



Complaints Handling Policy

This policy outlines the British Business Bank Group's approach to capturing, responding to and resolving complaints.

VERSION CONTROL

Version	Date	Author	Description	Approved by	Date approved	Date published
V1.0	19SEP14		BBB-wide internal complaints policy and procedures	Board Risk Committee	28 October 2014	01 November 2014
V1.1	23OCT14		Policy name change	CRO		
V2.0	06FEB18	Head of Customer Experience	BBB External Complaint Policy	Executive Directors	12 Mar 2018	21 Mar 2018
V . 2 .	17FEB20	Risk and Compliance Manager	Inclusion of link to BBB Privacy Notice	CRO	20 Feb 2020	21 Feb 2020

Policy owner: Chief Risk Officer
Policy level: Level 2
Policy approver: Board Risk Committee
Approval date: TBC
Annual review date: TBC
Document owner: Risk and Compliance Manager

1 Purpose & Objective

The British Business Bank Group (BBB) strives to deliver a fair and positive experience for all individuals engaging with their programmes.

The feedback BBB receives from an individual or organisation, whether positive or negative, is a primary way that the Group identifies areas for improvement. For this reason, it is essential that there is a clear and effective process for capturing, responding to and resolving complaints.

The purpose of this Policy is therefore to provide you with a clear and transparent process for submitting a complaint.

The objectives of this Policy are to:

- Provide a clear outline about how you or an organisation can express their dissatisfaction or make a complaint.
- Explain who should be contacted when submitting a complaint.
- Clearly communicate the levels of service you can expect when going through the complaints process.

A separate Start Up Loans Complaints Handling Policy for Start Up Loans only Customers can be found on the complaints section of the Start Up Loans website (<https://www.startuploans.co.uk/complaints-policy/>).

2 Scope

This Policy applies to any individual or organisation who has engaged with BBB entities, operations and subsidiaries, and wishes to express dissatisfaction.

This Policy does not apply to complaints about BBB Delivery Partners, which are separate legal entities that operate to their own policies and procedures. However, feedback on the administration and delivery of BBB programmes is welcomed as it enables us to investigate and identify areas for improvement.

This policy does not apply to SULCo customers who have already exhausted the SULCo complaints policy.

The BBB has separate policies and procedures for individuals, companies and other organisations who wish to submit a Freedom of Information request or a Data Subject Access Request.

This Policy does not apply to employees of BBB.

3 Legal and Regulatory Obligations

The BBB is not regulated by the Financial Conduct Authority (FCA).

In line with market practice, complaint records are kept on file for a three year period and BBB will co-operate with any official investigations or requests for information, as required by the relevant authorities.

4 Definition of terms

Complaints

A complaint is not restricted to a formal submission of dissatisfaction. Any individual or organisation may communicate an issue or concern at any stage of their engagement with the BBB, through any method and via any channel.

Delivery Partners

The BBB and its subsidiaries work with a network of Delivery Partner organisations that deliver or support funding to start-up businesses or small and medium sized enterprises.

5 Key principles

5.1 Complaints Handling and Timescales

The BBB will consider all complaints received from any individual or organisation. Please see Section 6 below for contact information.

When a complaint is received, BBB will endeavour to address the matter promptly and in a fair and reasonable manner.

If a resolution cannot be reached promptly, the Complaints Manager will send you a written acknowledgement that will:

- Acknowledge that a complaint has been submitted;
- Advise you that appropriate team or Manager is reviewing the matter;
- Inform you that the matter will be investigated and that a Final Response will be provided in writing within eight weeks of the complaint being received (although BBB aims to resolve all matters sooner than this where possible).

This Final Response will be provided to you in a PDF format via email and will:

- Acknowledge all of the concerns within the original complaint;
- Outline the findings of the investigation;
- Clarify whether the complaint was 'upheld' or 'not upheld';
- Outline the proposed resolution (if applicable);
- Inform you that if you are not satisfied with the Final Response, you have the right to escalate the matter to the Chief Risk Officer at BBB. You must do this within six months of receiving your Final Response.

In exceptional circumstances, the Complaints Manager may not be able to provide you with a Final Response within eight weeks. In these instances, a holding communication will be sent to you in writing.

This holding communication will:

- Inform you of the delay;
- Outline the reasons for the delay;
- Provide an expected response time for sending the Final Response.

5.2 Escalations

In the unfortunate event that you are dissatisfied with the final outcome of your response from the Complaints Manager at BBB, you have the right to escalate your complaint to the Chief Risk Officer.

This can be provided in writing, addressing your complaint to the Chief Risk Officer at Complaints@british-business-bank.co.uk or to:

FAO: The Chief Risk Officer

British Business Bank plc
Steel City House
West Street
Sheffield
S1 2GQ

6 Contact Information

If you have any questions about this Complaints Policy, or BBB's approach to managing complaints, please use the following details:

Email*: Complaints@british-business-bank.co.uk

**You should expect an acknowledgement from a BBB representative within three working days*

If you are dissatisfied with your FCA regulated Delivery Partner, please use the following details:

Phone*: 0800 0234 567

Online: <https://help.financial-ombudsman.org.uk/help/enquiries>

Email: complaint.info@financial-ombudsman.org.uk

Website: <http://www.financial-ombudsman.org.uk/>

**A free number for mobile phones and landlines. Open weekdays 8:00am – 8:00pm and Saturday's 9:00am – 1:00pm*

7. Further information

BBB will not reimburse any fees, expenses or costs involved in raising a complaint. Nothing in this Policy should be interpreted to restrict any rights of redress a Complainant has in law.

Please note that this Complaints Policy cannot be used to deal with an issue that is part of any legal action against BBB.

The BBB reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation. This Policy does not confer any contractual rights and the BBB reserves the right to update this policy and its key terms at any time.

The BBB will always respect data confidentiality and any comments complainants make about its Delivery Partners, and will be dealt with in accordance with current Data Protection legislation.

It is the BBB's policy to present information on complaints to its Board at least quarterly.

BBB's Privacy Notice is available here: <https://www.british-business-bank.co.uk/privacy-notice/>