

BizBritain Finance Limited Complaints Handling Procedure

1. Definitions and Interpretation

1.1 In this Complaints Handling Procedure the following expressions have the following meanings:

“8 week rule”	means the total time BizBritain Finance Limited have to resolve your complaint from the date it receives it. It relates to the time that BizBritain is handling your Complaint, not any periods whilst you are deciding to escalate the Complaint Resolution Response to the company in accordance with this Complaints Policy;
“Appeal”	means the final stage in our Complaints handling procedure under which: a) you not satisfied with the Complaint Resolution Response and wish to escalate a Complaint for Final Resolution Response by BizBritain; or b) your Complaint will be automatically moved to Appeal stage if we cannot issue a Complaint Resolution Response before the end of 3 business days following receipt of your Complaint. You will be informed if your Complaint is to be internally escalated. Your Complaint will be handled by a Complaint or Appeal Complaint Handler;
“Business Day”	means any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business in England;
“Complaint”	means a Complaint about services, about our customer service, or about our employees. We will try to resolve your Complaint satisfactorily by close of business on the third business day following the day on which it is received (i.e. received on Monday we would aim to resolve it by close of business on Thursday);
“Complaint Handler”	means a Manager of BizBritain Finance Limited who will handle your Complaint;
“Complaints Handling Procedure”	means the internal Complaints handling procedure of BizBritain Finance Limited which is followed when handling a Complaint, a summary of which is available from our website for your reference. A full copy may be requested;
“Complaints Policy”	means this document;
“Complaint Reference”	means a unique code assigned to your Complaint that will be used to track your Complaint;

“Complaint Resolution Response”	means a response from BizBritain to your Complaint within three business days following receipt. It may be written or verbal;
“Customer”	means a customer of BizBritain Finance Limited and includes potential customers;
“Data Protection Policy”	means our data protection policy, available from our website or by request;
“External Resolution”	means the Customers right to seek External Resolution for certain complaints;
“Resolution Action”	means the available actions to be taken in response to a Complaint as detailed in Section 8.
“Final Resolution Response”	means a written response from BizBritain to your Appeal which (a) accepts the complaint and, where appropriate, offers redress or remedial action; or (b) offers redress or remedial action without accepting the complaint; or (c) rejects the complaint and gives reasons for doing so. This is the final stage in BizBritain’s company Complaints process;

2. What this Complaints Handling Procedure Covers

- 2.1 This Complaints Handling Procedure applies to Complaints pertaining to the provision of services by BizBritain Finance Limited, to our customer service and to our employees.
- 2.2 For the purposes of this Complaints Handling Procedure, any reference to BizBritain Finance Limited also includes our employees.
- 2.3 Complaints may relate to any of our activities and may include (but not be limited to):
 - 2.3.1 The quality of our customer service;
 - 2.3.2 The behaviour and/or professional competence of our employees;
 - 2.3.3 Delays, poor guidance or other problems associated with the provision of services;
- 2.4 The following do not constitute Complaints. Customers raising such questions or matters should be directed to the appropriate person OR department:
 - 2.4.1 General questions about our services or policies;
 - 2.4.2 Matters concerning contractual or other legal disputes;
 - 2.4.3 Formal requests for the disclosure of information including, but not limited to, those made under the Data Protection Act.

3. Receipt and Recording of Complaints

- 3.1 Customers may make Complaints to BizBritain Finance Limited using any of the following methods:
 - 3.1.1 In writing to BizBritain, 96 High Street, Marlow, Buckinghamshire, SL7 1AQ;
 - 3.1.2 By email, to complaints@bizbritain.com;
 - 3.1.3 By contacting us by telephone on 01628 878343 and choosing option 1. Please note you may ask them to put your Complaint into writing so we can investigate it fully.

- 3.2 Upon receipt of an Complaint the following steps should be taken immediately:
- 3.2.1 If a written Complaint is received by post or email:
- A Manager, (see section 6.1) must be informed, and copy of the complaint provided to them;
 - A complaint file must be set up within the Complaints Folder, where all communications/actions for the case must be logged.
- 3.2.2 If a Complaint is made by telephone, ideally the Complainant should be passed immediately to a Manager to speak to, or if a Manager is not immediately available the BizBritain staff member to prevent delay to the Complaint, should:
- Set up a complaint file within the Complaints Folder.
 - Use the Telephone Complaint Form, capture the details of the conversation during the call or immediately afterwards (remembering the information required, covered in section 4).
 - Refer the complaint immediately to an available Manager to act as Complaint Handler (see section 6.1) if the call was taken by a member of BizBritain staff.
- 3.3 A Manager must acknowledge, via email, all complaints on the same day received using the template Complaint Acknowledgement. All Complaints must be given a Complaint Reference and confirmation of their Complaint Handler, attaching copies of the Complaint Policy and Complaint Handling Procedures.

