

► POLICY: EQUITY LOANS COMPLAINTS

1.0 Introduction

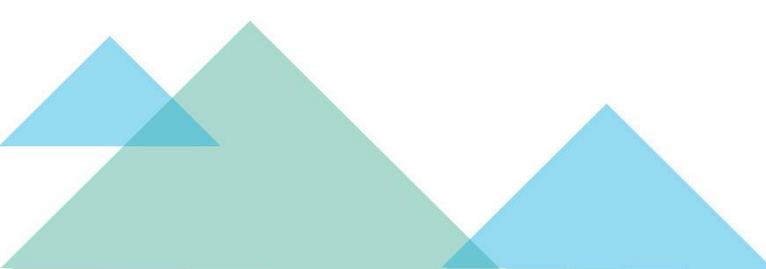
- 1.1 Thames Valley Housing Association is committed to providing the best service possible. However, there may be occasions when things go wrong and our service falls short of customer's expectations. In such cases, customers should let us know straight away so we can try to put things right. This will help us to improve our services and products. We are committed to handling complaints promptly and fairly.
- 1.2 This policy describes the operation of the Thames Valley Housings Equity Loans Complaints Procedure and shall provide information about what to expect when customers have lodged a Complaint with Thames Valley Housing.
- 1.3 This policy relates to any consumer credit activities carried out by Thames Valley Housing, primarily the Equity Loans suite of products.

2.0 Background legislation

- 2.1 The policy is written to reflect the Financial Conduct Authority ("FCA") Complaints Handling Rules and relevant guidance issued by the Financial Ombudsman Service (FOS).
- 2.2 More information about the FCA complaints rules can be found in the FCA Handbook: <https://www.handbook.fca.org.uk/handbook>

3.0 Definition of a Complaint

- 3.1 According to the definition in the FCA Handbook rules a Complaint is as follows:
 - 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 which alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience;
- 3.2 The complaint must relate to an activity of Thames Valley Housing or can extend to any other party with whom Thames Valley Housing has engaged in marketing or providing financial services or products.



3.3 Thames Valley Housing Complaints Procedure applies to those statements that are classified as “complaints” under the above definition.

4.0 Who is entitled to lodge a complaint?

4.1 A complaint may be lodged by any person who has interacted with Thames Valley Housing or any person authorised by the person who has interacted with Thames Valley Housing. This would usually be a customer or a proposed customer.

4.2 In some instances a complaint could be made by a third party. Although we will apply our complaints handling procedures to that party they are not likely to be an “eligible complainant” under the FCA rules and so will not have FOS referral rights (see below).

5.0 Where customers can lodge their complaints

5.1 Complaints may be lodged through a variety of ways including telephone, email, online at tvha.co.uk or verbally in person with a member of Thames Valley Housing staff. Customers should be prepared to provide contact information and their address in case the complaint cannot be resolved immediately, so that we may contact the customer for more information as needed, or with a resolution.

5.2 A complaint can also be made by someone on the customer’s behalf, such as a solicitor, a debt adviser or family and friends. We will however require the customer’s signed written authority to be able to deal with them.

5.3 Customers should be encouraged to provide details of the complaint including the circumstances around how the complaint has arisen, details of who handled the complaint or caused the complaint, how the customer would like us to solve the problem and how we can contact the customer.

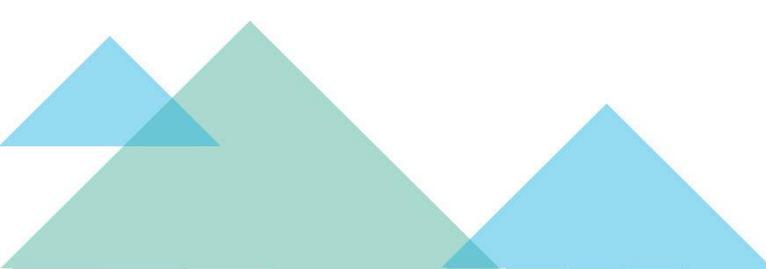
5.4 The customer should set out as much detail as possible including dates and any supporting evidence that will help us to resolve the complaint.

