



Complaints Policy

1.0 Introduction

- 1.1 We aim to deliver a good quality service and positive customer experience. If we don't meet our service standards, we'll:
 - Apologise
 - Accept responsibility
 - Acknowledge your expectations
 - Put things right when they're in our control within reasonable timescales
 - Keep you informed
 - Listen to you to improve what we do.
- 1.2 This Policy sets out a consistent and fair approach to responding to complaints from residents, customers, and stakeholders, which aims to resolve issues at the earliest opportunity.
- 1.3 We've developed this Policy in accordance with the [Housing Ombudsman's Complaint Handling Code](#), our statutory and legal duties, and residents' feedback.
- 1.4 Our 'involved' residents work with us to resolve complaints and monitor performance.
- 1.5 This Policy does not apply to:
 - Residents of properties managed by Triathlon Homes, who have their own [policy](#)
 - Complaints concerning care and support services; these have their own policy and are monitored by the Care Quality Commission.
- 1.6 The terms 'you' and 'your' in this Policy mean residents, customers, or stakeholders. The terms 'we', 'our' and 'us' mean Southern Housing.
- 1.7 You can contact the Housing Ombudsman Service for advice at any point throughout our process. See [section 8](#) for details.
- 1.8 We'll collect and store your information in line with our [Data Protection Policy](#).
- 1.9 We'll publish this Policy, and information about the Housing Ombudsman and their [Complaint Handling Code](#):
 - On our website

- In an [easy-to-read leaflet](#)
- In our resident magazine.

2.0 What is a complaint?

2.1 We've adopted the Housing Ombudsman's definition of a complaint as:

'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'

2.2 Building safety complaints

2.2.1 If your complaint is related to building safety and meets the criteria below, you have the right to escalate it to the [Building Safety Regulator](#) when you've exhausted our two stage complaints process. Under the [Building Safety Act 2022](#), it's a 'relevant complaint' if you live in a 'higher-risk' building¹ and your complaint is about:

- The performance of Southern Housing where we are the 'principal accountable person'² or an 'accountable person'
- The performance of a third-party 'accountable person'
- Building safety risks such as structural safety issues and spread of fire issues in or about the building e.g.
 - flammable cladding on the outside of a building
 - fire doors or smoke extraction that are not working or missing, increasing the risk of a fire spreading
 - failure of the building's structure, such as parts of the building collapsing, cracks, or parts of the building falling off.

2.2.2 If we believe your complaint doesn't meet the criteria of a 'relevant complaint', you may contact the [Building Safety Regulator](#) for final determination.

2.3 Consumer credit regulated activity

You have the right to make a complaint about any aspect of our regulated consumer credit agreements following our FCA Complaints Policy & Procedure (see [Appendix](#)). The process is free of charge.

2.4 Heat network complaints

If your complaint relates to a communal heat network, you have the right to escalate it to the [Energy Ombudsman](#) if eight weeks has passed since you first reported the issue to us. This only applies where:

¹ Defined under the [Building Safety Act 2022](#) as at least 18 metres in height or at least seven storeys.

² An 'accountable person' is either a person or organisation responsible for repairing any of the common parts of the building. Common parts include the structure, corridors, lobbies, and exterior spaces such as pathways and gardens. There is only one 'principal accountable person' but there may be more than one 'accountable person'.

- You are a heat network customer receiving heating, hot water, or cooling through a shared, central system rather than your own individual boiler, and
- You became aware of the issue on or after 1 April 2025.

2.5 Service requests

The Housing Ombudsman Service defines a service request as ‘a request from a resident to their landlord requiring action to be taken to put something right’.

When you first let us know about your concern, as a starting point we’ll ask you what you’d like us to do to put things right. We can often resolve service requests, such as a missed appointment or repair delay, immediately with an apology and by providing another appointment. We may be able to resolve this outside of our complaints process, recording it as a service request and monitoring it to completion.

If we need to make further enquiries to resolve the matter, you’re dissatisfied, or if you ask us to at any point, we’ll log it as a complaint. We’ll continue to address any service requests after we’ve logged a complaint.

3.0 Who can make a complaint?

- 3.1 Anyone can make a complaint about the services we, or anyone working for us (e.g. contractors), provide.

However, you may only be able to escalate your complaint to the Housing Ombudsman Service if you have a landlord/tenant relationship with us. This includes leaseholders and other residents with agreements to occupy premises with a member landlord/managing agent.

