

## GRG Complaints - Progress report Fri 28-Jun-2019

Complaint stage <sup>(1)</sup>	Current period	Change on prior period	% Complete
	Fri 28-Jun	Fri 31-May	
1.1 Complaints received	2,678		
Of which eligible to appeal	2,411		
2.1 Preliminary reviews completed	2,583	132	96%
3.1 Initial files built	2,454	154	92%
3.2 Cases reviewed	2,110	113	79%
4.1 Decisions made	1,988	125	74%
4.2 Letters drafted	1,965	126	73%
4.2 Letters sent	1,910	129	71%

- Note 1: Complaint stage numbers relate to stages in the Customer Journey below.

### Analysis of outcome letters sent

Customer not yet responded	328		
Appeals under review <sup>(2)</sup>	240		
No acceptance required	691		
Outcome accepted	458		
Outcome lapsed	193		
<b>Total</b>	<b>1,910</b>		

### Appeals Summary: <sup>(3)</sup>

Appeals made to date	599
Appeals Under Review	199
Referred back to Bank	41
Appeal Outcome Letter Sent	359

- Note 2: Includes referred back to the Bank.

- Note 3: Appeal numbers have been produced by the Bank and are not reconciled with the ITP, and may therefore be subject to change.

### Customer outcomes

All allegations upheld	40
Some allegations upheld	905
Apology only	52
No allegations upheld - eligible to appeal	565
No allegations upheld - not eligible to appeal	88
Case closed no investigation required	260
<b>Total</b>	<b>1,910</b>

