

HEARING ON 2 MAY 2024

B E T W E E N

TAXATION DISCIPLINARY BOARD (“TDB”)

– and –

MR KEITH ADAMS
(ATT membership No. 183764)

DECISION AND REASONS

Present:

Tanveer Rakhim (Chair, Lay member)

Amran Hussein (Lay member)

Shashi Sharma (Tax Panel member)

Nigel Bremner (Clerk to the TDB)

The Committee met via Microsoft Teams

INTRODUCTION

1. The Disciplinary Tribunal (‘the Tribunal’) sat on 2 May 2024 to hear charges brought by the Taxation Disciplinary Board (‘TDB’) against Mr Adams. The hearing was conducted remotely by video conferencing.
2. Mr Adams did not attend and was unrepresented. The TDB Case Presenter was Ms Sophia Kerridge, counsel.
3. Mr Adams faced the charge, as set out at Appendix 1.

4. The Tribunal was provided with the following documents:
 - a. Document index and schedule;
 - b. Case Summary and papers before the Investigation Committee:
 - Case summary
 - Complaint form/referral dated 23 January 2023
 - Supporting documents – Complainant’s tax return sent 26 January 2022
 - Email from Complainant seeking clarification from Member dated 18 November 2022
 - Email from Member to Complainant dated 28 November 2022
 - Emails from Complainant to Member between 14 December 2022 to 2 January 2023
 - Complainant’s letter of complaint to Member dated 23 December 2022
 - Emails between Complainant and Member dated 25 January 2023
 - c. TDB letter informing Member of complaint dated 10 March 2023;
 - d. Email from Complainant to TDB dated 17 March 2023, enclosing the Member’s email to the Complainant dated 16 March 2023;
 - e. Letter from Complainant to TDB dated 6 April 2023 with email enclosures;
 - f. Letter to Member re. IC decision dated 15 February 2024;
 - g. Member’s document - Response form (15 April 2024).

BACKGROUND TO THE CHARGES

5. Mr Adams is registered with the ATT.
6. On 23 January 2023, the Complainant raised concerns about Mr Adam’s conduct. The Complainant alleged that Mr Adams acted unprofessionally in preparing the Complainant’s tax return because a fundamental error was made that resulted in over a £1,000 difference in the Complaint’s tax position. It was alleged that Mr Adams neglected to undertake due diligence in checking the tax return and identify the error.

It was further alleged that Mr Adams refused to respond to requests for details of his professional body and his formal complaints procedure.

7. The Complainant engaged Mr Adams' firm to prepare his personal tax return for the 2020-21 tax year. On 26 January 2022 Mr Adams wrote to the Complainant stating that his tax return had been submitted and there was a £1,105.00 rebate owed to him. This was also confirmed by Mr Adams' colleague on 2 September 2022.
8. As no rebate was forthcoming, the Complainant emailed Mr Adams' firm in October and November 2022, but no response was received.
9. The Complainant was sent a revised tax calculation on 18 November 2022 and this showed that the HMRC was owed £32.60, as opposed to any tax rebate due to the Complainant.
10. On 28 November 2022 Mr Adams explained there had been a 'human error' in calculating the tax return and explained the error. Mr Adams offered to refund 40% of the fees for that year, the Complainant accepted and provided his bank details the same day by email. Mr Adams' colleague emailed the Complainant on 6 December 2022 requesting the bank details and he again sent these.
11. On 14 December 2022, after no payment had been forthcoming, the Complainant informed Mr Adams that he would not accept the partial refund and would instead pursue a complaint and requested Mr Adams' confirm his regulator's detail by 16 December 2022.
12. On 19 December 2022 the Complainant contacted the Financial Reporting Council to pursue a complaint against Mr Adams' firm. Mr Adams responded by reiterating the offer of a 40% refund. On 20 December 2022 the Complainant again sought the regulators details. The Complaint sent a formal letter of complaint to Mr Adams on 23 December 2022. On 2 January 2023 the Complainant threatened to start County Court proceedings against Mr Adams in order to claim a full refund of the fees and compensation for the inconvenience. On 6 January 2023 the Complainant submitted

a complaint to the ACCA, shared this with Mr Adams and also asked for the formal complaints procedure as well as details of his regulator.

