



# Complaint Handling Policy (For Coordination Body Activity)

Version: 2.0

Status: FINAL

Date: 20<sup>th</sup> September 2024

Classification: External Use



# 1 Introduction

## 1.1 Purpose

This policy (**Policy**) explains how LINK handles complaints from members of the public and other third parties in connection with its role as the "Coordination Body".

## 1.2 What is LINK's role as a Coordination Body?

LINK has been designated by the Treasury as a Coordination Body. In this role LINK is responsible for considering the impact of changes to access to cash facilities and banking provision (when for example a bank branch closes or there are changes to the hours a bank is open) in communities throughout the United Kingdom.

In its role as a Coordination Body LINK is supervised by the Financial Conduct Authority (FCA) and subject to the rules and guidance set out in the FCA's Access to Cash Sourcebook. It is the rules that direct LINK's work to independently assess the impact on relevant communities, and also inform the criteria used in the assessment process. The rules came into force on 18<sup>th</sup> September 2024.

Further information on the criteria can be found [here](#). The criteria are set by certain banks and building societies who have been designated by the Treasury to ensure the reasonable provision of cash access services in the UK. These firms are referred to as the **Participating Network Members** in this Policy.

The criteria help LINK to determine what is needed to meet a community's access to cash needs (e.g. services such as shared banking hubs, ATMs etc). Following assessment, LINK can recommend new services to meet the ongoing needs of a community.

It is important to note that any access to cash need is assessed based on the entire community's needs and not just the needs of customers or members of one bank or building society.

## 1.3 Meaning of some commonly used terms in this Policy

References to **LINK**, **we**, **us** or **our** in this Policy means Link Scheme Ltd and/or Link Scheme Holdings Ltd (as the context requires). There is also a Glossary of Terms in Section 11 which includes the meanings of some commonly used words or phrases in this Policy.

# 2 Scope

## 2.1 What is included in this Policy?

This Policy provides information about, and sets out, the complaints procedure that we apply when we receive, handle, and respond to complaints from any individual, body, or entity, in connection with our role as a Coordination Body, subject to minor exceptions which are set out in Section 2.4 below.

## 2.2 What is a complaint?

A complaint is any concern or expression of dissatisfaction raised that needs a response about the performance of LINK's responsibilities in its role as a Coordination Body, or about any



conduct of LINK's staff in the performance of that role or in responding to any complaints under this Policy, which is inappropriate, unprofessional or is otherwise below the standard generally expected of LINK staff.

## 2.3 What types of complaints does this Policy apply to?

This Policy applies to:

- **Decision Complaints.**

A **Decision Complaint** is any complaint that LINK has not properly performed its role as a Coordination Body. More information about LINK's role as a Coordination Body can be found [here](#). Please read this carefully as we do not always have discretion in the performance of all aspects of our Coordination Body role. For example, the criteria LINK uses to decide what new cash services a community needs are mostly set by the Participating Network Members.

The scope of a Decision Complaint is limited to matters within LINK's control, for example, where we have not applied the criteria correctly or followed our own internal processes correctly. It does not include whether the criteria are "right". There are other governance processes to provide independent oversight over this aspect of LINK's work as a Coordination Body.

An example of a possible Decision Complaint would be a complaint about LINK's *application* of the criteria in relation to a particular community (i.e. that we had applied the criteria incorrectly) or complaints about any published process followed by us in performing our role as a Coordination Body.

Decision Complaints do not include any Service Complaint (see below).

- **Service Complaints:**

A **Service Complaint** is any complaint about LINK's handling of a Decision Complaint; for example, if the Chief Risk Officer, in dealing with your Decision Complaint, acts in a manner which is inappropriate, unprofessional or is otherwise below the standard generally expected of our staff.

References to **complaints** in this Policy are a reference to a Decision Complaint and/or a Service Complaint unless the context otherwise requires.

## 2.4 Who can complain?

Generally, it is open to anyone (including members of the public, consumer groups, businesses and others) to make a complaint to LINK.

