

COMPLAINTS ROOT CAUSE ANALYSIS REPORT

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Attitude, capability and
effectiveness in retail
financial services

Includes our guide to good
complaints root cause
analysis included



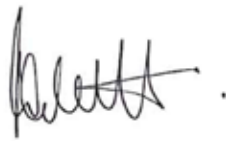
HUNTSWOOD

Survey findings in association with **YouGov**

Contents

1	Introduction by Paul Scott, Director of Markets and Propositions
2	Executive summary
4	Section one: Warning signs
10	Section two: Green lights
15	Guide to good complaints root cause analysis
44	Research methodology
	Contact and credits

INTRODUCTION

A handwritten signature in black ink, appearing to read 'Paul Scott'.

Paul Scott
Chief Commercial Officer

“All problems have root causes”. These are Martin Wheatley’s opening words in the latest Financial Conduct Authority publication *Journey to the FCA*. That is not to say that complaints are problems, but rather that complaints provide firms with crucial information to identify where real problems lie. The challenge is then to tackle the root cause of those problems effectively.

In the highly regulated complaints arena, the regulator sends a clear message to the industry: “where a firm cannot demonstrate they are delivering fair outcomes they can expect tough action from us. We will step in if a firm is not acting fairly on root cause analysis or not accurately assessing risks”. Attitude to complaints root cause analysis shows a great deal about staff attitude to customers and senior management attitude towards firm, staff and customer. In short, firm culture.

Throughout 2012 Huntswood facilitated industry knowledge sharing sessions on complaints root cause analysis. Attendees ranged from chief executives to root cause analysts and complaint handling team leaders. Each time, firms came away noting the same highlights: sharing best practice with peers, admitting and discussing problems with peers and, therefore, being able to benchmark the performance of their own firm.

The picture across the workshops was not one of universal confidence and clarity. Rather, firms were sure they undertook root cause analysis, but were still unsure

what good really looks like and who is achieving it in the industry. Such messages from firms and a desire for further comparison led to this survey of the retail financial services industry.

The results of this survey provide a snapshot of the retail financial services’ current views on root cause analysis moving into 2013. Over 60 firms, including the top four UK retail banks, took part. The scale of firms’ complaints operations ranges from those with under 100 complaints per quarter, to over 100,000 a quarter. The teams handling root cause analysis range in size from one to over 50.

We are extremely grateful for the time respondents took in adding their views and data to this survey. Huntswood strongly supports the sharing of knowledge in financial services. It is through seeing this industry – customers, regulated firms, consultants and regulators – as an ecosystem, where the best ideas and the most difficult problems are shared, that the industry as a whole will prosper, innovate and overcome challenges in the future.

We will continue to support and innovate with firms in this area. We look forward to exploring ways in which complaints root cause analysis can be a source of pride, insight and differentiation in your firm in 2013 and beyond.

Executive summary

Encouragingly, the results of this survey show that complaints root cause analysis is carried out in 96% respondents' firms. However, respondents are not confident in the effectiveness of this complaints root cause analysis: only one in three respondents strongly agree that clear action plans are produced to address identified issues. Simply starting the process of complaint root cause analysis does not mean it is done well.

95% respondents agree complaints root cause analysis has the support of senior management at their firm. However, a crucial test of that support – regular challenge from senior management – is still lacking. Under a third of respondents strongly agree that senior management regularly challenges root cause analysis management information. Challenge from senior management is vital to improving the quality and effectiveness of complaints root cause analysis. Fundamental senior management challenge demands better management information and, therefore, better quality action plans which are effectively followed up.

69% believe that ombudsman decisions being published in 2013 will have only a minor impact on firms' complaints root cause analysis. Given that the FOS states the impact will be "major", this is a cause for concern. This comes in the context of an industry where over a third of respondents believe that their complaints root cause analysis teams currently lack resource.

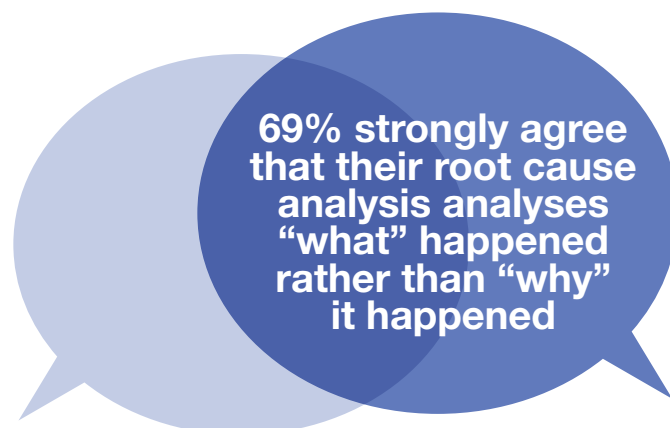
Overall, respondents have a positive attitude towards complaints root cause analysis. However, the effectiveness and quality of action plans and subsequent activity is not living up to the perceived support of senior management.

