



COMPLAINTS & DISPUTE RESOLUTION

POLICY and PROCEDURE

effective April 2026 ff.

This policy has been created to comply with the Financial Conduct Authority's Dispute Resolution: Complaints Sourcebook (**DISP**) rules, the FCA **Consumer Duty** and FCA guidance on the fair treatment of **Vulnerable Customers**. It applies to our regulated credit activity, i.e. **pawnbroking**.

1. Principles

We are a long-established family business whose continued success depends on satisfying our customers. We recognise that complaints are a valuable form of customer feedback and an opportunity to improve our service.

- All complaints will be investigated fully, fairly, competently, diligently and impartially.
- We are committed to the FCA **Consumer Duty** (Principle 12). This includes acting in good faith, avoiding foreseeable harm, and delivering **good outcomes** for our customers in all aspects of our business, including complaints handling. Particular care is taken to support customers with characteristics of **vulnerability** so they receive outcomes at least as good as those experienced by other customers. Our complaints procedure supports the **Consumer Support** outcome by providing an accessible, fair and effective process for resolving issues and learning from them.
- We are committed to Treating Customers Fairly (TCF) at all times and to managing Conduct Risk effectively.
- Customers will be kept informed of progress and will receive a clear, fair and not misleading response.
- Where we are at fault we will offer appropriate redress or remedial action promptly.
- If an eligible customer remains dissatisfied after our final response they have the right to refer the matter to the Financial Ombudsman Service (FOS) free of charge. *The FOS is a free, independent service for resolving disputes.*
- We are members of the National Pawnbrokers Association (NPA) and will escalate complex or legal issues to the NPA or our solicitors where necessary.

2. Definition of a Complaint

A complaint is any expression of dissatisfaction (oral or written, justified or not) from or on behalf of a customer that alleges :

- negligence, breach of a client agreement, terms of business or any statutory requirement
- misrepresentation, bad faith or malpractice (including incompetence or broken promises);
- unsuitable advice causing financial loss; or
- poor service.

The complaint will generally involve (or may involve) financial loss, material distress or material inconvenience.

3. How Customers Can Complain

Customers may complain at any time by :

- Speaking in person to a member of staff at the store where the business took place;
- Telephoning the relevant store;
- Writing to the store address; or
- Emailing info@miltontjewellers.com

A copy of this Complaints Policy is published in store and on our website, but we will also check that a complaining customer has a copy at the earliest opportunity.

A Complaint Form is available in-store and on our website. We may ask customers to complete this (or provide supporting documents) so that all details are captured clearly.

Copies of this Complaints and Dispute Resolution Policy and the Financial Ombudsman (FOS) leaflet “Your Complaint and the Ombudsman” are available in store and will be provided to customers both on request and at the appropriate stages of the complaint process.

Website resources (public) : www.miltontjewellers.com/pawnbroking

- Complaints Procedure
- Complaint Form
- Link to FOS leaflet and our standalone Complaints page

Staff resources (Miltontjewellers.com secure web area) :

Full Complaints policy

NPA complaints flowchart

4. Our Complaints Handling Process

- **Immediate / low-level issues** that can be resolved by close of business on the **third business day** after receipt do not require the full formal procedure but must still be recorded in the Complaints Register. A Summary Resolution Communication will be sent confirming the resolution.
- All other complaints will be handled formally.

Step-by-step process :

1. **Acknowledgement** – A prompt written acknowledgement will be sent confirming receipt and that the complaint is being investigated.
2. **Investigation** – The complaint will be investigated competently, diligently and impartially. We will speak to the staff involved, review all relevant records and evidence, and assess fairly, consistently and promptly what the complaint is about, whether it should be upheld, and what (if any) redress or remedial action is appropriate.
3. **Resolution** – We will seek an amicable resolution wherever possible. A manager will handle the complaint initially. If the customer remains dissatisfied it will be escalated to a Director.
4. **Response** –
 - If resolved within three business days: Summary Resolution Communication.
 - Otherwise: Final Response letter (or, if we cannot issue it within 8 weeks, an update letter explaining the delay and expected timescale).

The Final Response will :

- Summarise the complaint and our investigation;
- Clearly state whether we accept the complaint and offer redress / remedial action (or reject it with reasons);
- Enclose the FOS explanatory leaflet; and
- Inform the customer of their right to refer the complaint to the FOS within six months of the date of the letter.

We will ensure that any offer of redress or remedial action that is accepted is settled promptly.

A complaint will be considered closed either when Miltons receives confirmation from the customer that resolution has been reached or, where no such confirmation is received, 8 weeks from when our final response letter (or acceptable equivalent) has been sent.

