

GRG Complaints - Progress report Fri 15-Feb-2019

Complaint stage ⁽¹⁾	Current period	Change on prior period	% Complete
	Fri 15-Feb	Fri 8-Feb	
1.1 Complaints received	2,661		
Of which eligible to appeal	2,402		
2.1 Preliminary reviews completed	2,016	40	76%
3.1 Initial files built	1,826	47	69%
3.2 Cases reviewed	1,611	30	61%
4.1 Decisions made	1,501	29	56%
4.2 Letters drafted	1,478	28	56%
4.2 Letters sent	1,423	37	53%

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

Analysis of outcome letters sent

Customer not yet responded	222		
Appeals under review ⁽²⁾	247		
No acceptance required	565		
Outcome accepted	265		
Outcome lapsed	124		
Total	1,423		

Appeals Summary: ⁽³⁾

Appeals made to date	451
Appeals Under Review	204
Referred back to Bank	43
Appeal Outcome Letter Sent	204

- 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	30
Some allegations upheld	665
Apology only	36
No allegations upheld - eligible to appeal	425
No allegations upheld - not eligible to appeal	69
Case closed no investigation required	198
Total	1,423

GRG Complaints - Outcome & Offer Analysis Fri 15-Feb-2019

Key Allegation:	Bank Review - Allegations					ITP Review - Appeals					TOTAL	
	No. of Allegations	%	No. of Upheld Allegations	%	Direct Loss Offers, including 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	356	3%	153	43%	£90,500	£90,500	30	4%	4	13%	£0	£90,500
Incorrectly placed into GRG	623	6%	32	5%	£96,228	£96,228	66	8%	2	3%	£0	£96,228
Delay in return to mainstream	111	1%	16	14%	£7,500	£7,500	6	1%	0	0%	£0	£7,500
TRANSFER IN/OUT	1,090	11%	201	18%	£194,228	£194,228	102	12%	6	6%	£0	£194,228
Margins	967	9%	166	17%	£2,024,023	£2,024,023	74	9%	3	4%	£11,326	£2,035,348
Arrangement Fees	1,339	13%	390	29%	£2,865,418	£2,865,418	73	9%	10	14%	£28,545	£2,893,963
AFR:	979	10%	573	59%	£14,434,505	£40,312,727	62	7%	13	21%	£21,299	£40,334,026
Complex Fees	792	8%	492	62%	£9,088,290	£26,034,705	46	5%	8	17%	£0	£26,034,705
EPA	28	0%	9	32%	£924,133	£1,239,733	3	0%	1	33%	£4,142	£1,243,875
PPFA	159	2%	72	45%	£4,422,082	£13,038,289	13	2%	4	31%	£17,157	£13,055,446
PRICING	3,285	32%	1,129	34%	£19,323,945	£45,202,167	209	25%	26	12%	£61,169	£45,263,337
VALUATIONS	267	3%	21	8%	£60,581	£60,581	19	2%	0	0%	£0	£60,581
WEST REGISTER	19	0%	3	16%	£5,000	£5,000	2	0%	0	0%	£0	£5,000
Introduction of (and/or fees from) a third party	937	9%	131	14%	£791,413	£791,413	86	10%	12	14%	£45,010	£836,423
New advisor/management imposed	118	1%	11	9%	£230,516	£230,516	4	0%	0	0%	£0	£230,516
Forced sale of an asset	527	5%	5	1%	£63,700	£63,700	53	6%	1	2%	£0	£63,700
Forced into Insolvency	125	1%	0	0%	£0	£0	11	1%	1	9%	£0	£0
Other unfair treatment	1,405	14%	196	14%	£296,721	£296,721	147	17%	7	5%	£84	£296,804
UNFAIR TREATMENT - ACTIONS	3,112	30%	343	11%	£1,382,349	£1,382,349	301	36%	21	7%	£45,094	£1,427,443
Unreasonable repayment demands	815	8%	69	8%	£204,389	£204,389	49	6%	4	8%	£5,000	£209,389
Unsatisfactory restructuring proposals	971	9%	127	13%	£351,673	£351,673	59	7%	8	14%	£14,639	£366,312
Other	255	2%	24	9%	£81,545	£81,545	48	6%	1	2%	£0	£81,545
PROVISION OF FINANCE	2,041	20%	220	11%	£637,608	£637,608	156	19%	13	8%	£19,639	£657,247
RM BEHAVIOUR	425	4%	22	5%	£58,500	£58,500	54	6%	5	9%	£0	£58,500
<i>8% simple interest on above Offers</i>					£6,169,254	£6,169,254					£54,670	£6,223,924
ALLEGATIONS CONSIDERED	10,239	100%	1,939	19%	£27,831,465	£53,709,687	843	100%	71	8%	£180,572	£53,890,260

- The offers in respect of upheld complex fee / PPFA complaints includes £10,190,240 already offered under the Automatic Fee Refund (AFR) process.
- Each complaint is themed into allegations which are then individually assessed. The 10,239 allegations relate to 1,423 complaints.
- The average value of an offer across the 472 complaints to get a monetary offer is £59,348.
- The 843 appeal decisions relate to 204 appeal outcomes.
- The average value of an appeal outcome across the 23 appellants to get a monetary offer is £7,851.