What follows these findings is Huntswood's guide to good root cause analysis. This model provides your firm with the tools to question, challenge and review its complaints root cause analysis in line with best practice. The guide is brought to you by Huntswood's team of regulatory consultants and learning development experts with in-depth expertise honed in industry, as supervisors at the regulator and in consulting practice.

“respondents have a positive attitude towards complaints root cause analysis. However, the effectiveness and quality of action plans and subsequent activity is not living up to the perceived support of senior management”



Section one: **Warning signs**



Confidence is high amongst firms that root cause analysis on complaints is undertaken and supported by senior management. 96% agree that their firm undertakes complaints root cause analysis and 93% agree they generate root cause analysis management information. However, it is regarding the effectiveness of that root cause analysis and the accuracy of management information that confidence drops significantly.

Symptoms and causes

Over half of respondents state that their complaints root cause analysis tackles symptoms not causes. This is echoed by the 69% who strongly agree that their root cause analysis analyses “what” happened rather than “why” it happened. This is one of the first challenges for any root cause analysis team: to be ruthlessly clear about the difference between causes and symptoms. Thereafter, resources should be focused on attempting to tackle causes.

See our guide to good complaints root cause analysis for discussion around this important topic on page 18.

Non-complainant customers

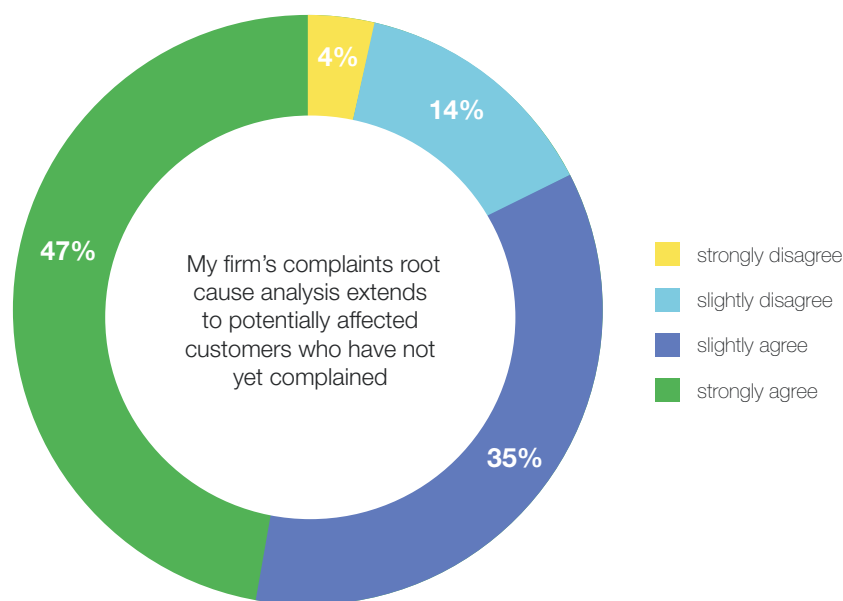
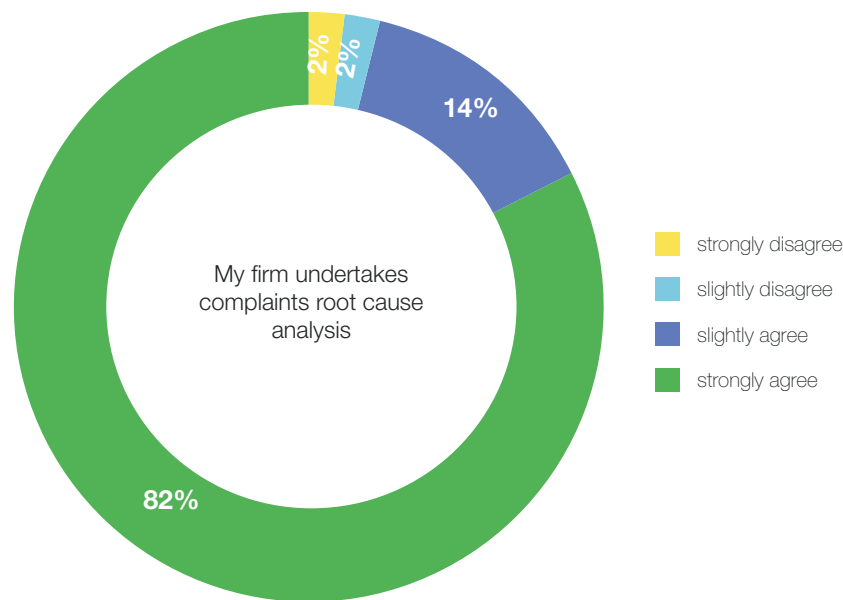
We may put the high percentage of those undertaking complaints root cause analysis in part down to the regulatory requirement to do so. However, regulatory requirement is not having the same impact on the fate of non-complainant customers.

Whereas 82% respondents strongly agree that their firm undertakes complaints root cause analysis, this drops to 47% when respondents were asked whether complaints root cause analysis considers non-complainant customers potentially affected. Customers who complain signal to the firm where a problem lies. Judging the size of the customer population affected which has not complained is where complaints root cause analysis comes into its own: this is the level of sophistication at which your firm should be working.

