# COMPLAINTS POLICY

## Clear, accessible and fair complaint handling

| Document control | Details |
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| **Policy owner** | Management Board |
| **Operational owner** | Operations Manager / Complaints Lead |
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| **Next review** | Within 12 months of approval, or earlier if required |

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# 1. Policy statement

JTR Collections Limited understands that enforcement contact can be stressful. We welcome complaints and will treat complainants with respect. Raising a complaint will not, by itself, lead to adverse treatment or affect a person's right to receive a fair and proportionate service.

We will acknowledge complaints promptly, investigate them fairly, explain our findings clearly and provide an appropriate remedy where something has gone wrong. We will also use complaint outcomes to improve our services, training, communications and controls.

**Our commitment** A person does not need to use legal language, prove fault or put a complaint in writing before JTR will record and consider an expression of dissatisfaction.

# 2. Purpose

This policy is intended to:

1. provide a simple, accessible process with no more than two stages;
2. resolve concerns as early as possible without compromising a fair investigation;
3. identify vulnerability, communication needs and any risk of avoidable harm;
4. give clear reasons for decisions and proportionate remedies;
5. preserve relevant evidence and maintain auditable complaint records; and
6. support Management Board oversight, organisational learning and compliance with applicable law, creditor instructions and ECB standards.

# 3. Scope and definitions

**Complaint.** Any expression of dissatisfaction about JTR's service, actions, omissions, communications, fees administered by JTR, an enforcement agent acting for JTR, or anyone working on JTR's behalf, where a response or remedy is reasonably expected.

**Complainant.** The person affected or an authorised representative. JTR will accept representatives such as a family member, friend, debt adviser or legal representative, subject to appropriate authority and data-protection checks. Anonymous concerns will be considered as far as the available information permits.

**Working day.** Monday to Friday, excluding public holidays in England and Wales. A complaint received outside normal office hours is treated as received on the next working day for service-target purposes.

**Final response.** The written outcome of JTR's formal stage, which completes JTR's internal complaints process and explains external escalation options.

# 4. What JTR can and cannot decide

JTR can investigate whether its own actions, communications, records, fees, visits and decisions were administered correctly and in accordance with applicable requirements. We can correct errors, explain action taken and consider service remedies within our authority.

JTR cannot cancel or vary the underlying debt, liability order, warrant, court order or creditor decision unless authorised to do so. Challenges to the underlying liability may need to be decided by the creditor, issuing authority or a court. We will explain the appropriate route and, where suitable, refer or forward that part of the correspondence with the complainant's knowledge.

A complaint may also include a payment enquiry, vulnerability disclosure, request for information, data-protection request or dispute about the underlying debt. We will separate and route those issues appropriately without treating that as a reason not to address the complaint. A request for personal data may be handled separately under data-protection law.

We may be unable to investigate an issue where JTR has no involvement or jurisdiction, the available information is insufficient after reasonable enquiries, or consideration would improperly prejudice live legal, regulatory or criminal proceedings. We will tell the complainant promptly which issues we cannot consider and why.

## 5. How to make a complaint

Complaints are accepted by telephone, email, post, live chat and any other communication channel actively used by JTR. A complaint can be made by saying what went wrong and what outcome would help. Helpful information includes the JTR reference, contact details, relevant dates and supporting material, but missing information will not prevent us recording the complaint.

**Email:** complaints@jtrcollections.co.uk

**Telephone:** 01933 623380

**Post:** Complaints Team, JTR Collections, PO Box 7672, Wellingborough, NN8 9GW

**Online contact:** JTR Collections website

Complaints should normally be raised within 12 months of the event, or within 12 months of when the complainant first became aware of it. We may accept a later complaint where there is a good reason, including vulnerability, delayed awareness or the availability of evidence. This does not extend any court, statutory, creditor or external-review deadline.

