

Complaints Policy and Procedure

Last updated:	May 2025 by the CEO
Authorised:	May 2025 by the BoD
To be reviewed:	July 2026

1. Policy Statement

1.1 Kingdom Community Bank (KCB) is committed to delivering exceptional service and treating all customers fairly. We view complaints as valuable feedback and opportunities to improve our services and customer experience. This policy outlines our approach to handling complaints in a manner that is fair, transparent, and in compliance with all regulatory requirements, including the FCA's Consumer Duty.

2. Our Commitment

2.1 We are dedicated to:

- Providing a fair and clear procedure for anyone wishing to make a complaint;
- Ensuring our staff and volunteers are trained to handle complaints effectively and empathetically;
- Investigating complaints impartially and promptly;
- Resolving complaints wherever possible and repairing relationships as needed;
- Learning from complaints to improve our services and prevent future issues.

3. Who Can Complain?

- 3.1 Anyone who has interacted with KCB, whether as a member or not, can make a complaint about any aspect of our service or conduct. We encourage complaints to be made as soon as possible after the issue arises to facilitate timely investigation. There is no time limit for making a complaint; we will investigate historical complaints as thoroughly as current ones.
- 3.2 Internal complaints from staff or volunteers should be addressed through our Grievance Policy and Procedure.

4. Respect and Confidentiality

- 4.1 All complaints will be handled with respect and confidentiality. Information will only be shared with those directly involved in the investigation and resolution process. We adhere to all relevant data protection regulations.
- 4.2 We reserve the right to make a public statement in response to a complaint, respecting confidentiality at all times.

5. Responsibility

Overall responsibility for this policy and its implementation lies with KCB's Board of Directors. Operational implementation and compliance is delegated to the Chief Executive Officer (CEO).

6. Making a Complaint

- 6.1 Complaints can be made through the following channels:
 - Online: Visit our website at <u>www.kingdomcb.org.uk/complaints</u> to access our complaint form.
 - **E-mail**: Send your completed complaint form or written complaint to ceo@kingdomcb.org.uk.
 - Post: Mail your completed complaint form or written complaint to our main office.
- 6.2 While using our complaint form is not mandatory, it helps us understand and address your concerns more effectively.

6.3 We may also proactively investigate issues that come to our attention, even if a formal complaint has not been submitted.

7. Verbal Complaints

- 7.1 Verbal complaints will be documented and treated as informal feedback unless the complainant wishes to escalate the matter formally. We encourage individuals to submit formal complaints in writing to ensure a thorough investigation.
- 7.2 Use of offensive language or rude, threatening or intimidating behaviour or language is not acceptable and may result in us terminating membership and refusing to deal with you. In some cases, we may report the matter to the police.

8. Complaint Resolution Process

8.1 Stage One

1. Logging the Complaint

All complaints are recorded securely in the Complaints Log, maintained by KCB managers in accordance with data protection requirements.

2. Escalation for CEO-Related Complaints

If a complaint concerns the CEO, it is automatically escalated to Stage Two and referred directly to the Board of Directors.

3. Assignment of Investigator

Complaints not immediately resolved are assigned to a senior employee deemed sufficiently objective. In complex or sensitive cases, the CEO may appoint a suitably qualified external investigator.

4. Investigation Process

The investigator determines whether direct contact with the complainant is necessary and gathers the evidence required. If the complaint relates to a specific individual, that person must be informed at the earliest opportunity and given a fair chance to respond.

5. Acknowledgement

We will acknowledge receipt of your complaint within 5 working days, including the name of the person handling your complaint and an estimated response date. A copy of this Complaints Procedure will be provided.

6. Response Timescale

We aim to issue a final response within 15 working days. If this is not possible, an interim update will be provided. We will always respond fully within 8 weeks (40 working days), as required by FCA DISP 1.6.2.

7. Outcome Communication

The final response will detail the findings, conclusions, and any remedial action taken (e.g., apology, redress, service improvement), regardless of whether the complaint is upheld.

8.2 Stage Two – Internal Review by a Director

1. Grounds for Escalation

A complaint may progress to Stage Two only where a substantive reason is proved. Such reason include that the complainant can reasonably demonstrate:

- a significant mistake or error in how the complaint has been handled which is likely to materially impact on the decision;
- that the person investigating the complaint was conflicted in a significant way;
- there has been a breach in legislation, regulations or rules whilst handling the complaint or which resulted in the complaint and the decision is unacceptable to the complainant;
- some other significant reason why the decision has not been reached properly. Dissatisfaction with the outcome alone is not sufficient.

2. Handling CEO Complaints

If the complaint concerns the CEO, any tampering or suppression of the complaint by the CEO will be considered a serious disciplinary matter and referred to the Board.

3. Requesting a Review

Requests to escalate to Stage Two must be made within 10 working days of receiving the Stage One outcome. These will be referred by the CEO to a Director with limited prior knowledge of the incident.

