JLA

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Complaint handling procedure

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Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Colleagues should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

JLA is regulated by the Financial Conduct Authority (the "FCA") and as such must handle any regulated complaint in accordance with FCA rules. As such it is JLA's policy that all complaints are;

- Investigated and responded to in a timely manner;
- Accurately recorded and reported where necessary; and
- Dealt with in a manner that treats the customer fairly.

The five key stages in our complaint management system are set out below:

01 **Receipt of complaints**

02 **Acknowledgement of complaints**

03 **Initial assessment and addressing complaints**

04 **Providing reasons for decisions**

05 **Closing the complaint, record keeping, redress and review**

01 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making a complaint;
- Issues raised by the person making a complaint and their preferred
- outcome(s);
- Any other relevant information; and
- Any additional support the person making a complaint requires.

02 Acknowledgement of complaints

- We will acknowledge receipt of each complaint promptly and preferably within two working days.
- Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

03 Initial assessment and addressing complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue(s) raised is/are within our control. We will also consider the outcome(s) sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is;
- Whether the complaint raises health and safety concerns;
- How the person making the complaint is being affected;
- The risks involved if resolution of the complaint is delayed, and whether our customer(s) are being treated fairly; and
- Whether a resolution requires the involvement of other organisations.

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation;
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements. We will always endeavour to treat our customers fairly and advise customers where appropriate of their rights of further redress, including as specified in FCA guidelines.

04 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them of:

- The outcome of the complaint and any action we took;
- The reason(s) for our decision;
- The remedy or resolution that we have proposed or put in place; and
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

05 Closing the complaint, record keeping, redress and review

We will keep comprehensive records regarding:

- How we managed the complaint;
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated);
- Any recommendations made to address problems identified and any decisions made on those recommendations; and
- Any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

Alternative avenues for dealing with complaints

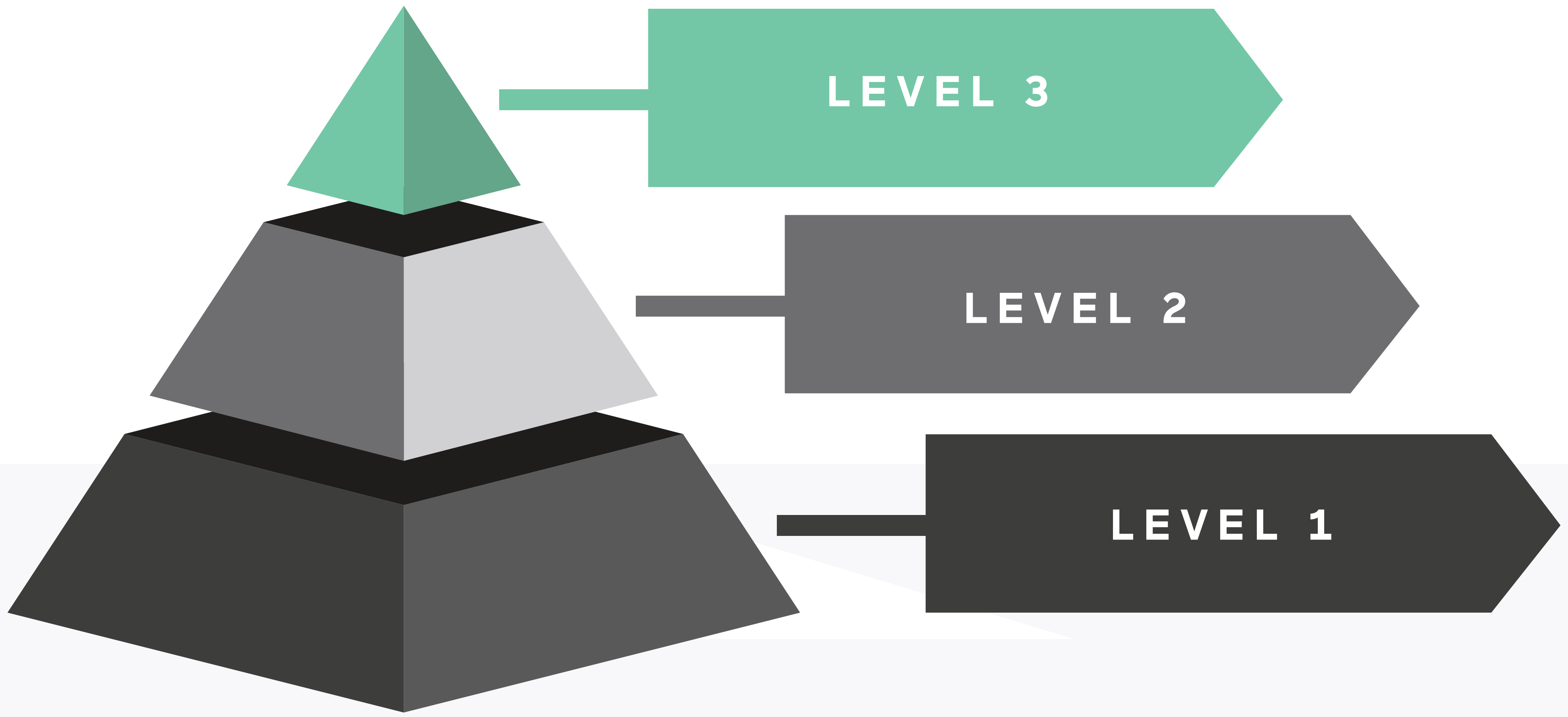
We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