4. Complaint Information

- 4.1 Customers are advised in our Complaints Policy that the following information should be provided in as much detail as is reasonably possible when making a Complaint:
- 4.1.1 Their name, address, telephone number and email address (We will contact them using their preferred contact method as their Complaint is handled);
- 4.1.2 If they are making a Complaint about a particular employee of ours, the name and, where appropriate, position of that employee;
- 4.1.3 Further details of their Complaint including, as appropriate, all times, dates, events, and people involved;
- 4.1.4 Details of any documents or other evidence they wish to rely on in support of their Complaint;
- 4.1.5 If applicable, details of what they would like BizBritain Finance Limited to do to resolve their Complaint and to put things right. (Please note that whilst we will make every reasonable effort to accommodate such requests, we are not bound to take any action beyond that which we may be contractually or otherwise legally obliged to take).
- 4.2 If the information detailed in Section 4.1 is missing, insufficiently detailed, or incomplete, the Complaint Handler should contact the Customer immediately to request further information.

5. Complaint Levels

- 5.1 BizBritain Finance Limited operates a two-stage complaints handling procedure. Upon receipt, all new Complaints should be handled in accordance with the Complaint procedure set out in Section 6 below. It is our policy to use all reasonable endeavours to resolve all Complaints to Customers' satisfaction at this initial Complaint stage. BizBritain will aim to resolve all Complaints by close of business on the third business day following the day on

which it is received.

- 5.2 If a Customer is not satisfied with the Complaint Resolution Response of their Complaint, they may request that the Complaint is escalated to Appeal level for a Final Resolution Response at which point the Complaint should be handled in accordance with the Appeal procedure set out in Section 7 below.
- 5.3 BizBritain will also escalate a Complaint to Appeal level if we have not been able to resolve it by close of business on the third business day following the day on which it is received for whatever reason. BizBritain aims to resolve Appeal level Complaints within 7 weeks and 3 days.
- 5.4 BizBritain considers the Complaint resolved when we issue either a Complaint Resolution Response or Final Resolution Response.
- 5.5 The Complainant will be asked to acknowledge their acceptance of the Complaint Resolution Response (either verbally or in writing). If the Complainant has failed to respond to the company within 8 weeks of the Response being issued we will consider it has been accepted.
- 5.6 A Complainant may externally escalate a Complaint at any time. If a Complainant is not satisfied with the outcome of a Final Resolution Response or they have not received one following an escalation to the Appeal level within the 8 weeks aggregate BizBritain has to deal with their Complaint they may be able to refer the complaint to the Financial Ombudsman Service. For further information, please visit the Financial Ombudsman's website <http://www.financial-ombudsman.org.uk/consumer/complaints.htm>.

They have the right to refer your complaint to the Financial Ombudsman Service, free of charge – but they must do so within six months of the date of BizBritain's Final Resolution Response or Complaint Resolution Response being sent to them. If they do not refer their complaint in time, the Ombudsman will not have our permission to consider their complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances.

- 5.7 They can escalate any Start Up Loans related issue:
 - by post to FAO Client Services, The Start Up Loans Company, 71-75 Shelton Street, Covent Garden, WC2H 9JQ;
 - by email to customer.relations@startuploans.co.uk;
 - or find out more information about the Start Up Loans Company Complaints process visit their website at <https://www.startuploans.co.uk>.
- 5.8 If BizBritain does not receive a reply from the Customer indicating whether the Response issued at the relevant stage to their Complaint is satisfactory or not within 8 weeks of the Response being issued, BizBritain shall consider the complaint accepted.

6. Complaints

- 6.1 The following staff members are qualified and eligible Complaint Handlers in the first instance of a Complaint being received:

Alison Wallace, Customer Service Manager, alison@bizbritain.com;

Claire Lingwood, Operations Manager, claire@bizbritain.com;

If neither of these are available, a BizBritain Director may act as a Complaint Handler.

