Complaints Policy

March 2026

Introduction

1 The PSAA Board is responsible for approving, publishing and maintaining a complaints procedure. The Chief Executive reports annually to the Board about the nature and number of complaints and about the company's handling of complaints.

2 We aim to achieve the highest standards and take all complaints seriously, so we need to know if you are concerned or dissatisfied about our action or lack of action or about the service provided by us, or where within our remit, with that of the auditors we appoint.

3 We aim to communicate with people clearly and politely and will ensure that we contact you in the way that you prefer, be it by email, letter or telephone.

4 At the start of any complaint, we will consider whether any potential conflicts arise, and if necessary, will act accordingly to ensure that the matter is handled fairly.

Complaints that we can consider

5 We can consider complaints:

- about PSAA not following appropriate administrative processes;
- conduct, treatment by, or attitude of a member of staff at PSAA;
- conduct, treatment by, or attitude of a PSAA Board member; and
- in our role as appointing person and further to regulation 7(b)(iii) of the Local Audit (Appointing Person) Regulations 2015 to resolve disputes or complaints from local auditors, opted in authorities and local government electors relating to audit contracts and the carrying out of audit work by auditors we have appointed

6 Complaints raised by PSAA staff members may, depending on their nature, be considered under PSAA's Grievance Policy. Where a concern relates to personal employment matters, such as working conditions, relationships with colleagues, or treatment by management, it may be more appropriately addressed through our formal grievance process. Staff are encouraged to seek guidance from a member of the Senior Management Team (SMT) or the HR Business Partner to determine the most suitable route for raising their concern.

Complaints that we cannot consider

7 We cannot consider complaints about:

- the judgements and decisions of auditors in the exercise of their statutory functions as these are matters for the court/regulators. This extends not just to decisions about matters of substance, but also to the process by which those decisions are made. This means we also cannot consider complaints about the exercise of auditors' specific powers and duties in relation to electors' rights under the Local Audit & Accountability Act 2014; or
- opted-in bodies, as these must be raised with the body concerned. (An opted-in body is one to which PSAA has appointed an auditor under the Local Audit (Appointing Person) Regulations 2015).

8 If you have any queries about whether we can or cannot deal with a specific complaint, please contact us via email at generalenquiries@psaa.co.uk. If we receive a complaint that we

cannot consider either in full or in part, wherever reasonable we will provide our assessment of the most appropriate body or bodies for the complainant to contact.

Making a complaint

9 If you wish to make a complaint, you can do so by submitting a form on our website (LINK) or by emailing the PSAA Chief Executive at generalenquiries@psaa.co.uk. These are the quickest and most efficient ways for us to receive and process your complaint. However, you can also write to us at:

Chief Executive
PSAA Limited
18 Smith Square
London
SW1P 3HZ

10 When complaining, tell us:

- your name and contact details
- as much as you can about the complaint including any supporting information
- where it relates to an auditor whether this has been raised with the auditor under their complaints policy
- what has gone wrong
- how you think we may resolve the matter.

Timing of complaints

11 To ensure that complaints are dealt with properly, we will not usually accept complaints that are made more than six months after the event that is the subject of the complaint.

Complaints without merit

12 PSAA reserves the right not to investigate complaints that it considers to be frivolous or without merit; where further investigation would not serve any useful purpose; or where it would otherwise be an inappropriate use of the complaint's procedure, with particular regard to the proper use of public funds. In these cases, we will inform the complainant and bring communication to a close.

Complaints about PSAA and PSAA staff

13 Where the complaint relates to PSAA itself, this will be dealt with by the person who is best placed to carry out a full investigation of the matter. Where an individual is the subject of the complaint this will most likely be their line manager.

14 In certain circumstances it may be necessary for a member of our SMT to perform the stage one review.

15 PSAA recognises the impact that an investigation can have on staff or Board members and will make available appropriate support to them.

How we will process your complaint

16 We will contact you within ten working days of receipt by email or letter to explain how it will be dealt with, by whom, and if possible, when you can expect to receive a full reply.

Stage one

17 We will consider your complaint carefully and, if the matter is straightforward, we will usually send you a full reply within 20 working days. If the issue is more complex, we may contact you before we start the investigation to clarify your concerns. If your complaint has more than one part, we may issue our findings to you in stages prior to coming to an overall conclusion. If we need to carry out a very detailed investigation our response may take longer than 20 working days. If so, we will contact you to explain what is happening, and provide an estimate of when we will expect to issue the full response, or provide a further update.

18 We will produce a written report of our review of your complaint with recommendations where appropriate.

19 If our overall conclusion is that your complaint is justified in part or in full, you will receive an apology together with details of any other steps we will take to address your concerns. Where possible we will also explain what we are doing to prevent the issue happening again.

20 We will seek to resolve your complaint at stage one. Where a complaint cannot be resolved or is not resolved to your satisfaction then you can ask for it to be referred to stage two.

Stage two

21 If you wish the outcome of stage one to be reviewed, the most appropriate member of SMT will undertake a review of the complaint and how it was handled. They will provide you with a response following their review.

22 Where the Chief Executive conducted the stage one review, we will ask an independent person to undertake the stage two review.

23 You will need to provide your reasons why you believe the stage one outcome is incorrect, unfair or not in accordance with the process.

Stage three (final stage)

24 If you remain unsatisfied that your complaint is fully resolved after stage 2 has completed, you can appeal to the Board Chair who will appoint a PSAA Board member to review your complaint and how it was handled. You will need to provide your reasons why you believe the outcome is incorrect, unfair or not in accordance with stated procedures.

