



SYNC LIVING LTD

COMPLAINT HANDLING POLICY

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1 POLICY STATEMENT

Sync Living Ltd's (*hereinafter referred to as the "Company", "we" or "us"*) complaint handling policy has been created to meet general standards and requirements. We take all concerns and issues seriously and use our robust and structured complaint processes to ensure a satisfactory resolution is reached.

The aim of this policy is to ensure that all customer complaints, either written or verbal, are handled in a consistent and regulated manner and that further complaint incidents are mitigated and where possible, prevented. Where a customer has cause to complain, the complaints handling procedure will be followed in every instance and a record will be made of the complaint nature and details to help improve our services and reduce the occurrence of similar complaints.

This policy has been designed in line with the FCA's expectations, including the principles outlined in the Dispute Resolution: Complaints (DISP) sourcebook and the Consumer Duty (PRIN 2A). It reflects the firm's intent to meet regulatory standards upon authorisation, including fair treatment of customers, timely resolution, and accessibility for all, particularly those in vulnerable circumstances.

2 PURPOSE

The Company are committed to delivering a fair, open and clear process for complaints and ensure a satisfactory outcome for all customers who raise a complaint. We provide thorough staff training in our internal complaint handling procedures and support our staff in how to handle complaint situations in a face-to-face, written and/or telephone environment.

This policy sets out our intent and objectives for how we handle complaints, from offering a clear and approachable system for customers to complain, through to conducting root cause analysis on all complaints received to identify the cause, issues and corrective actions regarding the complaint, and to implement measures to prevent reoccurrences where applicable.

This policy also supports the firm's future obligations under the FCA's Consumer Duty (PRIN 2A), especially in ensuring customers can raise complaints easily, receive clear and understandable communications throughout the process, and are treated fairly at all times, with particular care given to vulnerable individuals.

3 SCOPE

This policy applies to all staff within the Company (*including permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Company in the UK or overseas*). Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

4 OBJECTIVES

The Company's objectives are set out below regarding customer complaint handling. For the purposes of this policy, a complaint is defined as any customer contact whereby a negative communication or outcome has occurred. The customer does not have to formally address their communication as an official complaint or to request a response for the Company to treat the incident as a complaint and to follow the related procedures.

As a Designated Professional Service (DPS) firm operating under the Motability Scheme, we recognise that many of our customers may be vulnerable and therefore require additional care, clarity, and flexibility throughout the complaint-handling process. Our objectives reflect both general regulatory expectations and our specific duties to treat all customers fairly, particularly those in vulnerable circumstances.

The Company's objectives for internal complaint handling are: -

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint
- To ensure that our complaints procedure is fully accessible so that people know how to contact us to make a complaint
- To make sure everyone in the Company knows what to do if a complaint is received
- To make sure all complaints are investigated fairly and in a timely manner
- To gather information which helps us to improve what we do and how we do it
- To ensure that the Data Protection Officer (*or appointed person*) is involved in any complaints relating to personal data
- To comply with any obligations for complaint handling rules as applicable to our industry.

The Company's objectives for our customer complaint procedures are: -

- Complaints will be investigated and responded to within 8 weeks from the initial customer contact
- Customers will be sent a copy of our complaint procedures with the initial acknowledgement
- We will enclose any relevant information or mandatory leaflets to the customer with the initial acknowledgement in accordance with any industry requirements or codes of conduct that apply to us (*i.e. Financial Ombudsman Service (FOS)*).
- Complaint responses will always be provided in writing (*unless the complainant makes a specific request for an alternate form of communication, which will be provided in addition to the written format*)
- Complaint procedures and forms will be available via the company website as well as upon written and/or verbal request
- All complaints will be investigated by a trained member of staff and a full outcome summary provided to **Mark Spottiswoode**.

- Complaint records will be used to gain valuable management information to revise company procedures and to improve communication and business practices where applicable
- Complainants are advised of their rights and provided with any relevant right to refer/lodge the complaint and the applicable contact details (*i.e. FOS, FCA, the ICO*)
- Customers will be informed of their right to escalate complaints to the Financial Ombudsman Service (FOS) if they are dissatisfied with our final response or if eight weeks have passed without a resolution.
- All final response letters will clearly outline this right and include FOS contact details and relevant information, in accordance with DISP guidance.

As a Designated Professional Service (DPS) firm operating under the Motability Scheme, the Company recognises that a significant proportion of its customers may be classified as vulnerable. We are committed to ensuring that our complaints handling process is accessible, supportive, and sensitive to the needs of vulnerable individuals.

All complaint-handling staff are trained to:

- Identify potential indicators of vulnerability (including cognitive, emotional, or physical challenges) when engaging with complainants.
- Respond with empathy and flexibility, ensuring communication methods are appropriate to the customer's needs.
- Offer reasonable adjustments where necessary (e.g. longer timeframes to respond, use of an advocate or support person, or alternative communication formats).
- Additional care is taken to ensure that the complaints process itself does not cause further detriment or distress to vulnerable customers, in line with FCA expectations and safeguarding good practice.