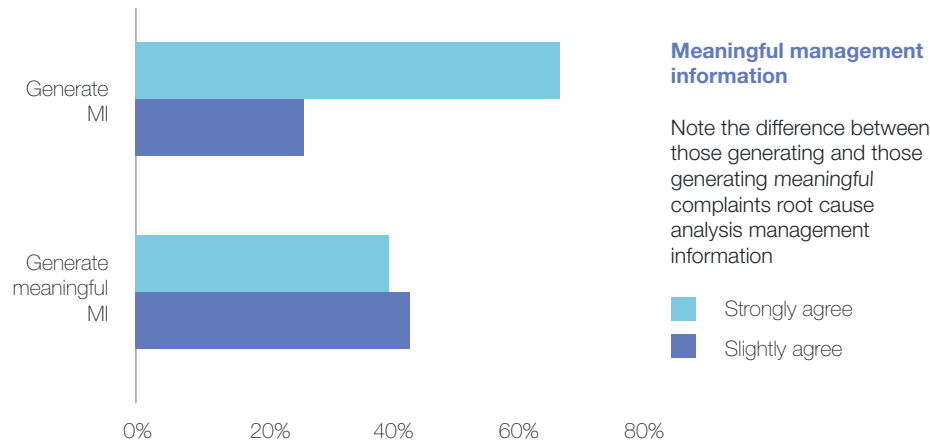
See also our section on ‘near miss’ root cause analysis on page 20.

Non-complainant customers

Note the difference between those undertaking root cause analysis and the number which extend to non-complainant customers



Warning signs



Meaningful management information

93% respondents agree they generate complaints root cause analysis management information with 67% strongly agreeing. However, asked whether the complaints root cause analysis management information generated is “meaningful”, those who strongly agree fell from 67% to 40%, well below half. This notable drop shows that whilst firms are generating data, it is not universally the case that the data produced is giving firms the intelligence they require.

This view was reflected by firms in Huntswood’s 2012 workshops held on complaints: whilst there is an abundance of complaints root cause analysis management information, it is not the case that it is doing its job. Note also, firms intending to invest in complaints root cause analysis in 2013 state that “increasing effectiveness” and “making management information more bespoke to key stakeholders” are on their lists of changes to make.

This is not a damning assessment of the industry’s complaints root cause analysis management information, but it points towards a weakness. It is a great challenge to gather, produce and analyse the right information. However, through the process of challenge from senior management – which in some areas is currently missing –

and increased testing to get closer to the meaning of the data, this vital tool for early warning and evidencing with the regulator can begin to do the work it is intended to.

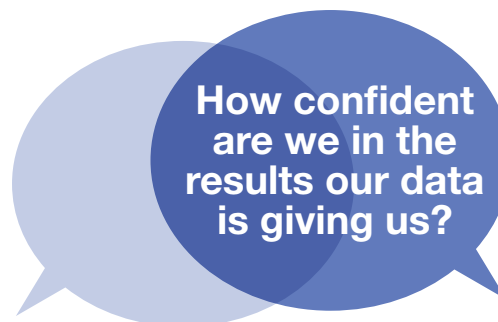
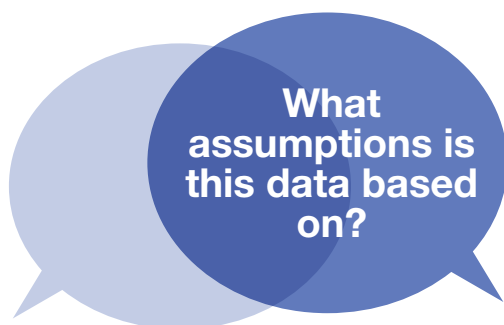
Senior management support

The regulator is clear on the pivotal role senior management plays in complaints and, therefore, complaints root cause analysis. In recent discussion and consultation papers on complaints where issues have been identified the following has been noted:

“The quality of a firm’s complaint handling... reveal[s] the extent to which cultural drivers such as senior management engagement... are delivering fair outcomes for customers.”

“Where the culture was poor, the key drivers were a lack of senior management engagement with complaint handling [and] poorly conceived procedures and controls...”

In confirming the abolition of the two-stage process for complaints handling, CP10/21 requires “firms to nominate a senior individual to have responsibility for the complaints handling function within the firm”. This is due to the considerable impact – for better or worse – that senior



management engagement has on complaints and quality of root cause analysis.

In this context, 95% respondents agree that complaints root cause analysis has the support of their senior management. This figure is promisingly high. However, the view of respondents changes in the extent to which senior management regularly challenges complaints root cause analysis management information.

This is a vital test of senior management attitude to complaints root cause analysis. It also raises a question of consistency: whilst 66% respondents strongly agree that senior management supports complaints root cause analysis, only 31% strongly agree that senior management regularly challenges complaints root cause analysis management information. Regular challenge is one of the clear ways in which staff can determine senior management's support of complaints root cause analysis.

