

# Complaints procedure

A guide to our complaints process.

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# Overview

1. This procedure sets out how we (Bluecrest Wellness) handle complaints and the standards we follow. It aligns to the relevant requirements as given in the Health & Social Care Act 2008 (Regulated Activities) Regulations 2014 (referred to in this guidance as the 2014 Regulations).
2. This complaint handling procedure describes how we (Bluecrest Wellness) will put into practice the core expectations given in the Fundamental Standards.
3. Our [Commitment to Good Complaint Handling](#) and this procedure, also support delivery of our mission statement and core values.



## Accountability, roles and responsibilities

1. Overall accountability and responsibility for managing complaints lies with the 'Responsible Person'. In our organisation, this is Dominique Kent, the Chief Executive Officer (CEO).
2. Various responsibilities for complaints are held throughout Bluecrest Wellness, and a full ARCI matrix is available in the appendix below.
3. We have processes in place to ensure we regularly review insights from complaints, and other feedback, to identify opportunities for improvement.
4. The responsible person, and relevant senior managers (together the 'Responsible Management') ensure that action is taken to identify learnings arising from complaints and implement improvements to our services.
5. Responsible Management uphold this procedure and are responsible for its development and day-to-day implementation. They demonstrate this by:
  - Leading by example to improve the way we deal with compliments, feedback and complaints.
  - Understanding the obstacles people face when people make a complaint to us, and taking action to improve the experience by removing them.
  - Knowing and complying with all relevant legal requirements regarding the handling of complaints.
  - Providing up-to-date training in complaints advocacy and ensuring resources are accessible for advice, in a format that people find easy to understand.
  - Ensuring that there is a strong commitment to the duty of candour so there is a culture of being open and honest when something goes wrong.
  - Ensuring that everyone knows when a complaint is a serious incident, a safeguarding or league issue and what must happen.
  - Ensuring that we listen and learn from complaints and proactively improve services when something goes wrong.

# Identifying a complaint

## Everyday conversations with our customers

1. Our team speak to people who use our services every day. This can often raise issues, requests for additional service, questions or concerns that our team can help with immediately, we will identify the type of communication in line with our Customer Voice Definition.
2. We encourage people to discuss any issues/concerns they have with our team, as we may be able to resolve the issue to their satisfaction promptly quickly and without the need for them to raise an open complaint.

## Definition: Complaint

“An expression of dissatisfaction, either spoken or written, that requires a response. It can be about an act, omission or decision we have made and/or the standard of service we have provided.”

## When people want to make a complaint

1. We recognise that we may not be able to resolve issues when they arise and that people will want to make a complaint. The NHS (National Health Service) have a definition of a complaint and we align to this here at Bluecrest Wellness

### Minor

A complaint that does not negatively impact the quality and/or safety of the services provided and poses no increased risk to customers and/or employees.

### Moderate

A complaint that may have a moderate impact on the quality and/or safety of the services provided but does not materially compromise it. The issue can be resolved through the standard application of existing processes, without requiring structural change.

### Major

A complaint that materially compromises the quality and/or safety of the services provided. The issue cannot be resolved through standard procedures and requires formal review and intervention.

### Critical

A complaint that cannot be resolved and may result in unsafe or significantly substandard service. These may be systemic or widespread, affect many customers, and/or carry severe consequences if not addressed promptly.

