



Mortgage Lenders' Handbook Platform

Complaints Policy

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1. Purpose and Scope

This Mortgage Lenders' Handbook Platform Complaints Policy (the "Policy") sets out how UK Finance operates its complaints system in fulfilment of the duties imposed by the **Online Safety Act 2023 (OSA)** and related Ofcom guidance. It applies to all users and affected persons who have experienced, or believe they have experienced, action taken by UK Finance in relation to content, accounts or services on the Mortgage Lenders' Handbook Platform.

UK Finance is committed to running an electronic, free, easy-to-use complaints system that delivers fair and timely outcomes. This Policy is to be read alongside UK Finance's Mortgage Lenders' Handbook Terms of Service.

2. Legal Basis

This Policy implements UK Finance's obligations under the Online Safety Act 2023, including:

- Sections 20–22: Illegal content safety duties
- Sections 64–67: Content reporting duties
- Sections 19 and 23: Duties relating to freedom of expression and privacy
- Sections 18–19 and Schedule 3: Complaints obligations for regulated services
- Ofcom's Guidance on Complaints Handling (as published and updated from time to time)

3. Complaints Coverage

UK Finance's complaints system allows users and affected persons to challenge each of the following categories of decision:

3.1 Content Moderation Decisions

- Removal or restriction of content posted by the complainant.
- Age-restriction, labelling, or de-amplification of the complainant's content.

3.2 Account and Service Sanctions

- Suspension or termination of a user's account.
- Temporary or permanent bans from the service.
- Formal warnings or strikes applied to an account.
- Restrictions placed on how a user may interact with or access the service.

3.3 Decisions Not to Act on a Notice

Where UK Finance has received a notice (whether from a user, a third party, or an automated report) and has decided not to take action, an affected person may submit a complaint challenging that decision.

3.4 Alleged Failure to Comply with OSA Duties

Complaints may also be submitted alleging that UK Finance has failed to comply with:

- Its illegal content safety duties under the OSA;
- Its content reporting duties under the OSA; or
- Its duties relating to freedom of expression and privacy under the OSA.

4. Submitting a Complaint

4.1 How to Submit

Complaints can be submitted electronically via UK Finance's dedicated Contact Us webform, which is free to use.

The Contact Us webform is located at the bottom of the Mortgage Lenders' Handbook platform, in the quick links section.

The webform is designed to facilitate precise and substantiated complaints and includes the following structured fields:

- Your Name
- Your Email
- Organisation
- Type of Query (Complaint)
- Message

4.2 In-Context Complaints Route

Where a complaint relates to a specific item of content, the complaints route is clearly accessible as the Contact Us page is at the bottom of every webpage through the Quick Links section.

5. Accessibility

UK Finance is committed to making its complaints tools accessible to all users:

- Written instructions and form labels use plain English, written to a reading age of no more than 11 years old.
- The complaints interface meets WCAG 2.2 Level AA accessibility standards, ensuring compatibility with screen readers, keyboard navigation, and other assistive technologies.
- The complaints form is mobile-responsive and compatible with major browsers.

6. Processing Standards

6.1 General Standards

All complaints received under this Policy will be handled:

- Diligently – with appropriate care, attention and thoroughness;
- Objectively – without bias, and with due regard to all available evidence; and
- Promptly – within the timescales set out in section 6.2 below.

Every complaint will receive a written outcome.

6.2 Target Timescales

- **Acknowledgement of receipt:** Within 2 business days of submission
- **Decision on straightforward complaints:** Within 10 business days of acknowledgement
- **Decision on complex**
- **Complaints:** Within 28 calendar days of acknowledgement (with interim update at 14 days)
- **Emergency complaints (imminent risk to safety):** Prioritised – best endeavours to resolve within 24 hours

If it is not possible to meet these timescales, UK Finance will notify the complainant with reasons and a revised expected date.

7. Human Oversight

All complaint decisions must be taken under the supervision of authorised members of staff. Automated tools may be used to assist in triage, prioritisation, or initial assessment of complaints, but:

- No complaint may be determined solely by an automated tool or system.
- The final decision on every complaint must be made by, or be reviewed and approved by, an authorised human reviewer.

8. Outcomes and Redress

8.1 Reasoned Decision

Upon conclusion of a complaint, UK Finance will send the complainant a written decision without undue delay. The decision will:

- Set out clearly whether the complaint is upheld, partially upheld, or not upheld;
- Give reasons for the decision, with reference to the relevant Policy or legal basis where appropriate;
- Explain any action UK Finance will take as a result; and
- Inform the complainant of any further review or escalation options available to them.

8.2 Upheld Complaints

Where a complaint is upheld and the original decision is overturned, UK Finance will:

- Reverse the original action without undue delay, and in any event as soon as reasonably practicable;
- Notify the complainant in writing of the reversal and the date on which it was (or will be) effected;
- Identify and record any process improvements arising from the upheld complaint; and
- Report patterns of upheld complaints to senior management on a regular basis to support systemic improvement.

9. Other Relevant Complaints

Complaints that do not fall within the categories in section 3, but which are otherwise relevant to UK Finance's operations, will be acted upon appropriately. UK Finance will assess such complaints on their individual merits, direct them to the appropriate

team for handling, and provide the complainant with a response confirming the action taken or the reasons why no action was taken.

10. Record-Keeping and Reporting

UK Finance will maintain the following records for a minimum of three years:

- Details of all complaints received, including date, category, and identity of the reviewer;
- Copies of all decisions issued (whether upheld or not);
- Details of all reversals made pursuant to section 8.2;
- Process improvement actions identified and taken.

Aggregated complaints data will be compiled at UK Finance and reviewed annually for effectiveness. This will be made available to Ofcom upon request.

11. Escalation and External Redress

Where a complainant remains dissatisfied with UK Finance's decision, they may:

- Request an internal review by a senior reviewer not involved in the original decision (to be requested within 20 business days of the decision);
- Refer the matter to Ofcom, which has powers to investigate complaints about regulated services under the OSA; or
- Seek independent legal advice or pursue other remedies available at law.

12. Policy Governance and Review

This Policy will be:

- Reviewed at least biennially;
- Updated promptly to reflect changes to the OSA, Ofcom guidance, or UK Finance's operations;
- Approved by the Operational Committee prior to any material amendment taking effect; and
- Published on the Mortgage Lenders' Handbook Finance's website and made easily accessible to all users.

Questions about this Policy should be directed to: mlh@ukfinance.org.uk

Annexe A – Complaints Process Summary

The following steps summarise the standard complaints process:

- **Step 1:** User submits complaint via the Contact Us electronic webform (free, accessible, structured).
- **Step 2:** Automatic acknowledgement sent within 2 business days.
- **Step 3:** Triage: complaint categorised (section 3) and assessed for complexity.
- **Step 4:** Complaint assigned to qualified human reviewer (with automated triage support where used).
- **Step 5:** Review and investigation: all relevant evidence considered objectively.
- **Step 6:** Written decision issued without undue delay (within target timescales in section 6.2).
- **Step 7 (if upheld):** Original action reversed without undue delay; process improvements recorded.
- **Step 8:** Outcome and escalation rights communicated to complainant.

Document Control

- **Review Date:** October 2026
- **Policy Owner:** Commercial Delivery
- **Approved by:** COO & Mortgage Lenders' Handbook Project Steering Committee

Version History

- **v1.0 (April 2026):** Initial version – OSA compliance (s.8 Complaints Duty)