Complaints Policy

Croydon, Merton & Sutton Credit Union Ltd

(Trading as Your Community Bank)

Approved 2026

YOUR COMMUNITY BANK

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1. Policy

A Complaint is any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a member about the provision of, or failure to provide, a financial service, which:

- Alleges that the member has suffered (or may suffer) financial loss, material distress or material inconvenience and
- Relates to an activity of Your Community Bank, or of any company with whom we have some connection in marketing or providing financial services or products, which comes under the jurisdiction of the FOS Complaints may be received verbally, written or indirectly from an external source.

All complaints, either verbal or written, must be investigated and the appropriate action taken.

As any member of staff may receive a complaint at any time and by any means (e.g. email, telephone, in person, by letter) it is very important that all staff should be aware of and understand the importance of following this policy and procedures.

A general query or a request for additional information is unlikely to constitute a compliant, however, if in any doubt, the issue will be recorded as a complaint.

- All complaints will be handled with courtesy at all times, even if the individual receiving the complaint believes that the complaint is unjustified. All complaints will be handled professionally and brought to conclusion according to FCA rules and TCF Principles.
- Complaints are a key source of management information and the quality of information entered into the Complaints Register is vital to ensure that the business continually improves.
- If a complaint relates to conduct, it must not be handled by the person against whom the complaint is made. In this instance, the person handling the complaint must be a senior member of staff.
- In each case, the facts of the complaint will be investigated, reviewed fully and the outcome recorded in writing for our firm's Complaint Handling records.

2. Record Keeping

Your Community Bank will retain records of the complaint and the investigation surrounding the complaint, indefinitely.

- Records will include any correspondence between our firm and the complainant and notes of any discussions with the complainant
- Any supporting evidence used to investigate to complaint · Details of redress or goodwill offered (if any)
- Details of the individual investigating the complaint
- Details of the final response decision
- Details of the Financial Ombudsman Service information provided to the customer.

3. The Financial Ombudsman Service (FOS)

Individuals are eligible to refer their complaints to FOS if they have raised their complaint with us and either they have not received a final response letter within 8 weeks, or the final response letter has been received but is not satisfactory to them.

The FOS is free to consumers, although a case fee may be charged to the business against which the complaint is made if the case is accepted, whether or not the case is found in the consumer's favour.

The FOS records complaints cases where the outcome was "not upheld" to include those where it recommends a nominal amount of redress/nominal increase in redress be offered.

- The FOS may request information from our YCB in order to review the case and make a decision. It is therefore vital that well maintained and robust records are held in relation to all complaints received.
- The final decision of FOS is binding on all parties only if the complainant accepts the decision. If the complainant does not accept the decision, it is not binding on either party.

The YCB website will include a statement within the regulatory footer as follows: "The Financial Ombudsman Service (FOS) is an agency for arbitrating on unresolved complaints between regulated firms and their clients. Full details of the FOS can be found on its website at www.financial-ombudsman.org.uk."

4. Logging of complaints

For every complaint received, the date, time, nature of the complaint, customer's name and contact details will be recorded along with our response (upheld / not upheld) and the justification for this decision, along with the date of the final response.

4.1 Redress

Redress is appropriate if Your Community Bank upholds a member's complaint. Its purpose is to put the customer back into the position they would have been in if the matter bringing about the complaint hadn't occurred. Redress offered to a complainant will be fair and in proportion to their financial loss. If there is no financial loss, or possibility of financial loss (for example if a customer is complaining about the poor customer service they believe they have received), this rule will still apply.

4.2 Goodwill

Goodwill may be offered to a customer is some circumstances, but it is not a substitute for redress. Goodwill may be offered by our firm if we do not uphold a customer's complaint, Your Community Bank wishes to offer the member a gesture of kindness in order to maintain a good business relationship with them.

4. Root Cause Analysis

Your Community Bank will review past complaints cases in order to identify business shortcomings and development areas. Such data will be included in Complaints Handling Management Information, reviewed regularly by senior management. Any trends will be identified along with the implication of these trends and their potential effect on other customers, past and future. Staff training and / or remedial action may also be taken, as appropriate.

5. Publicising the complaints procedure

In relation to the internal complaints procedure, the following will take place:

- YCB's complaint handling procedures will be made available to our customers and they will explain how customers can complain to us in writing and by telephone.
- A copy of our Complaints procedure will be provided upon request, and a copy supplied to the customer automatically upon receipt of a complaint.
- All complaints handling literature and correspondence intended for a customer will be written in clear and plain language.
- All complaints procedure information, in whatever format, will be provided in writing
- The complaints procedure will be made clear on our website and our website footer will also reference recourse to the FOS.