<b>Activity</b>	<b>Standard Complaint (Minor/Moderate)</b>	<b>Serious Complaint (Major/Critical)</b>
<b>Scope</b>	Impacts a single customer or isolated issue	Impacts multiple customers, affects customer health/wellbeing and/or poses reputational risk
<b>Resolution SLA</b>	Resolved within standard SLA	May require extended investigation, and extension of standard SLA
<b>Investigation Requirements</b>	May involve sponsors, stakeholders and/or team leaders	May require clinician input or senior-level review
<b>Escalation Level</b>	Typically, does not require senior involvement or escalation	Must be escalated to senior and/or clinical leadership. Where applicable, may also require escalation to insurer representative for further review.
<b>Cross-Department Involvement</b>	May involve other departments for info/support, but process change may not be required	Will involve other departments for info/support, and process/policy review
<b>Redress</b>	May include redress, including apology or goodwill gesture	May include redress and formal response from senior and/or clinical leadership
<b>Examples</b>	Minor service issues, minor delays, miscommunication	GP disputes, clinical errors, data breaches, marketing consent violations
<b>Data Breach Inclusion</b>	Not typically applicable	Mixed results, wrong recipient, unauthorised data sharing
<b>Marketing Breach Inclusion</b>	Not applicable	Unwanted marketing against prior consent or to wrong audience.

# Feedback

People may want to provide feedback instead of making a complaint. In line with this procedure, people can provide feedback, make a complaint, or do both.

1. People do not have to use the term 'complaint'. We will use the language chosen by the customer, or their representative, to understand better what they would like to raise (for example, "issue", "concern", "complaint", "tell you about"). We will always speak to people to understand the issue they raise and how they would like us to consider them, if we are unclear we will ask if they would like us to consider their feedback as a complaint.
2. If we consider that a complaint (or any part of it) does not fall under our Complaint Procedure we will explain the reasons for this. We will provide our decision in writing to the complainant and provide any relevant explanations and signpost supporting information.
3. We will consider all accessibility and reasonable adjustment requirements of people who wish to make a complaint in an alternative manner. We will record any adjustments we make.
4. We will acknowledge all complaints at point of receipt, or within 24 hours of receiving it. This can be done in writing, digitally, or verbally.
5. We may receive any anonymous or general complaint that wouldn't meet the criteria for who can complaint (see below). In this circumstance we would normally take a closer look into the matter raised to identify if there is any learning opportunity for our organisation unless there is a reason not to.
6. Complaints can be submitted to us via:



**In person:** by speaking to one of our team members directly



**By telephone:** 0808 168 7867 (UK) and 1800 937 499 (ROI)



**In writing:** Bluecrest HQ, Ridgeworth House, 5/9 Liverpool Gardens, Worthing BN11 1RY



**By email:** [customerservices@bluecrestwellness.com](mailto:customerservices@bluecrestwellness.com)



**Online:** using the dedicated form [www.bluecrestwellness.com/contact](http://www.bluecrestwellness.com/contact)

## Definition: Feedback

"Feedback can be an expression of dissatisfaction (as well as positive feedback) but is normally given without wanting to receive a response or make a complaint"



# Objectives

At Bluecrest Wellness the management of customer or public dissatisfaction is an important part of the Governance Framework. Ensuring information about complaints and their causes are an integral part of the system, this means Bluecrest Wellness can provide a safe and high quality service which is constantly improving.

## **Our complaints procedure aims to:**

- Ensure everyone knows how to make a complaint.
- Define the complaints handling and resolution procedures.
- Ensure complaints are handled consistently, fairly, and effectively in line with the given procedure.
- Provide a framework for complaints monitoring and review so service improvements can be made.
- Provide individuals with a fair and effective way to complain, provide feedback, or highlight an incident.

# How we will respond

Our vision for a successful complaints procedure is one that follows the eight principles of good complaint handling and meets the needs of our customers, team and the organisation.



- 1. Accessible and effective system**  
Providers must have a system in place that is easy to access and use for anyone wishing to make a complaint.
- 2. Thorough investigation**  
Every complaint must be investigated thoroughly, and necessary action must be taken to any failures identified.
- 3. Timely acknowledgement and response**  
Complaints should not be acknowledged any later than the third working day after receipt and offer the complainant the opportunity to discuss how the complaint will be handled.
- 4. Respect and courtesy**  
Complainants must be treated with respect, courtesy and empathy Responses should be professional, measured and sympathetic in tone.
- 5. Transparency and honesty**  
Providers must respond promptly, fully and honestly.
- 6. No adverse impact**  
A complaint must not negatively affect the care or treatment a person receives.
- 7. Record keeping and reporting**  
Providers must keep records of complaints and responses.
- 8. Learning and improvement**  
Complaints should be used as an opportunity to learn and improve service.

