

# SUMMARY OF THE INTERNAL PROCEDURES FOR HANDLING COMPLAINTS FOR GIBBS DENLEY FINANCIAL SERVICES

We regard a complaint as being:

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, 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 our firm, or of any other firm with whom we have some connection in marketing or providing financial services or products, which comes under the jurisdiction of the Financial Ombudsman Service'

We will provide a copy of this document on request and when acknowledging a complaint. There will be no charge for this. This information is also available via our website and contractual documents.

On receipt of a complaint, we will pass the details onto David Ellis, Director and Compliance Officer, who will be dealing with the complaint and will be responsible for ensuring that any complaint is dealt with promptly and fairly.

A complaint can be made via any reasonable means, including letter, telephone, email, and in person.

We operate a telephone line for the purposes of enabling a complaint to be filed and you will not be bound to pay more than the 'basic rate' when using this.

No charge will be made for handling a complaint from a client.

## Making a complaint

We do not make a charge for filing a complaint.

If you wish to make a complaint, we can be contacted as follows:

David Ellis, Director  
Gibbs Denley Financial Services Ltd  
Crystal House, Buckingway Business Park  
Swavesey  
Cambridge  
CB24 4UL  
Tel: 01954 233 650

## Complaints resolved by close of the third business day after receipt

Where we consider your complaint to have been fully resolved by the close of the third business day following the day it is received, we will promptly issue our 'Summary Resolution Communication'. All communications with you will be fair, clear and not misleading.

Our Summary Resolution Communication will

- be in plain language and easily understood;
- refer to the fact that you have made a complaint and that we consider the complaint to have been resolved;
- if relevant, include any offer of remedial action or the appropriate level of redress (or both);
- provide you with details of your rights to refer the complaint to the Financial Ombudsman Service or take civil action if you subsequently decide that you are dissatisfied with the resolution of the complaint.

We will also provide you with the contact details of the Financial Ombudsman Service (FOS), their website

address and refer you to the availability of further information on the FOS website.

The FOS can be contacted as follows:

The Financial Ombudsman Service  
Exchange Tower  
London E14 9SR

Telephone number: 0800 023 4 567.

Further information is available on the Ombudsman's website below:

Web: <http://www.financial-ombudsman.org.uk/>

If you are not satisfied with our decision, eligible complainants have the right to refer the matter onto the Financial Ombudsman Service (FOS) **within 6 months** from the date of our Summary Resolution Communication, or they may lose that right. Details of any rights will be provided.

We will also confirm whether or not we consent to the FOS considering a complaint if it becomes apparent that the complaint has been made or referred outside the time limits specified under FCA rules. Under these rules the Ombudsman service cannot normally look at a complaint from an eligible complainant if it is referred more than 6 months after our Summary Resolution Communication or final response is issued, or, 6 years from when the act complained of happened and 3 years from when a complainant should reasonably have been aware of a problem.

### Acknowledging your complaint

If your complaint cannot be resolved by the close of the third business day, following the day it is received, we will promptly send you a written acknowledgement of your complaint to confirm it has been received and we are dealing with it.

If you make an oral complaint, our written acknowledgement will set out our understanding of your complaint.

If we have reasonable grounds to be satisfied that another firm may be solely or jointly responsible for the allegation(s) made, we will promptly forward the complaint, or the relevant part of it, to that firm. We will write to you to confirm our actions and provide contact details of the firm concerned.

### Investigating your complaint

Your complaint will be handled effectively by somebody who is competent and who will treat it in an independent way.

Your complaint will be investigated diligently and will be assessed fairly, consistently and promptly.

We may ask you to submit copies of documentation and may request further relevant evidence and information from you to assist us with our investigation.

We will take into account any documents and/or information you may provide in relation to your complaint.

### Keeping you informed.

If your complaint cannot be resolved by the close of the third business day, following the day it is received, we will ensure that you are regularly kept informed of our progress with regards to the investigation into your complaint.

Any progress updates will include:

- an explanation of why we are not in a position to make a final response and indication of when we expect to be able to provide one;
- what further information / documents we require to resolve your complaint; and
- when you may expect to receive a further update / our Final Response letter.

We will work towards completing our investigation into your complaint within eight weeks of its receipt.

We will undertake a thorough investigation of your complaint which may take a little bit of time. However in the event that we have been unable to conclude our enquiries within the eight week period, we will write to you and provide an explanation why we are not in a position to make a final response and indicate when we expect to be able to provide one.

If we have been unable to conclude our enquiries within the eight week period we will provide you with details of any rights to refer the complaint to the Financial Ombudsman Service (FOS) (or take civil action) if you are

dissatisfied with the progress of our review; their contact details and website address; and refer you to the availability of further information on the FOS website.

We will also confirm whether or not we consent to the FOS considering a complaint if it becomes apparent that the complaint has been made or referred outside the time limits specified under FCA rules.

## Resolving your complaint

When we have finalised our investigation into your complaint, we will issue our Final Response letter. All communications with you will be fair, clear and not misleading.

If a complaint is resolved by the close of the third business day following the day it is received a Final Response letter will not be issued.

Our Final Response letter will:

- be in plain language and easily understood;
- include details of the complaint;
- provide details of our investigation and decision;
- if relevant, include any offer of remedial action or the appropriate level of redress (or both); and
- provide you with details of any rights to refer the complaint to the Financial Ombudsman Service (or take civil action) if you subsequently decide that you are dissatisfied with the resolution of the complaint.

We will also provide you with the contact details of the Financial Ombudsman Service (FOS) and their website address, and refer you to the availability of further information on the FOS website.

If you are not satisfied with our decision (and are an eligible complainant) you will have the right to refer the matter onto the Financial Ombudsman Service (FOS) within 6 months from the date of our Final Response letter or you may lose that right. Details of this right and an explanatory leaflet will be provided.

We will also confirm whether or not we consent to the FOS considering a complaint if it becomes apparent that the complaint has been made or referred outside the time limits specified under FCA rules.

You can be assured that we treat all complaints very seriously and we will conduct a full review of the issue(s) raised.