

Professional Services Complaints Policy and Procedure

This policy covers the Professional Services mentioned below:

- Statements of Professional Standing (SPS) - issued to financial advisers in accordance with the conditions set by the Financial Conduct Authority FCA. Including Certified Professional in Financial Advice (CPFA).
- Certificates of Professional Achievement (CPA) – issued to holders of RDR compliant qualifications but not currently delivering regulated financial advice.
- CeMAP® Professional and CeMAP® Advanced Professional (CeMAP® Pro)– which is available to those holding our CeMAP®, Advanced CeMAP®, DipMAP® and CeMAP® Diploma and Certified Mortgage Advisers (CMA).
- Chartered status – Chartered Associate of The London Foundation for Banking & Finance (Chartered ALFBF) and Chartered Member of The London Foundation for Banking & Finance (Chartered MLFBF).

Summary of Policy

A complaint is defined as an expression of dissatisfaction with a product or service we've delivered.

The purpose of this Policy and Procedure is to advise on the level of service you can expect to receive from us when making a complaint. It also provides details of how we process your feedback and look to resolve your issue. It also confirms how we periodically monitor complaints and review this complaints policy.

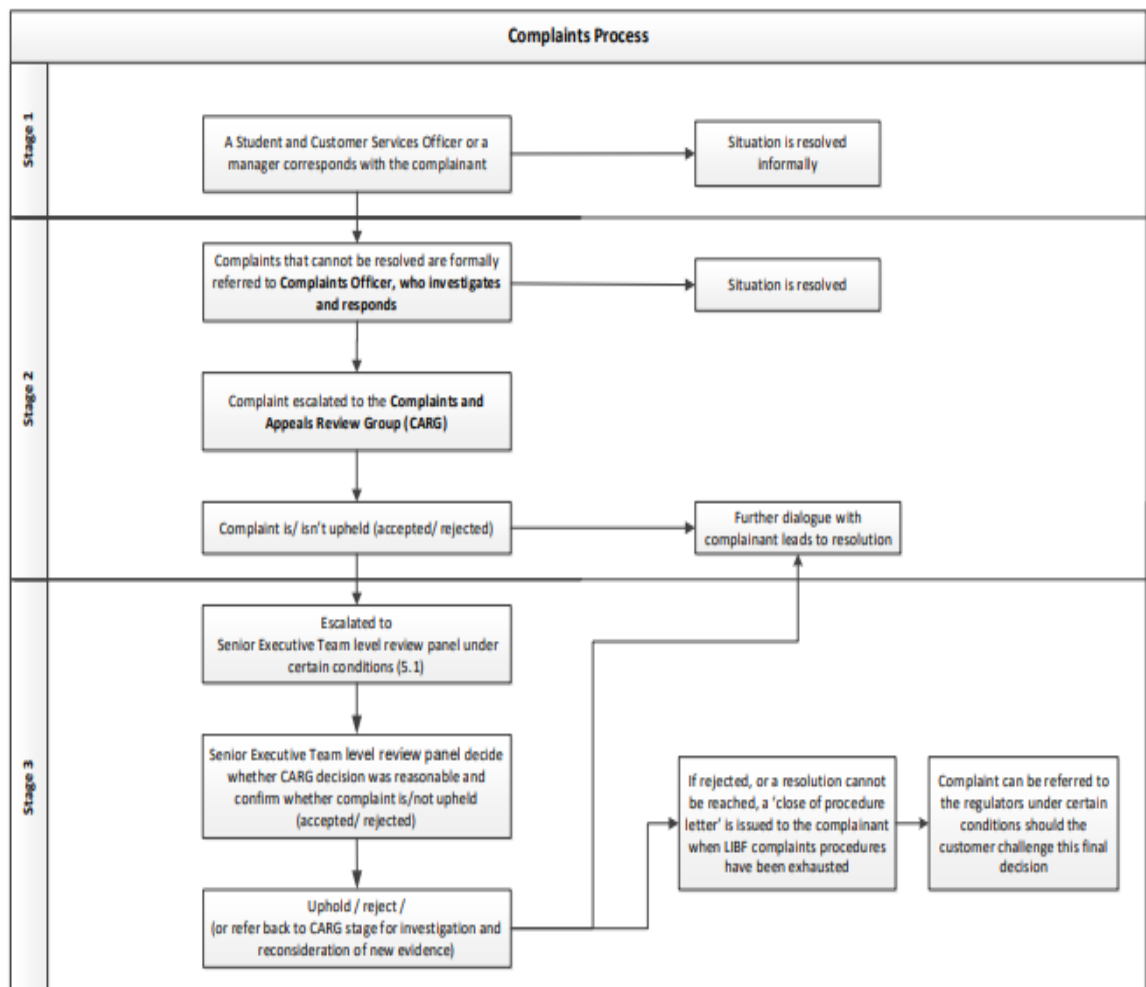
Through this policy we ensure that:

- complaints are treated fairly, consistently, transparently and in a timely manner;
- it provides a high standard of service to individuals to ensure that their concerns are dealt with fairly, openly and honestly;
- it gives careful consideration to all complaints;
- and it reviews aspects of its service in the light of any complaints.

