

GRG Complaints - Progress report Fri 26-Apr-2019

Complaint stage ⁽¹⁾	Current period	Change on prior period	% Complete
	Fri 26-Apr	Fri 12-Apr	
1.1 Complaints received	2,675		
Of which eligible to appeal	2,411		
2.1 Preliminary reviews completed	2,306	37	86%
3.1 Initial files built	2,134	54	80%
3.2 Cases reviewed	1,867	48	70%
4.1 Decisions made	1,730	40	65%
4.2 Letters drafted	1,709	33	64%
4.2 Letters sent	1,660	33	62%

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

Analysis of outcome letters sent

Customer not yet responded	300		
Appeals under review ⁽²⁾	236		
No acceptance required	600		
Outcome accepted	374		
Outcome lapsed	150		
Total	1,660		

Appeals Summary: ⁽³⁾

Appeals made to date	527
Appeals Under Review	181
Referred back to Bank	55
Appeal Outcome Letter Sent	291

- 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	33
Some allegations upheld	790
Apology only	44
No allegations upheld - eligible to appeal	487
No allegations upheld - not eligible to appeal	78
Case closed no investigation required	228
Total	1,660

GRG Complaints - Outcome & Offer Analysis Fri 26-Apr-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	424	3%	181	43%	£95,500	£95,500	45	3%	5	11%	£0	£95,500
Incorrectly placed into GRG	718	6%	36	5%	£103,728	£103,728	101	7%	2	2%	£0	£103,728
Delay in return to mainstream	130	1%	19	15%	£8,500	£8,500	15	1%	0	0%	£0	£8,500
TRANSFER IN/OUT	1,272	10%	236	19%	£207,728	£207,728	161	12%	7	4%	£0	£207,728
Margins	1,205	10%	232	19%	£2,736,504	£2,736,504	121	9%	8	7%	£86,361	£2,822,865
Arrangement Fees	1,658	13%	544	33%	£3,521,487	£3,521,487	142	10%	12	8%	£28,678	£3,550,165
AFR:	1,116	9%	667	60%	£16,509,188	£45,069,168	92	7%	16	17%	£24,576	£45,093,743
Complex Fees	893	7%	557	62%	£10,637,095	£29,050,495	68	5%	9	13%	£0	£29,050,495
EPA	36	0%	14	39%	£1,049,110	£2,031,092	6	0%	2	33%	£7,142	£2,038,234
PPFA	187	1%	96	51%	£4,822,984	£13,987,580	18	1%	5	28%	£17,434	£14,005,014
PRICING	3,979	32%	1,443	36%	£22,767,179	£51,327,159	355	26%	36	10%	£139,615	£51,466,773
VALUATIONS	327	3%	29	9%	£67,501	£67,501	34	2%	0	0%	£0	£67,501
WEST REGISTER	28	0%	3	11%	£5,000	£5,000	5	0%	0	0%	£0	£5,000
Introduction of (and/or fees from) a third party	1,128	9%	180	16%	£961,227	£961,227	139	10%	18	13%	£55,112	£1,016,340
New advisor/management imposed	142	1%	12	8%	£263,001	£263,001	8	1%	0	0%	£0	£263,001
Forced sale of an asset	628	5%	6	1%	£93,136	£93,136	86	6%	1	1%	£0	£93,136
Forced into Insolvency	166	1%	1	1%	£5,000	£5,000	23	2%	1	4%	£0	£5,000
Other unfair treatment	1,767	14%	225	13%	£344,003	£344,003	222	16%	11	5%	£119	£344,121
UNFAIR TREATMENT - ACTIONS	3,831	31%	424	11%	£1,666,367	£1,666,367	478	35%	31	6%	£55,231	£1,721,598
Unreasonable repayment demands	969	8%	81	8%	£224,389	£224,389	75	6%	7	9%	£5,000	£229,389
Unsatisfactory restructuring proposals	1,225	10%	154	13%	£386,359	£386,359	94	7%	9	10%	£14,639	£400,998
Other	297	2%	26	9%	£89,045	£89,045	77	6%	2	3%	£0	£89,045
PROVISION OF FINANCE	2,491	20%	261	10%	£699,794	£699,794	246	18%	18	7%	£19,639	£719,433
RM BEHAVIOUR	541	4%	33	6%	£79,000	£79,000	82	6%	5	6%	£0	£79,000
<i>8% simple interest on above Offers</i>					£7,844,823	£7,844,823					£85,316	£7,930,139
ALLEGATIONS CONSIDERED	12,469	100%	2,429	19%	£33,337,392	£61,897,371	1,361	100%	97	7%	£299,801	£62,197,172

- The offers in respect of upheld Complex Fee, EPA and PPFA complaints includes £11,242,357 already offered under the Automatic Fee Refund (AFR) process.
- Each complaint is themed into allegations which are then individually assessed. The 12,469 allegations relate to 1,660 complaints.
- The average value of an offer across the 570 complaints to get a monetary offer is £59,013.
- The 1,361 appeal decisions relate to 291 appeal outcomes.
- The average value of an appeal outcome across the 31 appellants to get a monetary offer is £9,671.

