GIBRALTAR SAVINGS BANK

COMPLAINTS HANDLING POLICY AND PROCEDURES

1. Objective of the policy

The Gibraltar Savings Bank aims to maintain and enhance the quality of the service provided. Complaints are seen as a mechanism to continuously improve products and customer services.

The Gibraltar Savings Bank is committed to being responsive to the needs and concerns of its customers and potential customers and to resolving complaints as quickly as possible.

This policy is designed to provide guidance to both customers and staff on the manner in which the department receives and manages complaints. We are committed to being consistent, fair and impartial when handling complaints.

The objective of this policy is to provide awareness of our complaints logging handling process and to ensure that:

- Customers and staff understand our complaints handling process,
- Complaints are investigated impartially with a balanced view of all the information or evidence,
- Each complaint is considered on its merit, taking into account the individual circumstances and needs.

2. Definition of a complaint

In this policy, a complaint means an expression of dissatisfaction by a customer relating to a service or product provided by the Gibraltar Savings Bank.

3. Changes in Policy

Senior management reserve the right to interpret, modify, suspend and review all or part of our policies and procedures.

4. How to lodge a complaint

If a client is dissatisfied with a service provided and in the first instance the staff member dealing with the matter is unable to resolve the issue to the satisfaction of the client, the matter must be escalated to the staff member's direct Line Manager. If the complainant is not comfortable with this or considers that the relevant staff member has not addressed their concern adequately, they may lodge a complaint as follows:

By email: complaints@treasury.gov.gi

• By telephone: +350 20048396,

• By mail: Treasury Department, 206-210 Main Street, Gibraltar

If a complaint is received verbally, and it is considered appropriate, the complainant may be advised to put this in writing.

No acknowledgement of receipt and no reply will be sent in cases where letters or complaints are abusive because of their excessive number or because of their repetitive or pointless character.

5. The information you will need to tell us

The Gibraltar Savings Bank relies on the information provided by the complainant and any other information held to be able to investigate the complaint. Where necessary, when carrying out an investigation, the complainant may need to be contacted to clarify or provide additional information. To ensure that a complaint is investigated effectively and efficiently, the complainant will be asked to provide the following information at the point when the complaint is lodged:

- Full name and contact details,
- The name of the member of staff dealing with the matter,
- The nature of the complaint,
- Details of any steps which may have already been taken to resolve the complaint,
- Details of any conversations held with staff members in relation to the complaint,
- Copies of relevant documentation that may support the complaint.

6. Recording complaints

The above information will be placed on record, including the facts and the cause of the complaint, the outcome and any action taken following the investigation of the complaint. All dates and times relating to actions taken to resolve the complaint will be recorded, including communication with the complainant (both verbal and in writing).

If a complaint is lodged, the complainant's personal information will be recorded solely for the purpose of addressing the complaint. For further information on how the Gibraltar Savings Bank receives, stores and shares personal information, please refer to the Gibraltar Savings Bank Privacy Notice available under www.gsb.gov.gi.

7. Feedback to Customers

The Gibraltar Savings Bank is committed to resolving any issues as efficiently as possible. If it is not possible to resolve a complaint at the first point of contact, a more formal complaint process will be followed.

An acknowledgment of receipt of the complaint will be issued as soon as possible, and not later than 14 days after the complaint has been lodged.

The complaint will be investigated and a substantive reply will be provided 21 days thereafter. However, should this not be possible, the complainant will be informed of the reason for the delay and a specific date will be agreed to determine when the complaint can be finalised.

A delay in resolving the issue within a specified timescale may result where additional documentation or clarification has been sought from the complainant and this information has not been provided. In such circumstances, upon receipt of the additional documentation a date when the complaint is expected to be finalised will be determined.

Once the complaint process has been finalised, the complainant will be advised of the findings. This will be done in writing, unless it has been mutually agreed to provide this information verbally.

The client making the complaint has the right to make enquiries about the status of their complaint at any time by contacting us.

8. Our five point complaint process

- Acknowledge An acknowledgement of receipt of a complaint shall be sent as soon as possible, and no later than 14 days after the complaint has been lodged, unless a substantive reply can be sent within that period.
- Review An initial review of the complaint will be taken and it will be determined
 whether any additional documentation or information is required. At this stage, the
 complainant may need to be contacted to clarify details and/or request additional
 information where necessary.
- **Investigate** Complaints will be investigated objectively and impartially, by considering the information provided, actions taken in connection with any dealings with Gibraltar Savings Bank officers and any other information available.
- Respond The complainant will receive a substantive reply 21 days after the confirmation of receipt, with provisions for an extension of time as required.

Following the investigation, the complainant will be notified of the findings with regards to their complaint.

 Record – Complaints will be recorded as part of the Gibraltar Savings Bank's continuous improvement and monitoring strategy, through regular review of processes. Personal information will be stored in accordance with relevant privacy notices (see Section 6 above).

9. Complaints under investigation by a regulator or law enforcement

If a complaint is being investigated by a relevant industry regulator or law enforcement agency further action may need to be taken in relation to this complaint.

10. Our complaints escalation process

Where possible, complaints will be resolved at the first point of contact. If this is not possible, an investigation of the complaint will be undertaken and the complainant will be provided with the findings.