# Who can make a complaint

1. Any person may make a complaint to Bluecrest Wellness if they have received or are receiving services from our organisation. A person may also raise a complaint to us if they are not in direct receipt of our services but are affected, or likely to be affected by, any action, inaction or decision that our organisation takes.
2. If the person affected does not wish to handle the complaint themselves, they can appoint a representative over the age of 18 to raise and handle the complaint on their behalf. There is no restriction on who may represent the person affected, however the appointed representative must have explicit consent from the customer to accept or reject any resolutions presented and to see their personal information including any relevant results information; this consent must be communicated by the person affected and recorded by Bluecrest.
3. If the person affected is deceased, is a child or is otherwise unable to complain because of physical and/or mental incapacity, a representative may make the complaint on their behalf. There is no restriction on who may act as a representative (provided they are over the age of 18) but there may be restrictions on the information we are able to share. We will explain this when we first look at the complaint.
4. If a complaint is brought on behalf of a child we will need to be satisfied that there are reasonable grounds for a representative bringing the complaint rather than the child. If we are not satisfied we will share our reasons with the representative in writing.
5. If at any time we believe that a representative is not acting in the best interests of the person affected we will conduct an assessment on whether we should stop our consideration of the complaint. If we do this, we will share our reasons with the representative and the person affected in writing.

Anyone affected can speak up - we're here to listen.



# Timescales for making a complaint

1. All complaints must be made to us within 6-months of the date the incident being complained about occurred or the date the person raising the complaint found out about it, whichever is the latest date.
2. If a complaint is made to us after the 6-month deadline, we will consider it if:
  - We believe there were good reasons for not making the complaint before the deadline. Examples which may be assessed on a case-by-case basis, but not limited to include delayed onset of concerns which causes a retrospective look, or administrative delays from Bluecrest
  - It is still possible to properly consider the complaint
3. If we do not see a good reason for the delay or it is not possible to properly consider the complaint (or any part of it) we will write to the person making the complaint to explain this.
4. If you wish to escalate your complaint to stage (2/3), you should do so within 6 months of the response at the previous stage (1/2). If you escalate your complaint, any offer of resolution that had been made will be withdrawn, and there is no guarantee an offer of the same amount or more will be made following a further review.
5. We will not escalate your complaint to the next stage, if all the following are deemed true:
  - The investigation completed so far is deemed to have been thorough and addressed 100% of the complainants' concerns
  - If any resolution offered is deemed to be appropriate for the concerns raised and investigation findings
  - No additional information is provided by the complainant

# Complaints and other procedures

1. We ensure team members who handle complaints are properly supported and trained to identify when it may not be possible to reach a suitable outcome through the complaint process on its own. When this occurs, the team member handling the complaint will inform the complainant and provide information about any other processes that may help address the issues and has the potential to provide the outcomes sought.
2. This can occur at any stage (1/2/3) in the complaint/incident handling process and may include identifying issues that could or should:
  - trigger a safety investigation
  - trigger our safeguarding procedure
  - involve an investigation which has become a legal requirement
  - trigger a relevant regulatory process, such as fitness to practice investigations or referrals
  - involve a relevant legal issue that requires specialist advice or guidance.
3. Where another process may be better suited to cover other potential outcomes, our team will seek advice and provide clear information to the complainant. We will ensure that the complainant understands why this is relevant and the options available to them. We will also signpost the complainant to sources of specialist independent advice. This will not prevent us from continuing to investigate the complaint.
4. We will ensure that the individual raising the complaint gets a complete and holistic response to all the issues raised. This includes any relevant outcomes where appropriate. The team members handling the complaint will engage with other teams or organisations who can provide advice and support the best way to do this.
5. If a complainant is already taking part or chooses to take part in another process but wishes to continue with their complaints as well, this will not affect the investigation and response to the complaint. The only exceptions to this are if:
  - there is a formal request for a pause in the complaint process from the police, a coroner or judge.
  - the complainant requests a delay or a delay is required to sufficiently complete the investigation

