

Complaints Policy and Procedure

Date last updated: January 2020

Policy Statement

We view complaints as an opportunity to learn and improve practice and the member experience. The complaint gives us the opportunity to put things right for the member that has made the complaint. Handling complaints effectively, objectively and efficiently is important to Kingdom Community Bank.

Our commitment

We will endeavour to:

- provide a fair and clear procedure for anyone wishing to make a complaint;
- publicise the existence of our Complaints Procedure so that people know how to make a complaint;
- make sure our staff and volunteers know what to do if a complaint is received;
- make sure complaints are investigated impartially and in a timely manner;
- make sure that complaints are, wherever possible, resolved and that relationships are repaired as required.

Who can complain?

Anybody who has used a Kingdom Community Bank service (whether they are a member or not) or who has engaged with Kingdom Community Bank in any way can use this Policy and Procedure to make a complaint, whether justified or not, about any aspect of our service or conduct.

We would encourage complainants to invoke this Policy and Procedure as soon as they reasonably can after an incident whilst circumstances and details are more likely to be remembered by parties involved. This would aid us in our investigation and ensure a timely and comprehensive response. There is no expiry period for a complaint – we will investigate historical complaints.

Internal complaints or issues should be raised through the Grievance Policy and Procedure.

Respect and confidentiality

Anybody who complains will be treated with respect and all complaint information will be handled sensitively, with details disclosed only to those who need to know. We will follow any relevant data protection requirements.

We reserve the right to make a public statement in response to a complaint, respecting confidentiality at all times.

Responsibility

Overall responsibility for this policy and its implementation lies with Kingdom Community Bank's Board of Directors. Operational implementation and compliance is delegated to the CEO.

Making a Complaint

Anybody who wishes to make a formal complaint can do so by requesting, or accessing on our website (www.kingdomcb.org.uk/complaints), a copy of the Complaint Form (which is also appended to this document). The form should be completed, signed and posted to our main office, or completed and attached to an e-mail to our CEO (ceo@kingdcomcb.org.uk).

Submitting a complaint by e-mail, or providing us with your e-mail address when complaining, will allow for swifter communication, potentially leading to earlier resolution – which is normally in the interest of all parties.

Complaints do not have to be submitted on our complaint form, but it will help greatly to fully understand the complaint and investigate it promptly. The form is also designed to make it easier to submit a formal complaint.

We reserve the right to investigate conduct which might be considered grounds for a formal complaint, taking into account any complaints or feedback received, and take whatever action we deem appropriate in the circumstances.

When a completed Complaint Form has been received, or a written complaint which provides sufficient information for us to act upon, the Complaint Resolution Process (detailed below) will then be followed.

Verbal Complaints

Complaints raised verbally, where the person is unwilling to put it in writing, will be regarded as negative feedback and will be noted. It may not necessarily be investigated and/or responded to.

Use of offensive language or rude, threatening or intimidating behaviour or language is not acceptable and may result in us terminating membership and refusing to deal with you. In some cases, we may report the matter to the police.

Complaint Resolution process

Stage One

Kingdom Community Bank will record all complaints in the Complaints Log held securely and confidentially by managers.

If the complaint relates to the CEO, then s/he will automatically invoke Stage Two of this process and pass the complaint on accordingly.

If the complaint has not already been resolved, it will be delegated to a senior employee who is considered to be sufficiently objective to investigate it. In some cases, the CEO may choose a suitably competent external party to conduct an investigation or to support the complaint handling process.

An investigation into the complaint may or may not involve speaking to the person who made the complaint. The person investigating the matter will determine whether or not they have sufficient information to conduct the investigation and what information/evidence they reasonably require in order to determine what has happened and what the outcome of the complaint should be.

If the complaint relates to a specific person, they should be informed at the earliest opportunity and given an opportunity to respond to the person appointed to investigate or to the complainant if deemed appropriate.

We will acknowledge receipt of the complaint within **one week**. The acknowledgement will state who is dealing with the complaint and when the complainant can expect a reply. A copy of this **Complaints Procedure** should be attached / enclosed.

Those who complain should receive a definitive reply within **20 working days**. If this is not possible for any reason, an example being an investigation having not been fully completed, a brief progress communication should be sent with an indication of when a full reply will be given.

We are required, by the Financial Conduct Authority, to deal with complaints within 8 weeks (40 working days). In exceptional circumstances, if we are unable to resolve complaints within this timescale, members are entitled to raise a complaint with the Ombudsman (details below). If we cannot give a final response within 8 weeks, we will write to you and give you the reasons for the delay and an indication of when we expect to reach a conclusion.

Whether or not the complaint is justified, the reply to the complainant will describe the conclusions drawn from the investigation and any action taken as a result of the complaint.

Stage Two

If the person who is complaining for any substantive reason feels their complaint has not been satisfactorily resolved at **Stage One**, they can request that the complaint be reviewed by a Director of Kingdom Community Bank – which is Stage Two of this process. Such complaints will be passed to a Director by the CEO. Reasonable efforts will be made to pass it to a Director with no or limited knowledge of the member or incident, to seek to ensure it is handled objectively at all times.

Complaints handled at Stage One cannot be routinely referred to Stage Two because the complainant is unhappy with the outcome. It can only be referred for a substantive reason. Such reasons include that the complainant can reasonably demonstrate:

- a significant mistake or error in how the complaint has been handled which is likely to materially impact on the decision;
- that the person investigating the complaint was conflicted in a significant way;
- there has been a breach in legislation, regulations or rules whilst handling the complaint or which resulted in the complaint and the decision is unacceptable to the complainant;
- some other significant reason why the decision has not been reached properly.

If the complaint involves the CEO, any attempt to amend, discard or in any way alter the complaint by the CEO will be considered a disciplinary offence and dealt with by the Board of Directors accordingly.

