

GRG Complaints - Progress report Fri 3-May-2019

Complaint stage ⁽¹⁾	Current period Fri 3-May	Change on prior period Fri 26-Apr	% Complete
1.1 Complaints received	2,676		
Of which eligible to appeal	2,411		
2.1 Preliminary reviews completed	2,335	29	87%
3.1 Initial files built	2,174	40	81%
3.2 Cases reviewed	1,893	26	71%
4.1 Decisions made	1,760	30	66%
4.2 Letters drafted	1,742	33	65%
4.2 Letters sent	1,689	29	63%

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

Analysis of outcome letters sent

Customer not yet responded	288		
Appeals under review ⁽²⁾	240	→	
No acceptance required	613		
Outcome accepted	386		
Outcome lapsed	162		
Total	<u>1,689</u>		

Appeals Summary: ⁽³⁾

Appeals made to date	537
Appeals Under Review	186
Referred back to Bank	54
Appeal Outcome Letter Sent	297

- 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	34
Some allegations upheld	807
Apology only	44
No allegations upheld - eligible to appeal	496
No allegations upheld - not eligible to appeal	79
Case closed no investigation required	229
Total	<u>1,689</u>

GRG Complaints - Outcome & Offer Analysis Fri 3-May-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	429	3%	182	42%	£100,500	£100,500	45	3%	5	11%	£0	£100,500
Incorrectly placed into GRG	732	6%	38	5%	£103,728	£103,728	103	7%	2	2%	£0	£103,728
Delay in return to mainstream	132	1%	19	14%	£8,500	£8,500	15	1%	0	0%	£0	£8,500
TRANSFER IN/OUT	1,293	10%	239	18%	£212,728	£212,728	163	12%	7	4%	£0	£212,728
Margins	1,229	10%	237	19%	£2,832,577	£2,832,577	124	9%	8	6%	£86,361	£2,918,938
Arrangement Fees	1,695	13%	561	33%	£3,643,579	£3,643,579	147	11%	13	9%	£28,678	£3,672,257
AFR:	1,139	9%	680	60%	£17,225,859	£45,997,635	92	7%	16	17%	£24,576	£46,022,210
Complex Fees	909	7%	567	62%	£10,695,066	£29,597,434	68	5%	9	13%	£0	£29,597,434
EPA	36	0%	14	39%	£1,549,110	£2,031,092	6	0%	2	33%	£7,142	£2,038,234
PPFA	194	2%	99	51%	£4,981,684	£14,369,108	18	1%	5	28%	£17,434	£14,386,542
PRICING	4,063	32%	1,478	36%	£23,702,015	£52,473,791	363	26%	37	10%	£139,615	£52,613,405
VALUATIONS	332	3%	30	9%	£71,238	£71,238	37	3%	0	0%	£0	£71,238
WEST REGISTER	28	0%	3	11%	£5,000	£5,000	6	0%	0	0%	£0	£5,000
Introduction of (and/or fees from) a third party	1,146	9%	186	16%	£993,840	£993,840	143	10%	19	13%	£55,242	£1,049,081
New advisor/management imposed	144	1%	13	9%	£277,059	£277,059	8	1%	0	0%	£0	£277,059
Forced sale of an asset	638	5%	6	1%	£93,136	£93,136	87	6%	1	1%	£0	£93,136
Forced into Insolvency	167	1%	1	1%	£5,000	£5,000	23	2%	1	4%	£0	£5,000
Other unfair treatment	1,794	14%	231	13%	£361,538	£361,538	228	16%	11	5%	£119	£361,656
UNFAIR TREATMENT - ACTIONS	3,889	31%	437	11%	£1,730,574	£1,730,574	489	35%	32	7%	£55,360	£1,785,934
Unreasonable repayment demands	995	8%	85	9%	£242,389	£242,389	79	6%	7	9%	£5,000	£247,389
Unsatisfactory restructuring proposals	1,257	10%	155	12%	£397,283	£397,283	95	7%	9	9%	£14,639	£411,922
Other	302	2%	26	9%	£89,045	£89,045	78	6%	2	3%	£0	£89,045
PROVISION OF FINANCE	2,554	20%	266	10%	£728,717	£728,717	252	18%	18	7%	£19,639	£748,356
RM BEHAVIOUR	559	4%	37	7%	£89,000	£89,000	83	6%	5	6%	£0	£89,000
<i>8% simple interest on above Offers</i>					£7,992,219	£7,992,219					£85,316	£8,077,535
ALLEGATIONS CONSIDERED	12,718	100%	2,490	20%	£34,531,491	£63,303,266	1,393	100%	99	7%	£299,930	£63,603,196

- The offers in respect of upheld Complex Fee, EPA and PPFA complaints includes £11,946,213 already offered under the Automatic Fee Refund (AFR) process.
- Each complaint is themed into allegations which are then individually assessed. The 12,718 allegations relate to 1,689 complaints.
- The average value of an offer across the 585 complaints to get a monetary offer is £59,541.
- The 1,393 appeal decisions relate to 297 appeal outcomes.
- The average value of an appeal outcome across the 36 appellants to get a monetary offer is £8,331.

