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Document Control

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1. Purpose

The purpose of this document is to set out the Company's procedures relating to the internal handling of complaints, including the time limits within which the Company must deal with a complaint. This is to ensure that complaints are handled fairly, effectively and promptly and resolved at the earliest possible opportunity.

The purpose of these procedures is to minimise the Company's regulatory risk by ensuring complaints are handled in a professional and timely manner.

2. Definition of a Complaint

The Financial Conduct Authority's definition of a complaint includes 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 alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience.

Complaints handling Do's and Don'ts

Do...

- Make sure all relevant staff can recognise a complaint and know how the complaints procedures work
- Be friendly and courteous. Show you understand the complaint and the reasons for it
- Apologise or express regret. An apology is not an expression of liability. We have an unhappy customer and should acknowledge that
- Consider what will satisfy the customer and maintain goodwill
- Be prompt in replying, trying to reach agreement before attitudes become too fixed
- Set out clearly what you believe the customer is complaining about and any proposals for resolving the complaint
- Use plain English in letters and explain technical terms if we cannot avoid using them
- Try to make sure that the final response can "stand alone" and does not refer to earlier letters that may not be readily available to the customer. If we do refer to previous correspondence, attach a copy

Don't.

- Be defensive
- Reject the complaint out of hand
- Force the customer to seek legal redress

3. Responsibilities

- It is the responsibility of all personnel to be aware of, and comply with, the complaints procedure
- It is the responsibility of any member of staff who receives notice of a complaint to record the details and inform the MLRO in writing as soon as practicable
- It is the responsibility of the MLRO to co-ordinate an investigation and respond to all complaints received by the Company. Where required they will seek assistance and input from the department or person against whom the complaint is made. The MLRO may appoint another person to investigate the complaint provided that person is of suitable seniority and experience to deal with the complaint and must not be the person against whom the complaint has been made
- It is the responsibility of the MLRO, to record all verbal or written complaints received by the Company. This includes:
 - Complaints handled, in the first instance, by a third party administrator
 - Complaints received by the Company in respect of all clients
 - Complaints received by the Company in respect of any other company trading names
- It is the responsibility of the MLRO to log and monitor the handling of all complaints

The MLRO will log all complaints and be responsible for responding to the complaint; however, these tasks may then be delegated to an appropriate person for investigation and response.

4. Action on Receipt of a Complaint

- a. When either a verbal or written complaint is received, details must be recorded and passed immediately to the MLRO, who will log the complaint. Details will then be passed on to the relevant area for investigation
- b. An acknowledgement letter (attached to this Appendix) and a copy of the Company's Complaint Handling Guide (attached to this Appendix) will be sent to the complainant. All complaints should be acknowledged within five working days of receipt (in any event no later than five working days from receipt)
- c. On notification of a complaint, the MLRO will log details onto control spreadsheet, which will be used to monitor how complaint is progressing and to ensure that all relevant timescales are being met. The complaint log spreadsheet is an Appendix to this procedure
- d. Upon completion of the investigation full details will be reviewed with the appropriate personnel and the MLRO will be responsible for responding to the complainant
- e. The MLRO will keep files copies of all correspondence

5. Written Complaints

A copy of complaint letters, together with any supporting evidence, will be held within the complaints files by the MLRO.

6. Verbal Complaints

On receipt of a verbal complaint, the following is important:

- To state our understanding of the complaint
- and
- To invite the complainant to confirm that our understanding of the complaint is correct

The following details should be recorded:

- The name, address and telephone number of the Individual
- Any relevant contact number
- Name of Account/ Account Number
- Nature of the complaint
- Any action to be taken and whether it has been agreed with the individual concerned
- Whether or not written confirmation is needed. In most cases the Company will confirm the receipt of a complaint in writing and the understanding of it

7. Timescales

Within eight weeks of receipt we must send the complainant either:

- a final response
- or
- a response which explains why we are still not: in a position to issue a final response, gives reasons for the further delay and indicates when we expect to be able to issue the final response and advises a retail client of their right to refer the complaint to the Financial Ombudsman Service

The rules also state that the following information is required to be included in our final response:

- A summary of the complaint
- A summary of the outcome of our investigation
- Whether we acknowledge there has been any fault on our part and whether the complaint will be upheld
- Details of any offer to settle the complaint and how long this offer will remain open
- For a retail client, a notification of the complainants right to refer the matter to the Financial Ombudsman Service

Failure to comply with any of these requirements in response to a regulated complaint would be a breach of the FCA rules. It is therefore important to ensure that letters have the correct regulatory information before sending anything out.

