

# **Our Complaints Policy – Fresh Start Finance LTD and Scott Mortimer**

## **We value complaints.**

We aim to behave in a way that does not cause complaints. However, we have a complaints policy and internal complaints process to ensure the efficient and effective handling of client complaints. We want to demonstrate our commitment to providing and improving a high-quality service to our clients. We see complaints as an important part of our client feedback and business improvement process.

*A complaint is “an expression of dissatisfaction made to you or to a person engaged by you, relating to your financial advice service (including any regulated financial advice given to a retail client by you or on your behalf), or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected. A complaint includes a complaint about a failure to provide a service or give advice”.*

All staff are responsible for identifying and responding to complaints in the first instance and directing clients to our internal complaints process if the complaint cannot be resolved.

We record all complaints in our complaint register so that we can learn from these client experiences and improve our business.

## **We will:**

- deal with complaints in a fair and transparent manner
- treat complaints with priority and give a timely response
- be fair and act with integrity
- take a genuine, fresh look at the issues raised and not be defensive
- try to see things from the client’s perspective, to understand and address why they think we were wrong
- acknowledge our mistakes and put them right if we can
- manage complaints using a defined and agreed process
- make sure clients know how our complaints process works, are clear which stage of it they have reached and what will happen next
- train our staff to apply the policy and processes for complaints resolution.

# Internal Complaints Process

This process is designed primarily for internal use within a business, with our client-facing complaints process. Our client-facing complaints process will be made available to all clients on our website, [www.freshstartfinance.co.nz](http://www.freshstartfinance.co.nz) or you can request one via emailing us at [scojo@xtra.co.nz](mailto:scojo@xtra.co.nz)

We have a 3-step complaints process:

## *Step 1 – Complaint*

- Every expression of dissatisfaction made to you or to a person engaged by you, relating to your financial advice service, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected is treated as a **Complaint**. This includes a complaint about a failure to provide a service or give advice.
- All complaints will be logged in the complaints register.
- We will resolve the complaint as soon as we can (often immediately if it can be resolved by providing an explanation or information).
- If the client complaint is not resolved and the client wishes to continue, then the client will be told about our Steps 2 and 3 complaints process in writing.

## *Step 2 – client complaints*

- The Step 2 complaint will be acknowledged by telephone and in writing (by letter or email as is appropriate) as soon as we can.
- All Step 2 complaints will be escalated to Scott Mortimer as part of our internal complaints process.
- We will investigate the complaint, obtaining any relevant information required and reconsider the complaint based on its merits. We will respond to the client in writing (“the response”) as soon as we can.
- If the client does not accept our decision and provides new information or issues, then Scott Mortimer will conduct a further review to determine if the new information or issues affect the response. Scott Mortimer will then write the client a second response (“the second response”) as soon as he/she can.

## *Step 3 – final decision and referral to IFSO Scheme*

- If the client does not accept the Step 2 complaint response or the second response and wishes to pursue the complaint, then we will review the response (and/or second response) again as the last stage in our complaints process.
- If the response remains unchanged, we will advise the client that we have reached the end of our internal complaints process by notifying them of “deadlock” (“the final response”). That means if they want to pursue the complaint, the client can make a complaint to the IFSO Scheme.

## *Complaints Register*

- All client complaints will be recorded in the complaints register. This will include the date of the complaint, the actions taken to resolve the complaint and the dates of these actions.
- The complaints register will be reviewed regularly to identify any improvements we can make to the services and/or information we offer clients.

# Client Complaint Process

*Do you have a complaint?*

We aim to provide you with the highest quality service and support. But if you do have a complaint or encounter a problem, please let us know as soon as you can. Our complaints process aims to address your concerns.

*Step 1 – Let's sort it out*

Discuss your complaint with the person you've been dealing with and try to resolve it.  
Call us/me on 0272712282 email: scojo@xtra.co.nz or come and see me/us.

*Step 2 – Review*

If your complaint is not resolved by Step 1, you can call, email or arrange to see [named senior staff member and contact details] [or complete a Feedback Form, which details your concerns]. Scott Mortimer will look into your complaint and give you a written response.

*Step 3 – I am/we are a Participant of the Insurance & Financial Services Ombudsman Scheme ("IFSO Scheme")*

You can refer your complaint to the IFSO Scheme if it has not been resolved after going through our complaints process. This is a free, independent dispute resolution service which will consider your complaint and, either reach an agreed outcome, or make a decision.

See [www.ifso.nz](http://www.ifso.nz) or call 0800 888 202 for information on the IFSO Scheme.



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**Signature:** \_\_\_\_\_  
Name

**Date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_  
Name (if more than one person is our client)

**Date:** \_\_\_\_\_