6. Training

All new employees will receive complaint handling training upon joining the company and on a regular basis as a refresher. Regular training outputs will be used as part of our ongoing staff key performance indicators.

7. Complaint Handling Reporting to the FCA

Complaints management information may be requested by the FCA. At all times, detailed records of the number and type of complaints, the investigation and the outcome will be retained for this reason, as well as for our internal quality assurance purposes.

8. Initial acknowledgement

Upon receipt of a complaint, a written acknowledgement of receipt of the complaint, giving the name and title of the Complaint Handler will be issued promptly to the complainant. This will normally be within a 48 hour response timescale. This acknowledgement will also include:

- A summary of YCB's Complaints Procedure
- Information about the complainant's right to refer their complaint to the Financial Ombudsman Service if they are not satisfied with our YCB's response
- **Final response:** All complainants that have logged a complaint with Your Community Bank will receive a final response within eight weeks.

If the complaint cannot be resolved within this timescale, for whatever reason, a letter (or email) will be sent to the member which explains:

- Our position
- Why we are not able to make a final response at this point in time
- When we will be able (or anticipate that we will be able) to provide a final response.

In addition, the member will be told, in writing, that they may refer the complaint to the Financial Ombudsman Service (FOS) if they are dissatisfied with the delay. We will inform them that their referral to the FOS must take place within six months of the end of the eight week period.

The FOS explanatory leaflet must be enclosed with this communication or emailed to the customer if communications are agreed by email.

9. The final response letter at or before eight weeks from the receipt of the complaint

When the written response is sent, it will include the following information:

- An outline of the complaint made
- Our decision to uphold or not uphold the complaint
- The reason for our decision
- An offer of redress if the member has been financially affected
- Information explaining how the complainant may pursue the complaint if they remain dissatisfied
- Reference to the to the availability of the FOS

10. Complaint Summary Resolution

If a complaint can be resolved within three business days from receipt, we will send a Complaint Summary Resolution Letter to the customer. This will be classed and recorded as a 'short complaint' and these complaints will be included in any reports requested by the FCA.

11. Regulatory Reporting to the FCA

We are required to submit a regular report to the FCA via its online Reporting system, Reg Data. The report must be submitted within 30 business days of the firm's accounting reference date (ARD). This report is to enable the FCA to monitor complaints received by payment service users, including persons who are eligible to complain to the Financial Ombudsman Service about the provision of payment services across the payment services market and to monitor compliance with the FCA (Financial Conduct Authority) Handbook "Dispute Resolution".

The complaints procedure (see below) will be clearly present on Your Community Bank's website, along with details of member recourse to the FOS noted in the regulatory footer of the website.

'*Occasionally things go wrong and if this is the case, we will do our best to put them right. If you wish to make a complaint, you can:*

'Telephone us on - 020 3468 8568

'Email us at – feedback@YourCB.org.uk

'Or write to us at - Your Community Bank, 4th Floor AMP House, Dingwall Road, Croydon CR0 2LX

'Upon receipt of a complaint, we will initiate a full diligent and complete investigation. Our investigation will include:

- *A full assessment of the nature of your complaint*
- *If a third party is involved a detailed response will be requested*
- *Regular communication to keep you updated on the status of your complaint*
- *A final, documented response, outlining the outcome of our investigation*

'All evidence gathered will be assessed fairly in line with the Financial Ombudsman service guidance in order for us to make a decision regarding your complaint.

'A final response will normally be issued within 8 weeks of receipt of the complaint.

'There may be exceptional cases where we are unable to resolve the complaint within this period and if this is the case, we will inform you at our earliest opportunity. If you are dissatisfied with the delay or do not agree with our decision you may refer your complaint to the Financial Ombudsman. A leaflet explaining your rights will be enclosed with the documentation we issue to you.'

12. Recording of Complaints

All complaints will be recorded on Your Community Bank's Complaints Register which will include a range of management information, including: date of receipt and response to complaint, customer name, complaint reference number, outline of complaint, whether the complaint was upheld or note, whether the complaint was sent to FOS and the outcome, root cause, remedial action and indicates whether the firm's PI Insurer has been informed.

The Complaints Register will be a source of management information and root cause will regularly be undertaken to determine how to best reduce complaints in the future.

13. Governance and Oversight

Management information regarding complaints will be supplied to the Your Community Bank's Board on a regular basis for review and for the board to take action when appropriate. The compliance function will regularly review this policy and process, as well as the outputs from complaint handling activity as part of the compliance monitoring regime.