No-one shall act as a Complaint Handler if the Complaint directly relates to them or their actions.

- 6.2 Upon receipt of a Complaint, the Complaint Handler shall investigate the Complaint and make a decision/ attempt to resolve the issue by close of business on the third business day following the day on which it is received.

- 6.3 If the Complaint relates to (a) particular employee(s) (a “Complainee” or “Complainees”), the Complaint Handler shall inform the Complainee(s) in question of the Complaint and arrange calls as required to discuss the Complaint. In such cases, the Complainee(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complainee(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complainee(s) should respectfully refuse to discuss the matter, referring the Customer to Section 4.1.3 of our Complaints Policy. Any such contact should be reported to the Complaint Handler.
- 6.4 If the Complaint Handler requires additional information or evidence in support of the Complaint, the Complaint Handler shall contact the Customer using the Customer’s preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint.
- 6.5 If a Customer is unable or unwilling to provide information or evidence requested under Section 6.4, the Complaint Handler must nevertheless use all reasonable endeavours to resolve the Complaint.
- 6.6 The Complaint Handler shall examine and evaluate the Complaint, taking full account of all relevant statements, information, evidence and circumstances. It shall be investigated competently, diligently and impartially and the Complaint Handler shall maintain full objectivity and records all times.
- 6.7 During the investigation of the Complaint, the Complaint Handler shall have access to all records, information, employees that may be necessary to enable him/her to carry out an impartial and thorough investigation.
- 6.8 Following his/her examination of the Complaint, the Complaint Handler shall aim to reach a decision within the time period set out in Section 6.2 and resolve the Complaint with the Complainant by assessing:
 - 6.8.1 the subject matter of the complaint;
 - 6.8.2 whether the complaint should be upheld;
 - 6.8.3 what remedial action or redress (or both) may be appropriate;
 - 6.8.4 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;

Then taking into account all relevant factors;

- 6.8.5 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
- 6.8.6 comply promptly with any offer of remedial action or redress accepted by the complainant.

The Complaint Resolution Response can be provided to the Complainant by phone, email or letter. Information relating to their decision-making should be recorded on the Complainants File in the Complaints Folder by the Handler.

- 6.9 BizBritain considers the Complaint resolved when we issue a Complaint Resolution Response.
- 6.10 The Complainant will be asked to acknowledge their acceptance of the Response, with neither the response nor acceptance having to be in writing. If the Complainant has failed to respond to the company within 8 weeks of the Response being issued BizBritain will consider it has been accepted.
- 6.11 If a Customer is not satisfied with the Complaint Resolution Response of their Complaint, they may request that the Complaint is escalated to Appeal level for a Final Resolution

Response at which point the Complaint should be handled in accordance with the Appeal procedure set out in Section 7 below.

- 6.12 BizBritain will also escalate a Complaint to Appeal level if we have not been able to resolve it by close of business on the third business day following the day on which it is received for whatever reason. BizBritain aims to resolve Appeal level Complaints within 7 weeks and 3 days.

7. Appeal Complaints

- 7.1 The following staff members are qualified and eligible Appeal Complaint Handlers for Appeal level Complaints:

Gary Lennon, Business Development Director, gary@bizbritain.com;
Matt Gubba, Co-Founder and Finance Director, matt@bizbritain.com;

No-one shall act as an Appeal Handler if the Complaint directly relates to them or their actions.

- 7.2 Upon receipt of a request to escalate to the Appeal Level, the following steps should be taken immediately by the original Complaint Handler:

- 7.2.1 If a written request to escalate the Complaint is received by post or email, the Complaint Handler must:

- Maintain the documents in the Complainants file, where all communications/actions for the case must be logged.

- 7.2.2 If a request to escalate the Complaint is made by telephone, the Complaint Handler must:

- Update the Complainant's existing Telephone Complaint Form with any additional details, capture the details of the conversation during the call or immediately afterwards.

- 7.3 All escalation requests must be forwarded to an appropriate Appeal Complaint Handler, selected in accordance with Section 7.1 within immediately as follows:

- 7.3.1 If a Complaint Resolution Response was not given to a Complaint and it was instead automatically escalated to an Appeal level Complaint, the original Complaint Handler may continue with the case (becoming an Appeal Complaint Handler) or an Appeal Complaints Handler may be appointed.