Certain categories of persons are excluded from this (meaning that they are not able to complain under this Policy). These are as follows:

- Any Network Member of the LINK Scheme (including any Participating Network Member) including its staff (but only when acting in their capacity as a member of staff and not when acting in a personal capacity). Network Members may make a complaint through one of the usual governance mechanisms of the LINK Scheme.
- Cash Access UK Limited (**CAUK**) and its staff (but only when acting in their capacity as a member of staff of CAUK and not when acting in a personal capacity). CAUK may make a complaint through one of the governance mechanisms established between LINK and CAUK from time to time.



Any person or entity which makes a complaint is referred to as a **Complainant** or **you** in this Policy.

## 2.5 What complaints are not covered by this Policy?

This Policy only applies to a Decision Complaint and/or a Service Complaint. If your complaint relates to anything that is not a Decision Complaint and/or a Service Complaint, then it is outside the scope of this Policy. This could be for several reasons, for example, your complaint might relate to the activities of a third party rather than LINK or it may be in respect of any matter over which LINK does not have discretion.

Furthermore, LINK only accepts Decision Complaints and/or Service Complaints for a period of 6 months after the decision or other matter for which LINK is responsible (and which is the subject of the complaint) was first published on LINK's website.

Some complaints may not be considered. For example, repetitive complaints from a Complainant which have already been submitted to LINK for consideration.

Where a complaint is received by LINK and we believe that it is not covered by this Policy, we will use reasonable efforts to contact you using the contact details provided to tell you that this Policy does not apply to your complaint and we will, where relevant, try to direct you to the right process so that your complaint can be handled.

## 3 Our principles

Our aim is to deal with complaints promptly and sensitively in accordance with this Policy. LINK is committed to:

- Operating within a culture that supports the fair treatment of those with questions, queries or complaints regarding LINK's activities as a Coordination Body;
- Demonstrating that when receiving, investigating, and handling any complaint, our aim is to deal with complaints promptly, sensitively, and impartially in accordance with this Policy;
- Apologising when things go wrong and, where appropriate, setting out proposals to put things right;
- Using the information gathered from handling complaints to identify any underlying issues, learning from these and making changes to improve in the future; and
- Ensuring that following conclusion of LINK's complaints procedure as set out in this Policy, we offer an alternative dispute resolution scheme by reference to an independent third party (**Independent Assessor**) in respect of certain complaints (as explained below) when the Complainant is dissatisfied with the outcome.

## 4 How can a complaint be raised?

We want to ensure that we make it as easy as possible for those wishing to make a complaint. Complaints can be logged with us using the following methods:

- **electronically**,
  - by email: [complaints@link.co.uk](mailto:complaints@link.co.uk)



- **by writing to us at:**

Link Scheme (Complaints)  
Central House  
Otley Road  
Harrogate  
HG3 1UF

## 5 Complaints Handling Procedure

This section sets out our Policy for handling a complaint received by us.

### 5.1 Confirming if the complaint is in the scope of this Policy

We aim to issue an acknowledgement and confirmation of the complaint and whether the complaint is in scope of this Policy within three (3) business days.

If we agree that the complaint is in scope of this Policy, we will confirm the following:

- a summary of our understanding of the complaint based on the information provided so far;
- that the complaint is being investigated by us in accordance with this Policy;
- the anticipated timings for when a Final Decision (defined below) can be expected for the complaint;
- if there is a delay in respect of the investigation and the reason for that delay; and
- our contact details.

If you have complained:

- electronically, the acknowledgement is sent to the email address you provided;
- by writing to us, we send this to the contact details you provide in your letter;
- by telephone, we confirm this information to you at the time and if agreed, follow up by email or in writing based on your preferred method of communication.

If we do not receive any contact details or the contact details you provide are incorrect, we may be unable to contact you.

If a complaint is not in the scope of this Policy our acknowledgement and confirmation, will explain the reason why we have reached this conclusion and provide our contact details should you wish to discuss this further.

Where we have determined that a complaint is not in scope then, where relevant, we try to direct you to the right process so that your complaint can be handled.