The request for an appeal (Stage Two) should be acknowledged within **10 working days** of it being received. The acknowledgement will state who has been appointed to investigate the complaint and when the complainant should expect a reply.

Directors may investigate the facts of the case themselves or delegate to a suitably senior employee to do so. This investigation will involve a review of the paperwork and speaking with the person who handled the complaint at **Stage One**. In some cases, Directors may choose a suitably competent external party to conduct an investigation or to support the complaint handling process.

An investigation into the complaint may or may not involve speaking to the person who made the complaint. The person investigating the matter will determine whether or not they have sufficient information to conduct the investigation and what information/evidence they reasonably require in order to determine what has happened and what the outcome of the complaint should be. If the complaint relates to a specific person, they should be informed and given a further opportunity to respond only to the investigator.

Those who complain will receive a definitive reply within **20 working days**. If this is for whatever reason not possible, for example if the investigation has not been fully completed, a progress communication should be sent with an indication of when a conclusive reply will be given.

We are required, by the Financial Conduct Authority, to deal with complaints within 8 weeks (40 working days). In exceptional circumstances, if we are unable to resolve complaints within this timescale, members are entitled to raise a complaint with the Ombudsman (details below). If we cannot give a final response within 8 weeks, we will write to you and give you the reasons for the delay and an indication of when we expect to reach a conclusion.

Whether or not the complaint is upheld, the reply to the complainant will describe the conclusions from the investigation and any action taken as a result of the complaint.

Complaints that cannot be investigated

We will not be able to follow the above process for any complaint which has been submitted:

- anonymously;
- directly to members of the Board of Directors (i.e. not in line with the process outlined in this document);
- which is based on previous complaints that have not been upheld and are not substantively different to the previous complaint;
- where legal action is intimated;
- which is about matters that do not directly relate to the products, services or people of Kingdom Community Bank.

Receiving our decision on your complaint

We will write to you with our conclusion on the complaint. We will always endeavour to reach a conclusion that you will be happy with, but in some cases this may not be possible. We must act legally at all times, and endeavour to be fair and responsible in our dealings with members. If you are not satisfied with how we have handled your complaint, or with the outcome, you are able to make a formal complaint to the Financial Ombudsman Service within 6 months of the date of receipt of our final response to your complaint.

Contacting the Financial Ombudsman Service

Visit their website: www.financial-ombudsman.org.uk or e-mail enquiries@financial-ombudsman.org.uk

Telephone 0845 080 1800 or write to: The Financial Ombudsman Service, South Quay Plaza, 183 Marsh Wall, London, E14 9SR.

This Policy and Procedure was last reviewed in January 2020.

Complaints Form

Before you begin

We are sorry that you have a need to access this form and we thank you for taking the time to complete the form and share your experience with us. We hope that we can resolve this issue with you and that as a member-led organisation we learn from the experience. We take all complaints seriously and work hard to resolve any issues that you might experience when dealing with us.

What is this form for?

This Complaints Form is designed to support members to make a complaint in the rare event that they feel that they have not received the level of service that they should expect from us.

How does it work?

This form is provided as part of our Complaints Policy and Procedure, a copy of which can be obtained at our branches and access points, or you can contact us to ask for a copy. It can also be found on our website at www.kingdomcb.org.uk/complaints

Why do I need to complete this form?

You do not need to complete this form to make a complaint (see the Policy and Procedure mentioned above). Completing the form is recommended and will help to resolve the matter.

What information do I need to provide?

Please complete as much of the form as you can and be as specific as possible. This allows us to fully understand the nature of the complaint, to investigate it appropriately and, importantly, to deal with it as swiftly as we reasonably can. If we require further information, then we will contact you. It is important that you give us the correct contact details in this form. An e-mail address allows us to communicate with you by e-mail, which is generally quicker and more convenient.

Is this a confidential process?

Yes, absolutely. All of the information you provide on this form will be treated in confidence and used to investigate your complaint and for us to improve as an organisation. Complaints are only handled by senior staff or Directors. The e-mail address for submission of complaints is only accessible by the CEO or Directors.

What if I have questions or need help to complain?

We want feedback, including negative and complaints. It gives us opportunities to learn and improve, and to make things right where we get it wrong. Please contact us and we will do our best to help you. Call us on 01592 714888 or e-mail the CEO directly at ceo@kingdomcb.org.uk

Your name		Member No.	
-----------	--	------------	--

E-mail address	
----------------	--

Phone number		Date you completed this form	
--------------	--	------------------------------	--

Date and, if appropriate, the approximate time that this issue/incident happened	
--	--

Please tell us what your complaint is about. Use this box to provide as much information and detail as you can that you think will help us to deal with your complaint.

--

Are there any other persons/witnesses that you think we need to speak to about this?

Can you please answer these 3 brief questions for us by circling or ticking the appropriate answer:

Was our treatment of you courteous and respectful?	Yes	Sort of	No
Did we try to resolve your issue at the time?	Yes	Sort of	No
Was our communication with you at the time easy to understand?	Yes	Sort of	No

What result/outcome are you hoping for?

Thank you for taking the time to share your experience with us. We will do what we reasonably can to look into this matter without any undue delay. We always acknowledge and respond to complaints.

Final Steps

If you have any paperwork, e-mails, printouts or other materials or evidence that would support your complaint, please include/attach it to this form when you submit it.

Please now print this form, sign it and post it to us at: Private and Confidential, CEO, Kingdom Community Bank, Main Street, Methilhill, Fife, KY8 2DP.

Or, e-mail it to the CEO at this confidential address: ceo@kingdomcb.org.uk

For Office Use Only

Date received dd / mm / yyyy Initials Method

Entered into Complaints Log dd / mm / yyyy Initials Log Reference No.