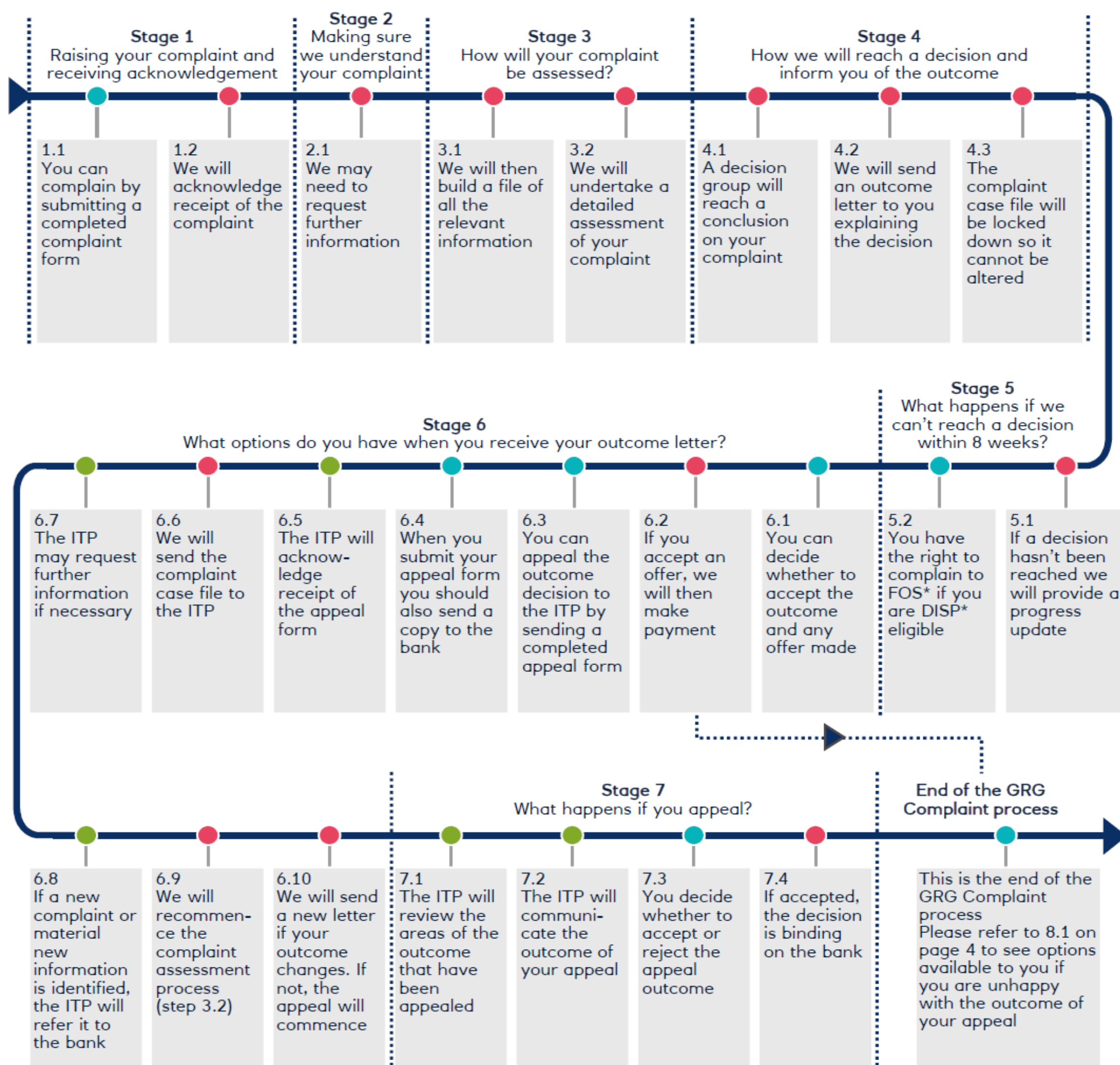
GRG Complaints - Other Unfair Treatment Analysis

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