- 7.3.2 If a Complaint Resolution Response was issued to the Complainant and they were not satisfied with the decision, then a new Appeals Complaint Handler must be appointed.

- 7.3.3 All escalations must be acknowledged in writing within three Business days of receipt, by the Complaint Handler. The acknowledgement should inform the Customer of their assigned Appeals Complaint Handler.

- 7.4 Upon receipt of an Appeal level Complaint, the Appeal Complaint Handler shall consider it and aim to make a decision and issue a written Final Resolution Response no more than 7 weeks and 3 days from BizBritain's receipt of the escalation to Appeal request.

- 7.5 If the Complaint relates to (a) particular employee(s) (a "Complaine" or "Complainees"), the Complaint Handler shall inform the Complaine(s) in question of the Complaint and arrange calls as required to discuss the Complaint. In such cases, the Complaine(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complaine(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complaine(s) should respectfully refuse to discuss the

matter, referring the Customer to Section 4.1.3 of our Complaints Policy. Any such contact should be reported to the Appeal Complaint Handler.

- 7.6 If the Appeal Complaint Handler requires additional information or evidence in support of the Complaint, the Complaint Handler shall contact the Customer using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint.
- 7.7 If a Customer is unable or unwilling to provide information or evidence requested under Section 7.6, the Appeal Complaint Handler must nevertheless use all reasonable endeavours to resolve the Complaint.
- 7.8 The Appeal Complaint Handler shall examine and evaluate the Complaint, review previous investigations and Responses, taking full account of all relevant statements, information, evidence and circumstances. It shall be investigated competently, diligently and impartially and the Appeal Complaint Handler shall maintain full objectivity and records all times.
- 7.9 During the investigation of the Complaint, the Appeal Complaint Handler shall have access to all records, information, employees that may be necessary to enable him/her to carry out an impartial and thorough investigation.
- 7.10 Following his/her examination of the Appeal Complaint, the Appeal Handler shall aim to reach a decision and send a written Final Resolution Response to the Customer within the time period set out in Section 7.4.
- 7.11 The Final Resolution Response shall set out the decision, reasons and any Resolution Action(s) by:
- a) accepting the complaint and, where appropriate, offering redress or remedial action;
 - OR**
 - b) offering redress or remedial action without accepting the complaint;
 - OR**
 - c) rejecting the complaint and giving reasons for doing so;
 - 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
- and for activity regulated by the Financial Conduct Authority:
- d) enclosing a link to the Financial Ombudsman Service's standard explanatory leaflet;
 - e) providing the website address of the Financial Ombudsman Service (FOS);
 - f) informing the complainant that if they remain dissatisfied with the BizBritain Finance Limited's response, they may now refer their complaint to the Financial Ombudsman Service; and
 - g) indicating whether or not the BizBritain Finance Limited consents to waive the relevant time limits for referral of the Complaint to the Financial Ombudsman Service if it becomes apparent that the Complaint has been made or is referred outside those time limits;
- 7.12 BizBritain considers the Complaint resolved when we issue a Final Resolution Response. This is the final stage of BizBritain's Complaints process.
- 7.13 The Complainant will be asked to acknowledge their acceptance of the Final Resolution Response in writing. If the Complainant has failed to respond to the company within 8 weeks of the Response being issued BizBritain will consider it has been accepted.
- 7.14 If a delay either occurs or is considered likely to occur at any stage of the Appeal level procedure, the Appeal Complaint Handler shall write to the Customer:

- a) explaining why it is not in a position to make a final response and indicating when it expects to be able to provide one;

and if the activity is regulated by the Financial Conduct Authority:

- b) informing the complainant that they may now refer the complaint to the Financial Ombudsman Service as the complaint has breached the 8 week rule;
- c) indicating whether or not BizBritain consents to waive the relevant time limits for referral to the Financial Ombudsman Service if it becomes apparent that the complaint has been made or is referred outside those time limits;
- d) enclosing a link to the Financial Ombudsman Service standard explanatory leaflet; and
- e) providing the website address of the Financial Ombudsman Service.

