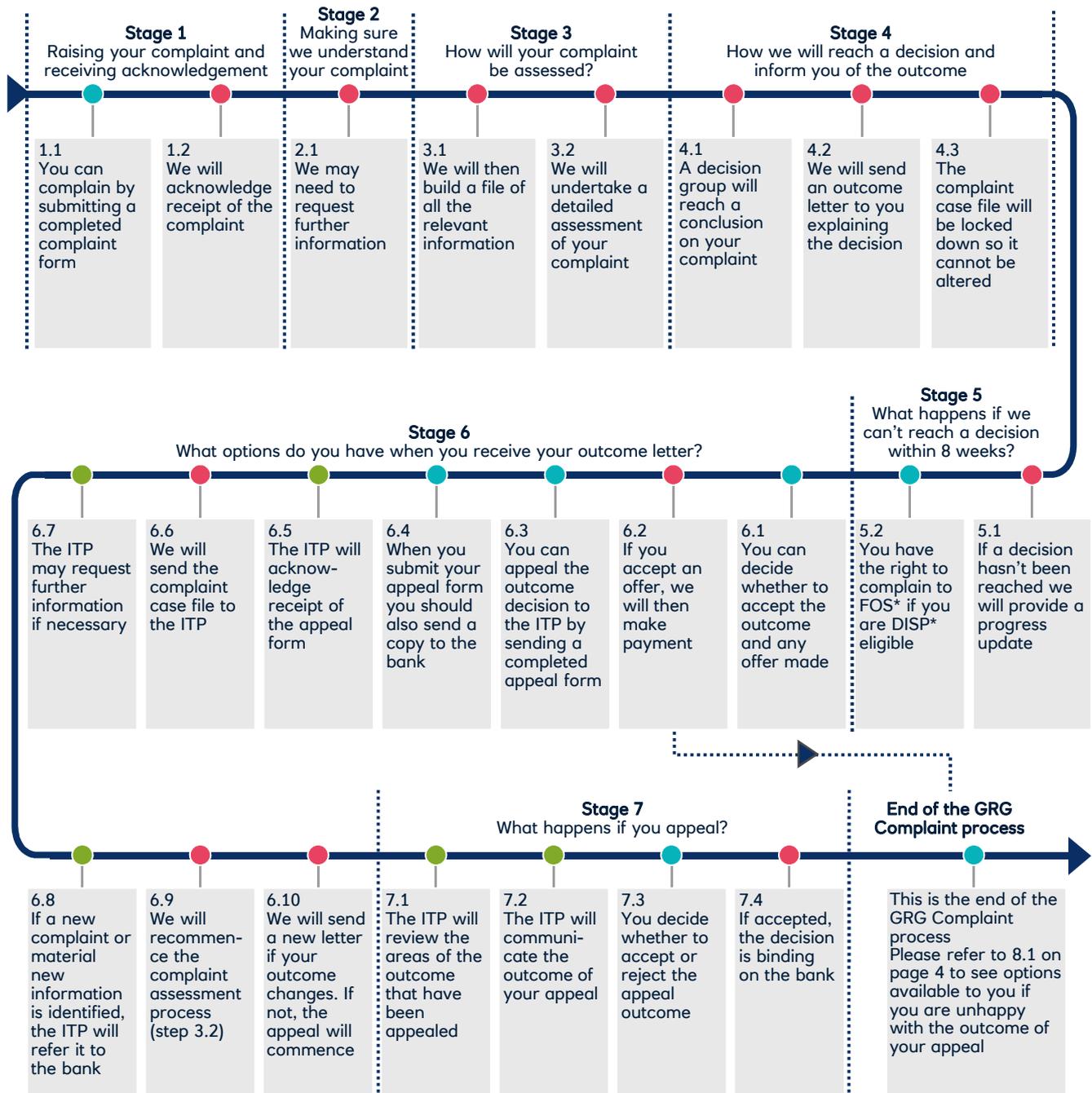


# Overview of the customer journey through the new GRG complaints process

Please see page two onwards for a fuller description of each stage of the process

● Customer ● Bank ● Independent Third Party (ITP)



\* For customers in the Republic of Ireland, it will be the Financial Services and Pensions Ombudsman (FSPO) if you are an eligible consumer

# The customer journey through the new GRG complaints process



● Customer ● Bank ● Independent Third Party

## Stage 1 – Raising your complaint and receiving acknowledgement

1.1 You will be required to submit a completed complaint form to the GRG Customer helpdesk

1.2 The GRG Customer helpdesk will send you an acknowledgment, normally within 48 hours

## Stage 2 – Making sure we understand your complaint

2.1 If necessary, you will be sent a request for clarification or further information by the Complaints Handling Team. This will normally happen within the first week or two

## Stage 3 – How will your complaint be assessed?

3.1 Building the file of documents and information to be reviewed is a very important step. Care will be taken to ensure a full file of relevant information is built whilst avoiding excessive requests for archived documents, which would lead to unnecessary delays in responding to your complaint. The time required to build a file will vary significantly depending on things such as the number of issues you raised in your complaint, the complexity of the issues and the date range involved, particularly if the origin of the issue pre-dates the relevant period (i.e. 2008 – 2013)

3.2 A detailed assessment of the file will take place by the Complaints Handling Team to understand the facts behind the key events underlying the complaint, for example the initial reasons for transfer to GRG

