

Public Complaints Policy and Procedure

ArchOver is committed to providing a high quality, transparent and accessible service to everyone we deal with. In order to do this, we need you to tell us when we get things wrong. We want to help resolve your complaint as quickly as possible and to your satisfaction.

We handle any expression of dissatisfaction with our service which calls for a response as a complaint. We listen to your complaints, treat them seriously, and learn from them so that we can continuously improve our service.

What is a complaint?

A complaint is an expression of dissatisfaction, whether justified or not.

Our policy covers complaints about:

- the standard of service you should expect from us
- the behaviour of our staff in delivering that service
- any action, or lack of action, by our staff or others engaged on ArchOver business

We refer to these complaints as "service complaints".

Our standards for handling complaints

- We can receive complaints by phone, letter or email. We treat all complaints seriously.
- You can expect to be treated with courtesy, respect and fairness at all times. We expect that you will also treat our staff dealing with your complaint with the same courtesy, respect and fairness.
- We will treat your complaint in confidence within ArchOver.
- We will deal with your service complaint promptly as laid down in our processes. We will acknowledge receipt of a written complaint within two working days where we have a return address and you can expect to have a full reply within five working days. In a few cases we will not be able to send a full reply within five working days of receipt, for example if your complaint is very complex. If this happens, we will tell you the reason why and let you know when we will be able to reply in full, keeping you fully informed of progress but this will always be within 14 days.
- We will treat you no less favourably than anyone else who uses the services of ArchOver.

Third Party Reporting

Complainants may wish to have a third-party act on their behalf. A third party is any person or organisation acting on behalf of or making enquiries for the complainant. For example, third parties may include:

- Financial professionals or advisors
- Legal advisor
- Family members

Where a third party is helping a complainant with a complaint, we need written consent to that effect.

Confidentiality

All complaints received will be dealt with confidentially and in accordance with the requirements of the Data Protection Act 1998.

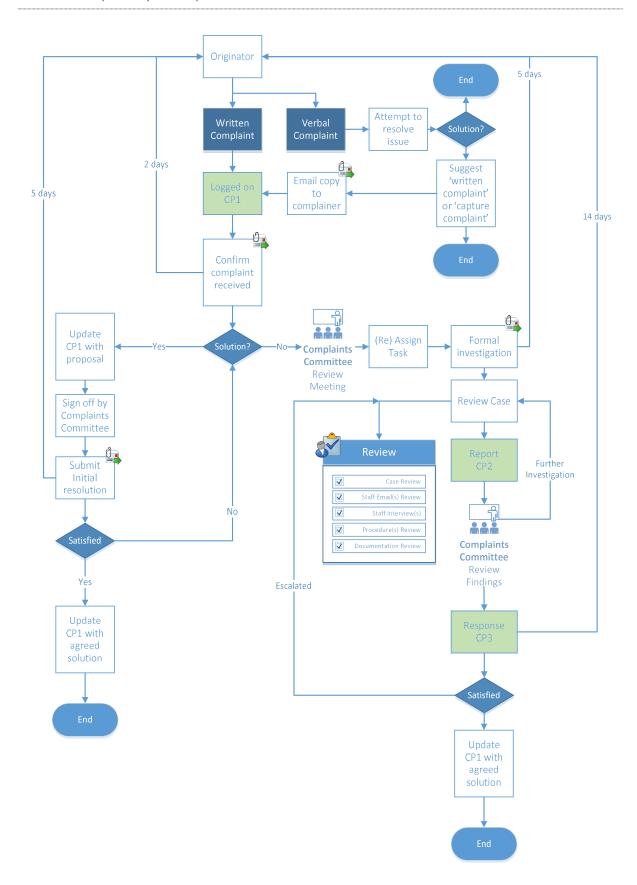
How to complain to us

If you wish to make a complaint, you can do so by email or letter. We are happy to deal in the first instance by phone to see if we can resolve your issue quickly but if not we will require a written complaint so we can fully understand the issue(s).