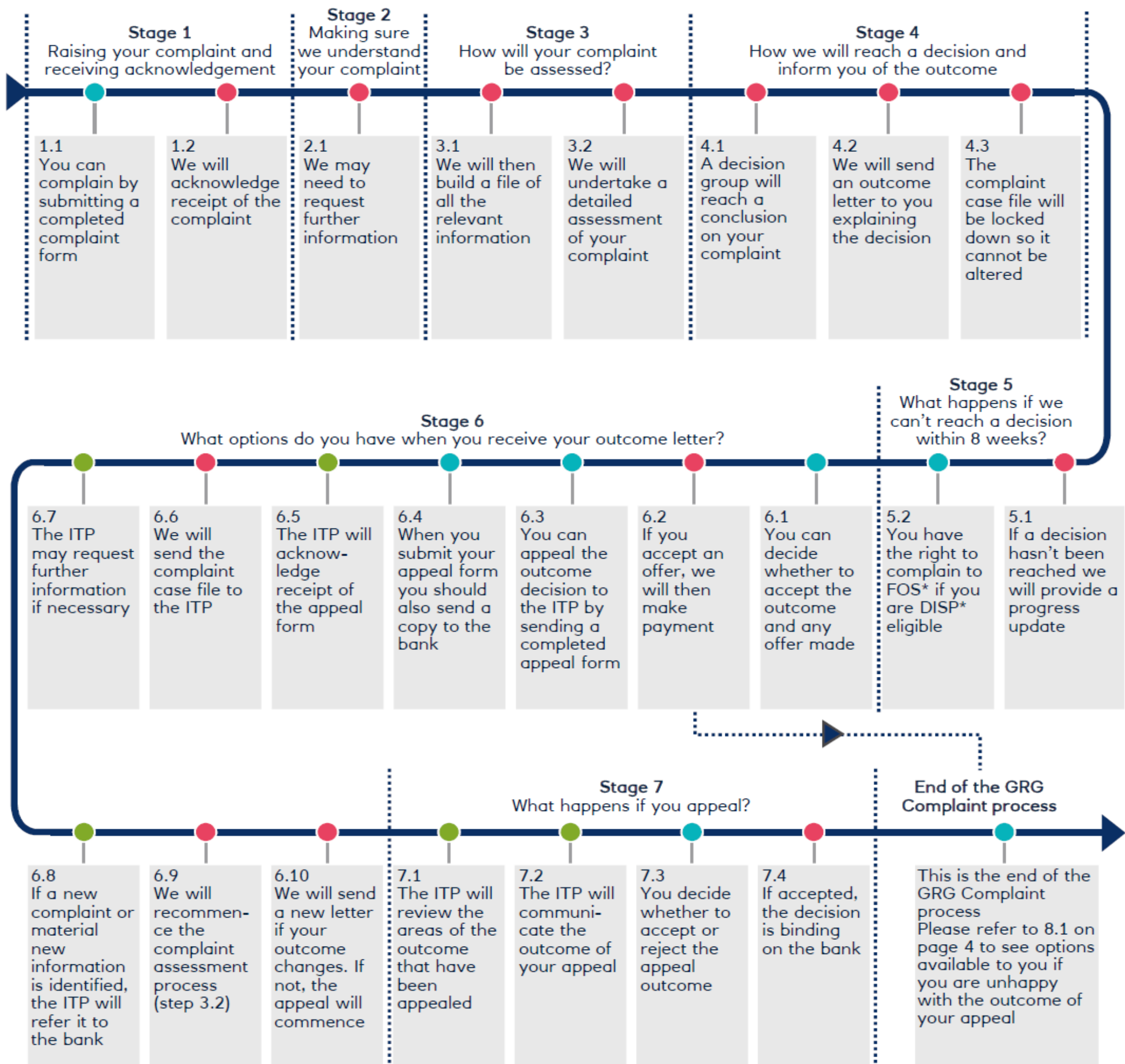
GRG Complaints - Other Unfair Treatment Analysis

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