Warning box: regulators will hold senior management accountable and responsible for complaints and root cause analysis. CP10/21 requires firms to nominate a senior individual to have responsibility for the complaints handling function within the firm

Interdependent weaknesses

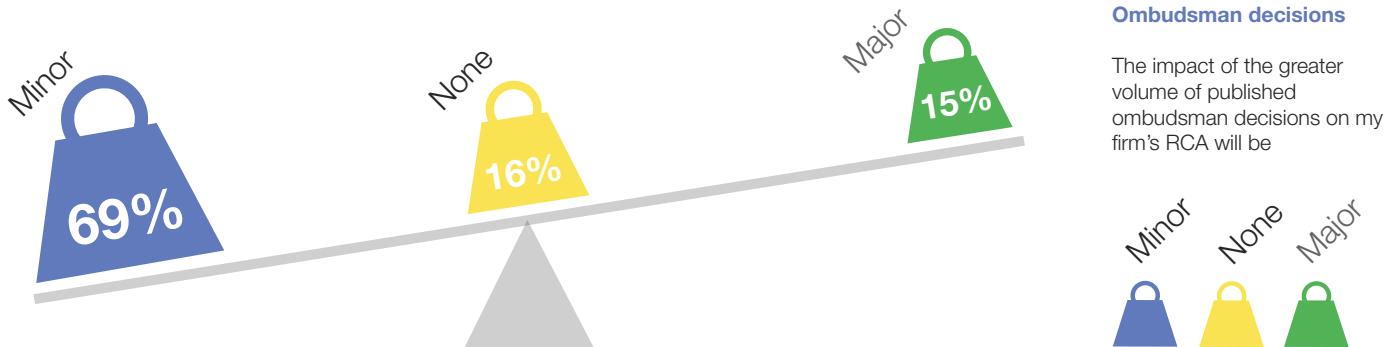
Firms are failing to make the most of their internal governance and controls to improve complaints root cause analysis when the following issues come together:

1. Firms' complaints root cause analysis management information is not deemed to be meaningful
2. Senior management does not regularly challenge management information

These fundamental tenants of complaints root cause analysis are interrelated. If management information is poor quality or deemed "meaningless" there is an obvious requirement to improve it. However, this process of improvement can and should be driven by senior management. Therefore, in this case, solving the second weakness drives improvement in the first.

It is precisely here that senior management has a role to play: by asking the right questions. "What assumptions is this data based on?" and "how confident are we in the results our data is giving us?", for example. From the right seniority of management these questions will see information begin the process of changing, improving and becoming a useful tool on which senior management, the firm and the regulator can confidently rely.

Warning signs



Ombudsman decisions

In early summer 2013, all ombudsman decisions at the Financial Ombudsman Service (FOS) will be published with the intention of promoting transparency and increasing visibility for consumers. The FOS press office refers to this change as a “wake up call” for the industry. This will only benefit firms – and in turn customers – where firms are well informed about this change and prepared to process the greater volume of information. The FOS official stance is that this will have a “major impact on the industry and the FOS”.

Whilst two out of three respondents believe publishing ombudsman decisions will improve root cause analysis, over two thirds believe the impact of publishing all decisions will only be minor.

With this in mind, only 10% respondents strongly agree that their firm will increase capacity to analyse the greater volume of decisions being published. Given that 50% respondents' root cause analysis teams are between 0 and 5 people and only 28% strongly agree that their firm invests enough resource in complaints root cause analysis, firms should review whether they have fully assessed the impact of the coming change.

The eventual impact of the published ombudsman decisions will be seen when it is introduced this year. However, given the possibility that over 400 decisions will be published each week from over 90 ombudsmen, with a crucial minority of decisions creating the equivalent of precedent setting cases, firms' complaints root cause analysis team may find itself overwhelmed when the new information does come without adequate resource.

**over 400 decisions
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ombudsmen**

“ only 10% respondents strongly agree that their firm will increase capacity to analyse the greater volume of decisions being published ”



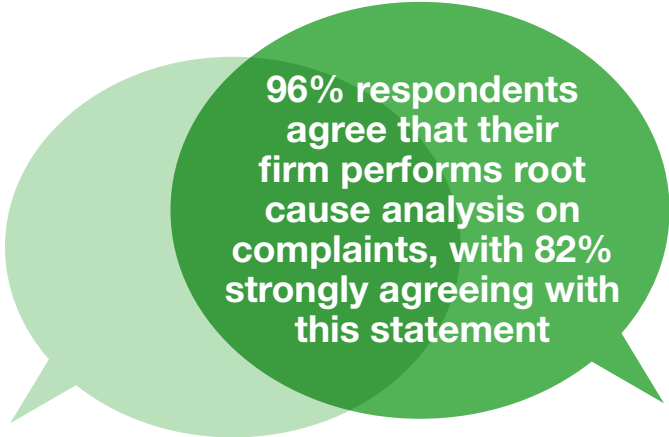
Section two: Green lights

Confidence and attitude

Given the importance of performing root cause analysis, it is positive to note that respondents were confident that complaints root cause analysis is being undertaken. 96% respondents agree that their firm performs root cause analysis on complaints, with 82% strongly agreeing with this statement.