In such circumstances the complaint investigation will be placed on hold until those processes are completed.
6. If we consider that a team member should be subject to remedial or disciplinary procedures or referral to a health professional regulator we will, where appropriate, advise the complainant. We will share as much appropriate information with them, whilst ensuring compliance with relevant data protection legislation. If the complainant chooses to refer the matter to a health professional regulator themselves, or if they subsequently choose to, it will not affect the way that their complaint is investigated or responded to. We will also highlight you of your right to seek independent advice or to contact an appropriate third party.
7. If the person handling the complaint identifies at any time that anyone involved in the complaint or incident may have experienced, or be at risk of experiencing, harm or abuse then they will discuss this matter with relevant colleagues and initiate our [safeguarding procedure](#).

# Confidentiality of complaints and other interactions defined within this procedure



1. We will ensure and maintain confidentiality and protect privacy throughout the relevant processes in accordance with UK General Data Protection Regulation and Data Protection Act 2018. We will only collect information from team members who have had direct involvement in the handling or consideration of the complaint.
2. Outcomes may be anonymised and shared within the organisation and may be published on our website to promote service improvements.

# How we handle complaints

## Ensuring people know how to complain

1. We will provide clear information about our complaints procedure and how people can seek further advice and support with their complaint, through an appropriate third party. Whilst a third party may not be able to complain on your behalf, they may refer your complaint back to us for review.
2. We will ensure that individuals who use (or are impacted by) our services (and those that support them) know how they can make a complaint by having our complaints procedure and/or materials that promote our procedure accessible on our website and to be shared upon request. We will provide a range of methods to do this so that individuals can raise a complaint easily in a method that is suitable for them. This includes providing access to our complaints procedure online.
3. We will ensure that a complainants ongoing or future service delivery will not be negatively impacted because they have raised a complaint.

## What we do when a complaint is raised

1. We want to ensure that all customers, their family members and carers have a good experience whilst they use our services. If somebody feels that the service received has not met our standards, we encourage people to talk to team members who are dealing with them and/or to contact our customer service department by calling 0808 168 7867 (UK) 1800 937 499 (ROI), emailing [customerservices@bluecrestwellness.com](mailto:customerservices@bluecrestwellness.com) or completing the form found at [www.bluecrestwellness.com/contact](http://www.bluecrestwellness.com/contact).
2. We want to ensure that all complaints are resolved in a timely manner. To do that, we have provided training to our team to proactively respond to customers and/or their representatives and support them to deal with any complaints raised at first point of contact.
3. All team members who have contact with customers (or those that support them) will handle complaints in a sensitive and empathetic manner and in accordance with our organisation's core values. Our team will ensure people are listened to, get an appropriate answer to any issues quickly where possible, and any learning is captured and acted upon.

### All team members will:

- actively listen to the customer to ensure understanding of the issue(s)
- ask the customer what they consider a satisfactory outcome to the issue(s)
- ask how the customer has been affected by the issue(s)
- where appropriate, carry out remedial actions themselves if they can (or with support of others)
- if any individual is unable to carry out actions, explain why and what is possible
- capture any learnings to share with colleagues and improve services for others.

## Acknowledging complaints

1. For all complaints, we will acknowledge them (either verbally or in writing) within the same working day of receiving it. If the complainant has a preferred form of contact, we will acknowledge and aim to adhere to their request.
2. A review of the complaint will occur, in line with Bluecrest Wellness policy as soon as the complaint is received to determine the appropriate investigation and route needed in order to meet our commitment to good complaint handling, and respond within the appropriate timeframe dependent on the complexity of the complaint.
3. In the unlikely event that a complaint requires escalation to Stage 2 or 3, we will acknowledge this in the same working day that the next stage is triggered.