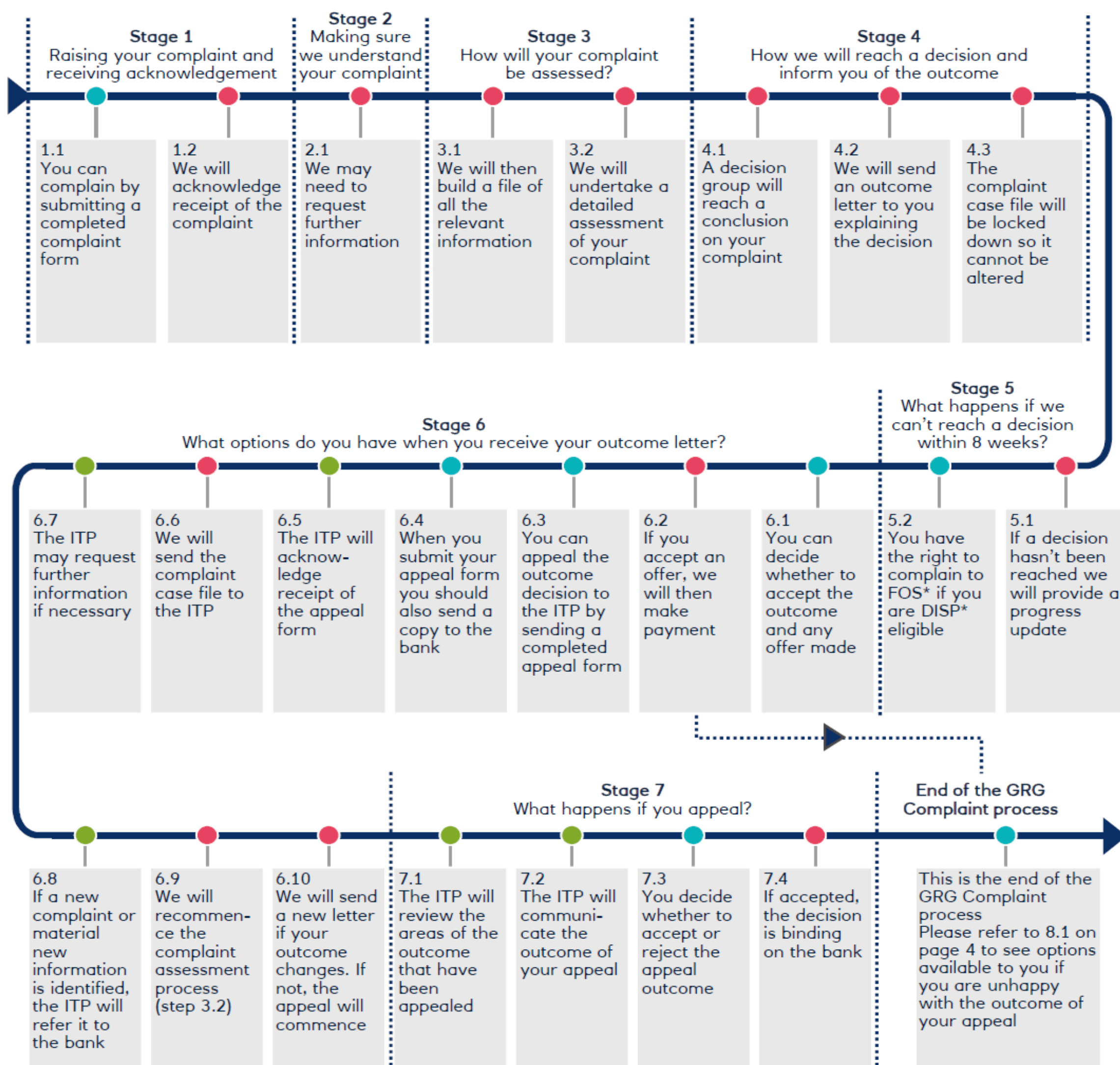
GRG Complaints - Other Unfair Treatment Analysis

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%
	1,059	100%	146	13%

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