



THE GRAHAM HIGH GROUP LIMITED

Complaints Policy

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Complaints Policy

Introduction

Graham High Group Ltd. (GHG) mitigate the possibility of a complaint by managing expectations and being pro-active and communicative in our claims handling and by treating customers fairly. GHG are committed to our core values: honesty, impartiality and professionalism which remain central to all our business interactions. Recognising that occasionally things can go wrong we have a robust policy to acknowledge, manage and learn from any errors. GHG also act as representatives for a number of their insurer clients and will therefore manage claims on their behalf where appropriate.

What is a Complaint?

Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination, which:

- a) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and
- b) relates to an activity of that respondent, or of any other respondent with whom that respondent has some connection in marketing or providing financial services or products, which comes under the jurisdiction of the Financial Ombudsman Service.

Who is an Eligible complainant?

- A consumer or representative authorised, in writing, by the consumer, to act on their behalf.
- A Micro-enterprise which employs fewer than 10 persons and has a turnover or annual balance sheet that does not exceed £2 million.
- A charity which has an annual income of less than £1 million at the time the complaint is made.
- A trustee of a trust which has a net asset value of less than £1 million at the time the complaint is made.
- A person acting for purposes which are outside that person's trade, business or profession.

What is an informal complaint?

An informal complaint is a complaint that is resolved within 3 working days. It does not require further investigation but must be notified immediately to the insurer.

When is a Complaint Resolved?

A complaint is resolved where the complainant has indicated acceptance of a response from the respondent, with neither the response nor acceptance having to be in writing.

GHG's Responsibilities - Investigating, Assessing and Resolving

Complaints

Whilst GHG Limited is not regulated by the Financial Conduct Authority (FCA) we follow the principles as suggested in the FCA handbook DISP 1. We are also compliant with Lloyds complaints policy and guidelines regarding our brokers, underwriters and policyholders who are affiliated with Lloyds.

Once a complaint has been received GHG will; investigate competently, diligently and impartially taking into consideration all relevant factors. We will do this consistently and promptly according to the timescales highlighted within this policy.

If the complaint is upheld, offer appropriate remedial action and or redress and action such promptly.

If the complaint is not upheld, offer a fair, clear and non-misleading explanation of our findings.

Once the complaint has been resolved GHG will promptly send a Summary Resolution Communication in writing to the complainant. If the complainant is dissatisfied with the resolution, GHG will advise the complainant how to refer to the Financial Ombudsman Service (FOS).

Staff Responsibilities

All GHG Limited staff must log any complaint accurately on the internal Horizon Claims Management System, complaints log and try to resolve the complaint themselves at first contact if this is not possible then within 1 working day. If they are unable to do so to the client's satisfaction, then the complaint must be logged and passed to the Complaints Team to investigate.

How does GHG Limited receive complaints?

Complaints or expression of dissatisfaction whether justified or not, can be written or oral:

Letter

E-mail

Telephone

In Person

Via customer/company representative

How are Complaints recorded?

GHG Limited complaints are logged on our internal 'Horizon' Claims Management system's complaints log. This log is monitored weekly by the GHG Managers who are responsible for monitoring and resolving complaints. On a monthly basis the Department Managers collate all the complaints information, and these are reviewed quarterly with root cause analysis carried out by the GHG Compliance Committee to identify any significant changes that are needed in the operations of the company.

Complaint Handling Procedure

- The complaint will be acknowledged immediately.
- All attempts will be made to resolve the issue at the time of the complaint or within 1 working day.
- If not resolved a Divisional/Technical Manager will review and attempt resolution which will be confirmed in writing by the end of the 3rd working day and the insurer notified.
- In the event that the issue cannot be resolved by the 3rd working day after the date of receipt then the Complaints Team is responsible for reporting the complaint to the relevant insurer for them to consider and resolve.
- When notifying the insurer of the unresolved complaint, the Complaints Team must provide the complainant with a draft acknowledgement letter that includes reference to other potential further avenues of complaint.
- All GHG complaints must be resolved and a final response letter sent to the complainant within 8 weeks from receipt of the initial complaint. If for some reason GHG Limited requires an extension of this timescale then a written request for extension must be sent to the complainant advising why they are not in the position to make a final decision within the 8 week timescale and offer an indication of when they can expect a final response.
- All resolved complaints must be confirmed to the complainant by way of a summary resolution communication with 1 working day of resolution.

Can the Complainant appeal the final decision and if so how?

Depending on the nature of complaint and / or the type of service being provided, there may be a route of appeal open to the complainant. This would be identified, with appropriate contact details, in the final response.

Does GHG limited offer compensation for a complaint?

Any complaint, where the complainant has suffered a loss or damages due to the actions or service by GHG, we will investigate the claim for redress or loss and we will offer compensation where we feel GHG has been negligent in our operations and we feel it fair and reasonable for the claim to be made.

There may be cases where alternative compensation is made as a 'gesture of good will' these gestures will only be made by instruction of a Director.

How does GHG Limited use complaints to our advantage

GHG appreciates any feedback about their service and by reviewing each complaint are able to identify the root cause of the issues and try to avoid any reoccurrence in complaint types.

All complaints are reviewed quarterly by the GHG Compliance Committee to identify if significant changes are needed in the operations of the company.

Does GHG conduct Customer Service Surveys?

GHG send customer service surveys to random clients by use of email, these surveys ensure that GHG are operating and providing the service our customers expect. It also gives GHG the opportunity to establish any dissatisfaction in our service that had not previously been raised by the client.

Lloyds Complaints Process

If the relevant claim is underwritten by a Lloyds underwriter then the complaint will fall under the Lloyds complaints process, please access the link enclosed to follow the Lloyds complaints process <https://www.lloyds.com/market-resources/complaints>