## Carrying out an investigation

1. Any team members who complete investigations will give a transparent and balanced explanation of what occurred and what should have occurred. They may reference relevant legislation, standards, policies, procedures or guidance to clearly identify if something has gone wrong.
2. Any investigation will be handled appropriately to ensure that all issues raised are addressed clearly. This includes obtaining evidence from the complainant and from any team members directly involved or specifically complained about.
3. If the complaint raises any clinical issue (see definition below) then we will obtain a clinical view from an individual with suitable qualifications. Ideally, they should not have been directly involved in providing the care or service that has been complained about.

A clinical complaint at Bluecrest Wellness specifically pertains to any concern or dissatisfaction about the clinical aspects of the service. This includes, but is not limited to, issues with any stage of the laboratory testing processes, post-assessment support provided by Health Hero, the appropriateness of personalised testing recommended, and any questions or issues regarding Bluecrest's Clinical Panel.

4. We will aim to complete any investigation within the timescales shared with the complainant, prior to the investigation launching. Should our investigation require a timescale extension we will;
  - a. notify the complainant, and team members involved, as soon as is reasonably possible
  - b. provide a clear and transparent reasoning for the extension
  - c. provide a new target timescale for completion
5. The team member handling the complaint will contact the complainant to explain the reasons for any extension and the anticipated timescales for completion. They will then maintain oversight of the complaint until it is resolved or it has been escalated to the relevant team member who will then assume responsibility.
6. When issuing a response to the complaint, the team member responsible for the investigation will share and discuss (via the process below) the outcome of the investigation and any actions we intend to take. This will be decided on a case-by-case basis and will be dependent on the complexity of the issues and identified impact. We will always consider any comments we receive before issuing a response.

- Stage 1 and Stage 2 responses will be delivered by telephone wherever possible. A written follow up will only be provided if telephone contact is unsuccessful or if the complainant has specifically requested written communication.
- Stage 3 responses will be provided in writing, using a format that is appropriate for any potential future referral or escalation.

# Complaint stages

## Stage one: Complaints that can be resolved promptly

Stage	Service level
<b>Acknowledgement</b>	Within 1 working day (maximum 24 hours)
<b>Ideal Completion</b>	Within 5 working days
<b>If Further Time/Info Needed</b>	Notify customer within 4 working days; new completion timeline starts from receipt of new info

1. We encourage our team to respond to any concern or queries at the first point of contact, where its applicable to do so, so that customers get a quick and effective answer to their issues.
2. All complaints are monitored and recorded; to be used to determine any areas of improvement regardless of the time it takes to resolve with the customer.

### Focus on early resolution

1. Upon the receipt of a complaint, we are committed to ensuring it is addressed and resolved at the earliest opportunity. Our team are trained to proactively identify any complaints that may be resolved at the time they are raised, or very soon after. If our frontline team consider that dissatisfaction doesn't warrant a complaint but has potential for the service to be improved, we will take a closer look into the matter.
2. When our team believe that an early resolution is possible, they are authorised to take appropriate action to address and resolve issues raised and support the complainant. Our team will resolve complaints by telephone, email or in person wherever possible.
3. If we believe that a complaint can be resolved promptly, we aim to provide this resolution within 5 working days. We will always discuss with those involved what we will do to provide our resolution, and where possible how long that will take.
4. If it is not possible to provide a resolution within 5 working days, we will inform the complainant prior to the completion of the SLA date. A new expectation of resolution will be shared with the complainant at this point.

### If we can resolve a complaint

1. If we can provide a resolution or address the complaint early, and the complainant is satisfied this resolves the issues our team have the authority to provide a response on our behalf. We will aim to provide this response via telephone and follow up in writing, if necessary, unless the complainant has indicated otherwise.
2. We will capture a detailed summary of the complaint, and the resolution provided, which will be shared with the complainant. This will ensure that we build up a detailed picture of how each of the services we provide is doing and what our customers experience when they use these services. This information will then be used to help us apply continuous improvement to our services for others.

