



Complaints Policy



Document Approval & Revision History

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(The Complaints Policy should be approved by two individuals, the individual should be at a capacity not less than the functional owner, the second can be any member of the executive committee)

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SECTION I

Introduction

A complaint is an expression of protest, grievance, objection, discontent or dissatisfaction made by a complainant against the institution or any agent thereof; regarding a product or service, or regarding the conduct of the institution. Having good and transparent relationships with stakeholders is very important therefore, great value is attached to being well informed on possible sources of complaints, and to get in contact with any dissatisfied person so that suitable solutions can be found which in return improves our products, activities and services.

This policy describes the measures that A & N Loan Hub will implement to ensure that an effective and transparent policy along with related procedures for the prompt handling of complaints are in place. It provides clear and accurate guidelines in respect of the complaints handling process. This policy document applies to all complaints received from clients irrespective of the channel used to register the complaint. Compliance with this policy document is mandatory for all staff members.

Objectives

This policy applies to all activities, products and services offered by A & N Loan Hub. The policy sets out the types of measures that should be taken by all members of staff. It is based on several Jamaican regulations and directives in force related to financial institutions such as the Banking Services Act, 2014; Microcredit Act, 2019; and in compliance with generally acceptable complaint management standards.

A & N Loan Hub's Complaint Management policy is intended to:

- I. Provide a framework to guide employees in handling client complaints;
- II. Ensure consistency in handling and resolving complaints;
- III. Ensure that staff members are aware of their responsibilities and are empowered to manage complaints;
- IV. Ensure adherence to regulatory requirements.

SECTION II

Complaints Management Function

The complaints management function allows for complaints to be investigated fairly and possible conflicts of interest to be identified and mitigated. It outlines the procedures for logging, tracking, monitoring and reporting. Effective complaint management requires the active involvement of all staff with clear points of accountability for logging, tracking, monitoring and reporting

The Compliance Department

This Department provides oversight and guidance in relation to the effective management of complaints within the organization. Its primary responsibilities are:

- I. Participating in and managing the process of logging, tracking, investigating and resolving complaints;
- II. Ensuring that the Complaint Management Standard Operating Guidelines Framework is documented and receives Board approval;
- III. Reviewing the Complaint Management Standard Operating Guidelines Framework periodically to ensure effectiveness and continued relevance.

Role of Compliance Officer

The Compliance Officer is responsible for monitoring the operations of the complaints handling process and must consider complaints as a source of relevant information in the context of his/her general monitoring responsibilities. For that purpose, and in particular where a

complaint relates to client loan accounts, he or she shall carefully analyze the complaint and complaints handling data to ensure that any risks or issues are identified and addressed.

The Compliance Officer/Compliance Department owns the management of complaints from the initial report to resolution. They should also manage the communication with regulatory entities regarding applicable complaints. Post resolution contact surveys should be carried out by the Compliance Officer or his/her designate after complaints have been resolved. Periodic support/training should be given to staff members re Complaint Management and Service Recovery this should also be done by the Compliance Officer.

Role of Staff Members

- I. Staff members, in their interactions with clients, shall behave in a manner consistent with this policy document and A & N Loan Hub's Client Service Standards.
- II. Staff members shall log all complaints in the Complaint Management System, irrespective of client touch point and including those that are resolved at first point of contact. Reference numbers shall be given to clients to facilitate follow-up, if necessary.
- III. Staff members should assist with investigations and provide all pertinent information relating to a complaint.
- IV. In the execution of their duties, staff shall ensure that company guidelines are followed when dealing with clients thereby minimizing the number of complaints received from clients.

- V. All staff members shall be required to read the Complaint Management Policy and confirm via signature that the details have been read and understood.