## 6. Accessibility, support and reasonable adjustments

JTR will make reasonable adjustments so that the complaint process is accessible. We can help record a complaint, communicate through an authorised representative, agree a preferred channel, allow additional time where appropriate, and provide information in an alternative format where reasonably available. Language, literacy, disability, health and digital-access needs will be considered.

A complainant may obtain support from a debt adviser, advocate, friend, family member or other representative. We will signpost to suitable independent support where appropriate. Requests for adjustments will be recorded and applied throughout the complaint unless the complainant asks us to change them.

## 7. Responsibilities and governance

**All staff and agents.** Recognise complaints, respond respectfully, record them promptly, preserve relevant evidence and alert the Complaints Lead to vulnerability, safeguarding, safety or serious-conduct concerns.

A complaint must not be left unanswered merely because it has been sent directly to an enforcement agent or another individual.

**Operations Manager / Complaints Lead.** Owns the register and inbox, acknowledges and triages complaints, allocates early resolution, sets deadline alerts, arranges evidence preservation, records enforcement-risk decisions, monitors remedies and provides reports to the Management Board.

**Formal investigator.** Undertakes a fair and proportionate investigation and must be suitably experienced, senior and independent of the events complained about and the Stage 1 handling. The investigator must declare any conflict or prior involvement.

**Management Board.** Owns this policy, appoints or approves a suitably independent formal reviewer, ensures conflicts are managed, approves or delegates approval of final responses, oversees serious-conduct decisions, reviews trends and ensures agreed improvements are completed.

A Management Board member who was materially involved in the underlying events or earlier complaint handling must take no part in deciding the formal outcome. If suitable internal independence or expertise is not available, the Management Board may appoint a competent external reviewer. The reviewer will act for JTR under this policy; responsibility for the final response remains with JTR.

# 8. The two-stage complaints process

| Stage | Target | What happens |
|---|---|---|
| 1 — Early resolution | Within 5 working days | A manager seeks a prompt explanation, correction or practical resolution where appropriate. |
| 2 — Formal investigation | Within 20 working days | A suitably independent reviewer investigates and issues JTR's final response. Extensions are exceptional and explained. |

## 8.1 Receipt, acknowledgement and triage

JTR will record the complaint and normally acknowledge it within two working days. The acknowledgement will, so far as appropriate, include:

7. a unique complaint reference and contact point;
8. the issues we understand are being raised and the stage at which they will be handled;
9. the relevant target date and an explanation of the process;
10. any information reasonably required to investigate;
11. confirmation of agreed communication needs or reasonable adjustments; and
12. the outcome of any initial decision about enforcement activity, where it is lawful and appropriate to provide it.

At triage we will identify urgent safeguarding or vulnerability information, serious allegations, evidence at risk of deletion, linked complaints, legal proceedings, creditor involvement and any need to restrict or hold particular action.

### 8.2 Stage 1 — early resolution

Where appropriate, a manager who is not the subject of the complaint will try to resolve it within five working days. This may involve an explanation, correction, apology, practical action or agreed next step. The outcome will be confirmed in a durable form, normally in writing, but not essential, and recorded on the complaint file.

A serious, complex or disputed complaint may move directly to the formal stage. If early resolution is unsuccessful, JTR will move the existing complaint to Stage 2 without requiring the complainant to submit it again.

### 8.3 Stage 2 — formal investigation and final response

The Management Board, or a delegated Complaints Lead acting under its authority, will appoint a suitably independent investigator. The formal stage should be concluded within 20 working days of the complaint being acknowledged. Where Stage 1 has already used part of that period, the formal investigation will be managed so that the overall 20-working-day target remains the objective.

If exceptional circumstances mean a fair investigation cannot be completed within 20 working days, we will explain the reason, the evidence or action outstanding, the steps being taken and the revised response date. We will provide regular and meaningful updates, normally at least every 10 working days, until the final response is issued.

## 9. Enforcement activity while a complaint is open

> **Important** Making a complaint does not automatically suspend enforcement action or the obligation to deal with the underlying debt. Any statutory, court-ordered or creditor-authorised hold will be honoured.