13. On 10 January 2023, after the ACCA confirmed that Mr Adams is not their member, the Complainant informed Mr Adams that he would complain to the TDB and again sought the complaints procedure as well as details of the regulator.
14. The TDB initially wrote to Mr Adams on 10 March 2023 and requested a response to the concerns raised.
15. On 16 March 2023, Mr Adams emailed the Complaint and apologised. He confirmed that a full refund, of the amount that the Complainant had paid, had now been made. Mr Adams explained that at the end of 2022, in the week that he was trying to resolve the case, there was a major flood that destroyed his main office causing much disruption and the renovation had only started a week prior to this email. He also said that he had a large backlog and administrative problems. He said that he had overlooked the bank details being provided. He said that he had received the complaint from the ATT but did not recognise the issues in relation to the professional body. He invited the Complainant to withdraw the complaint.
16. On 6 April 2023, Mr Adams provided a detailed letter of response to the TDB. He acknowledged the way he would expect the situation to be handled would have been different, but blamed the mitigation put forth. Within the letter he stated:
 - a. Regarding the tax error - he highlighted issues with the HMRC being disrupted in 2022, that the Complainant's unpaid tax was entered into the wrong box, as a result of which a rebate was showing as due.
 - b. Regarding the agreed refund - he said he spoke to the Complainant at length on 28 November 2022. He stated a full refund had been made, but accepted there were delays and cited staffing issues, a busy period with work, a flood on 27 November 2022 causing the office closure with the office only recently starting to undergo repairs, and a lot of time taken by trying to continue the business as well as deal with the repairs.

- c. Regarding not replying to the Complainant – he stated he had overlooked replying to the Complainant, this caused delays, the Complainant’s emails were filtered out as junk emails, they were not on the servers, and it was only recently that he had caught up with the correspondence.
- d. Regarding the complaints made - he stated that he did receive a complaint from the head office, but had misinterpreted it as a chaser to resolve the refund. He stated that details of the regulator should be on the letters sent but accepted this was not on the letter sent. He stated that when he had a long conversation with the Complainant (28 November 2022) and he either provided the complaint details or they were not sought, but admitted he could not recall. He expected head office would have provided the complaint details if they were asked to provide this. He stated he had not replied to the emails from the Complainant as he did not receive them and he will look to investigate this with IT on the junk email filtering.

17. On 15 April 2024, Mr Adams provided the Response Form:

- a. He admitted charges 1.1, 1.2, 2.1, 2.2, 2.3 and 2.4.
- b. He disputed charges 1.3, 2.5(a) (third bullet point) and 2.5(b).

PRELIMINARY ISSUES

Service

18. The Tribunal first considered whether service had been validly effected.

19. The Tribunal considered the allegations and the evidence before it. Mr Adams was emailed and written to on 16 April 2024 informing him of the date and time of this rescheduled hearing. He was informed on 4 March 2024 that the meeting would be conducted via Microsoft Teams. On 4 March 2024 he was provided with the relevant bundle of papers.

The Tribunal was satisfied that Regulations 14.2 and 31.3 of the Regulations had been complied with, in so far as complaint materials had been served on Mr Adams more than 28 days prior to the fixed date of the hearing.

Proceeding in Absence

20. The Tribunal had regard to Regulations 17.3 and 17.4, as well as the factors set out in the case of GMC v Adeogba and GMC v Visvardis [2016] EWCA Civ 162

21. The original hearing was listed for 16 April 2024 and Mr Adams was notified on 3 March 2024. On 15 April 2024 Mr Adams responded to the TDB, provided his Response Form, confirmed he does not require a hearing and that he would not be attending if any hearing proceeded. There was insufficient time to hear his case on 16 April 2024. On the same day, he was informed in writing, by email, that the hearing was rescheduled to today, namely 2 May 2024. Mr Adams replied on 29 April 2024 to confirm that he would not attend this hearing and he was happy for the matter to be considered in his absence.

22. Ms Kerridge invited the Tribunal to proceed in the absence of Mr Adams as he had made his position clear and had elected not to attend.

23. The Tribunal noted that Mr Adams had not requested for an adjournment. The Tribunal considered that if the case was adjourned then there was no reason to think that Mr Adams would attend at a subsequent hearing. He had two hearings listed and on both occasions confirmed in writing that he did not intend to attend the hearing. Mr Adams was aware of the hearing and voluntarily absented himself. The Tribunal had available to it the supplemental bundle which included Mr Adams's updated Response Form. The Tribunal reminded itself that it was only in exceptional cases that proceedings would be conducted in the absence of the member. This was such a case and the Tribunal determined the case should proceed in Mr Adams's absence.