5.5 The customer can send their complaint to their usual TVHA contact, otherwise they can contact us on:

Tel: 020 8607 0607

Email: info@tvha.co.uk

Online: <http://www.tvha.co.uk/customer-services/how-are-we-doing/complaints/complaint-suggestions-form/>



5.6 Complaints may also be lodged in writing to us at the following address:

**Sales & Marketing Director
Thames Valley Housing Association
Premier House, 52 London Road,
Twickenham,
Middlesex,
TW1 3RP**

6.0 Complaints Receipt Stage

6.1 We attempt to resolve each complaint as soon as possible. The circumstances of the complaint may be such that we are able to resolve the complaint by the 3rd working day after the complaint was received. If such a resolution occurs and the customer is satisfied with the outcome, the complaint will be considered closed and no further action will be taken by us.

6.2 If we are unable to resolve the complaint by the 3rd working day after receipt of the complaint, a Thames Valley Housing representative will provide the customer with a written acknowledgment of the complaint. The representative may also contact the customer by telephone. The Receipt Acknowledgement Letter shall detail how the complaint will be handled. The letter will also include this Complaints Policy and the FOS leaflet.

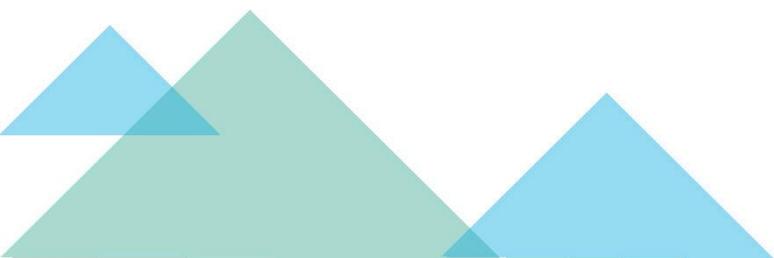
6.3 We may also receive a complaint from other parties who have forwarded the complaint to us because they believe that we are the proper party to address the complaint. Complaints received in this manner will be treated as if they were received from the customer directly.

7.0 Complaint Investigation Stage

7.1 If the complaint is not resolved by the close of the 3rd working day after receipt, we will conduct a more detailed investigation into the allegations of the complaint.

7.2 We can contact the customer to gather additional information. We will encourage the customer to cooperate with our investigation as this will aid us in reaching a resolution. We will keep the customer updated throughout this process.

7.3 We will also review past complaints from other customers to determine if similarities exist between the complaint being investigated and previous complaints which might indicate a



systemic issue. We will also refer to decisions and guidance issued by the FOS for assistance in handling customer complaints.

- 7.4 The investigation may determine that another party is responsible for all or part of the details of the complaint. In such a case, we may forward the whole or part of the complaint to the appropriate party.

8.0 Complaint Response Stage

- 8.1 Within 8 weeks of receipt of the complaint and if the complaint is not resolved by the close of the 3rd working day of receipt, we will issue a written response to the complaint.

- 8.2 The final response will consist of one of the following:

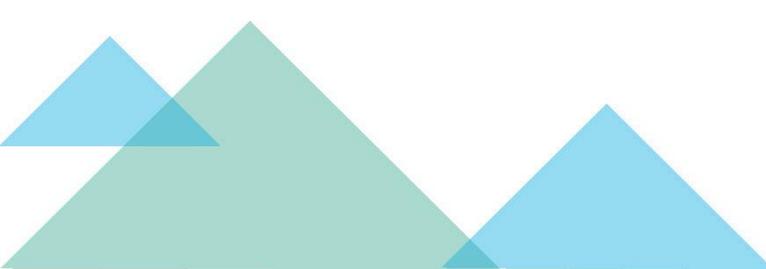
- i) Thames Valley Housing will accept the complaint, and when appropriate, will offer remedial action as determined by Thames Valley Housing;
- ii) Thames Valley Housing does not accept the complaint but in exceptional circumstances might offer redress or remedial action as a goodwill gesture;
- iii) Thames Valley Housing rejects the complaint and explains why the complaint has been rejected;
- iv) An indication that a final response cannot be issued at this time, including an explanation of why it cannot be provided and when Thames Valley Housing expects to issue a final response; or
- v) An indication that all or part of the complaint has been forwarded to another party with an explanation as to why Thames Valley Housing believes the other party should address the complaint or relevant part of the complaint. If only a part of the complaint is forwarded to another party, Thames Valley Housing will provide an appropriate response to the remaining portion of the complaint applicable to Thames Valley Housing.