JTR will promptly carry out and record a case-specific risk assessment. It will consider the nature and seriousness of the complaint, vulnerability or safeguarding information, the risk of avoidable or irreversible harm, evidence preservation, safety, creditor instructions, legal obligations and whether continued action could undermine a fair investigation.

The result may be to continue, limit, reallocate or temporarily hold particular activity. The decision and reasons will be recorded, kept under review when new information is received, and communicated to the complainant where lawful and appropriate. Payment discussions and essential account contact may continue during a hold unless the terms of that hold say otherwise.

## 10. Vulnerability, mental health and ability to pay

Information suggesting vulnerability, mental-health difficulty, disability, safeguarding risk or inability to meet essential living costs will be acknowledged and referred promptly under JTR's vulnerability and ability-to-pay procedures. It will not be treated merely as evidence of non-payment or non-engagement.

JTR will consider appropriate communication adjustments, whether contact or enforcement should be adapted, whether the creditor should be informed, and whether affordability information or independent debt advice should be considered. Any payment arrangement must be considered in the context of the authority available to JTR and applicable creditor instructions.

Sensitive information will be handled on a need-to-know basis and in accordance with data-protection requirements. Where evidence is reasonably needed, we will explain why and avoid requesting more information than is necessary.

## 11. Requests to change an enforcement agent

A complainant does not have an automatic right to select or remove an enforcement agent. However, a request for reassignment will receive a documented management review where it raises alleged misconduct, safety, vulnerability, a conflict of interest or a material breakdown in communication.

The reviewer will consider whether reassignment, different management oversight, an alternative communication route or another safeguard is proportionate and operationally available. The decision and reasons will be recorded and explained, subject to legal, privacy and safety restrictions. Contact by the agent complained about will be considered as part of the enforcement-risk assessment while the request is under review.

## 12. Investigation and evidence

The investigation will be fair, proportionate and focused on the issues raised. Depending on the complaint, evidence may include case notes, account records, notices, correspondence, emails, text messages, call recordings, live-chat records, body-worn video, visit and attendance records, system audit data, creditor instructions, policies, training records and statements from staff or enforcement agents.

The investigator will test relevant evidence rather than rely automatically on a single account. An enforcement agent or employee who is the subject of a complaint will have an appropriate opportunity to respond and will receive reasonable support, without controlling the complaint outcome.

Agent reports, internal notes and investigation material are evidence for JTR's decision and are not automatically disclosed. Requests for copies will be considered under applicable data-protection, confidentiality, legal-privilege, safety and third-party-rights requirements. The final response will nevertheless provide enough information to explain the evidence considered and the reasons for the findings.

## 13. Findings, remedies and final responses

Each material complaint point will normally be recorded as upheld, partly upheld, not upheld, or unable to determine. A finding will be based on the balance of the available evidence and will distinguish established facts, conflicting evidence and matters outside JTR's authority.

Where appropriate, remedies may include:

13. an apology or clear explanation;
14. correction of records, communications or administrative errors;
15. review, refund or removal of a fee where JTR has authority and the fee was wrongly applied;
16. reassignment, additional management oversight or a communication adjustment;
17. review of enforcement activity or referral to the creditor for a decision;
18. staff or agent coaching, training, monitoring or formal management action; and

19. changes to templates, systems, policies or controls to prevent recurrence.

The final response will include a summary of the complaint, the evidence considered, findings and reasons for each material issue, any remedy and completion date, the current position on enforcement activity where relevant, and details of external escalation. Personal, confidential or legally restricted information about employees, agents or third parties will not be disclosed merely because management action has been considered.

## 14. Escalation after JTR's final response

The Stage 2 response is JTR's final response. If the complainant remains dissatisfied, or JTR has not provided a final response within 20 working days of acknowledging the complaint, the complainant may ask the Enforcement Conduct Board (ECB) to consider an eligible complaint.