8. Complaints answered within one business day

The **rules** detailed above do not apply to a **complaint** that is resolved by a **respondent** by close of business on the **business day** following its receipt, however the company will still log these and include these complaints as part of their ongoing analysis of Complaint trends and MI.

9. Record Keeping and the Data Protection Act 2018

All staff should be aware of the requirements that the Company has as a Data Controller under the Data Protection Act 2018 (DPA).

A copy of all required information for the complaints process is maintained in securely held files for the purpose of complying with our legal and contractual obligations under the DPA.

The MLRO will review all personal data held in respect of complaints to ensure that personal records are only held for the purpose of enabling the complaints process to be completed and are not held for longer than necessary. The FCA rules require that we retain records of complaints for a minimum period of five years from the date of receipt.

10. Complaint Reporting

A register of all complaints logged against the Company will be maintained by the MLRO.

Internal

The register is used to facilitate the reporting of complaints statistics to the Directors on a monthly basis.

11. FOS (Financial Ombudsman Service)

A register of all complaints that have been referred to FOS will be maintained by the MLRO.

It is the responsibility of the MLRO to co-ordinate an investigation and respond to all complaints received by the Company. It is also their responsibility to provide MI on cases received and, on their progress, i.e. whether FOS have upheld the case.

Acknowledgement Letter

Dear

Acknowledgement of your Complaint

I am writing to acknowledge receipt of your recent complaint.

SimplePay London Ltd (PAYPORT UK) takes all such matters very seriously and your complaint will be investigated carefully and with urgency. You will be kept fully informed of any action taken to resolve the problem. I shall contact you further in due course but in the meantime, I enclose a copy of our Complaint Handling Guide for your information.

Yours sincerely

MLRO

Complaints Handling Guide

If you have a complaint about any aspect of our service then we would like to hear from you. You can contact us by telephone or in writing, by post, fax or email at the above address. Please address all correspondence to the MLRO.

Our Complaints department will be best placed to receive your complaint and work with you to resolve it.

PAYPORT UK has established an internal complaints procedure to ensure your complaint is dealt with efficiently, promptly and by the correct person. To help us investigate and resolve the problem as quickly as possible, please make sure you give us the following information:

- Your name, address and client reference number
- A clear description of concern or complaint
- Details of what would like us to do to put it right
- Copies of any relevant documents, such as letters
- A daytime telephone number where we can contact you

We will try to resolve your complaint immediately, and with minimum of inconvenience to you. The first step is for us to be really clear on what the problem and to with you what we can do to put it right. The more information you can give us the better.

Sometimes we will not be able to solve the problem for you immediately. if we are unable to resolve your complaint by the following day, and if we have not already contacted you to agree our proposal for resolving it, we will:

- Send an acknowledgement of your complaint in writing within 5 working days
- Confirm who will handle your complaint, and how you can contact them

If your complaint is particularly complex in nature, we will keep you informed of the progress we are making as we continue our investigations.

In any event we will endeavour to resolve your complaint and provide you with a final response within 8 weeks.

In our final response we will include:

- A summary of the complaint
- A summary of the outcome of our investigation

PAYPORT UK is a registered trading name of SimplePay London Ltd. Companies House reference #11059479. SimplePay London Ltd is registered with the Financial Conduct Authority under the Electronic Money Regulations 2011 # 902044 for the issuing of electronic money.

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- Whether we acknowledge there has been any fault on our part and whether the complaint will be upheld
- Details of any offer to settle the complaint and how long this offer will remain open
- If you are a retail client, a notification of your right to refer the matter to the Financial Ombudsman Service

If we are unable to provide you with a final response within 8 weeks, we will write to you with:

- An explanation as to why we are unable to provide you with a final response and with an indication as to when you will get one
- If you are a retail client, a notification of your right to refer the matter to the Financial Ombudsman Service

Parliament established the Financial Ombudsman Service as the official independent expert in settling complaints between consumers and businesses providing financial services.