- 8.3 A Thames Valley Housing representative may contact the customer to make appropriate redress or remedial arrangements if such a resolution has been reached.

- 8.4 Where we uphold the complaint and offer a remedial action or redress we will process the remediation or redress promptly once our offer has been accepted.

9.0 Financial Ombudsman Service

- 9.1 If the customer is not satisfied with our response or we indicate that we are not able to issue a response within eight weeks, the customer will be entitled to refer their complaint to the Financial Ombudsman Service.



- 9.2 Any such referral must be completed within six months of the date of the final response. The final response will include the Financial Ombudsman Service standard explanatory leaflet which describes how a complaint may be referred to the Financial Ombudsman Service.
- 9.3 It is important that the customer gives us the opportunity of addressing their concerns first before escalating the complaint to the Ombudsman Service as they will only consider the complaint after we have had the opportunity to sort out the matter under our internal complaints process.
- 9.4 Their details are below:

Financial Ombudsman Service
Exchange Tower
London
E14 9SR

Telephone:

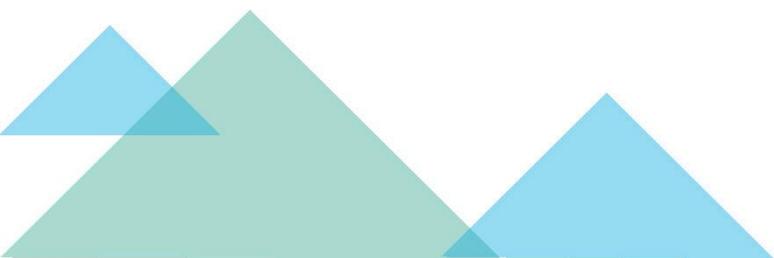
0800 023 4567 - calls to this number are free on mobile phones and landlines
0300 123 9123 - calls to this number cost no more than calls to 01 and 02 numbers

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

Website: www.financial-ombudsman.org.uk

10.0 Learning from complaints

- 10.1 In order to continuously improve how we provide services to our customers, or to stop failures from happening again, it is important that we capture any lessons learnt as a result of a complaint being made.
- 10.2 Learning from complaints is a continuous process made up of four key stages:
- i) Capture – ensure important information about complaints are recorded
 - ii) Analyse – Identify the causes of complaints and the lessons we can learn from them
 - iii) Action – Ensure that action is taken to resolve problems and prevent future complaints about the same issue reoccurring
 - iv) Report – publicise and promote improvements we have made
- 10.3 All learning points should be logged onto our complaints management system once the complaint has been resolved. This will allow us to identify what key lessons we can learn,



help us to look at the reasons for common or recurring complaints, and how we should provide services differently in the future. It could also lead to a change in our policies or procedures.

- 10.4 A report will be provided to senior management on a quarterly basis to review issues and determine if improvements are required.

11.0 Other useful links

- 11.1 TVHA Compensation policy and procedure
- 11.2 TVHA Vexatious policy
- 11.3 FCA website – www.the-fca.org.uk
- 11.4 FCA handbook - www.handbook.fca.org.uk/handbook
- 11.5 Financial Ombudsman Service - www.financial-ombudsman.org.uk

12.0 Equality Impact Assessment

- 12.1 No impact noted

13.0 Policy Information

Policy owner: After Sales & Compliance Manager
Approved by: Sales & Marketing Director
Last review date: 12/09/16
Next review date: September 2019
Equality assessment: No impact
Resident consultation completed: N/A