5 PROCEDURES & GUIDELINES

5.1 RAISING A COMPLAINT

Customers who request the Company's complaint handling procedure will be provided a copy of the procedure and form either by email, in a PDF format or in the post, and will be asked to raise their complaint in writing as soon as possible after the incident.

NOTE: Complaints are to be raised in writing, however verbal complaints will be accepted and dealt with as per the same procedures.

If a customer telephones the Company and wishes to raise a complaint, they should be passed through to a senior member of staff or the Complaints Officer who will try to resolve the complaint then and there.

Even if the complaint is resolved at the time, the customer must still be offered the option of receiving the complaints handling procedure and form prior to ending the call and the call recording must be retained and logged in the complaints record.

5.1.1 DATA PROTECTION RELATED COMPLAINTS

Where a complaint is related to the processing of personal data, this policy ensures that the Company complies with the data protection laws and notification requirements.

Every individual has the right to lodge a complaint with the supervisory authority where they consider that the processing of personal data relating to them infringes GDPR/DPA18 or we have breached data protection law. All individuals using our products or services and those employed by us are notified of this right via our Privacy Notice, in our complaint handling procedures and in our information disclosures.

The supervisory authority with which the complaint has been lodged is responsible for informing the complainant on the progress and the outcome of the complaint, including the possibility of a judicial remedy where the supervisory authority does not handle a complaint or does not inform the data subject within three months on the progress or outcome of the complaint lodged.

5.2 INFORMAL COMPLAINT RESOLUTION

The Company considers and responds to all complaints and issues, no matter how they are raised or what they refer to. Some issues and complaints we can resolve immediately or within a 3-working day timeframe and are referred to as *informal complaints*.

Such instances are where an investigation is not required because the nature of the complaint is clear, and a resolution can be obtained without further review of the facts. Where we resolve a complaint within the timeframe, the details are still logged on our complaint register, and the complainant is still informed of their rights.

The Company takes every opportunity to resolve complaints at the first initial point of contact where feasible and possible. Informal resolution is always attempted where the issues raised are straightforward and potentially easily resolved, requiring little or no investigation.

Most face to face and telephone issues can be resolved in this manner, however the complainant is always offered the option of making the complaint formal if the resolution is not to their satisfaction.

Where an informal complaint is received, it is acceptable for the point of contact or addressed employee to attempt to resolve the issue without involving the Complaints Officer. However, any issue relating to data protection infringes or breaches, no matter how small or informal, are always brought to the attention of the DPO or appointed person.

Frontline staff are trained to deal with basic issues and informal complaint resolution and are aware of their obligations and the subsequent reporting lines. Such employees are equipped to attempt to resolve a complaint relevant to their area of service or expertise, wherever possible.

5.2.1 TIMEFRAME FOR INFORMAL RESOLUTION

It is the aim of the Company to resolve informal complaints immediately, or at least within the first 24-hours. Such complaints and issues will have a quick, but informative response and do not need to have an investigation or enter the formal complaint process.

No matter how small or informal the complaint, if a satisfactory resolution has not been achieved within 3 working days of the complaint being raised or identified, the issue is passed to the Complaints Officer to enter the formal complaint process.

5.3 FORMAL COMPLAINT RESOLUTION

We have specific procedures in place for the receipt of a formal complaint, regardless of the medium in which it was received. This includes the progression of an informal complaint that we were unable to resolve during the initial point of contact.

For acknowledgements made by post, the procedures are enclosed in a hard-copy letter format. Where the customer has requested to correspond via email, we provide the complaint procedures **as a PDF attachment**.

The **Complaints Officer** is the only staff member who responds to customers regarding their complaints. They have been provided with the time, resources and training to communicate effectively with customers regarding concerns and formal complaints.

5.3.1 RESPONSE TIME FOR FORMAL RESPONSE

For all formal complaints, a written acknowledgement is sent to the customer within 3 working days. We provide approximate timelines and expectations for the investigation and future responses within initial acknowledgement response.

All investigations take place with 6-weeks of the initial complaint being received. We aim to send our final response (*decision letter*) to the customer within our designated 8-week period. Where this is not possible, the customer will be updated using our 8-Week Holding Letter response to provide them with an update and reason(s) for the delay.

5.3.2 INVESTIGATING THE COMPLAINT

The **Complaints Officer** will be assigned the role of investigating complaints and will gather all necessary documents, recordings and information to make an independent review of the incident.

If internal interviews are to be conducted, a note taker will be present alongside the investigator and interviewee and a copy of the interview notes will be written up and signed by the interviewer and interviewee prior to them being added to the complaint history.

All investigations must take place with 6-weeks of the initial complaint being received so that a final response (*decision letter*) can be sent to the customer within our designated 8-week period.

Investigations must utilise all the facts and any previous, related information to produce an unbiased outcome and an expected course of action. A complaint reference should be assigned and all documents relevant to the complaint should have the reference written on them for continuity.

The reference will also be added to the Complaints Register so that complaint and document can be audited and traced back in the future.