- 3.2 If you prefer, you can authorise someone else to make a complaint on your behalf i.e., an ‘advocate’. This could be a friend/relative or representative from an external organisation (such as Citizens Advice). If you’d like an advocate to act on your behalf, or represent or accompany you at any meetings with us, let us know.
- 3.3 We treat complaints received through petitions or a group of residents in the same way as all other complaints. If helpful, we’re happy to meet the petitioners or group. In terms of handling the complaint efficiently, we’ll ask for a single point of contact to be nominated.

If the complaint escalates to a [stage two review](#), we’ll allow one other petitioner/resident to be involved.

- 3.4 If your building is managed by a third-party agent or if Southern Housing isn’t the freeholder, we’ll:
- Liaise with the relevant parties to get all the information we need and resolve the matter
 - Investigate and respond to your complaint in line with this Policy.

- 3.5 We expect all residents to behave reasonably and cooperate with us throughout the process³.
- 3.6 We treat all residents fairly; we won't treat you unfavourably because you've made a complaint.

4.0 What can you complain about?

- 4.1 You can complain about our standard of service, actions or lack of action by us or anyone working for us (e.g. contractors) within 12 months of the issue happening or of you becoming aware of the issue.

We may use our discretion to accept older complaints if there's good reason you hadn't raised it before.

- 4.2 If the problem is a reoccurring or ongoing issue, we'll consider any older reports as background to the investigation.
- 4.3 If you make a complaint and we complete our process, we're unlikely to accept another complaint about the same issue unless you provide new information. If you're unhappy with our decision, please see [section 8](#), which explains other options.
- 4.4 We won't accept new complaints that have already been investigated or are under investigation by the Housing Ombudsman Service.
- 4.5 There may be some circumstances where your complaint is better dealt with outside our complaints process. If this is the case, we'll provide an explanation setting out why and the action you can take. You'll be able to approach the Housing Ombudsman Service once you've received our decision.

Table 1 provides examples of where we'll advise alternative action outside our complaints process. This list is not exhaustive.

Table 1

Concerns raised	What action we will take
Where legal proceedings have been started. This is defined as a Claim Form or Particulars of Claim have been filed in Court.	Our solicitors will communicate directly with your legal representative, if you have one.

³ Our [Unacceptable Behaviour Policy](#) outlines how we manage unacceptable behaviour from residents and/or their representatives.

Concerns raised	What action we will take
Service charge queries	<p>You can use our Service Charge Dispute Resolution process. A manager with knowledge of the service charges or scheme will look at your query.</p> <p>If you feel the services being delivered aren't to an acceptable standard, we'll consider this as part of our complaint process.</p>
Rent charges or increases	If you're dissatisfied with your rent charge or increase, the relevant team will respond to your enquiry.
Personal injury or third-party liability claims (including those against contractors)	You may need to contact your own insurance company, or we may refer these to our insurers.
Behaviour of our residents e.g. alleged anti-social behaviour	<p>We have a separate policy for dealing with anti-social behaviour (ASB).</p> <p>We'll consider complaints about the handling of your ASB case under our complaints process.</p>
Subject access requests	<p>If you have concerns about the content of your subject access request, you can contact our Data Protection Team. You may also contact the Information Commissioner's Office (ICO).</p> <p>We can deal with other complaints about our handling of your request under our complaints process.</p>
Decisions made in accordance with our statutory obligations, or legislation/regulation	<p>We're unable to reverse these decisions. Examples include succession and the Right to Rent.</p> <p>We'll deal with issues relating to how we handled the matter as a complaint.</p>
Issues subject to contact restrictions	Where the specific issue being raised is subject to contact restrictions under our Unacceptable Behaviour Policy . We'll act according to the contact arrangement we have with you.

4.6 We'll consider the individual circumstances of each complaint. If we decide not to accept a complaint, we'll provide an explanation setting out the reason why. If you're unhappy with our decision, you're able to approach the Housing Ombudsman Service for advice.

5.0 How you can contact us

5.1 There are a range of ways you can raise a complaint:

- [Our website](#)
- Online customer portal
- Live chat

- [Phone](#)
- [Letter/email](#)
- In person
- Via social media, where Southern Housing has a profile.

If you need help in raising a complaint in another way, just let us know.