SECTION III

Framework for Complaint Management

Types of Complaints	Who Manages It	Escalation Process	Documentation Process
At point of service (Verbal)	Client Services Representative /Credit Officer/Collections Officer	Escalate to the immediate supervisor then to the Compliance Officer, if necessary	Document verbal complaints in logbook. Escalation should be documented
Through the structured Complaint Management Process (Written)	Compliance Officer	Refer matter to Operations Supervisor if it is a straightforward and easily addressed loan account related matter, and monitor outcome. If not, escalate to the Senior Manager Risk & Compliance if necessary	Document written complaints in the Complaint management System
Through escalation (Written)/Social Media Complaints	Compliance Officer	Escalate to the Board of Directors where the company's image might be tarnished	Document written complaints in the Complaint management System

Point of Service Complaints

Complaints shall be dealt with directly and quickly at the point at which the issue arises. When a verbal complaint is made to a member of staff once they possess requisite knowledge to handle/resolve such, then escalation of this complaint should be avoided. In instances where a client does not feel comfortable lodging a complaint to front-line staff (e.g. Client Services Representative, Credit Officer), then that individual shall refer the matter to his/her supervisor

or in extraneous circumstances the Compliance Officer or in his/her absence the Senior Manager Risk & Compliance. Once a written complaint has been reported and logged, the client should receive a reference number.

Receiving Complaints

Complaints may be lodged in person, via the telephone, or in writing as well as through the social and print media. Any complaint shared via social or print media shall be referred directly to the Compliance Officer for guidance. Staff at all levels can accept complaints and shall ascertain what action they can take to resolve them or refer to the responsible unit or individual for assistance.

Channels for Client Complaints

Complaints may be shared with the organization via the following channels:

- I. Front desk
- II. Calls to A & N Loan Hub
- III. Email
- IV. Visit to a branch
- V. Suggestion Box
- VI. Face to face including non-branch staff
- VII. Social Media

Complaints are made verbally or in writing therefore, the details entered in the Complaint Management System shall include the following information:

- I. Client's name /TRN
- II. Telephone/email contact
- III. Complaint date
- IV. Details of complaint
- V. Date and/or time of complaint

If a client registers a complaint with a regulatory body the response shall be written and documented. These bodies include but are not limited to:

- I. Credit Bureau
- II. Bank of Jamaica
- III. Financial Services Commission Consumer Affairs Commission

NB. These responses shall be provided by the Compliance Officer/Senior Manager Risk and Compliance.

Types of Client Complaints

- I. Inadequate/poor service;
- II. Company policies which may seem prohibitive, restrictive or anti-competitive ;
- III. The employees' attitude or handling of a matter;
- IV. Branch/Company culture;
- V. Delay in responding to client queries;

- VI. Non availability of staff in the branch (time management);
- VII. Cumbersome/Malfunction/Non-compliance of processes, procedures and benchmarks;
 - a. Application process delays
 - b. Delayed disbursement
 - c. Fraudulent activities (cash collected not deposited)
- VIII. Non availability of required documentation
- IX. No or informal receipts issued to clients
- X. Funds not transferred to the designated Bank
- XI. Incorrect accounts record due to error or omissions
- XII. Gaps in standard and actual services rendered

The investigation process shall include:

- I. a review of the complaint details in CMS;
- II. using the relevant steps/methods to resolve the complaint;
- III. moving the complaint status to resolved in CMS with appropriate notation of results of investigation;
- IV. updating CMS with all interactions (conversations and written correspondence) with the client during the process. Once the complaint has been investigated and resolved, the staff to whom the complaint has been assigned shall update CMS with appropriate resolution/comments. Options for appropriate resolution shall include, but not limited to:

- a. Correcting the cause of the complaint and advising the client;
- b. Dispatching an apology Letter to the client and copied to external body (where required).

Waiving/discounting fees and advising the client (permission shall be granted by the responsible personnel, or by someone at the appropriate level). Final responses, where applicable, can be in the form of a letter signed by supervisor/HOD. The final response shall be factually correct and shall:

- I. Include an apology

NB: This is not necessarily about accepting blame or fault, but shall sometimes be an acknowledgement of the client's experience and their feelings.

- II. Address each of the points the client has raised with full explanation;
- III. Give relevant specific details about the investigation; and
- IV. Give details of action taken as a result of the complaint (if applicable); Provide channels through which the client may contact the company shall they have further queries/questions.