## If we are unable to resolve a complaint

1. If we are unable to find an appropriate resolution to a complaint, which meets the satisfaction of the complainant, we will look at whether a further investigation is required.
2. We may request further information or evidence prior to escalating a complaint if we believe the investigation completed has been satisfactory and suitable redress has been provided.

### Stage two: A closer look into the issues

Stage	Service level
<b>Acknowledgement</b>	Within 1 working day (maximum 24 hours)
<b>Ideal Completion</b>	Within 10 working days
<b>If Further Time/Info Needed</b>	Notify customer within 9 working days; new completion timeline starts from receipt of new info

1. We recognise that not every complaint can be resolved promptly and sometimes we will require a longer period of time to carry out a deeper investigation into the issues raised. In this circumstance, we will ensure the complaint is allocated to an appropriate member of our team (or Customer Experience Executive) who will conduct a closer look into the issues raised. This will always involve taking a detailed and fair review of the issues to determine what happened and what should have happened.
2. We will ensure that team members involved in carrying out a Stage 2 investigation are correctly trained to do so. We shall also ensure they have;
  - a. The appropriate level of authority to carry out a fair investigation
  - b. The relevant resources, support and time in place to carry out the investigation, appropriate to the work required in each case.
3. Where possible, complaints will be reviewed by somebody non-bias, therefore not directly involved in the concerns raised. If this isn't possible, we will explain to the complainant the reasons why it was assigned to that person(s). This should address any perceived conflict of interest.
4. We aim to provide a Stage 2 resolution within 10 working days. We will always discuss with those involved what we will do to provide our resolution, and where possible how long that will take.
5. If it is not possible to provide a resolution with 10 working days, we will inform the complainant prior to the completion of the SLA date. A new expectation of resolution will be shared with the complainant at this point.

## Clarifying the complaint and explaining the process

1. The team member (or Customer Experience Executive) handling the complaint will:
  - a. engage with the complainant to ensure they fully understand and agree:
    - i. the key concerns to be investigated further
    - ii. how the complainant has been impacted
    - iii. the preferred outcomes they seek
  - b. ensure that any team members specifically complained about are made aware at the earliest opportunity (see 'Support For Team' below)
  - c. share a realistic timeframe for the investigation with the complainant, dependent on:
    - i. the content and complexity of the complaint
    - ii. the work that is likely to be involved.
2. Agree how the complainant (and any team member(s) specifically complained about) regularly informed and engaged throughout
3. Explain what steps will be taken during the investigation into the complaint to help reach an outcome, including:
  - a. what evidence they will seek out and consider
  - b. who they'll speak to
  - c. how they will assess if an error has occurred
  - d. how any outcome will be communicated

### If we are unable to resolve a complaint

1. If we are unable to find an appropriate resolution to the Stage 2 complaint, which meets the satisfaction of the complainant, we will look at whether a further investigation is required.
2. We may request further information or evidence prior to escalating a complaint if we believe the investigation completed has been satisfactory and suitable redress has been provided.



## Stage three: The final written response

Stage	Service level
<b>Acknowledgement</b>	Within 1 working day (maximum 24 hours)
<b>Ideal Completion</b>	Within 20 working days
<b>If Further Time/Info Needed</b>	Exception. This can only be authorised by our Customer Experience Officer, or relevant management above.

