

KEY CURRENCY LIMITED (09603083)

Key Currency Limited

Complaints Policy

Document History

Version	Changes	Author	Board approval date
1.0	Original Document		
2.0	Name of Complaints Manager		

Key Individuals

It is the responsibility of the Compliance Officer to enforce and review this policy.

Review Process

This procedure is reviewed every year by the Compliance Officer. In addition, if there is a major compliance breach in this area, the Compliance Officer shall review the relevant procedure, or engage an external compliance consultant to review the procedure.

Sign-off Process

This policy must be signed off by the board of directors.

Introduction

The Company acknowledges the importance of having an effective and efficient complaints handling framework. The Company adopts a customer-focused approach, is open to feedback, and demonstrates its commitment in its actions and the resources it makes available to dispute resolution.

The person responsible for ensuring staff are trained in this policy is the Compliance Officer.

Overview

The Company defines a complaint as an expression of dissatisfaction made to us, related to our products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

This definition and this procedure have been developed with reference to the minimum requirements of PSR 2009 Schedule 4 and Chapter 11 of the Financial Conduct Authority's PSD Approach Document.

There is no charge payable by a complainant for making a complaint to the Company.

Dispute resolution procedure

This procedure is available to retail clients and is referred to in the Company's relevant disclosure documents. A summary of this procedure is provided to a client when they make a complaint. Where necessary the information in this procedure will be made available in alternative formats.

1. Report

Customer complaint is reported to the front line customer service staff in the call centre or online.

The customer may contact the company through one of the following channels:

Telephone: 01872 487 500.

Email: compliance@keycurrency.co.uk

The Company complaints manager is Nicola Burgess.

Where the customer wishes to report a complaint by telephone, the cost of the call is held at a basic rate such that the call provides no revenue to the Company.

This information is recorded in the Company's IT software against the payment(s) in question.

This information is forwarded automatically to the relevant staff in the customer service team.

2. Investigation

The complaint will be acknowledged within one working day.

The Company will attempt to provide a full reply to the customer within ten working days.

The Company will assess the complaint to consider:

- a) the subject matter of the complaint;
- b) whether the complaint should be upheld;
- c) what remedial action or redress (or both) may be appropriate;
- d) if appropriate, whether it has reasonable grounds to be satisfied that another respondent may be solely or jointly responsible for the matter alleged in the complaint;

The Company will then:

- a) Offer redress or remedial action when it decides this is appropriate;
- b) Explain to the complainant promptly and, in a way that is fair, clear and not misleading, its assessment of the complaint, its decision on it, and any offer of remedial action or redress;
and
- c) Comply promptly with any offer of remedial action or redress accepted by the complainant.

The Company will keep the customer informed at every stage of the investigation process.

3. Resolution

Where the issue has been resolved the client shall be informed and feedback taken. Where the client is not satisfied with the verdict the complaint will be escalated.

4. Escalation

Where a client maintains that their complaint has not been satisfactorily addressed the issue shall be escalated by order of seniority of staff.

5. The Ombudsman

Whilst every effort will be made to resolve a complaint in a manner that is satisfactory to the customer, in the event that the internal complaints procedure has not resolved the customer's complaint within the required period of 8 weeks the customer has the right to refer the matter to the Financial Ombudsman.

A link is included on the applicant's website to the Financial Ombudsman Service.

In the event that the client wishes to refer the matter to the Financial Ombudsman then the Company shall provide a final response letter as per the following specification:

- Contain a detailed account of the dispute at hand
- Address all issues outlined in Complainant's Complaint Form
- Quote the applicable loan contract terms/policy conditions/terms of business etc
- Give details of any redress offered to the Complainant by the Provider
- State that it is the Final Response of the Provider for the purpose of referring the matter to the Financial Ombudsman Service
- Advise the Complainant that he/she has 6 months from the date of said Final Response to refer the matter to the Financial Ombudsman Service for investigation

The Company will co-operate fully in any customer complaint and Ombudsman proceedings to ensure the swift and satisfactory resolution of the complaint.

Literature from the Financial Ombudsman is made available via a link on the Company's website.

Record Keeping

The Company maintains full records of all complaints, their investigation and resolution for a minimum of five years.