The three levels of complaint handling

We aim to resolve complaints at the first level, the frontline. Colleagues will be adequately equipped to respond to most complaints, including being given appropriate authority, training and supervision. The principle of treating customers fairly will always be followed.

Where it is not possible to resolve a complaint at the first level, we may decide to escalate the complaint to a more senior colleague within JLA. This second level of complaint handling will provide for the following internal mechanisms:

- Assessment and possible investigation of the complaint and decision/s already made;
- Assessment of whether JLA is treating customers fairly; and
- A facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).



Where a person making a complaint is dissatisfied with the outcome of JLA's review of their complaint, and our complaint process has been exhausted they may seek an external review of our decision. In the case of regulated complaints were applicable the customer should be referred to the Financial Ombudsman Service.

The address of the Financial Ombudsman is:
Financial Ombudsman Service, South Quay Plaza, 183 Marsh Wall, London, E14 9SR

LEVEL 3
Review of complaint and/or complaint handling by Senior Leadership team member

LEVEL 2
Internal review by Resolutions team of complaint and/or complaint handling (may include further investigation of issues raised and use of Alternative Dispute Resolution options)

LEVEL 1
Frontline complaint handling and early resolution of complaints. If not resolved, Team Manager intervention

Accountability & Learning

Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- The number of complaints received;
- The outcome of complaints, including matters resolved at the frontline;
- Issues arising from complaints;
- Systemic issues identified; and
- The number of requests we receive for internal and/or external review of our complaint

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to JLA's CEO and senior management for review.

Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints; and
- Identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- Support the making and appropriate resolution of complaints;
- Implement best practices in complaint handling;
- Recognise and reward exemplary complaint handling by staff;
- Regularly review the complaints management system and complaint data; and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Our timescale for responding to a complaint

STAGE	DESCRIPTION	RESPONSE
1	Our colleagues in customer support will endeavour to reach an early resolution of complaints. If not resolved, a Team Manager may intervene	By phone – on the day. Any other form of contact e.g. email – within two working days
2	Initial assessment and addressing of complaints	By phone – on the day. Any other form of contact e.g. email – within two working days
3	Internal review by our Resolutions Team of your complaint and/or complaint handling (may include further investigation of issues raised and use of Alternative Dispute Resolution options)	Within ten working days or eight weeks for more complex queries. We will share with you our findings and where appropriate offer a resolution. In the unlikely even that we have not finished investigating your complaint eight weeks after we received it, we will send you a further letter to: • Explain why we have been unable to reach a decision • Let you know when you can expect our final decision
4	Where a customer is not happy with JLA's final resolution, we will inform you of any internal or external review options available to you (including any relevant Ombudsman or oversight bodies). JLA will advise customers where appropriate of their rights of further redress, including as specified in FCA guidelines.	When a final response has been issued

What are FCA regulated activities?

The Financial Conduct Authority ("FCA") is the regulator for consumer credit firms and firms that undertake consumer credit activities as part of a wider business. JLA is regulated because its Total Care Agreements can in some cases be regulated consumer hire agreements. This is the case where the customer entering into the agreement is a sole trader, partnership of less than three people or an unincorporated body. It should be clear on the face of the agreement whether the agreement is regulated or not but please check with the Legal Team if in doubt.

UK Regulated Business: The Financial Ombudsman Service (FOS) is an independent arbitration service provided free for consumers. If the customer is dissatisfied with our response and the matter relates to a regulated contract, the customer must be notified of their right to escalate the matter to the FOS within six months (unless informed otherwise), by using the contact details below:

Financial Ombudsman Service (FOS)

- Address: Financial Ombudsman Service, Exchange Tower, London, E14 9SR
- Telephone: 0800 023 4567
- Online complaint form: www.help.financial-ombudsman.org.uk/help

JLA subscribe to the FCA Treat your customers fairly guidelines. The FCA has a wide range of enforcement powers – criminal, civil and regulatory – to protect consumers and to take action against firms and individuals that do not meet the standards of operation.

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