1. As soon as practical after the investigation is finished, the person conducting the final investigation will co-ordinate a written response signed by our Customer Experience Officer, Head of Customer Service or applicable director. They will send this to the complainant and any other relevant parties. We will ensure that team members involved in carrying out a Stage 3 investigation are correctly trained to do so. The response will include:
  - a. a reminder of the concerns investigated and the preferred outcome sort
  - b. an explanation of how we investigated the complaint
  - c. the relevant evidence that was reviewed and considered
  - d. what the final outcome is
  - e. an explanation of whether an error occurred and what should have happened, with reference to the any applicable legislation, standards, policies, procedures and guidance.
  - f. if an error occurred, an explanation of the impact it had
  - g. an explanation of how that impact will be remedied for the individual
  - h. a meaningful apology and ownership for any failings
  - i. an explanation of any wider learnings we have acted on/will act upon to improve our services for other users
  - j. if appropriate, an explanation of how we will keep the complainant involved and updated on how we are taking forward all systemic learning improvements relevant to their complaint
  - k. confirmation that they have now reached the end of our complaint procedure
  - l. relevant advice on how to escalate the complaint further, if the complainant is not satisfied with our final outcome

### Seeking independent advice

Contained within our final written response, we will clearly advise of the customer's right to seek independent advice or raise concerns with a third party. For transparency, Bluecrest is regulated by the Care Quality Commission (CQC). Whilst they cannot complain on an individual's behalf, they may refer the complaint back to us for review.

# Providing a resolution

1. Following an investigation, if the person investigating the complaint identifies that an error has occurred, they will seek to establish what impact this error has had on the complainant. Where possible they will take appropriate action to rectify this for the complainant and any other parties who have been similarly affected. If it isn't possible to provide a resolution, we will discuss with the complainant and relevant team members what actions can be taken to find a resolution.
2. In order to provide a resolution, the following remedies may be appropriate, subjective to their suitability of the concerns raised:
  - a. an acknowledgement, explanation and meaningful apology
  - b. reconsideration of a previous decision/response
  - c. expediting an action
  - d. waiving (or recompensing) a fee or penalty
  - e. issuing financial redress, in the form of compensation or refund
  - f. updating policies and procedures to prevent the same mistake(s) occurring again

# Providing support to our team members

## Training

We will ensure all team members who investigate or support on complaints are provided with the appropriate: annual training, resources, support and time to respond to complaints effectively. This includes how to manage challenging conversations and behaviour.

## Awareness

We will ensure all team members specifically complained about are made aware of the complaint and will be requested to provide a statement in relation to this complaint.

## Opportunity

We will ensure that team members involved in complaints are given a fair opportunity to share their perspective and respond to emerging information. Our approach will be open, honest and transparent and allow us to provide clear, truthful accounts of events, offer sincere apologies where appropriate, and ensure that all communications are handled with empathy and respect.

## Updates

We will ensure the individual carrying out the investigation will keep any team members about updated. On request, Team Members involved will be sent the final response.

## Escalation

We will ensure that all team members have an appropriate escalation route for support should any complaint be outside of their level of training or power to provide a satisfactory outcome.



# Complaint involving multiple organisations

1. We recognise that shared accountability across organisations requires robust and transparent communication procedures to ensure that individuals are informed and given the opportunity to respond appropriately.
2. Regardless of whether a complaint involves internal teams or external suppliers and partners we will apply our Complaints Procedure in full.
3. If we receive a complaint that involves other organisation(s) (including organisations involved in the delivery, or are promoted, our services) where appropriate, we will ensure that we investigate in collaboration with those organisations. The individual handling the complaint for each organisation will agree who will 'lead' on the complaint, responsible for overseeing and co-ordination consideration of the complaint.
4. The individual investigating the complaint for the 'lead organisation' will be responsible for ensuring the complainant is kept involved and updated throughout.

# Monitoring, demonstrating learning and data recording

1. We expect all team members to identify all and any learning opportunities from complaints, regardless of whether errors are found or not.
2. Our Senior Managers will take a proactive interest and involvement in all sources of feedback and complaints, identifying what insight and learning opportunities are available that will help improve our services for other users.
3. We shall ensure records are maintained, including:
  - a. each complaint we received
  - b. the subject matter
  - c. the outcomes provided
  - d. whether we sent our final written response to the complainant within the timeframe agreed at the start of our investigation
4. We shall monitor all feedback and complaints over time, identifying trends and risks that need to be addressed.
5. All complaints and service handling activities will be reported at agreed quarterly intervals to ensure full visibility for Senior Management and designated Responsible Person(s). This reporting will support transparency, oversight of complaints trends and resolution performance.