Complaints about PSAA Board members and the Chief Executive

25 The Board Chair is responsible for responses to complaints against Board members and the Chief Executive.

26 If a complaint is against the Chair individually, the Chair of the People and Remuneration Committee and the Company Secretary shall consider whether there is serious prima facie case, and if so, shall inform IDeA, as founder of the company for resolution.

Complaints relating to the processing of personal data

27 Under Section 103 of the Data (Use and Access) Act 2025, data subjects have the right to lodge complaints directly with the data controller if they believe their rights under UK GDPR or Part 3 of the DPA 2018 have been infringed.

28 Complaints may be submitted in accordance with paragraph 9 of this policy and investigated in the same way as for other complaints as set out in this policy.

29 If you are dissatisfied with the response, you may escalate the complaint to the Information Commissioner's Office.

Complaints about auditors

30 PSAA is responsible for monitoring the performance of the firms that it appoints as auditors, but the firms themselves remain responsible for the work and behaviour of their staff.

31 The Institute of Chartered Accountants in England and Wales (ICAEW) as Recognised Supervisory Body and the Financial Reporting Council (FRC) have responsibility for the regulation of audit firms. If the complaint relates to a matter which we believe falls under the regulatory jurisdiction of either of those bodies, we will, with your agreement, pass it on to the relevant body to be looked into under its complaints process.

32 Audit firms are required to report any complaints to PSAA as part of the contract monitoring process.

33 Each firm already has its own complaints process and complaints about auditors should, in the first instance, be dealt with under those processes, independently of PSAA. Therefore, as and when PSAA receives a complaint that has not already been investigated by the relevant firm, it will be passed to the firm's contact partner to deal with in the first instance.

34 The complaint should be progressed through all stages of the firm's own complaints process, until either a satisfactory resolution is found, or it is clear that the firm will be unable to resolve matters. If the firm is unable to resolve matters, it should refer the complainant to PSAA.

35 Because appointed auditors are statutorily independent of PSAA (and are subject to both the jurisdiction of the courts and regulators), PSAA cannot:

- interfere with or pass judgement on an appointed auditor's exercising of their professional skill and judgement in performing their statutory functions;
- substitute its own judgements for those of an appointed auditor in the exercise of those functions; and
- direct an appointed auditor to act, or to review their own decisions.

36 PSAA will not normally investigate matters raised that should only be reviewed by the courts, such as how statutory functions have been exercised in relation to work that has been completed and the decisions that were taken, and conclusions drawn, in exercising statutory functions. This extends not just to decisions about matters of substance, but also to the process by which those decisions are made. It is normally inappropriate for us to investigate such matters because we cannot retrospectively change the outcome of the exercise of statutory functions, and so investigations would not usually be a good use of public money. This includes the exercise of auditors' specific powers and duties in relation to electors' rights under the Local Audit & Accountability Act 2014.

37 However, PSAA will consider complaints about auditors which relate to a failure in service or maladministration. Maladministration includes matters such as:

- failure to follow normally expected administrative procedures;
- discourtesy and rudeness;
- discrimination;
- delays;
- not informing someone of their rights and entitlements;
- not responding to phone calls, emails or letters;
- not answering complaints fully and promptly; and
- failure to recognise and rectify mistakes.

38 PSAA will not consider any complaint that relates to relevant ongoing investigation until the matter has been concluded.

Complaints about auditors – Complaints Process

39 We will contact you within ten working days of receipt by email or letter to explain how it will be dealt with, by whom, and if possible, when you can expect to receive a full reply. If you have any queries about whether we can or cannot deal with a specific complaint, please contact us via email at generalenquiries@psaa.co.uk.

Stage one

40 We will check whether the firm has dealt with your concern as a complaint under its own procedures and if so, seek a copy of the firm's response to your complaint.

41 We will consider your complaint carefully and, if the matter is straightforward, we will usually send you a full reply within 20 working days. If the issue is more complex, we will contact you before we start the investigation to clarify your concerns. If we need to carry out a very detailed investigation our response may take longer than 20 working days. If this is the case, we will contact you to explain what is happening, and tell you when we will send you the full response.

42 If we find that your complaint is justified in part or in full, we may ask the audit firm to apologise and to take specified steps to meet your concerns. This may include giving you an explanation or making disclosure of documents. Please note that firms have operational independence from PSAA, but any non-compliance will be taken into account in our contract review with the audit firm. It may be included in the reporting of contract KPIs or reported to relevant regulators and national stakeholders (subject to agreeing this with you where appropriate).

43 We will make every effort to satisfactorily resolve your complaint in the first instance. Where a complaint cannot be resolved then you can ask for it to be referred to stage two. However, all efforts will be made to resolve the complaint at stage one.

Stage two

44 If you wish the outcome of stage one to be reviewed, the most appropriate member of SMT will undertake a review of the complaint and how it was handled. They will provide you with a response as a result of that review.

45 Where the Chief Executive has conducted the stage one review, we will ask an independent person to undertake the stage two review.

46 You will need to provide your reasons why you believe the stage one outcome is incorrect, unfair or not in accordance with the process.

Stage three (final stage)

47 If you remain unsatisfied that your complaint is fully resolved after stage 2 has completed, you can appeal to the Board Chair who will appoint a PSAA Board member to review your complaint and how it was handled. You will need to provide your reasons why you believe the outcome is incorrect, unfair or not in accordance with the process.