DECISION ON THE CHARGES

The relevant paragraphs from the Professional Rules and Practice Guidelines 2018 ('PRPG') are included at Appendix 2.

Charge 1

24. The Tribunal noted that Mr Adams had admitted to paragraphs 1.1 and 1.2 of Charge 1 within his Response Form. He had failed to realise he entered a figure in the wrong box and the result of this was that the Complainant was required to pay £32.60 tax, as opposed to the rebate that he expected. Paragraphs 1.1 and 1.2 were found proved.

25. In the Response Form, the Respondent disputed paragraph 1.3 in relation to failure to exercise reasonable skill and care for his client. He stated that this was human error, the adjacent box was ticked on the tax return which affected the calculation, and that when it came to light he did promptly discuss with the Complainant. He submitted that paragraph 1.3 implies a low bar to disciplinary sanctions and few members could claim to have never surpassed this bar, i.e. very few would not have made such a mistake in their career.

26. The Tribunal noted the error was minor in nature and was alive to the possibility of human errors being made on tax returns. The Tribunal considered that a perfect record without errors was unrealistic. It had regard to Mr Adams' prior unblemished record. It was noted that the tax return was completed on 28 January 2022, which was a single working day before the self assessment tax deadline, thus he would be under considerable pressure. The Tribunal found it unrealistic that on any fair reading a single error could be concluded as amounting to a lack of reasonable care and skill. Paragraph 1.3 was thus not proved.

Charge 2

27. The Tribunal noted that Mr Adams had admitted to paragraphs 2.1, 2.2, 2.3 and 2.4 of Charge 2 within his Response Form.

28. On 28 November 2022, Mr Adams spoke to the Complainant and agreed to refund 40% of the fees. It is unclear when the refund was made. On the evidence before the Tribunal, Mr Adams did very little until the TDB wrote to him on 10 March 2023 and then he replied on 16 March 2023 where he stated a full refund had been made. It does not matter when in 2023 the refund was made, it stemmed from a complaint, it was agreed on 28 November 2022, the Complainant provided his bank details the same day and the refund should have been made soon after. This was not a timely refund. Paragraph 2.1 is proved.
29. There is no dispute between the parties that Mr Adams did not provide the details of his regulator to the Complainant, which resulted in escalating complaints, including to Mr Adams' firm, the ACCA and the TDB. No issue was taken on the dates given in paragraph 2.2. Mr Adams made an admission in his Response. Paragraph 2.2 is proved.
30. The same is true for Mr Adams' not providing details of his firm's complaint procedure. No issue was taken on the dates given in paragraph 2.3. Mr Adams made an admission in his Response. Paragraph 2.3 is proved.
31. Mr Adams had the telephone conversation with the Complainant on 28 November 2022 where the refund was agreed. When this was not paid, the Complainant began to complain and there is no evidence of a response to him until 16 March 2023 when Mr Adams emailed the Complainant and apologised. The Tribunal considered that the delay was not a timely response. No issue was taken on the dates given in paragraph 2.4. Mr Adams made an admission in his Response. Paragraph 2.4 is proved.
32. With respect to paragraph 2.5(a), Mr Adams only disputes the third bullet point, namely that he did not have in place a complaints procedure that investigated each complaint thoroughly and without delay, thus breaching Rule 9.1.1. The Tribunal had regard to the details provided by Mr Adams in his Response and he stated that he was the most senior person and so the matter was appropriately sent to him and he spoke to the client about it. The Tribunal noted that the only conversation with the Complainant was on 28 November 2022, which was before the formal complaint was

raised. At no point had Mr Adams provided details of any complaints procedure and a copy has not been put before the Tribunal. There was no evidence of any of the matters being completed as listed in the four bullet points in paragraph 2.5(a). It was accepted by Mr Adams that the complaints procedure had not been provided to the Complainant, there was no evidence the complaint was ever acknowledged, the complaint was not investigated until the TDB got involved, thus there was a delay and there was a delay in the remedial action. The Tribunal find paragraph 2.5(a) is proved.