4. Acknowledgement and Assignment

Acknowledgement will be sent within 5 working days, confirming the reviewer's details and expected timeframe for a decision.

5. Investigation Process

The Director may:

- Personally review the evidence;
- Interview the Stage One investigator;
- Involve a senior or external investigator for impartiality.

The subject of the complaint (if any) will be informed and allowed to respond as necessary.

6. Response Timescale

A conclusive response will be sent within 15 working days. If delays occur, we will send a progress update. The final deadline for resolution remains 8 weeks, per FCA DISP 1.6.2.

7. Final Response

Our reply will set out the decision, rationale, and any remedial steps taken. If unresolved to the complainant's satisfaction, referral to the Financial Ombudsman Service (FOS) is available.

9. Complaints That Cannot Be Investigated

- 9.1 We cannot formally process complaints that are:
 - Anonymous;
 - Submitted directly to Board members, bypassing proper channels;
 - Repeats of previously closed complaints without substantive new evidence;
 - Involving matters currently under legal proceedings;
 - Not related to KCB services, products, or personnel.

10. Receiving Our Decision

10.1 We will write to you with our conclusion on the complaint. We will always endeavour to reach a conclusion that you will be happy with, but in some cases this may not be possible. We must act legally at all times, and endeavour to be fair and responsible in our dealings with members. If you are not satisfied with how we have handled your complaint, or with the outcome, you are able to make a formal complaint to the Financial Ombudsman Service within 6 months of the date of receipt of our final response to your complaint.

11. Contacting the Financial Ombudsman Service

11.1 Website: www.financial-ombudsman.org.uk

E-mail: enquiries@financial-ombudsman.org.uk

Phone: 0300 123 9123 or 0800 023 4567

Post: Financial Ombudsman Service, Exchange Tower, London, E14 9SR

We will include an FOS leaflet with our final response, in accordance with DISP rules (Dispute Resolution as per the Financial Conduct Authority (FCA) Handbook).

Complaint Form



Before you begin

We are sorry that you've had a reason to access this form and we appreciate you taking the time to share your experience with us. We aim to resolve issues promptly and fairly, and as a member-led organisation, we value every opportunity to learn and improve. Please be assured that we take all complaints seriously.

What is this form for?

This Complaint Form is here to support members who feel they haven't received the standard of service they should expect from us. Thankfully, such instances are rare—but when they do happen, we want to hear about them.

How does it work?

This form is part of our Complaints Policy and Procedure, which you can request from any of our branches. It is also available on our website at www.kingdomcb.org.uk/complaints.

Do I have to complete this form to make a complaint?

No—you don't need to complete this form to make a complaint (see our Policy and Procedure for other options). However, using this form can help us resolve your concern more efficiently.

What information should I include?

Please fill in as much of the form as you can, with clear and specific details. This helps us understand the nature of your complaint, investigate it properly, and respond as quickly as possible. If we need more information, we'll get in touch—so please make sure your contact details are accurate. Providing an e-mail address is helpful as it allows for quicker communication.

Is this process confidential?

Yes—all information provided is treated with strict confidentiality and used solely to investigate your complaint and improve our services. Complaints are handled only by senior staff or Directors.

Need help or have questions?

We welcome all feedback—positive and negative. It helps us improve and put things right when they go wrong. If you need assistance making a complaint or have questions, please get in touch. Call us on 01592 714888 or email the CEO directly at ceo@kingdomcb.org.uk.

This form was last updated in May 2025.

Your name			Member No.		
E-mail address					
Phone number		Date you complete	ed this form		
	Date and, if appropriate, the approximate time that this issue/incident happened				
Please tell us what your complaint is about. Use this box to provide as much information and detail as you can that you think will help us to deal with your complaint.					

Are there any other persons/witnesses that you think we need to speak to about this?					
Can you please answer these 3 brief questions for us by circling or tick					
Was our treatment of you courteous and respectful?	Yes	Sort of	No		
Did we try to resolve your issue at the time?	Yes	Sort of	No No		
Was our communication with you at the time easy to understand?	Yes	Sort of	NO		
What result/outcome are you hoping for?					

Thank you for taking the time to share your experience with us. We will do what we reasonably can to look into this matter without any undue delay. We always acknowledge and respond to complaints.

Final Steps

If you have any paperwork, e-mails, printouts or other materials or evidence that would support your complaint, please include/attach it to this form when you submit it.

Please now print this form, sign it and post it to us at: Private and Confidential, CEO, Kingdom Community Bank, Main Street, Methilhill, Fife, KY8 2DP.

Or, e-mail it to the CEO at this confidential address: ceo@kingdomcb.org.uk

For Office Use Only				
Date received dd / mm / yyyy Initials	Method			
Entered into Complaints Log dd / mm / yyyy	Initials Log Reference No.			