Section A – Complaint handling process

- 1.1 Anyone may raise a complaint with us. This should be made as soon as possible as we reserve the right to dismiss a complaint brought more than 3 months after the incident occurred or that should, within reason, have been highlighted at an earlier point.
- 1.2 The stages for handling a complaint are as set out in Figure 1 below:

Figure 1: The complaints handling process



- 1.3 Our employees are trained in compliant resolution.
- 1.4 We expect those making complaints or enquiries via any medium, to behave with respect, courtesy, and in a professional manner towards the staff facilitating their complaint. If a complainant is abusive we will warn them of their behaviour and reserve the right to discontinue their current form of communication.
- 1.5 All complaints will be treated appropriately, through dialogue and mutual understanding, with regard to applicable law, and in line with our Equity and Diversity Policy.
- We will provide sufficient opportunity for your complaint to be fully discussed and resolved and such issues will be treated in confidence and with impartiality.
- 1.6 At any stage we are both entitled to seek independent advice, as appropriate, in respect of a complaint.
- 1.7 We will adhere to the time limits and deadlines contained within this policy. However, in certain circumstances it may be deemed inappropriate or impossible to meet these limits and deadlines. If it becomes necessary to alter the time limits and deadlines set out within this policy, we will explain the reasons for this.
- 1.8 Complaints will not be upheld where the complaint is about something which has been made clear in the terms and conditions for that particular service.
- 1.9 We reserve the right to withdraw services such as: SPS / CPA or CeMAP® Pro if repeated, unfounded or vexatious appeals and / or complaints regarding these professional services and / or their delivery where, in our opinion, the motive is mendacious or frivolous.
- 1.10 At each stage of the complaints process one of the following outcomes will apply:
- A complaint is upheld (in part or in full). Where appropriate, some form of action is taken.
 - A complaint is not upheld. Reasons for this decision will be clearly

outlined.

At the end of each stage in the process the outcome may be accepted or a choice made to progress the complaint to the next relevant stage, if there are grounds to do so.

Section B – Stage One (Informal resolution)

- 2.1 We will always attempt to resolve a complaint at this stage in the first instance. In doing so the complaint will be investigated and there will be an attempt to reach a solution that satisfies both parties.
- 2.2 We will need your reference or registration number and any other applicable information and evidence. We will respond to all correspondence clearly, concisely and in a timely manner.
- 2.3 There may be occasions where it is not appropriate to resolve a complaint informally. Depending on the nature of the complaint, we may advise that the matter should proceed to stage two from the outset.
- 2.4 Complaints regarding Chartered status may also be discussed with The London Foundation for Banking & Finance at this informal resolution stage.

Section C – Stage Two (Formal resolution)

- 3.1 If we are unable to satisfactorily resolve the complaint informally, in the first instance, the complaint should be addressed to:

The Complaints Officer

Walbrook Institute London Ltd.

8th Floor

Peninsular House

36 Monument Street

London

EC3R 8LJ

E : complaints@walbrook.ac.uk

- 3.2 You need to clearly state the reason(s) for the complaint as well as identify what resolution you seek.
- 3.3 Throughout the formal process the Complaints Officer will act as your main point of contact and will keep you informed of the timescales, progress and outcome(s) of the complaint.
- 3.4 The Complaints Officer will confirm receipt of a formal complaint within 5 working days; giving notification of the process that will be undertaken and the timescale within which we expect the outcome of the complaint investigation to be communicated.
- 3.5 The Complaints Officer may be able to resolve the complaint at this stage. The Complaints Officer will need to refer complaints regarding Chartered Status to The Foundation. If you are dissatisfied with the outcome determined by the Complaints Officer you may seek further consideration of your case by the Complaints and Appeals Review Group.
- 3.6 There may be occasions where the Complaints Officer is unable to resolve the complaint at this stage; in such instances they will refer the case for consideration to the Complaints and Appeals Review Group or to The Foundation for Banking & Finance in the case of Chartered Status complaints. The Foundation will follow similar practices as LIBF in resolving Chartered Status complaints.