If we do not hear from you within ten (10) business days following the date of our acknowledgement and confirmation of your complaint being out of the scope of this Policy, this will end our involvement with your complaint, and you should not expect to receive any further correspondence from us.



---

## 5.2 Investigation

Any complaint we receive is investigated thoroughly, objectively, fairly, and consistently. In dealing with complaints, we aim to ensure, where possible, that factually similar circumstances are handled alike.

All complaints are handled by our Complaints and Consumer Engagement Manager, and overseen by our Chief Risk Officer.

### Assessment of available information

We use the information provided to undertake an appropriately detailed investigation to establish the underlying issue that caused the problem and to develop an understanding of the complaint from your perspective.

We carefully consider all relevant information provided by you to seek to ensure that wherever we can the decisions we make in respect of your complaint are proportionate, appropriate, and fair.

Where any Service Complaints are raised, we also need to act fairly towards our staff by ensuring that members of our staff are aware of a Service Complaint raised about them and, where appropriate, have an opportunity to respond to the complaint.

### Request for further information

In certain circumstances as part of our investigation we might ask you for clarification where necessary to ensure that we fully understand the complaint and the desired outcome.

### Complex or serious issues

If there are circumstances which might lead to a delay in issuing our findings, we tell you and, where possible, communicate revised timings and keep you up to date on progress.

### Summary Resolution Communication

For complaints which are resolved by the end of the third business day following receipt of a complaint, we send a summary resolution communication. This procedure is mainly used for simple complaints.

The summary resolution communication refers to the fact that you have made a complaint and explains that we consider your complaint to be resolved and why. It also sets out what you can do if you later decide that you are dissatisfied with the resolution of your complaint and, in respect of Decision Complaints, the contact details of the Independent Assessor.

### Final Decision

For complaints which cannot be resolved by the end of the third business day, once we have completed our investigation, we confirm the outcome of that investigation to you as a **Final Decision**.

If we do not uphold the complaint, then our Final Decision sets out the reasons why, together with the detail of the outcome of our investigation, and, if applicable, information on how the matter can be escalated to the Independent Assessor.



If we uphold the complaint, we say so, setting out the detail of the outcome of our investigation and, where applicable, what we will do to seek to put things right. When we respond to your complaint, we do so in a way that is appropriate to you and to your circumstances, using language that is easy to understand.

## **6 Unhappy with a Final Decision or summary resolution communication?**

If a complainant is unhappy with an outcome in respect of a Decision Complaint, then an appeal can be made to the Independent Assessor.

Service Complaints are not capable of appeal to the Independent Assessor, but can be referred to the Chief Risk Officer for final review.

### **6.1 Who is the Independent Assessor?**

The Independent Assessor is responsible for managing the appeals process for Decision Complaints if you are unhappy with the outcome of a Final Decision or summary resolution communication.

While the Independent Assessor is contracted by LINK, the Independent Assessor is "independent", meaning that they are independent of LINK in its role as a Coordination Body and will form their own view on any complaint escalated to them.

There are various processes, procedures and requirements which have been put in place with the aim of ensuring that the Independent Assessor is independent of LINK.

### **6.2 In what circumstances can I appeal to the Independent Assessor?**

If you are unhappy with the Final Decision or summary resolution communication in respect of any Decision Complaint, you can raise the matter with the Independent Assessor free of charge.

You can complain if your complaint relates to the decision of the Complaints and Consumer Engagement Manager and a Final Decision or summary resolution communication has been issued by LINK (which means a decision must have been issued by the Complaints and Consumer Engagement Manager).

In these circumstances the Independent Assessor will accept your complaint.

### **6.3 Is there a time limit to appeal to the Independent Assessor?**

Any escalation of a Decision Complaint to the Independent Assessor must be made within six (6) months of the date of the Final Decision or summary resolution communication otherwise the Independent Assessor may refuse to deal with the complaint.

