

# **THINK BETTER GROUP LIMITED**

## **Complaint Handling Policy**

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### **Policy Statement**

Think Better Group (hereinafter referred to as "the Company") is committed to delivering high standards of service and maintaining the trust and confidence of its customers, employees, suppliers, business partners and stakeholders. This Complaints Handling Policy has been developed to ensure that all complaints, whether written or verbal, are managed consistently, fairly, transparently and within appropriate timescales. The policy supports the Company's commitment to continuous improvement and compliance with applicable legal and regulatory requirements, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The aim of this policy is to ensure that all complaints are handled professionally, investigated appropriately and resolved wherever possible. Information gathered from complaints will be used to identify improvements to our services, processes and ways of working, helping to prevent recurrence of similar issues.

### **Purpose**

The Company is committed to providing a fair, open and accessible process for handling complaints and achieving satisfactory outcomes wherever possible.

This policy establishes a framework for:

- Receiving and recording complaints.
- Investigating complaints fairly and objectively.
- Communicating effectively with complainants.
- Resolving complaints in a timely manner.
- Identifying root causes and implementing corrective actions.
- Meeting legal, regulatory and contractual obligations.
- Improving customer experience and organisational performance.

The Company provides appropriate training and support to employees to ensure complaints are managed professionally and consistently.

### **Scope**

This policy applies to all employees, directors, temporary staff, contractors, consultants, agency workers, volunteers, interns and any third parties acting on behalf of Think Better Group.

The policy applies to complaints relating to:

- Customer service
- Products and services
- Employee conduct
- Communication and administration
- Data protection and privacy
- Business operations
- Accessibility and inclusivity
- Any other aspect of Think Better Group's activities

Compliance with this policy is mandatory.

### **Objectives**

For the purposes of this policy, a complaint is defined as any expression of dissatisfaction, whether justified or not, regarding the Company's services, conduct, decisions or activities.

A communication does not need to be formally described as a complaint for the Company to treat it as such.

### **The Company's objectives are:**

- To provide a complaints process that is clear, fair and easy to use.
- To ensure individuals know how to raise a complaint.
- To ensure complaints are handled consistently.
- To investigate complaints fairly and impartially.
- To resolve complaints promptly wherever possible.
- To identify opportunities for improvement.

- To ensure data protection complaints are managed in accordance with applicable legislation and ICO guidance.
- To ensure complainants are informed of their rights and available escalation routes.

### **Complaint Handling Targets**

The Company aims to:

- Acknowledge complaints within five working days.
- Resolve informal complaints within three working days wherever possible.
- Complete investigations and issue a final response within eight weeks.
- Keep complainants informed throughout the process.
- Maintain accurate complaint records.
- Review complaints regularly to identify trends and improvements.

### **Procedures & Guidelines**

All complaints will be handled according to the principles of fairness, confidentiality, transparency and accountability.

Complaints may be raised verbally or in writing and will be recorded appropriately.

The Company encourages early resolution wherever possible while ensuring that more serious or complex complaints receive appropriate investigation.

### **Raising a Complaint**

Complaints may be submitted through any reasonable communication channel, including:

- Email
- Telephone
- Letter
- Website contact forms
- Social media platforms
- Direct communication with an employee

### **Contact Details**

**Email:** [privacy@thinkbettergroup.com](mailto:privacy@thinkbettergroup.com)

**Postal Address:**

Think Better Group  
Park House  
North Street  
Horsham  
West Sussex  
England  
RH12 1RN

Individuals are not required to complete a specific form in order to raise a complaint.

Where a complaint is received verbally, the details will be documented and handled in accordance with this policy. Employees receiving complaints must ensure they are escalated to the appropriate manager or Compliance & Privacy Lead.

### **Data Protection Related Complaints**

Where a complaint concerns the processing of personal data, the Company will ensure compliance with UK GDPR, the Data Protection Act 2018 and applicable ICO guidance.