That this is a regulatory requirement may appear to drive the high compliance on complaints root cause analysis. However, it is a different matter to judge whether firms' staff believe in its importance. When asked, the answer was overwhelmingly that firms are supporters: 95% agree that complaints root cause analysis is an effective early warning indicator, 78% strongly agreeing with this statement. Put in the context of a practical example, however, this lessens: 68% respondents believe that complaints root cause analysis could have identified the issues with PPI.

This is a strong foundation for confidence in this vital feedback loop for customers, firms' staff and regulators: firms both undertake and have a healthy belief in the benefits of complaints root cause analysis. Refer to the "warning signs" section on page 4 to read about the weaknesses regarding effectiveness.



96% respondents agree that their firm performs root cause analysis on complaints, with 82% strongly agreeing with this statement



Customer experience

My firm tells its customers when it has made improvements as a result of complaints root cause analysis:



Customer experience

Firms have a chance to conduct themselves with customers in a way which creates trust and confidence. This is an industry wide challenge, but one which must come from individual firms' actions. In the context of complaints, firms have the opportunity to reassure customers that if or when they get things wrong, the firm will put things right. This is where customer experience can play a big role.

89% respondents agree that their firm has improved customer experience as a result of complaints root cause analysis. Given this high figure, it is surprising to see that only 38% firms communicate positive news to their customers. As the guide to good root cause analysis states (page 22), existing customers are the primary beneficiary of complaints root cause analysis. However, there is a commercial advantage as well as increased trust to be gained from communicating the news of real improvement to customers.

Example: Virgin tickles

Virgin media tells customers when it improves customer service.

Virgin Media increased standard internet bandwidth speed at no extra cost to customers. They communicated this to their customers.

Culture

Firm culture and senior management attitude are closely correlated in all messaging from the regulator. Not only must senior management lead cultural change where necessary; the current culture in a firm is a good mirror of the priorities of senior management.

This close correlation is reflected in the views of respondents, where senior manager attitude and culture were compared. 95% respondents agree senior management takes complaints root cause analysis seriously and an equally high percentage (91%) believes firm culture supports robust complaints root cause analysis.

Respondents' confidence in senior management attitudes towards complaints root cause analysis is high. 95% agree that senior management takes complaints root cause analysis seriously, 66% agreeing strongly with this statement.

Green lights



What changes is your firm likely to make to its complaints root cause analysis approach over the next 12 months?

Investment in root cause analysis

Respondents shared that there will be an increase in complaints root cause analysis investment in 2013. 37% firms expect to increase resource to meet the higher demand for data analysis when all ombudsman decisions are published. Firms plan investment in people, process and systems. This shows an industry aware of its challenges and the importance of complaints root cause analysis.

The investment and improvements respondents' firms expect to make include an overhaul of firm management information systems and increasing resource. Other respondents aim to involve wider areas of the business – by spreading information further or gathering from more areas – and providing greater training for those in analytical roles to ask the right questions and attempt to provide the answers.

The increased investment in complaints root cause analysis this year provides a snapshot of an industry which understands the importance of complaints root cause analysis, but which is highly aware that it is not in a perfect state within firms. One respondent commented: "root cause analysis is easier said than done". That said, there are respondents who have complete confidence that their firm's root cause analysis is in excellent working order: "complaints root cause analysis is in the DNA of the business and that will continue."

“ Respondents shared that there will be an increase in complaints root cause analysis investment in 2013... This shows an industry aware of its weaknesses and the importance of complaints root cause analysis ”



**“ find out what
causes a
problem and
do something
about it ”**

Guide to good complaints root cause analysis

This model provides your firm with a tool to question, challenge and review its complaints root cause analysis in line with best practice.

The guide is brought to you by Huntswood's team of regulatory consultants and learning development experts with in-depth expertise honed in industry, as supervisors at the regulator and in consulting practice.

Contents

16	What is root cause analysis?
22	Who benefits and how?
24	Regulatory expectations
26	If it's not effective it's not root cause analysis
28	Management information
30	Model for effective complaints root cause analysis

What is root cause analysis?

Root cause analysis identifies the underlying reasons – the root cause – that contribute to a problem or an event. If effective, once the root cause is found, the task is completed by devising and directing solutions to correct or eliminate that cause. This prevents future occurrences of the initial problem being caused in the identified way and avoids systemic failures.

In the context of complaints, a firm has received information that there is a problem. It must determine why that complaint happened in order to stop its reoccurrence. Effective root cause analysis creates a culture of identification and rectification before problems escalate within firms. This moves firms from a reactive process of merely ‘handling’ complaints towards meaningful data gathering and analysis with the ability to point to the reason for a complaint and tackle it. The goal is this: no repeated complaints for known reasons.

We asked Financial Services Authority (FSA) supervisors for their definition of root cause analysis. Their answer was unanimous: find out what causes a problem and do something about it. Tackling root causes removes the problem through a process of change or improvement. Addressing the root cause of complaints reduces complaints in the medium to long term, benefiting the firm and future customers.