Escalation of Complaints

Nature	Escalated To
Remain unresolved after a period of three (3) days	Immediate supervisor
Remain unresolved after a period of seven (7) days as a result of the investigation process	Compliance Officer through the immediate supervisor

Nature	Escalated To
Tarnish the company's image	Senior Manager Risk and Compliance through the Compliance Officer
Service Level Agreements have been breached	Compliance Officer through the immediate supervisor
Disclose possible misconduct on the part of a staff member	Compliance Officer through the immediate Supervisor
Require communication with or reporting to external entities including regulatory bodies such as Bank of Jamaica, Credit Bureau, Financial Services Commission and Consumer Affairs Commission	Compliance Officer through the immediate Supervisor
Issues with negative implications for the company's operation	CEO/Board of Directors through the immediate Supervisor, Compliance Officer and the Senior Manager Risk and Compliance

Registering and Acknowledging Complaints

A Complaint Management System shall be kept by the Risk & Compliance Department which registers each complaint received. As soon as a written complaint is received, staff members shall:

- I. Calmly acknowledge the client's concerns and provide an explanation of the possible contributing factors;
- II. Offer a sincere apology without speculating or attributing blame to the organization/other team members and/or units;
- III. Log the complaint in **the Complaint Management System**; provide the client with a reference number and the expected resolution time. Ensure that all correspondence associated with the complaint are attached to the case in the complaint management system, to include final decisions taken.

- IV. Advise the client of the expected resolution time and that they shall be notified of the outcome of the complaint.

Where a verbal complaint is received it shall be documented in the complaints register.

Guidelines for the Responding to Complaints

Complaints received by staff members shall be resolved within 3-10 business days. In instances where the timeline exceeds the prescribed limit, the Compliance Officer shall;

- I. Provide a response in keeping with company policies as well as policies set out under the Microcredit Act 2019 without any unnecessary delay;
- II. The complainant shall be provided with a confirmation of receipt;
- III. When an answer cannot be provided within the expected time frame, the Compliance Officer should inform the complainant regarding the cause of the delay and indicate when the investigation is likely to be completed.
- IV. When communicating the company's position/action regarding the complaint to the complainant(s), it must be clear and easily comprehended.

A & N Loan Hub will inform prospective clients of the procedures for handling complaints. If a client wishes to make a complaint, the institution will provide information on how this may be done and the means of recourse if the client is not pleased with the outcome. A & N Loan Hub will also, in response to a written complaint:

- I. Send a written acknowledgement, within ten (10) working days of receiving a complaint. This acknowledgement may take the form of letters, e-mails, texts, IVR

- applications or such other forms as the bank may have available for communication with the client;
- II. Write to the Client again, within six (6) weeks, with a final response or to explain the reasons for the failure to provide a response, if more time is required;
 - III. Send a final response within ten (10) weeks (if an explanation instead of a final response had been sent within six (6) weeks) and advise the client of the procedures (if any) for taking the complaint further if he/she is not satisfied with the outcome.

Complaints Resolution

Complaints must be investigated competently, diligently and impartially, taking into account all relevant factors. For example, relevant evidence might include company policies and procedures, point of transaction disclosure material, and both client and staff recollection of events. Investigations should address all aspects of the complaint. The investigating officer must assess the subject matter of the complaint, whether the complaint should be upheld and, if so, what remedial action and/or redress may be appropriate, in a fair consistent and prompt manner. In each case, the staff member investigating the complaint shall:

- I. Consider if it is necessary to obtain advice from specific personnel for example, his/her immediate supervisor/Compliance Officer/Senior Manager Risk and Compliance;
- II. Consider who needs the information (regulatory body or client). If a regulatory body requires the information this complaint shall be escalated to the Compliance Officer

through the immediate Supervisor. The Compliance Officer will escalate where necessary.

Internal follow-up of complaints handling

Complaints handling data should be analyzed on an ongoing basis, to ensure that any recurring or systemic problems are identified and addressed, as well as any potential legal and operational risks. Always solicit client feedback while responding to complaints in a manner that creates loyalty. Utilization of the information is essential to make procedural and process improvements in an effort to win the client goodwill, once it has been lost due to a service failure.