33. With respect to paragraph 2.5(b), Mr Adams' comments in the Response are noted. The Tribunal considered he did breach Rule 9.1.2 as he did not treat the complaint seriously or take immediate action to defuse the problem and remedy the defect. Mr Adams failed to provide any evidence of the flooding or evidence the IT issues. He elected not to attend the hearing so he was unable to assist in clarifying concerns. A business continuity plan would be expected to be in place. It was unclear how the flooding affected email access and so there was no reason that he would be prevented from accessing and dealing with the email complaints. On the evidence, it was unclear when he became aware of the complaint and the Tribunal had concerns of his flawed understanding of the complaint via head office. Equally of concern was that the complaint was only responded to after the TDB became involved. Mr Adams stated "*I have already acknowledged the complaint arising was not dealt with sufficiently quick*", which is indicative of him not dealing with the complaint in time. The Tribunal was not persuaded that Mr Adams dealt with the complaint seriously as on the one hand he says the "*error was quickly and fully acknowledged when it came to light*", but on the other hand he did not deal with the complaint appropriately once it was received from the head office. The Panel considered both elements were proven, namely that Mr Adams did not take the complaint seriously or take immediate action. The Tribunal find paragraph 2.5(b) is proved.

SANCTION

34. In determining what, if any, sanction to impose, the Tribunal had regard to the Indicative Sanctions Guidance ('ISG').

35. The Tribunal bore in mind the purpose of a sanction is not to punish a member, albeit it may have that effect. The purpose is to promote the public interest which includes not only protecting the public but upholding the proper standards of conduct in the profession and maintaining its reputation.
36. Any sanction imposed by the Tribunal must be appropriate and proportionate taking into account the member's own interests and should be the least onerous measure that adequately meets the facts of the charges found proved.
37. The Tribunal took into account the partial admissions and Mr Adams's lack of any previous disciplinary matters before this regulator.
38. There were no submissions from Mr Adams on the sanction. Ms Kerridge made submissions on the mitigating and aggravating sanctions. She indicated that a Censure was an appropriate sanction.
39. The Tribunal considered there were some aggravating features in this case, in that Mr Adams should have had some business continuity measures in place to counter the floods and there was a lack of a response from Mr Adams necessitating the complaint being escalated to the regulator. The refund was agreed on 28 November 2022, but no actual refund was provided to the Complainant until March 2023, which was a considerable period of delay.
40. The Tribunal considered there was mitigation present as this was the first time Mr Adams appeared before the regulator, he had no previous regulatory history and had no complaints since. The Tribunal considered there was no actual loss caused as the tax rebate amount expected by the Complainant was an erroneous calculation and the tax that he was required to pay was a negligible amount and one that he would have had to rightfully pay in any event. The breach was considered to be minor and inadvertent as it was due to a genuine error. The Tribunal were mindful of the context with the IT issues and the office flooding, albeit this was not considered to be a bar in being able to deal with the complaint. Mr Adams did attempt to correct matters by offering the reduction in fees within two weeks of the error coming to light, with it

being noted that his delays thereafter caused the complaint but by March 2023 the full fees had been refunded to the Complainant. It was further noted that Mr Adams had apologised.

41. The Tribunal was aware of relevant guidance in the ISG which included:

- a. The role of the Tribunal is to balance the nature and gravity of the offence and its bearing, if any, on the member's fitness to practise as a tax adviser; and to weigh up the need to protect the public and confidence in the reputation of the profession against the need to impose a further penalty and its consequential impact on the ability of the member to practise their profession.*
- b. Consideration needs to be given to whether the conduct crossed the line of damaging the standing of the member as a provider of tax services or harmed the profession. A member owes a duty not to act in a way that would bring the CIOT/ATT into disrepute or in a way that would harm the reputation of the CIOT/ATT.*
- c. Given the range of situations, it is not possible to give simple guidance on the likely sanction(s). The Tribunal should have regard to the full range of sanctions that are available, from No Further Action to Expulsion.*

42. The Tribunal bore in mind its duty to only impose a sanction which was appropriate and proportionate in all the circumstances of the case. It therefore considered the available options in ascending order, starting with the least restrictive sanction.

43. The Tribunal considered that imposing no sanction or allowing the matter to rest on file would not appropriately mark the nature of Mr Adams' misconduct. The Tribunal did not consider such sanctions would address the aims of upholding the proper standards of conduct in the profession and maintaining its reputation.

44. The Tribunal did not consider a warning was appropriate given this was not minor misconduct. It would be concerning to a member of a public if a tax professional could ignore complaints until the regulator gets involved.