5.2 Social media⁴

- 5.2.1 If you contact us with an enquiry or complaint on social media, we'll ask you to send us a private message with further details. We'll also ask for information to allow us to find you on our systems (e.g. name, address, contact details).
- 5.2.2 We'll never discuss anything sensitive or reveal personal information in a public message on our social media channels.
- 5.2.3 If the matter escalates to a complaint, we'll contact you away from social media in line with our usual complaints process.

6.0 Our complaints resolution process – stage one

- 6.1 If you're unhappy with our response to your service request or wish to raise a complaint at stage one of our process, we'll contact you within five working days to:
- Acknowledge your complaint; we'll confirm which aspects of your complaint we are, and are not, responsible for and clarify any areas where this is not clear
 - Establish full details of your complaint, clarifying with you anything that's unclear
 - Find out how you'd like us to resolve it. We'll be clear where your desired outcome may be unreasonable or unrealistic, but we'll focus on what we can do.
- 6.2 If you raise multiple complaints at the same time, we'll provide you with one point of contact, where possible. If you raise further concerns when we've already issued a response, or it would unreasonably delay our response, we'll log it as a new complaint.
- 6.3 We aim to give you a full response within 10 working days of the acknowledgement date.
- 6.4 If, for any reason, we need more than 10 working days to respond to your complaint, we'll explain why and inform you of the expected timescale for our response. You can contact the Housing Ombudsman for advice at any point. We'll continue with our investigation and provide a response within the extended timeframe.
- 6.5 We'll email our acknowledgement and formal response (unless you've requested a different communication method). Our response will confirm:

⁴ For more information about how we use our social media channels, please refer to our [social media guidelines](#).

- The complaint stage
- Definition of your complaint
- Our decision on the complaint
- Reasons for our decision
- Clear details of any remedy offered to put things right, including timescales we've agreed with you
- Details of any outstanding or further actions required and how we'll monitor progress
- How you can contact us to discuss our findings
- Details of how to escalate your complaint to stage two if you're not satisfied with the outcome.

6.6 We may close your complaint if you refuse to engage with us to resolve the complaint, for example:

- Failing to respond to contact for a prolonged period and we've exhausted all methods of contact
- Refusing to allow access to your home
- Failing to provide information when requested within agreed timescales.

If we decide to close your complaint, we'll always confirm this in writing.

7.0 Unhappy with our decision? – Stage two

7.1 We'll explore if there's anything further we can do, or you can ask us to review your complaint at stage two of our Policy. You must request this within 20 working days of the date of our formal response. We may consider requests after this time at the discretion of the manager responsible for the service.

7.2 We'll ask you about the reasons you remain dissatisfied with our reply and the outcome you'd like to resolve your complaint.

7.3 Within five working days of you contacting us, we'll acknowledge your request and confirm our understanding of the issues and outcomes you're seeking. We'll clarify any details of your complaint that are unclear. We'll confirm which aspects of your complaint we are, and are not, responsible for and clarify any areas where this is not clear.

7.4 An appropriately trained Southern Housing staff member with no previous involvement in your complaint will conduct the review.

7.5 We'll contact you with our decision within 20 working days of our acknowledgement of your complaint. Our response will confirm:

- The complaint stage
- Definition of your complaint
- Our decision on the complaint
- Reasons for our decision
- Clear details of any remedy offered to put things right, including timescales we've agreed with you

- Details of any outstanding or further actions required and how we'll monitor progress
- How you can contact us to discuss our findings
- Your right to contact the Housing Ombudsman Service if you remain dissatisfied.

7.6 If, for any reason, we need more than 20 working days to respond to your complaint, we'll explain why and inform you of the expected timescale for our response. You're entitled to contact the Housing Ombudsman for advice at any point. We'll continue with our investigation and provide our response within the extended timeframe.

7.7 There may be occasions when we won't accept a request to review a complaint, for example if the outcome being sought isn't within our power or ability to deliver. In these cases, we'll write to you and explain why. We'll give the options available to you, including your right to contact the Housing Ombudsman, the Building Safety Regulator (if applicable), or the Financial Ombudsman Service (if applicable).

See [Table 1](#) for examples of why we may not accept a request to review. This list is not exhaustive.