Client Feedback can be solicited utilizing the following:

- I. analyzing the causes of individual complaint to identify root causes common to the types of complaint;
- II. considering whether such root causes may also affect other processes or products, including those not directly complained of;
- III. correcting, where reasonable to do so, such root causes.
- IV. Uses data for continuous improvement.

SECTION IV

Root Cause Analysis for Complaints Filed

Some complaints shall be subject to Root Cause Analysis as a result of the high volumes received, the loss of revenue, depth of inconvenience to clients or if they indicate non-

conformity to policies. The intent is to find, correct or eliminate the cause and thereby prevent the problem from recurring.

Poor Service Delivery by Staff Member

The following procedure shall be adopted when a client registers a complaint regarding poor service delivered by staff:

- I. Complaint shall be logged in CMS and ticket number forwarded immediately to the immediate supervisor;
- II. The complaint shall be reviewed by the Hub Operations Manager or the Direct Supervisor and contact will be made with the client;
- III. The staff member involved shall be required to submit a report to the Hub Operations Manager or their immediate supervisor. The Hub Operations Manager or immediate supervisor shall provide an update to the Compliance Officer within two (2) business days of receiving the complaint. The report shall include:
 - I. An overview of the findings;
 - II. The staff's perspective;
 - III. Actions taken to address the issue(s) raised;
 - IV. Disciplinary action taken (where necessary);
 - V. Recommendation(s)/action(s) taken to bridge service gap.

Where disciplinary action is required, HODs shall act in accordance with the A & N Loan Hub's Disciplinary Policy.

Reporting

Internal

A report must be completed twice per year on the complaints received and be provided to the CEO.

External

Upon the bringing into effect of the Microfinance Act, 2019, the relevant authority which is so designated under the law.

Provision of Information to Clients

Details of the procedure to be followed when handling a Complaint should be made available to clients in an easily accessible manner, for example in brochures, contractual documents or via the website. Such details shall include information about the Complaints Handling Policy and the contact details of the complaints management function/unit/department. This information shall also be provided to stakeholders on request, or when acknowledging a complaint. The information about the Complaints Handling Process must be clear, accurate and up-to-date, and include:

- I. further details on how to complain (e.g. the type of information to be provided by the complainant;
- II. the identity and contact details of the person or department to whom the complaint should be directed;

- III. the process that will be followed when handling a complaint, e.g. when the complaint will be acknowledged, indicative handling timelines, the availability of the internal appeal procedure and of a competent authority or alternative dispute resolution entity. The complainant shall be kept informed about further handling of the complaint.

Protecting client information

In accordance with the applicable laws of the Government of Jamaica, A & N Loan Hub will treat client information as private and confidential in all instances. A & N Loan Hub will take all reasonable steps to safeguard against the disclosure to third parties' personal details of clients (including names, addresses or other details regarding client accounts), except as required or permitted by law or the clients' written authorizations.

Key controls

The institution will ensure the following are in place to handle and deal with client complaints:

- I. The Compliance Department will handle the complaints management system.
- II. a detailed procedure on how complaints are handled within the institution; in line with the principles set out in this policy, is available and clearly communicated.
- III. a complaint register/complaint management system in line with the requirements as set out in this policy.
- IV. a reporting structure in respect of complaints:
 - Internally, to Compliance Officer (who serves as the Complaints Coordinator)

- Externally, to local regulator (if necessary)

Ownership and Maintenance

This policy is owned by the A & N Loan Hub. This document and any changes thereto will require the approval by the CEO and Board of Directors. But, as laws and our environment change, we may revise and modify some of our policies. We will establish assessment and review of the document biennially to ensure alignment with applicable laws. We also ask you to contact the HR representative, if you see any inconsistencies or errors.

Employee Acknowledgement

Please sign to acknowledge that you've read this handbook and that you are committed to following our policies. If you need any clarifications, feel free to speak with the HR representative.

APPENDIX

EMPLOYEE RECEIPT AND ACCEPTANCE

I hereby acknowledge that I have read and understood A&N Loan HUB Complaints Policy. I understand that it is my responsibility to read and know its contents.

Signature _____

Print Name _____

Date _____