45. The Tribunal next considered a Censure and had regard to the relevant part of the ISG. The Tribunal concluded that there was no actual loss to the client as the correct amount was later calculated once the error had been identified and it was noted that the full fees had been refunded by Mr Adams. It was accepted that Mr Adams had some understanding and appreciation of his failings. Mr Adams had failed to engage with the complaint and this did carry on for an extended period of time until the regulator became involved. Mr Adams had some insight and had apologised. He was of previous good conduct and there had been no repetition since this.
46. The Tribunal thus concluded that a Censure was the appropriate sanction. With respect to the period of the Censure, the Tribunal considered the standard period of three years was appropriate and there were no reason to depart from this.
47. The Tribunal also considered if a fine would be appropriate. The Tribunal was mindful that its role was not to punish. The Tribunal considered a financial penalty would be punitive and it did not consider a fine would suit any appropriate purpose. The Tribunal determined that the sanction of the Censure would serve as an appropriate deterrent to members of the profession and mark the misconduct.
48. The Tribunal did not consider a suspension was appropriate as it was disproportionate.

COSTS:

49. The TDB applied for costs in the sum of £2,345.50.
50. There was no submission from Mr Adams. Ms Kerridge sought the full costs claimed.
51. The Tribunal had regard to the Guidance on Awarding Costs. The presumption is that the Defendant will pay the costs on the principle that the majority of members should not subsidise the minority who have brought disciplinary proceedings upon themselves. The Tribunal found no reason to depart from that presumption.
52. There was no reason that the costs incurred by the TDB should be reduced as they were rightly incurred. There were no exceptional circumstances that would persuade the Tribunal that costs should not be awarded. The Tribunal considered the

breakdown of the costs claimed in the schedule and was satisfied that those costs were reasonable and had been appropriately incurred. There was no reason why the costs should be reduced. It was noted that the costs had been apportioned for the day and there had been a reduction to reflect the other case listed. Ms Kerridge had confirmed that the relisting of the hearing did not result in any additional cost.

53. The Tribunal awarded the costs in the sum claimed, at £2,345.50.

PUBLICITY:

54. The Tribunal made an order under regulation 28.1 of the Disciplinary Regulations for publication of this order made and the written reasons, naming the member.

55. The Guidance on the Publication of Disciplinary and Appeal Decisions sets out the general principle that a disciplinary finding made against a member will be published and the member named in the publication. The Tribunal found no reason to depart from that principle and directed that this decision be published in accordance with the Guidance.

56. Pursuant to regulation 28.4 of the Disciplinary Regulations, publication will be made after the expiry of the appeal period, namely within 21 days of the effective date of this order, provided no valid notice of appeal is served within that period.

EFFECTIVE DATE

57. Pursuant to regulation 20.10, this decision will be treated as effective from the date on which it is deemed served on Mr Adams.

T Rakhim

**Tanveer Rakhim
(Chair)
2 May 2024**

APPENDIX 1

IN THE DISCIPLINARY TRIBUNAL OF
THE TAXATION DISCIPLINARY BOARD

TDB/2023/02

HEARING ON 2 MAY 2024

B E T W E E N

TAXATION DISCIPLINARY BOARD (“TDB”)

– and –

MR KEITH ADAMS
(ATT membership No. 183764)

SCHEDULE OF CHARGES

The charges set out below make reference to the following rules of the Professional Rules and Practice Guidelines 2018 (the “PRPG”) of the Chartered Institute of Taxation (the “CIOT”) and the Association of Taxation Technicians (the “ATT”), as amended from 1 January 2021:

Rule 5.1.1 (Duty of Care)

A member has a duty of care to their client which is recognised in law. A member must exercise reasonable skill and care when acting for a client.

Rule 9.1.1 (Complaints)

A member in practice is strongly recommended to have procedures in place to handle complaints from clients which should include:

- Informing each new client in writing of the name and status of the person to be contacted in the event of the client wishing to complain about the services provided, and of the ability to complain to the TDB (unless alternative forms of alternative dispute resolution are outlined). This information should be included in the engagement letter;
- Acknowledging each complaint promptly in writing;
- Investigating each complaint thoroughly and without delay. The investigation should be carried out by a person of sufficient experience, seniority and competence who preferably was not directly involved in the act or omission giving rise to the complaint. The client should be told about the investigation;
- Taking appropriate action if the investigation finds that the complaint is justified in whole or in part;
- Considering whether to inform professional indemnity insurers.