## GRG Complaints - Outcome & Offer Analysis Fri 28-Jun-2019

Key Allegation:	Bank Review - Allegations						ITP Review - Appeals					TOTAL
	No. of Allegations	%	No. of Upheld Allegations	%	Direct Loss Offers, including refunds and applicable AFR payment	Total Redress (Including the balance of AFR Payments for the Outcome Population)	No. of Appeal Decisions	%	No. of Upheld Appeal Decisions	%	Incremental Redress following Appeal	Consolidated Redress (Bank Review + Appeal)
Communication about the transfer	473	3%	199	42%	£102,731	£102,731	62	3%	5	8%	£0	£102,731
Incorrectly placed into GRG	842	6%	44	5%	£108,728	£108,728	137	7%	2	1%	£0	£108,728
Delay in return to mainstream	150	1%	19	13%	£8,500	£8,500	22	1%	0	0%	£0	£8,500
<b>TRANSFER IN/OUT</b>	<b>1,465</b>	<b>10%</b>	<b>262</b>	<b>18%</b>	<b>£219,959</b>	<b>£219,959</b>	<b>221</b>	<b>12%</b>	<b>7</b>	<b>3%</b>	<b>£0</b>	<b>£219,959</b>
Margins	1,472	10%	272	18%	£3,361,360	£3,361,360	179	9%	12	7%	£179,748	£3,541,109
Arrangement Fees	1,993	14%	675	34%	£4,281,147	£4,281,147	240	13%	17	7%	£81,747	£4,362,894
AFR:	1,295	9%	758	59%	£18,120,936	£48,468,829	125	7%	19	15%	£26,270	£48,495,099
Complex Fees	1,042	7%	632	61%	£11,445,781	£31,748,712	88	5%	10	11%	£0	£31,748,712
EPA	39	0%	16	41%	£1,588,261	£2,070,244	7	0%	2	29%	£7,142	£2,077,386
PPFA	214	1%	110	51%	£5,086,894	£14,649,874	30	2%	7	23%	£19,128	£14,669,002
<b>PRICING</b>	<b>4,760</b>	<b>32%</b>	<b>1,705</b>	<b>36%</b>	<b>£25,763,443</b>	<b>£56,111,337</b>	<b>544</b>	<b>28%</b>	<b>48</b>	<b>9%</b>	<b>£287,764</b>	<b>£56,399,101</b>
<b>VALUATIONS</b>	<b>379</b>	<b>3%</b>	<b>35</b>	<b>9%</b>	<b>£73,295</b>	<b>£73,295</b>	<b>59</b>	<b>3%</b>	<b>1</b>	<b>2%</b>	<b>£1,150</b>	<b>£74,445</b>
<b>WEST REGISTER</b>	<b>35</b>	<b>0%</b>	<b>3</b>	<b>9%</b>	<b>£5,000</b>	<b>£5,000</b>	<b>7</b>	<b>0%</b>	<b>0</b>	<b>0%</b>	<b>£0</b>	<b>£5,000</b>
Introduction of (and/or fees from) a third party	1,280	9%	214	17%	£1,058,472	£1,058,472	181	9%	29	16%	£71,411	£1,129,882
New advisor/management imposed	160	1%	14	9%	£287,139	£287,139	17	1%	0	0%	£0	£287,139
Forced sale of an asset	743	5%	8	1%	£93,136	£93,136	103	5%	1	1%	£0	£93,136
Forced into Insolvency	187	1%	1	1%	£5,000	£5,000	28	1%	1	4%	£0	£5,000
Other unfair treatment	2,052	14%	261	13%	£405,183	£405,183	300	16%	14	5%	£13,205	£418,388
<b>UNFAIR TREATMENT - ACTIONS</b>	<b>4,422</b>	<b>30%</b>	<b>498</b>	<b>11%</b>	<b>£1,848,930</b>	<b>£1,848,930</b>	<b>629</b>	<b>33%</b>	<b>45</b>	<b>7%</b>	<b>£84,616</b>	<b>£1,933,546</b>
Unreasonable repayment demands	1,142	8%	89	8%	£267,389	£267,389	104	5%	7	7%	£145,000	£412,389
Unsatisfactory restructuring proposals	1,470	10%	173	12%	£411,883	£411,883	118	6%	9	8%	£14,639	£426,522
Other	328	2%	26	8%	£89,045	£89,045	122	6%	2	2%	£0	£89,045
<b>PROVISION OF FINANCE</b>	<b>2,940</b>	<b>20%</b>	<b>288</b>	<b>10%</b>	<b>£768,317</b>	<b>£768,317</b>	<b>344</b>	<b>18%</b>	<b>18</b>	<b>5%</b>	<b>£159,639</b>	<b>£927,956</b>
<b>RM BEHAVIOUR</b>	<b>647</b>	<b>4%</b>	<b>55</b>	<b>9%</b>	<b>£109,000</b>	<b>£109,000</b>	<b>106</b>	<b>6%</b>	<b>7</b>	<b>7%</b>	<b>£0</b>	<b>£109,000</b>
<i>8% simple interest on above Offers</i>					<b>£9,031,330</b>	<b>£9,031,330</b>					<b>£221,464</b>	<b>£9,252,794</b>
<b>ALLEGATIONS CONSIDERED</b>	<b>14,648</b>	<b>100%</b>	<b>2,846</b>	<b>19%</b>	<b>£37,819,274</b>	<b>£68,167,167</b>	<b>1,910</b>	<b>100%</b>	<b>126</b>	<b>7%</b>	<b>£754,633</b>	<b>£68,921,800</b>

- The offers in respect of upheld Complex Fee, EPA and PPFA complaints includes £12,434,422 already offered under the Automatic Fee Refund (AFR) process.
- Each complaint is themed into allegations which are then individually assessed. The 14,648 allegations relate to 1,910 complaints.
- The average value of an offer across the 656 complaints to get a monetary offer is £58,802.
- The 1,910 appeal decisions relate to 359 appeal outcomes.
- The average value of an appeal outcome across the 53 appellants to get a monetary offer is £14,238.

