



Complaints Handling Procedure

1. Definitions and Interpretation

1.1 In this Complaints Handling Procedure the following expressions have the following meanings:

“Business Day”	means, any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business;
“Complaint”	means a complaint about Lighthouse Mentoring’s services and/or about Lighthouse Mentoring’s employees / subcontractors / support workers
“Complaints Policy”	means Lighthouse Mentoring’s customer complaints policy, available from www.lighthousementoring.co.uk ;
“Complaint Reference”	means a unique code assigned to a Complaint that will be used to track that Complaint;
“Customer”	means a customer of Lighthouse Mentoring’s and includes potential customers (no purchase necessary);
“Data Protection Policy”	means Lighthouse Mentoring’s data protection policy, available from www.lighthousementoring.co.uk
“Decision Letter”	means a letter informing a Customer of the outcome of their Complaint;
“External Resolution”	means the referral of a Complaint to an external body or organisation for resolution by a Customer if that Customer is not satisfied with the outcome of this Complaints Handling Procedure;
“Investigation Report”	means a report detailing the investigation of a Complaint;
“Recommendation”	means the recommended resolution to a Complaint made by member of Lighthouse Mentoring handling a Complaint; and
“Resolution Action”	means the available actions to be taken in response to a Complaint as detailed in Section 6.



2. What this Complaints Handling Procedure Covers

- 2.1 This Complaints Handling Procedure applies to Complaints pertaining to the provision of services by Lighthouse Mentoring's to our clients and employees / subcontractors / support workers,
- 2.2 For the purposes of this Complaints Handling Procedure, any reference to Lighthouse Mentoring also includes our employees / subcontractors / support workers.
- 2.3 Complaints may relate to any of Lighthouse Mentoring's activities and may include (but not be limited to):
 - 2.3.1 The quality of Lighthouse Mentoring's service;
 - 2.3.2 The behaviour and/or professional competence of Lighthouse Mentoring and Lighthouse Mentoring's employees / subcontractors / support workers.
 - 2.3.3 Delays, defects or other problems associated with provision of service
 - 2.3.4 Delays, defects, poor workmanship or other problems associated with the provision of services.
- 2.4 The following do not constitute Complaints. Customers raising such questions or matters should be directed to the appropriate person [Craig Fearn] addressed accordingly:
 - 2.4.1 General questions about Lighthouse Mentoring's services;
 - 2.4.2 Matters concerning contractual or other legal disputes;
 - 2.4.3 Formal requests for the disclosure of information including, but not limited to, those made under the Data Protection Act;

3. Receipt and Recording of Complaints

- 3.1 Customers may make Complaints using any of the following methods:
 - 3.1.1 In writing, addressed to Craig Fearn, Lighthouse Mentoring, Tremough Innovation Centre, Penryn, TR10 9TA
 - 3.1.2 By email. Addressed to Craig Fearn at craig.fearn@lighthousementoring.co.uk
- 3.2 Upon receipt of Complaints, the following steps shall be within 5 Business Days:
 - 3.2.1 If a written Complaint is received by post, Craig Fearn shall log and record the complaint;

If a written Complaint is received by email, Craig Fearn shall log and record the complaint;



- 3.3 All Complaints shall be given a Complaint Reference and the investigation thereof shall begin within 5 Business Days.
- 3.4 All Complaints shall be acknowledged in writing within 5 business days of receipt. The acknowledgement shall inform the Customer of their Complaint Reference, by whom their Complaint is to be handled, and shall include copies of Lighthouse Mentoring's Customer Complaint Policy and this Complaints Handling Procedure.

4. Complaint Information

- 4.1 Customers are advised in Lighthouse Mentoring's Complaints Policy that the following information should be provided in as much detail as is reasonably possible when making a Complaint:
 - 4.1.1 The Customer's name, address, telephone number and email address, indicating any preferred method of communication;
 - 4.1.2 If the Customer is being represented by a third party, the information set out in Section 4.1.1 should be provided in reference to both parties;
 - 4.1.3 If the Complaint relates to a particular transaction, the Invoice number;
 - 4.1.4 If the Complaint relates to a particular employee / subcontractor / support worker, the name and, where appropriate, position of that employee / subcontractor / support worker;
 - 4.1.5 Further details of the Complaint including, as appropriate, all times, dates, events, and people involved;
 - 4.1.6 Details of any documents or other evidence on which the Customer wishes to rely in support of the Complaint;
 - 4.1.7 Details of how the Customer would like Lighthouse Mentoring to resolve the Complaint. Whilst Lighthouse Mentoring undertake to make all reasonable efforts to accommodate such requests, however, Lighthouse Mentoring are not bound to take any action beyond that which Lighthouse Mentoring may be contractually or otherwise legally obliged to take.
- 4.2 If the information detailed in Section 4.1 is missing, insufficiently detailed, or incomplete, the Customer should be contacted within 5 Business Days, requesting further information.