Rule 9.1.2 (Complaints)

A complaint received from a client should be treated seriously and immediate action taken. The objective should be to defuse the problem which has given rise to the complaint and remedy any defective work (so far as practicable) as quickly as possible. A speedy and well thought out response often repairs any damage which may have been done to a member/client relationship.

Charge 1

1.1 The Defendant failed to identify that the figure of £568.80 was entered into the wrong section when preparing the 2020-2021 personal tax return of Mr Kevin O'Malley ("the Client").

1.2 As a result of the error in charge 1.1, HMRC was required to amend the Client's tax return, resulting in the Client being informed in November 2022 that he owed HMRC £32.60 whereas he had previously been informed that he was due a rebate of £1,105.00.

1.3 Consequent upon the facts and matters set out in Charge 1.1 and 1.2, the Defendant is in breach of rule 5.1.1, in that the Defendant did not exercise reasonable skill and care when acting for the Client, to whom he owed a duty of care.

Charge 2

2.1 Having agreed with the Client on 28 November 2022 to refund 40% of his fees, the Defendant did not provide the refund in a timely manner.

2.2 The Defendant did not provide details of his regulator to the Client in a timely manner or at all when asked on:

- a. 14 December 2022;
- b. 19 December 2022;
- c. 20 December 2022;
- d. 2 January 2023.

2.3 The Defendant did not provide the complaints procedure of TaxAssist Bath to the Client in a timely manner or at all when asked on:

- a. 20 December 2022;
- b. 2 January 2023.

2.4 The Defendant did not respond in a timely manner or at all to email complaints made by the Client on:

- a. 14 December 2022;
- b. 16 December 2022;
- c. 20 December 2022;
- d. 23 December 2022;
- e. 2 January 2023.

2.5 Consequent upon the facts and matters set out in Charges 2.1, 2.2, 2.3 and/or 2.4, the

Defendant is in breach of:

a. Rule 9.1.1, in that the Defendant did not have in place (or follow) a complaints procedure which included:

- Informing each new client in writing of the name and status of the person to be contacted in the event of the client wishing to complain about the services provided, and of the ability to complain to the TDB (unless alternative forms of alternative dispute resolution are outlined). This information should be included in the engagement letter;
- Acknowledging each complaint promptly in writing;
- Investigating each complaint thoroughly and without delay. The investigation should be carried out by a person of sufficient experience, seniority and competence who preferably was not directly involved in the act or omission giving rise to the complaint. The client should be told about the investigation;
- Taking appropriate action if the investigation finds that the complaint is justified in whole or in part.

b. Rule 9.1.2, in that the Defendant did not treat seriously and take immediate action upon receipt of a client complaint to defuse the problem and remedy any defective work (so far as practicable) as quickly as possible.

END OF CHARGES

APPENDIX 2

RULE 5.1.1 (DUTY OF CARE) OF THE PROFESSIONAL RULES AND PRACTICE GUIDELINES

2018

A member has a duty of care to their client which is recognised in law. A member must exercise reasonable skill and care when acting for a client.

RULE 9.1.1 (COMPLAINTS) OF THE PROFESSIONAL RULES AND PRACTICE GUIDELINES 2018

A member in practice is strongly recommended to have procedures in place to handle complaints from clients which should include:

- Informing each new client in writing of the name and status of the person to be contacted in the event of the client wishing to complain about the services provided, and of the ability to complain to the TDB (unless alternative forms of alternative dispute resolution are outlined). This information should be included in the engagement letter;
- Acknowledging each complaint promptly in writing;
- Investigating each complaint thoroughly and without delay. The investigation should be carried out by a person of sufficient experience, seniority and competence who preferably was not directly involved in the act or omission giving rise to the complaint. The client should be told about the investigation;
- Taking appropriate action if the investigation finds that the complaint is justified in whole or in part;
- Considering whether to inform professional indemnity insurers.

RULE 9.1.2 (COMPLAINTS) OF THE PROFESSIONAL RULES AND PRACTICE GUIDELINES 2018

A complaint received from a client should be treated seriously and immediate action taken. The objective should be to defuse the problem which has given rise to the complaint and remedy any defective work (so far as practicable) as quickly as possible. A speedy and well thought out response often repairs any damage which may have been done to a member/client relationship.