



Complaints Procedures

Seneca Partners Limited

January 2021

1. Context

The FCA requires Seneca Partners Limited "Seneca" to have clear and defined procedures when dealing with complaints from customers whether the complaint is in the form of a letter, email or telephone call. All staff have a duty to respond to a complaint in a timely, professional and efficient manner. A complaint is defined by the FCA as 'any expression of dissatisfaction, whether oral or written, justified or not.'

2. Receiving complaints

Complaint via Letter

If you are not sure that the letter constitutes a complaint you **must** direct the letter to Mark Hopton, the Complaints Officer.

Complaints via Email

If a complaint has been received either to one of the group email addresses or sent to a personal email address, the email must be printed off and retained with all communication in relation to the complaint. If you are unsure that the email constitutes a complaint you **must** direct the email to the Complaints Officer for their comment.

Complaints via Telephone Call

If you are not sure whether the call constitutes a complaint then the customer **must** be asked if they wish to lodge a complaint. At this point the member of staff must log the following:

- the telephone extension the call was taken on;
- the date;
- the time of the call; and
- the name of the client.

Without this information the complaint may not be addressed sufficiently and you will not be able to log details correctly on the complaints register. Make sure the customer has your name as a reference point.

Recording the Complaint

Complaints Register – Log immediately upon receipt of a complaint

Any complaint received **must** in the first instance be logged in the complaints register. This may be done by the Compliance Officer when he is notified

Central File

All documentation received from the customer along with copies of any letters written and investigation documentation must be placed in the file held by the Complaints Officer at the end of each day. The Complaints Officer will then keep the file safe until the following day when you will have access to it. This process helps to stop any documentation from being misplaced.



Complaints Form

Complete the first part of the complaints form, including the reference number and remember to update the Compliance Officer on any client contact. After each stage of the complaints procedure, the Compliance Officer will update the register.

Filing

Once a complaint has been finalised, all copy documentation along with the completed complaints forms should be passed to the Complaints Officer to be filed for further reference.

4. Resolution

Within 3 days

If you are able to resolve a complaint made verbally (by telephone) within 24 hours of receiving the complaint, you may do so by returning the complainant's call and resolving the complaint over the telephone.

You must ask the customer whether they are satisfied that the matter has been resolved.

If the customer is satisfied, you should update the Complaints Officer with the details.

You must record the Verbal Complaint and pass to the Complaints Officer for sign off, he will ensure that a summary notice is sent to the client.

Initial Response – Receipt + 5 business days

An initial response **must** be provided to the customer within 5 business days of receipt (e.g. the date the letter was stamped) of the complaint regardless of how the complaint was made (unless resolved within 24 hours for verbal complaints).

This response which will be by the Compliance Officer must include details of the actual complaint made by the customer, e.g. *I understand your complaint is about ----*. This communication must inform the individual who is dealing with the complaint and provide details of:

- their name;
- their title; and
- their telephone number.

The Initial Response can be provided in letter form or via a telephone call, providing that this is done within 5 working days of receipt of the complaint. You **must** state that the complaint will be investigated and a response will be sent shortly.

You must provide the complainant with the complaint reference number (as allocated in the complaints register) and this must be reference in all communications that Seneca send in relation to this complaint. You **must** post the Financial Ombudsman Service Ltd ("FOS") complaints leaflet to the customer whether you perform the initial response via a letter or by telephone.

If writing to the customer, a copy of the letter must be retained with the complaints form and prior to sending, update the Complaints Register with the details of the initial response.

This letter **must** include Seneca's **these Procedures**.

Final Response

If the investigation into the complaint has been completed within 8 weeks from receipt of the complaint, then a letter with the heading Final Response **must** be sent to the customer.

The letter should contain a sentence stating: *If you are not satisfied with our final response and wish to contact us further, please quote our reference number at the top of this letter to ensure that we continue to deal with your communication swiftly.*



The letter **must** also advise customers that if they wish to contact FOS in respect of their complaint they **must** do so within 6 months of the date of the Final Response. The FOS leaflet **must** be enclosed with this Final Response. A copy of this communication must be retained with the initial response, the complaints form and any investigating material. A photocopy must not be taken until the letter has been signed.

Complaints for Concern

If a complaint is likely to exceed the time limits above the matter should be referred to the Compliance Officer who will discuss with senior management to ensure the client is treated fairly.

5. Investigating Complaints

Complaints take on many forms and whilst most will relate to a process/procedure within Seneca, others will relate to a policy set by Seneca. If the complaint relates to a policy and there have been similar complaints relating to this, Senior Management will assess the impact of changing a policy and effect a change if agreement is reached.

6. Compensation/Financial Redress

All payments for compensation or redress are required to be agreed by Senior Managements.

7. Checklist

Initial Response

1. Have you clarified that the communication is a complaint?
2. If received via telephone call, have you logged all the essential information?
3. If received via a telephone call, can you resolve this issue within 24 hours?
4. Have you logged the complaint on Seneca's complaints register?
5. Have you sent an initial response within 5 business days from the receipt of the complaint?
6. If you have been able to resolve the complaint within 5 business days, have you sent a final response (short form response)?
7. Has the Client Adviser reviewed this response?
8. Have you enclosed a copy of the Seneca complaints procedure?

Final Response

9. Have you been able to investigate the complaint within 8 weeks of receipt of the complaint?
10. If so, have you sent a Final Response letter? Don't forget this letter must contain the complaints reference number and advise the customer about the FOS timescales.
11. Have you enclosed the FOS leaflet?
12. The Final Response letter must be sent within 8 weeks of receipt of the complaint.

Having problems

15. Are you having problems in dealing with the complaint, if so, approach the Compliance Officer.

Approved by the Directors 2021