Valentine&Co

# Complaints Handling Policy

Policy for Valentine & Co (the Firm)

## 1. Purpose

This policy sets out the approach adopted by Valentine & Co ("the Firm") for the fair, consistent and timely handling of complaints. this policy has been updated to meet the requirements of the revised Insolvency Guidance Paper issued in October 2025.

The Firm is committed to dealing with complaints professionally and expeditiously in order to:

- resolve concerns at the earliest opportunity
- ensure transparency and accountability
- maintain confidence in the insolvency profession

This policy applies to:

- all insolvency appointments undertaken by the Firm
- all partners, insolvency practitioners and employees
- all complaints received from clients, creditors, debtors or other stakeholders

## 2. Definition of a Complaint

A complaint is defined as any expression of dissatisfaction, whether oral or written, relating to:

- the service provided by the Firm
- the conduct of its staff or insolvency practitioners
- actions or decisions taken in an insolvency engagement

The Firm will consider whether expressions of dissatisfaction should appropriately be treated under this procedure.

## 3. General Principles

The Firm will ensure that:

- complaints are handled in a structured, consistent and transparent manner
- communications are clear, accurate and in plain language
- complainants are kept informed of progress and timescales
- early resolution is sought wherever appropriate
- outcomes are properly documented
- lessons learned are used to improve procedures and training

## 4. Complaints Procedure

### 4.1 Receipt and Acknowledgement

Complaints may be made in writing including by email.

All complaints will:

- be recorded upon receipt
- be acknowledged promptly (normally within 5 working days)
- be assigned to an appropriate individual for investigation

The acknowledgement will include:

- confirmation of receipt
- a copy of (or link to) this policy

- the name of the individual handling the complaint
- indicative timescales for response

### 4.2 Investigation

The Firm will:

- establish the relevant facts without undue delay
- review all relevant documentation and correspondence
- seek further information where necessary
- ensure the complainant is kept informed of progress and any delay

Where appropriate, consideration will be given to the circumstances of the complainant, including whether any reasonable adjustments are required.

### 4.3 Outcome

A written response will be issued within a reasonable timeframe (normally within 28 days), which will:

- set out the findings of the investigation
- clearly explain the Firm's decision
- provide the reasons for that decision in a clear and understandable manner

Where appropriate, the Firm will:

- acknowledge any error
- take corrective action
- offer an apology
- implement steps to prevent recurrence

Where a complaint is not upheld, a full and reasoned explanation will be provided.

### 4.4 Internal Review

Where the complainant remains dissatisfied, they may request a review.

Where possible. the review will be undertaken by:

- a senior member of staff, or
- the insolvency practitioner who has not acted as Lead Office-holder in the matter.

A final response will then be issued.

### 4.5 External Escalation

If the complainant remains dissatisfied after the Firm's internal process, they will be informed of their right to refer the complaint to the Regulated Professional Body of the Lead IP or to The Insolvency Practitioner Complaints Gateway.

Details of how to access the Gateway will be provided in the final response. Where appropriate, the Firm will also explain where the correct route for challenge is via application to the Court.

## 5. Timeframes

- Acknowledgement: within 5 working days
- Substantive response: normally within 28 days
- Updates: provided where delays arise

All timescales will be clearly communicated to the complainant.

## 6. Communication and Accessibility

The Firm will:
- ensure communications are clear and proportionate to the recipient
- make reasonable adjustments for vulnerable complainants
- make this policy available on request and via appropriate channels
- notify stakeholders of their right to complain at an early stage, including within engagement documentation

## 7. Unreasonable, Vexatious or Repetitive Complaints

The Firm recognises that, in limited cases, complaints may become unreasonable, vexatious or repetitive.

A complaint may be treated as such where:
- it has been fully investigated and responded to, and no new evidence is presented
- substantially the same issues continue to be raised, or
- the nature or frequency of contact is disproportionate.

In such cases, the Firm may adopt a proportionate approach, including:
- confirming that its previous response represents its final position
- declining to enter into further substantive correspondence on previously addressed matters, and/or
- applying reasonable limits to ongoing communication

Such action will only be taken where:
- the complaint has been fully and fairly considered
- a clear and reasoned response has been issued, and
- the approach is proportionate in the circumstances

The complainant will be notified in writing and reminded of their right to refer the matter to the Insolvency Practitioner Complaints Gateway.

All such decisions will be documented and subject to senior review.

## 8. AI generated correspondence

The Firm recognise that generative AI tools (such as ChatGPT, Gemini and Claude) are increasingly being used to prepare complaints, queries and case correspondence. Used responsibly, these tools can help people put their concerns into writing. However, a rise in high-volume, repetitive correspondence bearing the hallmarks of AI generation has been seen; often containing factual errors, misapplied points, or lengthy arguments that add no substantive value and which can place a disproportionate burden on the Firm's resources without benefiting the matter at hand.

Regardless of how correspondence is produced, the Firm's focus will always be on its substance: whether it raises a legitimate issue that requires action. Correspondence that is excessive, repetitive, or places a disproportionate burden on our ability to perform our role, including where this appears to result from the use of AI tools, will be treated as unreasonable under this policy, in the same way as any other excessive or repetitive contact (see 'Unreasonable, Vexatious or Repetitive Complaints' above).

Where a pattern of high-volume or apparently AI-generated correspondence is identified, the Firm will keep a clear, chronological record of the correspondence received and the responses provided, including its frequency, volume and repetitive nature in order to explain and justify, where necessary, any decision to limit further engagement with an individual.

## 9. Record Keeping

The Firm will:

- maintain central complaints register
- record the nature of each complaint, actions taken and outcome
- retain supporting evidence, including correspondence and file notes

Records will be sufficient to demonstrate:

- the steps taken
- the rationale for decisions, and
- compliance with this policy

## 10. Monitoring and Continuous Improvement

The Firm will:

- monitor complaint volumes and trends
- review outcomes to identify recurring issues
- update procedures, controls and training as appropriate.

## 11. Insurance and Regulatory Considerations

Where required:

- complaints will be notified to the Firm's professional indemnity insurer, and
- any response will take account of applicable policy conditions.

## 12. Responsibilities

- **All staff:** Identification and escalation of complaints
- **Assigned complaints officer:** Investigation and response
- **Senior management / insolvency practitioners:** Oversight, escalation and final decisions

## 13. Review of Policy

This policy will be reviewed periodically to ensure continued compliance with regulatory requirements and best practice.