Complaint handling and complaints root cause analysis

This guide assumes that firms’ complaint handling policy delivers fair complaints outcomes for customers; a topic for a different paper. However, the complaint handler has a vital role to play in giving effective root cause analysis the right start.

Complaint handling must be focused on delivering fair outcomes for customers. Root cause analysis is the necessary process of looking at all complaints and improving products, people and processes as a result. The complaint handler must understand his or her role in the larger system of continuous improvement. However, the focus of complaint handling should not be shifted from delivering fair outcomes.

Complaints root cause analysis is:

Key risk identification to drive root cause analysis activity

About tackling root causes

A continuous improvement process

A means of addressing customer detriment, both actual and potential

A tool that can identify wider business risks

Necessary to ensure fair customer outcomes

About problems that must be resolved

Accepting the real or possible impact of an issue on customers

An effective tool for competitive advantage

A tool that proactively protects customers

Essential to commercial and customer risk mitigation

About listening and responding to:

- Customers and staff
- The right data
- Senior manager challenge
- The regulatory authority
- The Financial Ombudsman Service
- Industry complaints as well as firms' own complaints

Complaints root cause analysis is not:

A tool to apportion blame within the business

Generating management information: this merely facilitates complaints root cause analysis

About servicing symptoms: by performing complaints root cause analysis effectively, servicing symptoms becomes a problem of the past

Analysing graphs and spreadsheets: this simply aids complaints root cause analysis

Solely about the volume of complaints received: a reaction to volume will always be just that

Complaint handling: this addresses the symptom, not the root cause

About overreacting

A tap that can be switched on and off



What is root cause analysis?

Tackle root causes, not symptoms

It is fundamental to complaints root cause analysis to distinguish between a symptom and the root cause of a complaint. This skill set must be well developed with all relevant staff in the complaint root cause analysis process.

Consider the following simple example. A customer's contents insurance claim has been rejected and the customer has filed a complaint. What is the root cause of the complaint?

- A. Insurance claim has been rejected
- B. The sale was carried out on a non-advised basis
- C. The call script did not test insurance eligibility and explain policy exclusions
- D. The customer did not read the terms and conditions

Although A – the insurance claim has been rejected – has prompted the customer to complain, there is a reason beyond this that this failed claim has become a complaint. Finding this reason should be front of mind for staff. B – the sale was carried out on a non-advised basis – is irrelevant in this case.

Whilst D – the customer did not read the terms and conditions – is a contributing factor, from the firm's point of view their sales process has failed to prepare the customer for what to expect. C – the call script did not fully explain the policy exclusions – is the root cause for the disparity between the customer's expectations and what the firm delivered.

In this case root cause analysis would identify C - the failings in the call script - as the root cause of the complaint.

Ensuring this analysis is effective for the customer and the firm means committing to the right next steps. An example of next steps would be to provide staff with training and further guidance and revising the call script. This would clarify with call handlers how to ensure that eligibility is discussed and that policy exclusions that may invalidate claims are understood and relayed to the customer.

By taking this action, the firm seeks to ensure that existing customers who may be affected can be identified. The firm can also avoid customers complaining in the future due to the customer's lack of understanding of exclusions on the insurance policy.

See the following case study for a further example.

Case study

Miss L called ABC Bank's call centre on 14/2/13 to request a one-off change to this month's mortgage payment date which was due to collect on 18/2/13. The call centre agent agreed to change the payment date to 1/3/13 as requested and confirmed that no payment would be taken during February.

On 23/2/13, Miss L called back to complain that a payment was debited on 18/2/13 and this has now taken her overdrawn and led to unauthorised bank charges of £5 per day. The agent was apologetic but unable to explain why the payment date wasn't changed. The customer asked for her bank charges to be refunded so the agent asked the customer to send in a copy of her bank statement along with a covering letter to ABC Bank's complaints department (address given). The agent promised to make relevant file notes in the meantime, but Miss L was told that no refund could be made until this was received.

Miss L called back on 1/3/13 and spoke to another agent with "another complaint" as a further payment had been taken from her account. She stated "every time this happens I am incurring charges on my account...it's becoming a joke." The agent agreed to escalate and promised that the matter would be resolved that day and a colleague would call her back.

On 2/3/13, the customer called again as no contact had been made by the bank. The agent couldn't trace any of the customer's previous calls, even though the customer recited the dates and times (post QA did subsequently trace these calls). The customer asked to speak to the agent's manager, but this was not granted because "she won't be able to tell you any more than I have". The agent mentioned that the person dealing with the complaint was in a meeting and she would get her to call her back later that day.

A letter upholding the complaint was sent on 4/3/13 confirming £486.74 had been collected in error and had been refunded along with £25 "compensation" as "you had to call back a number of times and this was not dealt with in the way that it should have been".

Symptoms

- Overdrawn account
- Bank charge of £5 per day
- Further payment taken from account
- The customer's complaint

Root cause identification

The customer requested to change direct debit four days before payment was due for collection. The agent did not realise or understand that a payment due in four days could not be stopped because it is already in BACS.

Preventative actions

The agent should have told the customer it was too late to stop the payment from being taken. The customer should have been directed to her bank to stop the payment.