### **6.4 How do I appeal to the Independent Assessor?**

You can appeal a complaint to the Independent Assessor who can be contacted by:





- 
- Email at <mailto:IA@link.co.uk>;

Or in writing to:

The Independent Assessor  
Care of Link Scheme  
Central House  
Otley Road  
Harrogate  
HG3 1UF

## 6.5 Further Information

You can read further information about the Independent Assessor [here](#).

## 7 Timescales for resolution

Our aim is to investigate complaints in a timely manner and issue a Final Decision within eight (8) weeks from the date that we receive a complaint that is within scope of this Policy.

While we aim to resolve matters promptly, it will depend on the nature and facts surrounding the complaint in question. Some complaints are more complex or give rise to serious issues. In these circumstances we may require extra time to carry out our investigation thoroughly. If this is the case, we will inform you in writing (either by email or to the address provided by you) promptly and, where possible, communicate revised timings as to when to expect our Final Decision.

## 8 Training and monitoring

We ensure that our staff are properly trained, equipped, and empowered to put things right when something has gone wrong, focusing on the outcome for those affected.

We keep full and accurate records of all complaints we receive, and the measures taken for their resolution, so that we can monitor: (i) the types of problems reported to us; (ii) the best way to resolve them; and (iii) how long we are taking to deal with complaints. This also helps us to take a closer look at how we can improve in the future.

For further information on the handling of personal data please see section 9 below.

## 9 Personal data

Any personal data processed as part of any complaint (or otherwise submitted as part of any feedback, concerns, or other queries) is processed in accordance with our Privacy Notice which is available [here](#).

## 10 Feedback, concerns, or other questions

If you are not happy with our handling of your complaint, you should tell us at any point while





we are investigating your complaint.

Any feedback, concerns or questions related to this Policy can be directed to LINK's Chief Risk Officer. E-mail: [complaints@link.co.uk](mailto:complaints@link.co.uk).

## 11 Your behaviour to us

Please note that, in dealing with your complaint, LINK will behave in a respectful manner, and we expect the same in return from you. We cannot tolerate behaviour that is intimidating, abusive or offensive. Steps will be taken to address such a situation should it arise, which can include but are not limited to, declining to continue to investigate a complaint or an appeal of a Final Decision, or reporting the matter to appropriate authorities.

## 12 Changes to this Policy

LINK may change or update this Policy from time to time and will publish or otherwise make available the Policy, as amended on its website.

## 13 Glossary

Term	Definition
Business Day	A weekday that is not a public holiday.
Cash Access UK Limited ( <b>CAUK</b> )	The company responsible for establishing and operating Banking Hubs
Complaint	A complaint is any concern or expression of dissatisfaction raised that needs a response, about the performance of LINK's responsibilities in its role as a Coordination Body, or about any conduct of LINK's staff in the performance of that role or in responding to any complaints under this Policy which is inappropriate, unprofessional or is otherwise below the standard generally expected of LINK staff, being either a Decision Complaint and/or a Service Complaint.
Complainant	The person or entity that raises a Decision Complaint and/or a Service Complaint.
Coordination Body	LINK's role which is described in further detail <a href="#">here</a> .
Criteria	The measures used by LINK to determine if new cash access services are required in a community. Further details can be found <a href="#">here</a> .
Final Decision	A written response from LINK which either: <ul style="list-style-type: none"><li>• accepts the complaint, and, where appropriate, sets out its proposals to put things right; or</li><li>• rejects the complaint and explains the reasons for doing so.</li></ul>



Term	Definition
Decision Complaint	Any complaint that LINK has not properly performed its role as a Coordination Body which is within the scope of this Policy.
Independent Assessor or IA	An independent assessor responsible for managing the external appeals process for Decision Complaints.
Participating Network Members	The banks and building societies that are Members of the LINK Scheme and that set the criteria.
Service Complaint	Any complaint about LINK's handling of a Decision Complaint which is within the scope of this Policy.
Summary resolution communication	The communication of LINK's final decision on a complaint which has been resolved between you and us within three (3) business days following receipt of the complaint by LINK.