Standard wording which will be included in our Final Response :

“You have the right to refer your complaint to the Financial Ombudsman Service, free of charge, but you must do so within six months of the date of this letter. If you do not refer your complaint in time, the Ombudsman will not have our permission to consider your complaint and so will only be able to do so in very limited circumstances (for example, if the Ombudsman believes that the delay was as a result of exceptional circumstances).”

Customers may refer to the FOS earlier, but the FOS will normally require our agreement if we have not yet issued a Final Response or exceeded the 8-week period.

5. Support for Customers in Vulnerable Circumstances

Miltons recognises that some customers may be in vulnerable circumstances due to factors such as health issues, disability, age, financial hardship, bereavement or other life events. Under the FCA Consumer Duty and our obligations to treat customers fairly, we will :

- Take reasonable steps to identify characteristics of vulnerability during the complaints process (using the four drivers: health, life events, resilience and capability).
- Provide additional support and make reasonable adjustments where needed (for example: allowing more time to respond, using simpler language, preferred communication methods, larger print, or accepting help from a representative or advocate).
- Handle complaints involving vulnerable customers with particular care, sensitivity and flexibility.
- Record details of any disclosed vulnerability (with appropriate consent) to ensure consistent support throughout the process.

Staff (particularly those handling complaints) are trained to recognise and respond appropriately to vulnerability.

6. Complaints Officer

Complaints Officer : Director Haywood Milton (supported by all Store Managers and Assistant Managers).

The Complaints Officer is responsible for :

- Overseeing the smooth running of the complaints process;
- Analysing root causes and identifying recurring issues;
- Ensuring complaints are resolved promptly and properly;
- Escalating complex, legal or high-value complaints for assistance from any / all of the NPA, our solicitors and our Compliance Advisor
- Ensuring the Complaints Register (“log”) is maintained.

The Board wish to be involved at the earliest opportunity in all but the most minor complaints.

7. Record Keeping and Monitoring

It is vital that any areas of repeat concern to customers, any decline in general satisfaction levels or any individual, material problem are highlighted by the Complaints Monitoring / Reporting system as quickly as possible. The Complaints Register (also known as the Complaints Log) is a vital resource which must be completed.

- All complaints (including those resolved within three business days) must be logged in the Complaints Register.
- The following information will be recorded (in the Register or separately) :
 - Complainant's name and contact details
 - Employee who recorded the complaint
 - Date and time of receipt, and how the complaint was received
 - Nature of the complaint
 - Relevant notes on vulnerability if applicable
 - Whether resolved (and if so, action taken and method of communication)
 - If not resolved, details of referral / escalation
 - Any linked Money-Laundering, TCF or Conduct Risk issues
- Records will be kept for at least **six years** from the date of resolution.
- The Complaints Register is reviewed regularly by the Complaints Officer and Director(s). Complaints data is analysed for root causes, trend, potential systemic issues and outcomes for customers in vulnerable circumstances. This forms a key part of our ongoing Consumer Duty monitoring to identify whether good outcomes are being achieved and to drive improvements in our products, services, communications and support processes.
- Any material or recurring issues will be discussed at management level.

8. Escalation and External Bodies

- **National Pawnbrokers Association (NPA)** – Clients may contact them for guidance on pawnbroking matters, but please note that their role is not to resolve disputes.
- **Financial Ombudsman Service (FOS)** – Independent, free service for unresolved complaints. Contact details below. We will cooperate fully with the FOS if a complaint is referred to them.

9. Contact Details

Miltons (Liverpool) Ltd 149-150 Charlotte Way, St. John's Centre, Liverpool L1 1NB
Tel: 0151 708 0424 | email : info@miltonsjewellers.com
Website : www.miltonsjewellers.com

M.S.Milton Limited 36 Borough Pavement, Birkenhead CH41 2XX
Tel: 0151 647 2144 | email : info@miltonsjewellers.com
Website : www.miltonsjewellers.com

S.S.Milton Limited 71 Church Street, Liverpool L1 1DG
Tel: 0151 708 0365 | email : info@miltonsjewellers.com
Website : www.miltonsjewellers.com

S.S.Milton Limited 60 Eastgate Street, Chester CH1 1LE
Tel: 01244 351814 | email : info@miltonsjewellers.com
Website : www.miltonsjewellers.com



National Pawnbrokers Association 2 The Old Estate Yard, High Street, East Hendred, Wantage, Oxfordshire OX12 8JY
Tel: 07735 886930 | Email: sonia.sahota@thenpa.com
Website : www.thenpa.com

Financial Ombudsman Service Exchange Tower, London E14 9SR
Tel: 0800 023 4567 | Email: enquiries@financial-ombudsman.org.uk
Website: www.financial-ombudsman.org.uk

10. Policy Availability and Review

- This policy is displayed in-store and on our website.
- A copy will be provided to any customer on request.
- The policy is reviewed at least annually or following any material changes to FCA rules, FOS guidance or our business.

Approved by : Director Haywood Milton

Date : April 2026