What is root cause analysis?

'Near miss' complaints root cause analysis

Firms should be open to investigating issues which could result in customer detriment and complaints, but did not on this occasion. 'Near miss' complaints root cause analysis focuses on events that do not necessarily result in financial loss or a complaint, but had the potential to do so; only a fortunate break in the chain of events prevented financial loss. 'Near miss' complaints root cause analysis is good practice and can benefit your business because it is a proactive tool that does not wait for complaints to happen.

Ask of your firm: what other sources of information could be used to predict where our issues are? Is a past business review currently taking place? Does your risk and compliance department have reports of industry wide failings which could point to weaknesses closer to home? Other sources of information that enable near miss root cause analysis include feedback from advice quality checking, solicited or unsolicited customer feedback and customer "gripes" which may not make it into the complaints process.


Firms' customer service and front line staff are excellent sources of knowledge about where the cracks in a firm's process are. Gathering this information effectively is a challenge faced by all firms across all industries, but using similar collection methods as undertaken in normal root cause analysis is possible. Where this information could prevent customer detriment in the future, it is the duty of the firm to find a solution that facilitates effective internal communication and tackles the problem.

Why should firms undertake complaints root cause analysis?

Complaints root cause analysis is not a choice: it is a regulatory requirement. However, effective complaints root cause analysis has great potential benefits. It reduces regulatory and operational risk, increases customer loyalty and, therefore, customer advocacy and retention. This has clear commercial benefits as well as mitigating the risk of regulatory scrutiny turning to enforcement.

It is always difficult for firms to invest now for later lower complaints figures. The benefits for firms are in some cases immediate, but in most cases they are medium and long term:

- Identification of process failure and inefficiency
- More customer focused product development
- Clearer, compliant literature
- Reduced operational losses
- Effective allocation of resource
- Effective management oversight
- Formalised action tracking and escalation
- Helps with regulatory 'show me'
- Identifies the 'next big thing'



“ what other
sources of
information
could be used
to predict our
issues? ”

Who benefits and how?

The primary beneficiary of complaints root cause analysis is a firm's existing customer base which may be affected. The secondary beneficiary is the future customer who will not experience a problem with the financial product or service they receive from your firm. However, your staff and firm performance will also benefit from effective root cause analysis on complaints.

Customer perspective



If a customer is making a complaint, especially one which is upheld, something has gone wrong. If the cause was more than a 'one off' there is a problem which may affect another current customer or cause a future customer to complain. By making changes as a result of complaints root cause analysis your firm will reduce or eliminate the reasons that cause customer complaints - detriment, dissatisfaction and frustration - in the first instance. This is an obvious and immediate benefit to the customer.

In the medium term, your firm can build on this benefit to customers, creating confidence and trust. But in order to gain this trust, you must show customers that their feedback is important and that changes have happened as a result of their communication with the firm. In the longer term, if this positive feedback is a reflection of reality, customers will understand that your firm ethos is one of a continuous customer centric change and improvement.

As we have mentioned, firms need not only benefit customers who have complained. Your firm can show its customer centric ethos by investigating cases of non-complainant customers who may be at risk.

Employee perspective



Firms advertise many messages about their commitment to customers and the regulator provides clear messaging that customers must come first. Consumer groups will loudly broadcast where there is a disparity between what firms promise and what they deliver. Customers too – through social media – have a stage on which to broadcast their views of dissatisfaction publicly.

In the midst of this are the staff at your firm. Changes made as a result of complaints root cause analysis evidence to staff that senior management are ‘walking the talk’ as well as delivering the right ‘tone at the top’. This creates confidence and satisfaction in staff that the role they play in the complaints journey will deliver positive change for customers. This is when the culture of a firm, led by senior management, can come to life in action.

Such clarity of message – doing what you say you will – will improve staff confidence when speaking to customers because staff members know that the customer’s opinion is valuable and will be acted upon.

Commercial perspective



In the task of complaints root cause analysis commercial, shareholder and customer interests align. It is not in firms’ commercial interest to fail to mitigate complaints risk. There is not merely a preventative benefit in risk mitigation. The conclusions, improvements and changes which come as a consequence of complaints root cause analysis can be a tool for competitive advantage and marketability.

In making complaints root cause analysis central to the firm’s communication with customers, over time customer focused products, services, processes and policies will be embedded in firms as a result of using the information the customer base provides.

The most obvious benefit to firms is the future cost saving associated with lower complaints, redress and regulatory enforcement. This is not only beneficial to your customers and staff, it fulfils your duty to your shareholders.

Retail conduct risk is a real risk for firms’ commercial viability and reputation. In performing effective complaints root cause analysis, firms will be in a much better position to demonstrate to the new and more intrusive regulator that the firm is treating customers fairly and putting customers at the centre of the firm’s business model.

Evidence will be key in proving your firm’s commitment to customers with the regulator: a functioning and effective complaints root cause analysis system will provide all the evidence the regulator requires in your compliance with the regulator’s dispute resolution rules.