Make a complaint to the Enforcement Conduct Board | Email: complaints@enforcementconductboard.org

The ECB applies its own scope, eligibility criteria and time limits, so complainants should check its current requirements and act promptly. External rights are not extended by JTR's internal process.

Where JTR acts for a local authority or another creditor, the complainant may also use that organisation's complaints procedure. For local-authority matters, the authority may explain any later route to the Local Government and Social Care Ombudsman. Court procedures, including any right to use Form EAC2 in relation to a certificated enforcement agent, and other legal rights are unaffected by this policy.

## 15. Creditor, regulatory and serious-conduct referrals

JTR will inform or consult the instructing creditor where required by contract, instruction, law or good complaint handling, including where the complaint concerns the creditor's decision, significant vulnerability, a proposed remedy outside JTR's authority or a serious operational issue. The complainant and creditor are distinct: information will be shared only where there is an appropriate basis.

Allegations indicating serious misconduct, safeguarding risk, criminality, data breach or a serious or persistent breach of applicable standards will be escalated promptly to the appropriate senior manager or Management Board member. JTR will make any notification to the creditor, ECB, court, police, data-protection authority or other body that is required or appropriate. Referral does not predetermine the outcome of the complaint.

## 16. Evidence preservation, records and data protection

When a complaint is identified, JTR will take reasonable steps to preserve potentially relevant evidence, including body-worn video, calls, messages, attendance records, case notes, notices, correspondence and system records. A preservation decision does not mean that every item will be disclosed or that every allegation is accepted.

Complaint correspondence, decisions, remedies and register entries are normally retained for six years from closure, subject to JTR's retention schedule and any overriding legal requirement. Information relevant to an ECB-eligible or live complaint will be retained until it is no longer required for resolution and, where the ECB standards require it, for at least 12 months from the date of the complaint. Relevant body-worn video will be retained on the same minimum basis.

Complaint information will be kept securely, access will be limited to those with a legitimate need, and information will be shared only where there is a lawful and proportionate basis. Data-subject rights and JTR's data-protection procedures continue to apply.

## 17. Repeated contact and unreasonable behaviour

Persistence, disagreement with an outcome, disability-related communication or the making of multiple genuine complaints will not by itself be treated as unreasonable. However, JTR may manage contact that is abusive, threatening, discriminatory, seriously disruptive or disproportionately repetitive.

Any restriction will be proportionate, normally follow a warning, be authorised by a senior manager, state the reasons, permitted contact method, duration and review date, and take account of reasonable adjustments. A restriction will not prevent JTR from considering substantive new evidence, safeguarding information or a complaint that can reasonably be progressed.

## 18. Quality assurance, learning and reporting

The Complaints Lead will maintain an auditable register recording issues, stages, deadlines, outcomes, remedies, vulnerabilities or adjustments where appropriate, enforcement-risk decisions, evidence-preservation steps, external referrals and completion of improvement actions.

A suitably experienced person will review complaints and outcomes for themes, recurrence, timeliness, consistency and evidence quality. The Management Board will receive regular management information and will ensure that agreed improvements are assigned, tracked and tested. Findings may inform staff and agent training, template controls, call and body-worn-video monitoring, system changes and creditor discussions.

## 19. Publication and review

This policy will be published in an accessible form and promoted in relevant correspondence. It will be reviewed at least annually and sooner if law, ECB standards, creditor requirements, JTR's services or complaint trends materially change.

The Management Board is responsible for approval and oversight. The Operations Manager / Complaints Lead is responsible for operational implementation, staff awareness, controlled templates and monitoring compliance with the stated service targets.

## 20. Reference framework

This policy is designed to operate alongside applicable enforcement law, data-protection law, creditor instructions and the current ECB Professional Values and Standards of Practice for Enforcement Firms and Agents. It also anticipates the ECB Vulnerability and Ability to Pay Standards scheduled to take effect in January 2027.

ECB standards and guidance | ECB vulnerability and ability-to-pay standards

**END OF POLICY**