Complaints and Appeals Review Group (CARG)

- 4.1 The Complaints and Appeals Review Group is held on a regular basis and will normally consider a complaint within 20 working days of the case being referred by the Complaints Officer.
- 4.2 You will be advised of the proposed date for the complaint to be heard by the Complaints and Appeals Review Group, and of your right to request to attend.
- 4.3 The standard of proof required at any consideration by the Complaints and Appeals Review Group shall be the balance of probabilities.
- 4.4 Depending on the nature of the complaint the Complaints and Appeals

Group may not be able to propose a solution to a complaint it has upheld and in this situation it will inform the department best placed to address the issue of the complaint and request that a resolution is provided.

- 4.5 The Complaints Officer will provide written confirmation of the Complaints and Appeals Review Group decision and any action(s) to be taken, including timescales, within 10 working days of the case being heard.

Section D – Stage Three (Complaint escalation)

Referral to Operating Committee level review panel

- 5.1 If you are dissatisfied with the outcome determined by the Complaints and Appeals Review Group you can request a hearing by the Operating Committee level review panel, within 10 working days of receipt of the written confirmation of the Complaints and Appeals Review Group decision.
- 5.2 Such a review may only be requested on one or more of the following grounds:
- that the procedure adopted by the Complaints and Appeals Review Group was defective; or
 - that the action taken or solution provided was unreasonable in light of the outcome determined by the Complaints and Appeals Review Group; or
 - that new evidence that could not have been produced to the Complaints and Appeals Review Group has since come to light.
- 5.3 The reasons for requesting a review must relate to the way the complaint has been investigated or dealt with; a review will not be considered if the nature of the complaint is merely restated.
- 5.4 We reserve the right to reject any review against a Complaints and Appeals Review Group decision that does not fall within the timescales stated in 5.1 above or fails to provide appropriate grounds for escalation.
- 5.5 If a review proceeds, the Complaints Officer will advise of all timescales related to the review panel process and formal consideration will be

undertaken by a review panel which will include at least one member of the Operating Committee. The panel will be chaired by an individual who has no direct involvement with the complaint.

- 5.6 You and / or your representative(s) are not permitted to be present at the review panel.
- 5.7 You need to submit, to the review panel, a case in writing outlining the grounds you have for escalation of the complaint. The review panel may request any further information it deems necessary to progress the investigation of the complaint. If the review panel agrees that the individual has sufficient grounds for escalation, it will review the complaint. In such a situation, the review panel has the power to overturn the outcome determined by the Complaints and Appeals Review Group.
- 5.8 If the review panel reviews a complaint on the grounds that new evidence has come to light since the original case was heard, the review panel has the power to inform the Complaints and Appeals Review Group to reconsider its original outcome, taking into consideration the new evidence. Your rights to escalate the complaint shall apply equally to the reconsideration by the Complaints and Appeals Review Group.
- 5.9 At any stage if a complaint is upheld then we will undertake to offer appropriate remedial action depending on the nature of the complaint. Regardless of the outcome of the complaint, you may be asked to cover your own costs
- 5.10 If a request for a review is rejected and all internal complaints and / or review procedures are exhausted, we will issue a completion of procedures letter confirming that the complaints / review process has now been exhausted. If the complaint concerns a Statement of Professional Standing, it may at this point, be eligible for consideration by the FCA.

Section E - Quality assurance, monitoring and review

- 6.1 If, as a result of its complaints process, we learn of a failure in our policies, procedures or processes, we will take reasonable steps to:
 - identify other individuals who have been affected by this failure;

- correct or, where it cannot be corrected, mitigate as far as possible the effect of the failure; and
 - ensure that the failure does not reoccur.
- 6.2 Records of all complaints, and their outcomes, are maintained for a period of at least 2 years, and are subject to regular monitoring and review. Complaints are monitored annually by the Operating Committee in line with its terms of reference.
- 6.3 This policy is formally approved by our Complaints and Appeals Review Group.
- 6.4 We continually review our practices to maintain the highest possible standards of consistency and quality.
- 6.5 This policy has been developed to comply with all relevant legislation and have been externally benchmarked.
- 6.6 We recognise the importance of obtaining feedback and using that information to improve the process and service offered to individuals. We strive to incorporate good practice into all aspects of our service standards.
- 6.7 In the event that the FCA / FSC advises us of failures that have been discovered in similar processes being offered by other accredited bodies / approved bodies, we will review our own processes and rectify any failures found.

06/26

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