## Stage 4 – How we will reach a decision and inform you of the outcome

4.1 Once the assessment is completed the facts will be presented to a decision group that comprises individuals within the bank that have no interest or prior involvement with the case or GRG. This group will reach a conclusion as to whether your complaint is upheld or not and, if it is, whether any direct losses need to be reimbursed and/or whether a goodwill payment is appropriate

4.2 Once a decision has been reached the drafting, checking, signing and dispatching of your letter will commence. Your outcome letter will contain reference to the key documents/evidence relied on to reach the decision

4.3 Once your outcome letter has been dispatched the file will be locked down to preserve the exact file of information on which the initial decision was based

# The customer journey through the new GRG complaints process (cont'd)



● Customer ● Bank ● Independent Third Party

## Stage 5 – What happens if we can't reach a decision in 8 weeks?

5.1 If, as is likely for all but the most straightforward complaints, an outcome letter has not been sent to you within 8 weeks, then in accordance with the requirements of the FCA's Dispute Resolution: Complaints Sourcebook (DISP) or the Central Bank of Ireland's Consumer Protection Code (CPC) and SME Regulations, the bank will send you a progress update indicating the stage reached and, where possible, a likely timeline for completion

5.2 If the bank is unable to issue an outcome letter by the end of the eighth week then, if you are DISP eligible, you will have the right to refer your complaint to the FOS. In the Republic of Ireland, then you will have the right to refer your complaint to the FSPO, if you are an eligible consumer. **Please note that if you refer your complaint to the FOS/FSPO and receive a decision from them, this will render it ineligible for the appeals process**

## Stage 6 – What options do you have when you receive your outcome letter?

If you are unhappy with the bank's outcome, and you are DISP eligible, you have the right to refer your complaint to the FOS within 6 months of the date of the outcome letter. In the Republic of Ireland, if you are unhappy with the bank's outcome and you are an eligible consumer, you have the right to refer your complaint to the FSPO after you receive your outcome letter.

6.1 If an offer to reimburse direct losses, or an offer of a goodwill payment, is made an authorised official of the business will need to accept the outcome of the complaint by completing, signing and returning the acceptance form, in order to receive payment. Please note accepting the outcome does not restrict your ability to make a claim for consequential losses

6.2 Payment will be made on receipt of a correctly completed and signed acceptance form. Dissolved entities will need to be restored in order to receive payment

6.3 Within 56 days of the date of the outcome letter, if you are unhappy with the outcome, you may make an appeal to the Independent Third Party. Appeals should be made using an appeal form that will be provided, in which you must identify the areas of the outcome that are disputed and set out the reasons why you think the decision by the bank is wrong

6.4 A copy of your completed appeal form must be sent to the bank

6.5 The ITP will receive and acknowledge your appeal. Please note that appeals received after 56 days from the date of the outcome letter will be accepted at the discretion of the ITP and only for a good and sufficient reason

6.6 The bank will make available to the ITP the locked down case file created in connection with your complaint

6.7 In exceptional cases the ITP may request additional information to help assess the appeal

6.8 Where the ITP concludes that the appeal raises a new complaint or includes significant new information, the ITP will confirm this to you advising that the appeal process will not proceed until the new complaint or significant new information has been reviewed by the bank

# The customer journey through the new GRG complaints process (cont'd)



● Customer ● Bank ● Independent Third Party

## Stage 6 – What options do you have when you receive your outcome letter? (cont'd)

6.9 If the ITP concludes that the appeal contains a new complaint or significant new information, the bank will recommence the complaint assessment process. Please note the appeal process cannot proceed until this step has been completed

6.10 If the bank concludes a different outcome, you will be informed of the new outcome and you will retain the ability to appeal if you are still unhappy. If the bank concludes that the original outcome is unchanged, then you and the ITP will be informed and the appeal process will recommence

## Stage 7 – What happens if you appeal?

7.1 The ITP will review the disputed outcomes guided by the reasons you may have given in the appeal form

7.2 Once the ITP has concluded the review of your complaint, he will write to you and the bank with the outcome of the appeal

7.3 Your option is either to accept the appeal outcome or to reject it. There is no further appeal to the ITP allowed

7.4 If you accept the outcome of the appeal, the decision is binding on the bank

If you are unhappy with the bank's outcome and you are DISP eligible, you have the right to refer your complaint to the FOS within 6 months of the date of the ITP appeal decision letter. In the Republic of Ireland, if you are unhappy with the bank's outcome and you are an eligible consumer, you have the right to refer your complaint to the FSPO after you receive your ITP appeal decision letter.

## 8. This is the end of the GRG Complaint process

### 8.1 What options are available if you are not happy with the outcome of your appeal?

- If DISP eligible, you have the right to complain to FOS
- If you are an eligible consumer, you have the right to complain to the FSPO
- Alternatively you may have the option to initiate, or recommence, legal action
- You have no further recourse to the bank's GRG Complaints Process announced on 8th November 2016

### Can you claim for consequential loss?

- If you accept the outcome of the GRG complaints process or the appeal outcome you may submit any claim for consequential loss to the bank. Any such claim will be considered by the same team in RBS that conducted the GRG complaints process, but, for the avoidance of doubt, this process will not be overseen by the ITP and there will not be any right of appeal to the ITP. If you are unhappy with the outcome of your claim for consequential loss and you are DISP eligible, you have the right to refer your complaint to the FOS within 6 months of the date of the consequential loss outcome letter. In the Republic of Ireland, if you are unhappy with the outcome of your claim for consequential loss and you are an eligible consumer, you have the right to refer your complaint to the FSPO after you receive your consequential loss outcome letter.