All employees are provided with clear guidelines of when a complaint is formal and requires an appropriate investigation. ***Complaints must be referred to the Complaints Officer where: -***

- The complainant has requested such a referral or investigation
- The complaint involves any type of personal data issue
- The informal complaint resolution stage failed or was inappropriate
- There is a conflict of interest between the complainant and an employee
- The issues are complex and require an investigation
- The complaint represents a high or serious risk to the company
- The facts are unclear, or the complaint will require additional time to resolve
- The complainant is identified as being vulnerable
- There has been any media contact or attention
- Child protection issues are involved
- The issues do or may affect more customers (*whether identified or not*)

5.4 DECISION LETTER (FINAL RESPONSE)

After the complaint has been investigated in full and an outcome decision has been reached, the Complaints Officer will draft a final response letter to the complainant with their findings and decision regarding any action(s) to be taken or compensation awarded. The final response will be issued within 8 weeks of the initial complaint being raised and will inform the complainant of their right to escalate the matter to the Financial Ombudsman Service (FOS) if they remain dissatisfied or if the 8-week period has passed without resolution. The letter will also include FOS contact details and the relevant consumer leaflet, in accordance with the FCA's DISP requirements.

- a)** For complaints to firms regulated by ***The Financial Ombudsman Service*** (FOS), the final response will detail the FOS's telephone number and address and the ombudsman's consumer leaflet will also accompany the final letter. The complainant will be provided with the options for taking the matter further and that they have only 6 months to log the complaint with the FoS.
- b)** For complaints related to personal data and/or breaches of the data protection laws and

regulations, the final response will reiterate the complainants right to lodge a complaint with the supervisory authority (*the Information Commissioners Office*) and will detail the ICO's telephone number and address, along with the possibility of seeking a judicial remedy.

- c) For complaints relating to regulatory breaches or concerns under the scope of the Financial Conduct Authority (FCA), the final response will inform the complainant of their right to report the matter directly to the FCA. The letter will include the FCA's contact details, including their telephone number and address, and will outline the types of issues the FCA can consider. It will also clarify that the FCA does not resolve individual complaints but uses such reports to monitor and enforce standards across the financial industry.

6 COMPLAINT RECORDING

All complaints, whether formal or informal, are recorded on a Customer Complaint Register. The register consists of the below information and is audited on a **quarterly** basis to ensure that incidents are not being repeated and improvements are being made.

- **Date**
- **Nature of Complaint**
- **Department(s) Involved**
- **Complaint Reference**
- **Lead Investigator**
- **Decision Letter Sent (Y/N)**
- **Date Complaint Closed**

The register is made available to any relevant authority, ombudsman or body who relates to or oversees the firms' complaints, as well as being made available with the local Trading Standards should a representative work alongside the organisation. To access the register or for any complaints-related inquiries, please contact the firm's **Complaints Officer**.

6.1 PATTERNS AND ANALYSIS

Where gaps or patterns are identified, we put corrective actions into place as soon as possible and keep the function, process or person under a weekly review until a satisfactory improvement is noted. Root cause analysis findings are also reviewed with management to assess whether any systemic issues are affecting customer outcomes, and to support continuous improvement under the Consumer Duty.

7 PUBLISHED COMPLAINT PROCEDURES

The Company has a user-friendly version of its complaint procedures that are made available to customers. This provides them we easy to access and understand guidance on how to raise a

complaint and the process and timeframes for resolution. The customer complaint procedures are published on our website at [\[insert hyperlink to website complaint procedure page\]](#).

We also provide a hard-copy complaint procedure letter and a PDF digital version for responses by post and email.

8 RESPONSIBILITIES

The Company will ensure that all staff are provided with the time, resources and support to learn, understand and deal with customer complaints and that full training will be provided for new and existing employees on the complaint handling policy, procedures and expectations.

The **Complaints Officer** will be appointed the role of overseeing, investigating and recording all customer complaints and is responsible for regular monitoring of the complaint register to ensure mitigating actions and improvements are put into place where required.

Complaint handling responsibilities include awareness of and adherence to the principles in DISP and PRIN 2A, and ensuring that complaint processes are fair, accessible, and lead to good customer outcomes. All staff are expected to understand these expectations and reflect them in their conduct.

8.1 THE COMPLAINT OFFICER

The Company has an appointed **Complaints Officer** who deals with all complaints and is provided with the training and support to understand, investigate and respond to complaints of all types. Where the complaint involves personal data, the Complaint Officer is assisted by the Data Protection Officer/Appointed Person to ensure that the relevant data protection regulations and laws are adhered to, and the individuals' rights are exercised and complied with.

The Company ensures that the person assigned to handle complaints can complete their duties independently and without bias and is afforded adequate resources to review each complaint effectively. In the absence of the assigned complaint officer, or if a conflict of interest is identified (*i.e. the complaint involves the investigating person*), we have a nominated deputy who is fully trained to handle complaints.

The Complaint Officer has full authority and internal credibility to ask questions, carry out investigations and interviews, obtain and analyse evidence, recommend policy and process changes and be involved in department functions for the purposes of complaint handling.