8.0 What if you disagree with the review decision?

8.1 You're able to contact the Housing Ombudsman Service at any point throughout your complaint for advice. Once you've exhausted our complaints process at stage two, you may ask the Housing Ombudsman Service to mediate or investigate the case on your behalf.

8.2 The Housing Ombudsman Service may not consider complaints that fall within the jurisdiction of another:

- Ombudsman
- Complaints-handling body (such as the Information Commissioner)
- Regulator (such as the Regulator of Social Housing or Building Safety Regulator)
- Property Redress Scheme.

Appropriate referral will depend on the specific complaint. We, or the Ombudsman, will signpost you to the relevant body as appropriate.

8.3 You can find Housing Ombudsman Service contact details below, on our website, or at housing-ombudsman.org.uk.

Housing Ombudsman Service

PO Box 1484
Unit D
Preston
PR2 0ET

Telephone: 0300 111 3000

Email: info@housing-ombudsman.org.uk.

- 8.4 If you're unhappy with the outcome of a building safety complaint (as defined in [2.2](#)), you can escalate it to the Building Safety Regulator on 0300 790 6787 or at <https://www.gov.uk/guidance/contact-the-building-safety-regulator>. You may contact them for advice at any point.
- 8.5 For consumer credit regulated activity, you're able to contact the Financial Ombudsman Service at any point throughout your complaint for advice. Once you've exhausted our [FCA complaints process](#), you may ask the Financial Ombudsman Service to mediate or investigate the case on your behalf within six months of us sending our final response. You can find their contact details below or at www.financial-ombudsman.org.uk.

Financial Ombudsman Service

Exchange Towermedi
Harbour Exchange Square
London
E14 9SR

Telephone: 0800 023 4567

Email: complaint.info@financial-ombudsman.org.uk.

- 8.6 If your complaint relates to a **communal heat network**, you have the right to escalate it to the [Energy Ombudsman](#) if eight weeks has passed since you first reported the issue to us. This only applies where:
- You are a heat network customer receiving heating, hot water, or cooling through a shared, central system rather than your own individual boiler, and
 - You became aware of the issue on or after 1 April 2025.

In some cases, we may issue you with a 'deadlock letter' saying you can contact the Energy Ombudsman earlier. We'll include their contact details in the letter. You must escalate your dispute within 12 months of receiving the letter. You can contact them via their website (www.energyombudsman.org) or use their contact details:

Energy Ombudsman

PO Box 966
Warrington
WA4 9DF

Telephone: 0330 440 1624

Email: enquiry@energyombudsman.org.

9.0 National Codes Administrator

- 9.1 If you're a resident in our student accommodation, you (or your representatives) may also [contact the National Codes Administrator](#) if:
- You feel your complaint is a breach of the ANUK (Accreditation Network UK) code **and**

- You're still unhappy with the outcome having exhausted our complaints process.

Your complaint to the National Codes Administrator must be in writing and submitted within six months after the end of the tenancy.

10.0 Learning from complaints

- 10.1 We want to learn from complaints as this helps us improve our services. We have formal mechanisms in place to make sure we gather learning from complaints and use this insight to improve services. We'll share our annual Complaint Handling and Service Improvement report, along with our Board's response, on our website by 30 June each year.

11.0 What we've done to ensure this Policy is fair

- 11.1 We've carried out an Equality Impact Assessment to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#).
- 11.2 We recognise some residents, prospective residents, and those wishing to access our services may need adjustments due to a language barrier, disability, cultural need, or vulnerability. In these circumstances, in line with our [Reasonable Adjustments & Vulnerable Needs Policy](#), we'll work with residents to ensure we consider their specific needs, on a case-by-case basis, provided it doesn't compromise health and safety to individuals or homes. This includes working in partnership with other agencies to ensure we manage and mitigate any known risks of safety and wellbeing.
- 11.3 We aspire to embed diversity and inclusion within the culture of our business activities.

12.0 Review

- 12.1 We will review this Policy to address legislative, regulatory, best practice, or operational issues.

Policy controls

Version 1.13 – effective 13 March 2026
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Appendix 1: FCA Complaints Policy & Procedure

1.0 Introduction

- 1.1 This Policy & Procedure sets out our approach to managing complaints in relation to consumer credit regulated activities and the customers associated with those activities.
- 1.2 We aim to ensure:
 - We carry out our actions as quickly as possible
 - Our communication is clear, timely, and polite
 - We provide a good, reliable service to all customers
 - We treat all feedback as an opportunity to improve our services.
- 1.3 We've developed this Policy & Procedure in accordance with guidance provided by the Financial Conduct Authority (**FCA**). There's no charge to customers making a complaint through this process.