Examples include:

- Data accuracy concerns
- Marketing communications
- Data sharing concerns
- Data retention concerns
- Subject Access Requests
- Individual rights requests

- Personal data breaches
- Privacy-related concerns

All data protection complaints must be referred immediately to the Compliance & Privacy Lead.

Individuals have the right to raise concerns directly with the Company before contacting the Information Commissioner's Office (ICO).

The Company will investigate all data protection complaints fairly and keep complainants informed of progress and outcomes.

### **Informal Complaint Resolution**

The Company seeks to resolve complaints at the earliest reasonable opportunity.

Where issues are straightforward and can be resolved immediately or within three working days, they may be treated as informal complaints.

Informal complaints may include:

- Administrative errors
- Communication misunderstandings
- Minor service issues

Where an informal complaint is resolved, details will still be recorded in the Complaints Register.

Where resolution cannot be achieved within three working days, the matter will enter the formal complaint process.

Any data protection complaint, regardless of severity, must be reported to the Compliance & Privacy Lead.

### **Responding to a Complaint**

Formal complaints will be acknowledged within five working days.

The acknowledgement will include:

- Confirmation of receipt
- Complaint reference number
- Details of the complaint handling process
- Expected investigation timescales
- Details of the person managing the complaint

Only authorised managers or the Compliance & Privacy Lead may issue formal complaint responses.

### **Investigating the Complaint**

A suitably trained investigator will be appointed to review the complaint.

The investigator may:

- Review relevant records and documentation
- Interview employees
- Obtain witness statements
- Review correspondence and communications
- Gather any additional information required

Investigations will be impartial, evidence-based and conducted without bias.

Where interviews are undertaken, records will be maintained as part of the complaint file.

The Company aims to complete investigations within six weeks to allow a final response to be issued within the overall eight-week target.

Complaints should be referred for formal investigation where:

- Requested by the complainant

- Data protection issues are involved
- Informal resolution has failed
- There is a conflict of interest
- The matter is complex
- There is significant risk to the Company
- Facts are unclear
- Vulnerable individuals are involved
- Media attention has been received
- The issue may affect multiple individuals

### **Decision Letter (Final Response)**

Following completion of the investigation, a written final response will be provided.

The final response will include:

- Summary of the complaint
- Investigation findings
- Decisions reached
- Actions taken or proposed
- Details of escalation routes where applicable

The Company aims to issue final responses within eight weeks of the complaint being received.

For complaints relating to personal data, the final response will include information regarding the complainant's right to contact the Information Commissioner.

### **Information Commissioner**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 0303 123 1113  
Website: <https://ico.org.uk/make-a-complaint/>

### **Complaint Recording**

All complaints, whether formal or informal, will be recorded within the Complaints Register.

The register will include:

- Date received
- Complaint reference
- Nature of complaint
- Department involved
- Assigned investigator
- Outcome
- Date closed

Complaint records will be retained in accordance with the Company's Data Retention Policy.

### **Patterns and Analysis**

Complaint records will be reviewed regularly to identify:

- Recurring issues
- Service improvement opportunities
- Training requirements
- Compliance concerns
- Process weaknesses

Where trends are identified, corrective actions will be implemented and monitored.

Management will review complaint data periodically to ensure continual improvement.

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### **Responsibilities**

The Company will provide employees with the resources, training and support necessary to understand and fulfil their responsibilities under this policy.

All employees are responsible for:

- Taking complaints seriously.
- Escalating complaints appropriately.
- Cooperating with investigations.
- Maintaining confidentiality.
- Following this policy.

Managers are responsible for ensuring complaints are handled consistently and fairly.

### **Compliance & Privacy Lead**

The Company has appointed a Compliance & Privacy Lead to oversee complaint management and data protection matters.

The Compliance & Privacy Lead is responsible for:

- Overseeing complaint investigations.
- Maintaining the Complaints Register.
- Monitoring complaint trends.
- Advising on corrective actions.
- Supporting compliance with UK GDPR and data protection legislation.
- Liaising with regulatory authorities where required.
- The Compliance & Privacy Lead has the authority to obtain information, conduct investigations, recommend policy changes and support continuous improvement initiatives across the Company.