If you are disabled, and need a reasonable adjustment to ensure you can register your complaint, you can contact us alternatively by:

- telephone (one of our officers will help you by writing out your complaint)
- asking a member of staff to help you in writing out your complaint

Our contact details are on the ArchOver website or please call 0203 021 8100. If you require different adjustments, let us know and we will try and put those arrangements in place where we can.



Service complaints procedure

We have a two-stage service complaints handling procedure, explained above. At each stage it will help us to resolve your complaint quickly if you can give us as much clarity and detail as possible, including providing any documents and correspondence and stating that you are making a complaint. If we do not have all the details required to deal with the complaint, we may contact you and ask you for further information.

Our Portfolio Manager is responsible for managing the handling of service complaints including notifying you of the outcome.

Stage 1

This is the first opportunity for us to resolve your dissatisfaction. We expect the majority of complaints to be resolved at this stage. On receipt of your complaint the Portfolio Manager will respond to your complaint after reviewing your compliant and presenting it to the Complaints Committee.

We will acknowledge complaints within 2 working days of receiving each complaint. We will send a full response within 5 working days of receiving each complaint.

Stage 2

If you are dissatisfied with the response at stage 1 or we believe we cannot satisfactorily answer your compliant it will be elevated to Stage 2.

We will acknowledge an extension for your compliant within 5 working days. We will send a full response within 14 working days of receiving each complaint.

Extending time limits

We aim to complete our investigation into all complaints received about our service within the timescales set out above. However, in a limited number of cases - for example, if a complaint is very complex or requires further breakdown, it may be necessary to extend the time limit to ensure we have all the information necessary to deal with it. If this is the case we will keep you informed of progress with the investigation, the reasons for the delay, and inform you of next steps.

If you are still dissatisfied

If having followed the two internal stages of our service complaints procedure you remain dissatisfied, you can ask to have your complaint reviewed by the Board of ArchOver. If you are not still not happy after that, you can refer your complaint to the Financial Ombudsman Service (the 'FOS') at South Quay Plaza, Exchange Tower, E14 9SR. The FOS will consider your complaint for up to six months from the date of our Final Response.

Remedies

When we get things wrong we will act to:

- accept responsibility and apologise
- explain what went wrong and why
- put things right by making any changes required
- learn lessons from and change policies and practices where proportionate and sensible to do so

The action we take to put matters right (i.e. redress) in response to a service complaint can include any combination of the remedies set out in the list below. The general principle we follow is that complainants should, so far as possible, be put in the position they would have been in, had things not gone wrong.

The remedy applied needs to be proportionate and appropriate to the failure in service, and take into account what redress people seek when they complain. An apology is generally the most appropriate action, but other action may also be necessary in some circumstances.

List of remedies

- A full apology, explaining what happened and/or what went wrong. (an apology is not an acceptance of liability under Section 2 of the Compensation Act 2006)
- Remedial action, which may include reviewing or changing a decision on the service given to an individual complainant
- Provide the service required in first instance (immediately, if appropriate)
- Putting things right (for example a change of procedure to prevent future difficulties of a similar kind, either for the complainant or others)
- Training or supervising staff; or a combination of both

Recording complaints

Complaint details, outcomes and actions taken are recorded by us and used for service improvement. We record all complaints we receive and collate data from them to help us understand what types of problems are most prevalent, and how well we are doing to resolve them.

We value your feedback and expect to use it to help us to:

- get things right in the future if we have not done so already
- become more customer focused
- be more open and accountable
- act fairly and proportionately
- seek continuous improvement

Quality of service is an important measure for us of our effectiveness. Learning from complaints, including non-service complaints (complaints not covered by this policy), is a powerful way of helping continuous improvement at ArchOver and enable us to better deliver to our values and standards. All non-service complaints will be looked at by a responsible manager from the appropriate team, and a response, if required, sent to you directly within 14 working days where possible. Non-service complaints should be sent to Portfolio Manager at ArchOver.

As well as learning from your complaints we are also interested in ideas you may have on how we might do things better. We would also like you to tell us when we do things well.

Your comments will be passed on to the relevant team and we will use them to help improve our service and the way we do things.