5. Complaints Handling

- 5.1 As a sole trader I, Craig Fearn, shall handle all Complaints.
- 5.2 Upon receipt of a Complaint, the Complaint shall be considered and a decision made within 5 Business Days whether to:
 - 5.2.1 Investigate the Complaint fully if it is considered to be valid, in which case the procedure should resume from Section 5.3; or
 - 5.2.2 Dismiss the Complaint if it is considered to be invalid, in which case the Customer shall be informed of the decision in writing within 5 Business Days.
- 5.3 Subject to delays arising from circumstances beyond Lighthouse Mentoring's reasonable control or beyond the reasonable control of the employees / subcontractors / support worker handling the Complaint](including, but not limited to, delays in other persons responding to communications), Complaints shall be fully investigated and decided upon and a Recommendation made within 20 Business Days.
- 5.4 If the Complaint relates to a particular employee / subcontractor / support worker (a "Complaine" or "Complainees"), the Complaine(s) in question shall be informed of the Complaint and meetings and/or telephone calls shall be arranged as required to discuss the Complaint. In such cases, the Complaine(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complaine(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complaine(s) should respectfully refuse to discuss the matter, referring the Customer to Section 5.4 of Lighthouse Mentoring's Complaints Policy. Any such contact should be reported to Lighthouse Mentoring.
- 5.5 If additional information or evidence in support of the Complaint is required, the Customer shall be contacted using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint, as per Section 5.5 of Lighthouse Mentoring's Complaints Policy.
- 5.6 If a Customer is unable or unwilling to provide information or evidence requested under Section 5.5, reasonable endeavours shall nevertheless be used to resolve the Complaint. If, however, it is not possible to uphold the Complaint in the absence of the requested information or evidence, the Complaint may be closed and the Customer informed of the outcome in accordance with Sections 5.9 to 5.12.
- 5.7 The Complaint shall be examined and evaluated, taking full account of all relevant statements, information, evidence and circumstances. Full objectivity and fairness shall be maintained at all times.
- 5.8 Subject to the exceptions in Section 5.8.1, During the investigation of the Complaint, all records, information of employees / subcontractors / support workers that may be necessary to enable an impartial and thorough



investigation shall be made available.

5.8.1 Access to the following records and/or information is restricted and shall require the authorisation of Craig Fearn:

a) All held information.

- 5.9 Following examination of the Complaint, a decision shall be reached within the time period set out in Section 5.3 (subject to the exceptions noted therein). Resolution Actions that may be chosen are set out in Section 6.
- 5.10 Once a decision has been reached under Section 5.9 or Once a decision has been approved or a final decision made under Section 5.10 or 5.11, as applicable, an Investigation Report and Decision Letter shall be sent to the Customer by first class post or by email, as appropriate. Decision Letters shall set out the decision and the Resolution Action(s). The Customer shall also be reminded of their right to seek External Resolution of their Complaint. 1 copy of the Investigation Report and Decision will be held in secure file storage.
- 5.11 If a delay either occurs or is considered likely to occur at any stage of this procedure, the Customer should be informed using his or her preferred communication method. The Customer should be informed of the length or likely length of the delay and the reasons therefor.

6. Resolution Actions

When handling Complaints the following Resolution Actions may be selected, as appropriate to the facts and circumstances of a Complaint:

- 6.1 Refund;
- 6.2 Alternative appointment;

7. External Resolution

- 7.1 As Lighthouse Mentoring is regulated by DSA QAG, Customers have the right to seek External Resolution of Complaints from that organisation if they are not satisfied with the outcome resulting from this Complaints Handling Procedure.
- 7.2 DSA QAG handles any and all such referrals in accordance with its own policies and procedures. The appropriate representative(s) of GSA QAG may require contact with Lighthouse Mentoring and/or employees / subcontractors / support workers of Lighthouse Mentoring and may require access to documents and information pertaining to a Complaint in the event that a Customer refers their Complaint for External Resolution. Any and all such interactions between DSA QAG and us shall take place via Craig Fearn. Any and all requests made by DSA QAG for evidence or information, whether written or oral, shall be answered without undue delay, subject to the approval and authorisation of Craig Fearn, who shall ensure that said request is



reasonable and pertinent given the nature of the Complaint.

8. Implementation of Resolution Actions

Upon the conclusion of a Complaint, the Resolution Action(s) settled upon shall require implementation in a timely manner. Responsibility for the implementation of Resolution Actions ultimately lies with Lighthouse Mentoring.

9. Recording of Resolution Actions

Upon the conclusion of a Complaint and the implementation of the applicable Resolution Action(s), All documentation will be held securely on an offline storage device in compliance with GDPR.

10. Confidentiality and Data Protection

- 10.1 All Complaints, Appeals, evidence and other information gathered, held and processed under this Complaints Handling Procedure shall be treated with the utmost confidence at all times. Such information may be shared with employees / subcontractors / support workers of Lighthouse Mentoring only to the extent required to resolve the Complaint in question in accordance with this Complaints Handling Procedure.
- 10.2 In the event that the details of a Complaint are to be used for training or quality improvement purposes, in which case they may be shared with employees / subcontractors / support workers of Lighthouse Mentoring beyond the scope of this Complaints Handling Procedure, the relevant Customer's express permission must first be sought using that Customer's preferred contact method. Personal details (that is, anything that may be used to identify the Customer) shall be removed from all information so used. Such permission may be revoked at any time in accordance with the Customer's right to do so under Section 6.2 of Lighthouse Mentoring's Customer Complaints Policy.
- 10.3 All personal information collected by Lighthouse Mentoring (including, but not limited to, Customers' names and contact details) shall only be collected, used and held in accordance with the provisions of the Data Protection Act 1998 and our Customers' rights under that Act, as detailed and embodied in Lighthouse Mentoring's Data Protection Policy.

11. Procedure Review and Responsibility

- 11.1 Overall responsibility for this Complaints Handling Procedure and the implementation thereof lies with Craig Fearn
- 11.2 This Complaints Handling Procedure shall be reviewed regularly at intervals of not more than 6 months and shall be updated as required.



11.3 This Complaints Handling Procedure was adopted on 1/2/2017.

11.4 This Complaints Handling Procedure was last reviewed on 27/09//2018.