You can obtain a copy of the Financial Ombudsman Service explanatory leaflet from us or contact the Financial Ombudsman Service directly at:

The Financial Ombudsman Service
South Quay Plaza
183 Marsh Wall London E14 9SR

Telephone: 0845 080 1800*
E-mail: enquiries@financial-ombudsman.org.uk
Website: www.financial-ombudsman.org.uk

Remember, we value your feedback. Help us to get it right every time, for every client.

Final Response – Complaint Upheld

[FOS leaflet can be excluded if 8-week holding letter already sent]

[Enter Name]
[Enter House Number]
[Enter Street Name]
[Enter Town/City]
[Enter County]
[Enter Post Code]
[Enter Date]

Dear [name]

[Enter reference number if applicable]

Further to my letter of [date of latest correspondence], I have now investigated your complaint fully and would like to apologise for [short summary of mistake/poor service], and for the inconvenience/distress this has caused you.

As a result of our mistake/poor service [enter final response]

Please note that, under terms of our Complaints Procedure, this is our final response. If you are dissatisfied with it, you may refer your complaint to the Financial Ombudsman Service. You need to do this within six months from the date of this letter.

The address of the Financial Ombudsman Service is:

Financial Ombudsman Service South Quay Plaza
183 Marsh Wall London, E14 9SR

Additional paragraph and enclosure if final response doubles up as acknowledgment (i.e. is sent within 5 days of receipt of complaint.)

[I also enclose a copy of our internal Complaints Procedure for your information.]

Once again, we are sorry for the inconvenience we caused you and hope you will find that the points above offer a fair resolution.

Yours sincerely,

[Enter Name of person handling the complaint] [Enter Job title of person handling the complaint]
[Enter medium by which they can contact you e.g. direct dial]
Encs: FOS explanatory leaflet 'Your Complaint and the Ombudsman'
[Name of company, Complaints Procedure leaflet]

Final Response – Complaint Not Upheld

[FOS leaflet can be excluded if 8-week holding letter already sent]

[Enter Name]

[Enter House Number]

[Enter Street Name]

[Enter Town/City]

[Enter County]

[Enter Post Code]

[Enter Date]

Dear [name]

[Enter reference number if applicable]

Further to my letter of [date of latest correspondence], I have now investigated your complaint fully. While I understand the [inconvenience/distress] that this has caused you I regret that I am unable to [summary of customer's request/demand]. The reason for this is [give full detail].

Please note that, under terms of our Complaints Procedure, this is our final response. If you are dissatisfied with it, you may refer your complaint to the Financial Ombudsman Service. You need to do this within six months from the date of this letter.

The address of the Financial Ombudsman Service is:

Financial Ombudsman Service South Quay Plaza
183 Marsh Wall London, E14 9SR

Additional paragraph and enclosure if final response doubles up as acknowledgment (i.e. is sent within 5 days of receipt of complaint.)

[I also enclose a copy of our internal complaints procedures for your information.]

I acknowledge the [inconvenience/difficulties/distress] this situation has caused you, but taking into account my comments above, I am sorry that we are unable to [offer the response you were looking for/take this matter further].

Yours sincerely,

[Enter Name of person handling the complaint] [Enter Job title of person handling the complaint]

[Enter medium by which they can contact you e.g. direct dial]

Encs: FOS explanatory leaflet 'Your Complaint and the Ombudsman'

[Name of company, Complaints Procedure leaflet]

Customer Complaints Report

PAYPORT UK	Customer Complaint Report
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If a complaint has not been resolved by the end of the next business day, the member of staff must complete this report and immediately pass it to the Compliance/MLRO

Customer name:		Staff member who took complaint & is completing this form:	
Account No:		MLRO:	
Reason for Complaint:			
<p>Provide details of complaint:</p> <p>How the complaint was made (phone/email/letter/in person etc.):</p> <p>Actions already been taken to resolve the complaint If the complaint was resolved by the end of the next business day you could record details here (optional), then complete the 'Complaints resolved by the end of the business day' log & file a copy of this report on the customer's file. (Alternatively, you can complete the log direct.) If it hasn't been resolved, make a note of action taken so far then pass this sheet - together with relevant documents - to the MLRO/investigator.</p>			
Staff Signature:		Date:	
Complaints/ Compliance Manager Signature:		Date:	
<p>MLRO/Compliance Use Only</p> <p>Actions taken/Final Outcome: (please give a summary of actions/correspondence, complete the General Complaints Log, then file this report both on the customer's file and with the General Complaints Log.)</p>			
Signature		Date	