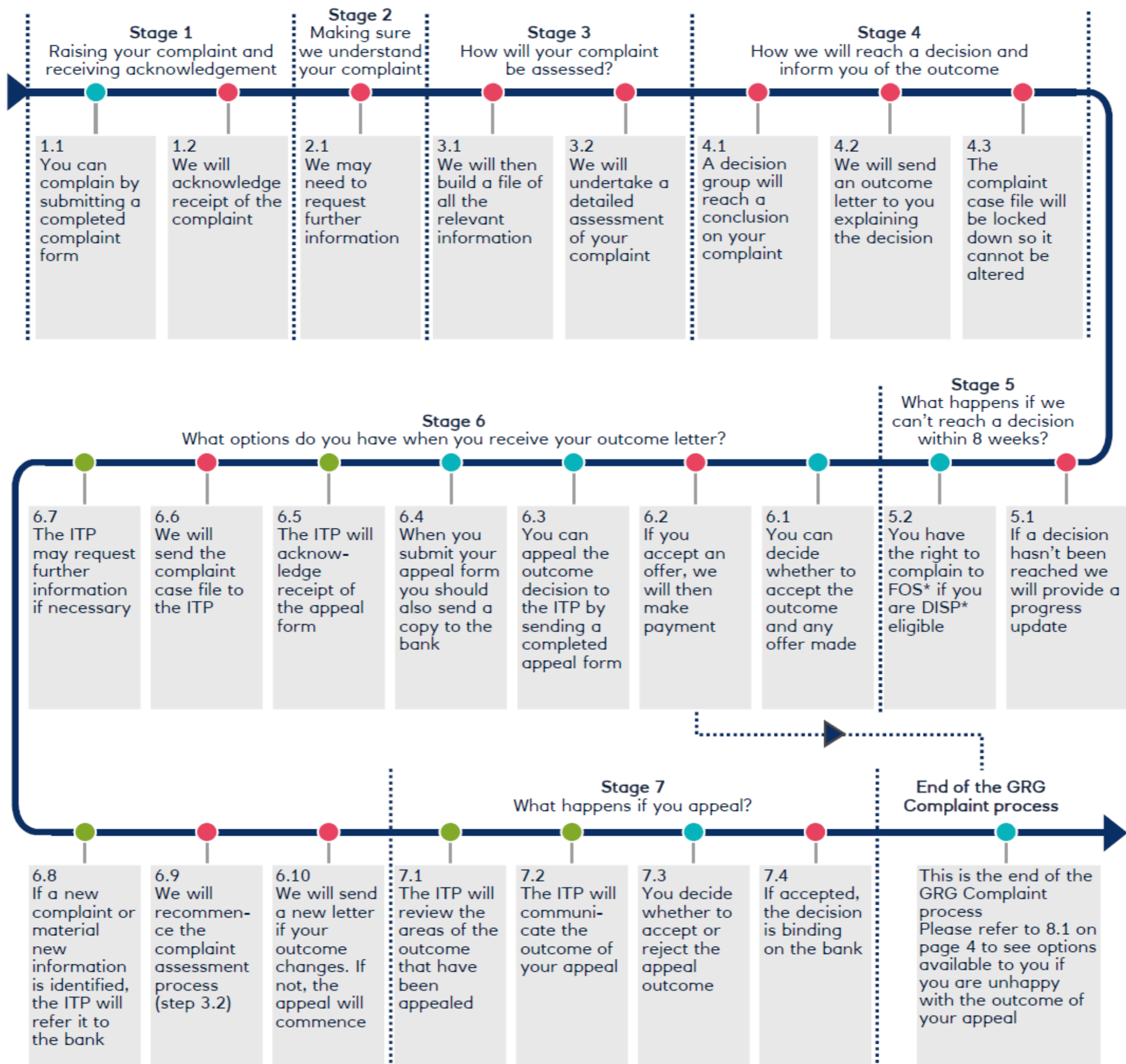
## GRG Complaints - Other Unfair Treatment Analysis

Allegations	No. of Allegations	(%)	No. of Upheld Allegations	(%)
		Of allegations in Other Unfair Treatment		Upheld Rate
Aggressive Bank strategy	177	17%	12	7%
Unreasonable information requests	147	14%	11	7%
Poor customer service	104	10%	31	30%
Unfair treatment of guarantors	84	8%	5	6%
Poor communication	82	8%	25	30%
Unreasonable security requirements	82	8%	9	11%
Unreasonable enforcement of facility terms	79	7%	13	16%
Unreasonable pressure to re-bank or refinance	65	6%	3	5%
Unreasonable rejection of customer proposals	55	5%	3	5%
Poorly managed complaint	34	3%	18	53%
Failure to honour commitments made	27	3%	3	11%
Bank acting as shadow director	26	2%	3	12%
Uncategorised allegations	97	9%	10	11%
	<b>1,059</b>	<b>100%</b>	<b>146</b>	<b>13%</b>

We have performed a one-off analysis of the types of allegations reported under "Other Unfair Treatment" on page 2, as of the end of October 2018.

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