and transparent process about how to submit a complaint.

This Policy has four key objectives:

1. Provide a clear outline about how any individual who comes into contact with SWIG can express their dissatisfaction.
2. Offer a transparent view of the processes that will be followed in reviewing and investigating complaints, ensuring individuals are aware of what to expect at every stage.
3. Explain who should be contacted when submitting a complaint, including how and when an individual can escalate a complaint to the Financial Ombudsman Service (FOS).
4. Clearly communicate the levels of service an individual can expect when going through the complaints process.

3. What is a complaint?

The Financial Conduct Authority (FCA) defines a complaint as:

'Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of a Complainant about the firm's provision of, or failure to provide, a financial service'.

A complaint is not restricted to a formal submission of dissatisfaction. You may communicate an issue or concern at any stage of your engagement with SWIG, through any method and via any channel.

4. Submitting a complaint

All complaints should be made directly to SWIG Finance using the following contact details:

SWIG Finance
Lowena House
Glenthorne Court
Truro Business Park
Threemilestone
Truro
Cornwall TR11 3LW

Email: info@swigfinance.co.uk
Tel: 01872 223883

Any official SWIG social media channels (Facebook, Twitter, LinkedIn and Instagram)

In person to any SWIG employee (e.g. at an event, via email or on the phone)

5. The complaints process

SWIG deals with complaints using the following process:

i. All complaints will be acknowledged by telephone or email within three working days:

Any SWIG employee who receives a complaint will endeavour to immediately address the matter, as appropriate, based on their role. However, if this cannot be done for any reason, the SWIG employee will refer your complaint to an Investigating Officer (IO), who will be responsible for contacting the complainant via phone or email and attempting to resolve the matter within three working days.

ii. If SWIG cannot resolve a complaint within three working days: If a resolution cannot be reached within three working days, we will send the complainant a written acknowledgement that will:

- Acknowledge that a complaint has been submitted;
- Advise the complainant that an IO is reviewing the matter;
- Inform the complainant that the matter will be investigated and that a Final Response will be provided in writing within eight weeks of the complaint being received (although SWIG aims to resolve all matters sooner than this where possible);

From this point forward, the IO will assume responsibility for ensuring the complaint is resolved within eight weeks. The Investigating Officer will ensure that the complaint is investigated by the appropriate individuals within this timescale.

Where required and at their discretion, the IO may choose to convene a Complaints Panel to resolve the matter and this will be held within the eight-week period, to ensure that there is no delay in sending the Final Response.

iii. If SWIG can fully investigate a complaint within eight weeks: Once the matter has been investigated and SWIG has made a decision whether or not to uphold the complaint, the complainant will receive a written Final Response from the IO. This Final Response will be provided to the complainant in PDF format via email and will:

- Acknowledge all of the concerns within the original complaint;
- Outline the findings of the investigation;
- Clarify whether the complaint was 'upheld' or 'not upheld';
- Outline the proposed resolution (if applicable);
- Inform the complainant that if they are not satisfied with the Final Response, they have the right to escalate the matter to the Financial Ombudsman Service (FOS). They must do this within six months from the date of the final response. A copy of the FOS information pack will be sent to the complainant with the Final Response.

iv. If SWIG cannot fully investigate a complaint within eight weeks: In exceptional circumstances, the IO may not be able to provide the complainant with a Final Response within eight weeks. In these instances, a holding communication will be sent to the complainant in writing. This holding communication will:

- Inform the complainant of the delay;
- Outline the reasons for the delay;
- Provide an expected response time for sending the Final Response.

6. Escalating a complaint: The Financial Ombudsman Service

The Financial Ombudsman Service (FOS) was established by Parliament in 2001 as an independent expert body for settling disputes between consumers and businesses providing financial services. Their role is to help settle disputes without taking sides.

The complainant may escalate their complaint to the FOS, which they may then consider, but only after SWIG has had the opportunity to deal with the matter first through the complaints process outlined in Section 5. SWIG is committed to working closely with FOS to facilitate a further review of the matter if appropriate.

Please see Section 9 for details on how to contact the FOS.

7. Levels of service

In accordance with the Treating Customers Fairly policy, SWIG endeavours to ensure that, where possible, all individuals who interact with the scheme:

- receive a fair and positive experience;
- are supported in accordance with their needs, provided this does not conflict with SWIG's policy requirements or other regulations that the scheme is bound by;
- are given fair and impartial consideration of their concerns, with due consideration for their confidentiality;
- have their concerns responded to in a timely manner that reflects the approach outlined within this Policy;
- can rely on accurate information being provided with which to make an informed decision;

- feel they can approach SWIG at any time to ask questions, clarifications or request more details.

8. Additional information

Complaint records are kept on file for a three year period in order to comply with the FCA requirements and SWIG will co-operate with any official investigations or requests for information, as required by the relevant authorities. SWIG will not reimburse any fees, expenses or costs involved in raising a complaint. Nothing in this policy should be interpreted to restrict any rights of redress a Complainant has in law.

Please also note that this Complaints Policy cannot be used to deal with an issue that is part of any legal action against SWIG. SWIG reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation. Finally, this Policy does not confer any contractual rights and SWIG reserves the right to update this policy and its key terms at any time.

9. Contact information

If you have any questions about this Complaints Policy, SWIG's approach to managing complaints or the Financial Ombudsman Service, please use the following details:

SWIG Finance Ltd

The Financial Ombudsman Service (FOS)

This is a free service for businesses and consumers.

Contact details:

Phone: 01872 223883

Open weekdays, 9.00am to 5.00pm excluding bank holidays.

Email: info@swigfinance.co.uk **Website:** www.swigfinance.co.uk/contact-us/

Phone: 0800 0234 567

Open weekdays 8.00am – 8.00pm and Saturdays 9.00am – 1.00pm. Free on mobile phones and landlines.

Online: <https://help.financial-ombudsman.org.uk/help/enquiries>

Email: complaint.info@financial-ombudsman.org.uk

Website: <http://www.financial-ombudsman.org.uk/>