2.0 Scope

- 2.1 This Policy & Procedure applies to our customers who receive FCA-regulated products or services from us from time to time.

3.0 Key terms and definitions

- 3.1 A complaint can be defined as an expression of dissatisfaction about the standard of service, actions, or lack of action by the organisation, employees, or those acting on our behalf. This could affect an individual or a group of customers. The word 'complaint' does not need to be used for it to be treated as such.

4.0 Consumer awareness rules

- 4.1 We publish information regarding our FCA Complaints Policy & Procedure in order to allow for the reasonable and prompt handling of complaints. We ensure customers are aware of where to access the relevant information.
- 4.2 We provide information to customers about the Financial Ombudsman Service (**FOS**), including the FOS's website address, in a clear, comprehensible, and easily accessible way. We provide this information on our website and on any contract between the us and the customer regarding regulated activities.

5.0 Our approach

- 5.1 We welcome feedback in the form of complaints from anyone who is affected by a service we provide, or a decision taken in relation to the consumer credit regulated activities we undertake.
- 5.2 We allow complaints to be made by any reasonable means. There are several ways to raise a complaint:
- Our website
 - Online customer portal
 - Live chat
 - Phone
 - Letter/email
 - In person
 - Via social media, where Southern Housing has a profile.
- 5.3 If you need help raising a complaint, just let us know.
- 5.4 We recognise complaints as requiring a solution.
- 5.5 Overall, in order to comply with FCA rules (under the DISP section of the FCA Handbook), we will ensure we provide a final response to the complainant within eight weeks after receipt of the relevant complaint.

6.0 What can customers complain about?

- 6.1 Customers may raise concerns regarding the following matters. This list is not exhaustive:
- Failure to properly assess customers' affordability before entering into a credit agreement with them
 - Failure to treat customers fairly – not offering affordable repayment plans or ignoring customer vulnerability
 - Poor communication or failing to explain arrears or default notices in clear and understandable terms
 - Failure to update settled accounts
 - Not providing required information – e.g. copy of credit agreement or annual statements when requested
 - Failure to identify vulnerability – e.g. customer with mental health or financial difficulties not treated fairly
 - Failure to make reasonable adjustments – not adapting communication methods for vulnerable customers where we have been asked to do so.

7.0 Complaints resolution rules

- 7.1 Once we've received a complaint, we will:

- a) Send the complainant a written acknowledgement within five business days to provide early reassurance we have received the complaint and are dealing with it
- b) Investigate the complaint competently and impartially, obtaining any additional information as necessary
- c) Assess fairly, consistently, and promptly:
 - the subject matter of the complaint
 - whether the complaint should be upheld
 - what remedial action or redress is appropriate, taking into account all relevant factors.
- d) Offer redress or remedial action when appropriate
- e) Keep complainants informed in clear language about the progress of their complaint.

7.2 Factors that may be relevant in our assessment of a complaint include:

- a) All the evidence and the circumstances of the complaint
- b) Similarities with other complaints received by us
- c) Relevant guidance published by the FCA or the FOS and analysis of decisions by the FOS.

8.0 Closure of complaints

8.1 Within eight weeks of receiving the complaint we will send the customer a final response letter. This is a written communication that:

- a) Explains the investigation and outcome
- b) States whether the complaint is upheld
- c) Where appropriate, offers redress or remedial action
- d) Lets the customer know they can refer the complaint to the FOS if they're unhappy with the final response
- e) Provides the website address of the FOS
- f) Refers to the availability of further information on the FOS website
- g) In all cases, encloses a copy of the FOS's standard explanatory leaflet providing the FOS website address and informing the customer they may refer the complaint to the FOS if still dissatisfied. This will contain the words:

“You have the right to refer your complaint to the FOS, free of charge – but you must do so within six months of the date of this letter so that your complaint is not time-barred under the FOS's rules.”

8.2 Where we are not in a position to provide a final response within eight weeks of receiving the complaint, we'll provide a written update that:

- a) Explains why we are not in a position to make a final response and indicate when we expect to be able to provide one
- b) Informs the customer that they may now refer the complaint to the FOS
- c) Indicates whether or not we consent to waive the relevant time limits
- d) Encloses a copy of the FOS standard explanatory leaflet
- e) Provides the website address of the FOS.