# Complaint about a third party provider of our services

1. This complaint handling procedure applies to all Bluecrest services that are provided. If the complaint relates solely to one of our third party providers we will direct the complaint to the relevant process.
2. Where we outsource the provision of Bluecrest services to a third party provider we cannot guarantee they will follow the same complaint handling procedures or timeframes. If this is the case, we shall inform the complainant is updated and provided with a new resolution timeframe is shared.

# Appendix

## ARCI Matrix

Overall responsibility for good complaint handling at Bluecrest is shown in the below ARCI table. Guidance on the ARCI model is available upon request.

Activity	CEO	Senior Manager	Customer Experience Officer / Head of Customer Services	Team Managers / Team Leaders / Customer Experience Executive	Complaint Sponsor	All Team Members
Stage 1 Complaint	Informed	Informed	Responsible	Accountable	Consulted / Accountable	Informed
Stage 2 Complaint	Informed	Informed	Responsible	Accountable	Consulted / Accountable	Informed
Stage 3 Complaint	Accountable	Responsible	Accountable	Informed / Consulted	Consulted / Accountable	Informed
Feedback	Informed	Informed	Informed	Accountable	Consulted / Accountable	Informed

## Complaint service level agreements

What is a Service Level Agreement (SLA)?

- As a service provider, a service level agreement is a plain-language agreement between the provider and their customers (whether internal or external) that defines the services they will deliver and the responsiveness that can be expected.
- SLAs define agreed upon terms for services including responsiveness. For example, promising customers their complaint will be acknowledged within 1 working day.

Stage	Action	Service Level	Detail	Rationale
<b>Stage 1</b>	Acknowledgement	Within 1 working day (maximum 24 hours)	Customer is informed that their complaint has been received and is under review.	Acknowledgement sets expectations, confirms receipt, and reassures the customer they have been heard.
	Ideal Completion	Within 5 working days	Investigation and review are completed, and findings/ resolution are presented to the customer.	Complaints should be resolved promptly to avoid unnecessary delays and maintain customer trust.
	If Further Time/Info Needed	Within 4 additional working days	Customer is informed if more time or information is required. The SLA resets from the date new information is received.	Customers must be kept informed of delays and reasons, ensuring transparency and respect throughout the process.
Stage	Action	Service Level	Detail	Rationale
<b>Stage 2</b>	Acknowledgement	Within 1 working day (maximum 24 hours)	Customer is informed that their complaint has been received and is under review.	Acknowledgement sets expectations, confirms receipt, and reassures the customer they have been heard.
	Ideal Completion	Within 10 working days	Investigation and review are completed, and findings/ resolution are presented to the customer.	Complaints should be resolved promptly to avoid unnecessary delays and maintain customer trust.
	If Further Time/Info Needed	Within 9 additional working days	Customer is informed if more time or information is required. The SLA resets from the date new information is received.	Customers must be kept informed of delays and reasons, ensuring transparency and respect throughout the process.
Stage	Action	Service Level	Detail	Rationale
<b>Stage 3</b>	Acknowledgement	Within 1 working day (maximum 24 hours)	Customer is informed that their complaint has been received and is under review.	Acknowledgement sets expectations, confirms receipt, and reassures the customer they have been heard.
	Ideal Completion	Within 20 working days	All responses to be issued within this timeframe barring exceptions as below.	Complaints should be resolved promptly to avoid unnecessary delays and maintain customer trust.
	Exception	Authorised By CXO or Senior Managers	This is by exception only and as an example, would be outside our control	It is not always within our control as to when a complaint will be fully closed.