



BRIGHTER FINANCIAL SERVICES LTD

Complaints Procedure

As a client of Brighter Financial Services Ltd we aim to offer you the highest standard of financial advice and service. However we recognise that sometimes things can go wrong. In such cases we would always, wherever we are able to do so, wish to manage your concern to a satisfactory conclusion for all concerned and would ask our clients to work with us to help us achieve this.

Our complaints manager-

Mr Ross McFadzean, the Managing Director of our business will operate as the Complaints manager on behalf of all clients. Any client wishing to make a complaint to Brighter should communicate through Mr McFadzean in the first instance.

What happens if we receive a complaint?

When a complaint is received into Brighter Financial Services Ltd or an adviser becomes aware of circumstances that may give rise to a reportable complaint we will record the complaint and track it internally to ensure that it is resolved satisfactorily.

The Complaints manager will gather relevant evidence from those involved with the client's case in order to be able to review the case with full information to hand. The Complaints Manager will also determine who best to assign the case to in order to manage communications between the business and the client. In many cases this will be the Complaints manager themselves, but in certain circumstances, it could be with support from the senior IFA-Operational Management.

If there is any doubt as to whether a particular circumstance is classed as a complaint we will seek guidance from our independent compliance service.

We will always rely on written evidence in which to formulate the basis of a response from a complaint and will ask the adviser for additional evidence where necessary to help resolve a client's issue.

How will we deal with your complaint?

Whether you contact us directly with a verbal complaint or write to us outlining your concerns, these are the steps we will take:

- i. The Complaints manager will acknowledge the complaint within 3 days after receipt. We will handle all complaints, referred or otherwise via the procedures set out in this document.
- ii. In the event that the complaint relates to activities or services provided by another financial services partner, we will advise the client of this in writing, giving contact details of the partner or financial services provider involved, wherever possible. We will also ensure that, at the client's request, we forward their complaint in writing to the financial services provider concerned.
- iii. If we have not resolved your complaint within 8 weeks from date of receipt, we will write to you again with our reasons for delay. We will also enclose the leaflet "Your Complaint and the Ombudsmen" informing you of your rights to take up your complaint with the Financial Ombudsman if you are unhappy with the progress. We will confirm when we expect our final response to be made.
- iii. A final response to a complaint will be given in writing to the client. When we give our final response we will try to explain to the client all the reasons why we have come to our conclusion. If we feel that redress is appropriate we will show how we have calculated this, having based it upon what we believe is fair and appropriate to the complaint.
- iv. We would request that where financial compensation has been offered that acceptance of the offer is done in writing to Mr Ross McFadzean at Brighter Financial Services Ltd within 14 days of receiving the offer letter for recompense.
- v. In cases where the client is not satisfied with the outcome of the complaint they may be able to refer their case to the Financial Services Ombudsman free of charge. Contact details of the Financial Services Ombudsman are www.financial-ombudsman.org.uk or by phone on 0800 0234 567.

If you wish to refer your complaint to the Financial Ombudsman you must do so within six months of our final response letter.

If you do not refer your complaint to the Ombudsman within six months of the date of the final response letter, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances.

Information regarding eligible complaints

A complaint can only be dealt with under the Financial Ombudsman Service if it is brought by or on behalf of an eligible complainant. We will advise you, in our final response letter, whether or not you are classed as an eligible complainant.

In order to be an eligible complainant the client has to meet certain criteria. The criteria are that the complainant must be a person that is:

- A consumer
- A micro-enterprise (defined as an enterprise which employs fewer than 10 persons has a turnover or annual balance sheet that does not exceed €2 million. In this definition, "enterprise" means any *person* engaged in an economic activity, irrespective of legal form and includes, in particular, self-employed persons and family businesses engaged in craft or other activities, and partnerships or associations regularly engaged in an economic activity)
- A charity which has an annual income of less than £1 million at the time of the complaint, or
- A trustee of a trust which has net assets of less than £1million at the time of the complaint.

In addition to meeting one of the above criteria they must be or have been a customer of Brighter Financial Services Ltd and the complaint must arise out of matters relevant to them having been a customer of our firm.

Standard setting

To help us uphold our standards we will do the following in cases of complaints:

- ✿ We will produce a report on a 6 monthly basis and forward this to the FCA as part of mandatory regulatory requirements imposed upon us.
- ✿ Identification of training needs within the business where required
- ✿ Communication and consultation with our compliance and insurance service to assist with client redress where necessary.
- ✿ Retain a copy of your complaint on our files for a period of 3 years.
- ✿ Analyse trends from the complaints register on a half yearly basis and seek to rectify and manage any anomalies in our practice.
- ✿ Discuss this procedure and any complaints at least half yearly to alert employees of the business of our approach and commitment

Our contact details:

The Complaints Manager
Brighter Financial Services Ltd
66 West St
Sowerby Bridge
West Yorks
HX6 3AP

Tel: 01422 832100

e-mail to the Complaints Manager Ross McFadzean ross@brighterfs.com

website: www.brighterfs.com

We hope you have found this information clear and straightforward, but if you would like anything explained further, please do not hesitate to contact us.