8.3 A complaint will be considered closed when a final response has been sent.

9.0 Forwarding a complaint

9.1 If we have reasonable grounds to be satisfied another respondent may be solely or jointly responsible for the matter alleged in a complaint, we can forward the complaint (or the relevant part) to that respondent, provided we:

- a) Do so promptly
- b) Inform the customer who made the complaint promptly in a final response why we've forwarded the complaint and the contact details of the respondent who received the forwarded complaint
- c) Where jointly responsible for the fault alleged in the complaint, comply with our obligations in respect of the relevant part not forwarded.

9.2 The respondent who has received the forwarded complaint should deal with it as if the complaint was made directly to them and in accordance with the DISP section of the FCA Handbook.

10.0 Complaints time-barring rules

10.1 If we receive a complaint that's outside the time limits for referral to the FOS we may reject the complaint without considering the merits, but must explain this to the customer in a final response (see [8.1](#)).

10.2 The FOS can only consider a complaint if:

- a) We have already sent the customer our final response, or
- b) Eight weeks have elapsed since we received the complaint, unless we consent otherwise.

10.3 The FOS cannot consider a complaint if the customer refers it to them:

- a) More than six months after the date we sent the customer our final response or redress determination, or
- b) More than:
 - six years after the event complained of, or (if later)

- three years from the date the customer became aware (or ought reasonably to have become aware) they had cause for complaint,

unless the customer referred the complaint to the respondent or the FOS within these time periods and has written acknowledgement of receipt.

10.4 Paragraph 10.3 applies unless, in the view of the FOS:

- Failure to comply with the time limits were as a result of exceptional circumstances,
- The FOS is required to do so by the Ombudsman Transitional Order, or
- The respondent has consented to the FOS considering the complaint where the time limits expired (consent cannot be withdrawn).

10.5 The six-month time limit is only triggered by a final response. Our response will inform the customer about the six-month time limit the customer has to refer a complaint to the FOS.

11.0 Governance and oversight

11.1 Appropriate management controls are in place to identify and address recurring issues by:

- Analysing complaints
- Determining if root causes affect other areas
- Correcting problems where reasonable.

11.2 Systemic or recurring issues found will prompt consideration of redress for affected customers, even if they have not complained.

11.3 We'll assess the extent of any consumer harm and decide if it's appropriate to carry out remediation, which could involve contacting affected customers proactively.

12.0 Co-operating with the FOS

12.1 Where a complaint against us is referred to the FOS, we will cooperate and comply promptly with any settlements or awards made by it.

12.2 If we have forwarded a complaint in its entirety, we will not include it in our report.

13.0 Complaints reporting

13.1 The Head of Governance & Regulation will provide the FCA with a report concerning complaints received from customers set out in the form required under DISP 1 Annex 1.

14.0 Record keeping

14.1 We keep records of:

- Complaints received
- Investigation conducted
- Outcome
- Redress offered.

We retain records for three years from the date we received the complaint.

15.0 Equality, diversity, and inclusion

- 15.1 We are committed to making our complaints process accessible and easy to use for all our customers in line with our statutory duties, as set out in the [Equality Act 2010](#). If customers need assistance in making a complaint, they should inform us.
- 15.2 We should consider all requests from customers to accommodate their needs and act on them where possible, in accordance with the [Equality Act 2010](#) and our [Reasonable Adjustments & Vulnerable Needs Policy](#).
- 15.3 We make customers aware they can request a reasonable adjustment from us through the officer they are engaging with, or by contacting our customer service.
- 15.4 Examples of the support we can provide include:
- Providing information in alternative formats
 - Adapting our communication method
 - Allowing more time for a complaint to be brought to our attention.

16.0 Responsibilities

- 16.1 The Head of Governance & Regulation has responsibility for this Policy & Procedure and ensuring it's:
- Up to date
 - Compliant with FCA rules
 - Relevant
 - Being delivered.
- 16.2 We may be required to notify the name of the individual to the FCA or the FOS.

17.0 Review

- 17.1 We'll review this Policy & Procedure every two years or to incorporate legislative, regulatory, or best practice developments, or address operational issues.