

# Complaints Policy and Procedure

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### Purpose

Fraser and Fraser ("the Firm") is committed to providing an exemplary, transparent and responsive service to all clients, beneficiaries, referrers and third parties. In keeping with our core values – Passionate, Focused, Professional, Straight-forward and Responsible – we aim to resolve concerns quickly and fairly, learn from mistakes and continually improve our practice. This document sets out our internal complaints-handling arrangements and the external avenues available where matters remain unresolved.

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### Scope and Definition

A complaint is any expression of dissatisfaction, whether oral or written, about the quality of our work or the behaviour of our people, regardless of whether it is justified. Complaints relating solely to matters outside the Firm's control (for example, delays caused by third-party registries) are logged but treated as "feedback".

This procedure applies to all Fraser and Fraser services, including our Financial Conduct Authority ("FCA") - regulated insurance mediation activity and services provided by staff who are Chartered Legal Executives or CILEX Practitioners.

#### 2.1 Anonymous & Third-Party Complaints

We recognise that concerns may sometimes be raised anonymously or by a third party such as a family member, carer or professional adviser. Such matters will be entered in the Complaints Log and, where enough detail is available, we will conduct an internal review to identify any systemic issues or misconduct.

However, we are unable to investigate fully or provide a substantive response where:

- the complainant is **not a client, beneficiary, referrer or other person with whom the Firm has a direct professional relationship**, and is not authorised to act on their behalf; or
- the anonymity of the complainant prevents us from obtaining the information necessary to reach findings.

In these circumstances the issue will be treated as feedback rather than a formal complaint. We may take appropriate internal action, but we will not be able to correspond further unless and until the affected individual (or their authorised representative) contacts us directly.

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## 2.2 Whistleblowing vs Complaints

**Whistle-blowing** is the disclosure of information about suspected wrongdoing or danger at work – for example fraud, money-laundering, bribery, health-and-safety risks or deliberate breaches of a legal obligation. Such disclosures are **outside the scope of this complaints procedure**.

Fraser and Fraser operates a separate **Whistle-blowing Policy**, which provides confidential channels – including an external ethics hotline – for employees, contractors, suppliers and others to report concerns directly to senior management. The policy is available on request.

If a matter submitted under this complaints procedure is identified as whistle-blowing, we will transfer it to the whistle-blowing process and notify the reporter accordingly.

## 2.3 Malicious or Reptitive Complaints

While Fraser and Fraser is committed to addressing every genuine concern, we reserve the right to refuse or discontinue an investigation where a complaint is assessed as **malicious, abusive** or **repetitive** (sometimes referred to as vexatious). A complaint will normally be considered vexatious if:

- it is made primarily to harass, intimidate or abuse our staff;
- the language used is defamatory, threatening or offensive; or
- it substantially repeats issues that have already been fully investigated and resolved, and no significant new evidence is presented.

If a complaint is judged vexatious we will:

1. Record the matter and the reasons for our decision in the Complaints Log;
2. Decline or cease the investigation;
3. Notify the complainant in writing of our decision and, where applicable, their right to escalate the matter to an external body.

**Frequency limit**, an individual (or anyone acting on their behalf) may raise only **one substantive complaint within any rolling twelve-month period** unless they can show that a different issue has arisen or produce materially new evidence. Any additional complaints received during that period that do not meet these criteria may be treated as repetitive and declined without investigation.

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## How to Complain

We encourage complainants to raise concerns with the person dealing with their matter **as soon as possible**.

We will normally accept a complaint only if it is raised within **six months** of the date on which you first became (or ought reasonably to have become) aware of the issue. Complaints received outside this window may be declined unless exceptional circumstances apply. If you remain unhappy, please contact:

### The Complaints Partner

Fraser and Fraser  
39 Hatton Garden  
London EC1N 8EH

**Tel:** +44 (0)20 7832 1400

**Email:** [complaints@fraserandfraser.co.uk](mailto:complaints@fraserandfraser.co.uk)

If you have accessibility needs, we can provide this procedure, and accept complaints, in alternative formats (large print, audio, braille or a language other than English) on request.

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## Our Internal Process

Stage	Action	Timescale
<b>Acknowledgement</b>	Written acknowledgement confirming who is handling the complaint and a copy of this policy.	<i>Within 5 working days</i> of receipt
<b>Investigation</b>	A Partner independent of the matter reviews the file, speaks to the team and, where appropriate, to you. We may ask for clarification or further evidence.	Substantive update <i>within 21 working days</i>
<b>Response</b>	We issue a <i>Final Response Letter</i> setting out our findings, any redress offered, and your escalation rights.	<i>Within 28 calendar days</i> of acknowledgement. Where this is not possible – e.g. due to staff absence or complex issues – we will explain why and provide a revised date (never later than 8 weeks).*

\* Where the complaint concerns an employee who is on long-term leave, we will notify you and send our final response within 15 working days of that employee's return.

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## Possible Outcomes & Remedies

- An apology and explanation
- Remedial action or expedited work
- A goodwill gesture or proportional fee reduction/refund
- Referral to our professional indemnity insurers where appropriate

All remedies are recorded in the Complaints Log and followed through by the responsible Partner.

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## Recording, Monitoring & Learning

Every complaint is entered on our secure Complaints Log, noting root cause, outcome and any corrective or preventive action. Data is reviewed periodically by the partners to identify trends and drive service improvements.

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## Your Right to Escalate

### 7.1 Chartered Institute of Legal Executives (CILEX) Regulation

If your complaint relates to the conduct of a member or CILEX Practitioner employed by the Firm, and you are dissatisfied with our Final Response, you may contact CILEX Regulation:

**Tel:** 01234 845770

**Email:** [info@cilexregulation.org.uk](mailto:info@cilexregulation.org.uk)

**Web:** [cilexregulation.org.uk/problems-and-complaints](https://cilexregulation.org.uk/problems-and-complaints)

CILEX Regulation considers conduct and ethical breaches. Service-quality complaints fall to the Legal Ombudsman (see 7.3).

### 7.2 Financial Services Complaints

For complaints about our FCA-regulated insurance mediation activity that remain unresolved after 8 weeks or on receipt of our Final Response, you may refer to the Financial Ombudsman Service ("FOS") free of charge:

**Tel:** 0300 123 9123

**Web:** [financial-ombudsman.org.uk](https://financial-ombudsman.org.uk)

You must contact FOS within six months of our Final Response.

### 7.3 Legal Ombudsman

Fraser and Fraser is not within the Legal Ombudsman's jurisdiction for most of its work. However, if your complaint relates to service provided by any CILEX-authorised entity within the Firm, the Legal Ombudsman may be able to assist. Full details and eligibility rules are available at [legalombudsman.org.uk](https://legalombudsman.org.uk).

### 7.4 Information Commissioner's Office

Data-protection concerns can be raised with the ICO ([ico.org.uk](https://ico.org.uk)) if we do not resolve them to your satisfaction.

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### No Charge & Confidentiality

We do not levy any fee for handling complaints. Making a complaint will not prejudice your ongoing matter. All complaints are managed confidentially in accordance with the UK GDPR and the Data Protection Act 2018.

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### Policy Ownership & Review

Fraser and Fraser Partners owns this policy. It is reviewed annually or sooner if regulatory requirements change.