8 Resolution Actions

8.1 When handling Complaints, Complaint Handlers and Appeal Complaint Handlers may select from the following Resolution Actions, as appropriate to the facts and circumstances of a Complaint:

- 8.1.1 Reject the Complaint;
- 8.1.2 Uphold the Complaint and where appropriate offer redress or remedial action, for example;
- 8.1.3 Offer redress or remedial action without upholding the complaint.

Examples of remedial actions or redress may include:

- Reconsider the status of a Start Up Loan Application if it was declined due to inadequacy of business plan or cashflow submissions;
- Require staff re-training to improve understanding or approach;

9 External Resolution

9.1 If you are not satisfied with the outcome of a Final Resolution Response or have not received one following an escalation to the Appeal level within the 8 weeks aggregate BizBritain has to deal with your Complaint you may be able to refer the complaint to the Financial Ombudsman Service. For further information, please visit the Financial Ombudsman's website <http://www.financial-ombudsman.org.uk/consumer/complaints.htm>.

You have the right to refer your complaint to the Financial Ombudsman Service, free of charge – but you must do so within six months of the date of BizBritain's Final Resolution Response or Complaint Resolution Response being sent to you. If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances. For example, if the Ombudsman believes that the delay was as a result of exceptional circumstances.

9.2 You can escalate any Start Up Loans related issue:

- by post to FAO Client Services, The Start Up Loans Company, 71-75 Shelton Street, Covent Garden, WC2H 9JQ;
- by email to customer.relations@startuploans.co.uk;
- or find out more information about the Start Up Loans Company Complaints process visit their website at <https://www.startuploans.co.uk>.

9.3 Any and all requests made by the Start Up Loans Company and/or the Financial Ombudsman Service for evidence or information, whether written or oral, shall be answered without undue delay, subject to the approval and authorisation of Gary Lennon, Business Development Director, who shall ensure that said request is reasonable and pertinent given the nature of the Complaint.

10 Implementation of Resolution Actions

Upon the conclusion of a Complaint, whether internally or through External Resolution, the Resolution Action(s) settled upon shall be implemented in a timely manner. Responsibility for the implementation of Resolution Actions ultimately lies with (and may be delegated thereby, as appropriate) Gary Lennon, Business Development Director, gary@bizbritain.com;

11 Recording of Resolution Actions

11.1 Upon the conclusion of an Appeal level Complaint and the implementation of the applicable Resolution Action(s), Gary Lennon or a delegated Manager shall:

11.1.1 Update the Complainants File in the Complaint Folder with additional documents, log resolutions and follow up actions.

11.1.2 Log the final outcome of the Complaint in the Complaint Tracker.

12 Confidentiality and Data Protection

12.1 All Complaints evidence and other information gathered, held and processed under this Complaints Handling Procedure shall be treated with the utmost confidence at all times. Such information may be shared with employees of BizBritain Finance Limited only to the extent required to resolve the Complaint in question in accordance with this Complaints Handling Procedure.

12.2 In the event that the details of a Complaint are to be used for training or quality improvement purposes, in which case they will be shared with other employees of BizBritain Finance Limited beyond the scope of this Complaints Handling Procedure, the Customer's personal details (that is, anything that may be used to identify the Customer) shall be removed from all information so used.

12.3 All personal information collected by BizBritain Finance Limited (including, but not limited to, Customers' names and contact details) shall only be collected, used and held in accordance with the provisions of the Data Protection Act 1998 and our Customers' rights under that Act, as detailed and embodied in our Data Protection Policy.

13 Abusive behaviour toward BizBritain staff

Any abusive or aggressive behaviour toward BizBritain staff will not be tolerated and, if applying for a Start Up Loan, will result in your application being declined with immediate effect.

This includes aggressive, abusive or violent behaviour of any kind (written or verbal). Any form of this behaviour will not be acceptable. We will also consider any remarks made of a racial or discriminatory nature as abusive behaviour and reserve the right to not deal with any such individual. Please see the Managing Unreasonable Behaviour towards BizBritain Staff Policy for more information.

14 Procedure Review and Responsibility

14.1 Overall responsibility for this Complaints Handling Procedure and the implementation thereof lies with Gary Lennon, Business Development Director.

14.2 This Complaints Handling Procedure shall be reviewed regularly at intervals of not more than 6 months and shall be updated as required.

- 14.3 This Complaints Handling Procedure was adopted on 4/11/2015.
- 14.4 This Complaints Handling Procedure was last reviewed on 17/10/17.