Regulatory expectations

Financial Conduct Authority's objectives

One of the ways the Financial Conduct Authority (FCA) will measure its own effectiveness and success will be through its customer focused objectives and, in particular, how the industry deals with complaints. This is likely to be a challenge, given the findings of our 2012 survey of approved persons: 66% industry stakeholders did not expect the FCA to be more successful than the FSA in preventing mis-selling and, thus, complaints. Regulatory success is hard to judge, but the FSA is continuing its journey to develop a set of desired outcomes that it can measure its performance against.

In the Journey to the FCA, published in October 2012, the FSA notes the following aim:

Consumers get financial services and products that meet their needs from firms they trust.

This is broken down into four key performance indicators (KPIs):

- Building trust and value
- Improving customer experience
- Suitability and fairness of products and services
- Effective remedy handling

If the FCA is measuring itself by these standards, firms can be sure to be measured in line with them too. Thus, where evidence is king in the new world, having an effective complaints root cause analysis model will go a long way to provide the evidence the FCA, and therefore your firm, requires.

Taking the last KPI in isolation – effective remedy handling – it is clear that effective complaints root cause analysis will be instrumental in delivering improved complaint handling. The desired objective of this KPI is to ensure customer detriment is kept within a firm's risk tolerance and that consumers receive appropriate redress; both of these can and will be monitored through complaints root cause analysis at firms.

The FCA has eight key success measures in its first three years. The three key measures of success below provide a very clear message about the regulator's expectations of itself and, therefore, firms:

- Successful earlier intervention to the benefit of consumers
- Dealing quickly and efficiently with crystallised risks
- Putting consumers at the heart of everything

If your firm delivers complaints root cause analysis effectively it is likely to meet regulatory expectations, mirror key regulatory success measures, deliver desired outcomes and help the regulator to meet its objectives for consumers.

Supervisor expectations

All regulated firms will have contact with the regulatory authority in the coming years. This is most likely to take place in the context of the FCA's Frame Systematic Framework (FSF). It is designed to assess a firm's conduct risk including how effectively it handles complaints and the resulting issues.

Whether this regulatory contact comes through a supervisory visit, a supervisory review, thematic work or more general supervisory activity, evidence and understanding of your complaints are vital. This evidences your firm's commitment to the fair treatment of customers with active governance, culture and controls.

What evidence will supervisors look for when reviewing complaints root cause analysis process and outputs?

- Early warning indicators in place
- FSA and FOS guidance implemented
- Complaint trends tracked with robust management information with trend analysis carried out and well documented
- FOS referrals monitored and overturns tracked as an indicator of potential problems in complaint handling
- Root cause analysis of complaints to identify instances of misleading literature and potentially unfair contract terms are passed to the relevant departments and acted upon
- Treating customers fairly outcomes considered in the complaints root cause analysis process
- Trend analysis in line with established post-sales service measures. These include timeliness in processing claims, complaints or switches and transfers. Focus remains on customer interests and expectations being met

- Action plans are monitored regularly and reported to senior management
- Management information tracking progress and effectiveness of complaint root cause analysis action plans, i.e. how many action plans are started, in progress and rejected. To what extent does each achieve the desired improvement?
- Clarity of senior management accountability, responsibility and involvement
- Accountability at board level or an executive committee to track the firm's attitude to risk in line with firm strategic objectives

If it's not effective it's not root cause analysis

Whilst 98% survey respondents agree they undertake complaints root cause analysis, there remains a question about how effective this root cause analysis is. If your complaints root cause analysis is ineffective, it is a double cost on your firm: 1) allowing complaints to continue because root causes are not removed, and 2) diverting resource and senior management time to a complaints root cause analysis system which does not work.

In order to test the effectiveness of your root cause analysis the questions on the opposite page are a fundamental starting point.

It is in combining the right people, seniority and skill sets with good processes that firms can begin to achieve the outcomes they seek. This is when complaints root cause analysis becomes effective. If it is not effective, then the firm is missing out on an opportunity to mitigate risk as well as taking on a cost: a double burden.

In our experience, firms that do not test the capability and effectiveness of their complaints root cause analysis rely on assumptions that all is well with their processes. Assuming your firm's complaints root cause analysis capability is effective when, in reality, it is not means your firm is blind to increased costs, regulatory non-compliance and is potentially not preventing customer detriment.

People

Do you ensure your staff are involved and take ownership of improvement projects to ensure they have a vested interest in achieving outcomes?

Do you give adequate training to new staff, checking competency of existing staff?

Do you regularly review the accuracy and performance of your complaints root cause analysis staff?

Are decision makers senior enough? Could their decisions be overridden and by whom?

Is senior management bought into the process and the outcomes?

Is the senior manager responsible for complaints also responsible for root cause analysis?

Process

How easy is it for front line employees to communicate feedback to management decision makers?

Do you collect the right level of management information? Is this challenged and tested?

Do you act on unsolicited customer feedback and what do you do with it?

Do you collect broad feedback for a more representative picture of the customer perspective?

How do you identify key complaint themes?

Do you measure key complaint themes for both commercial and customer impact?

Do you prioritise what you are going to look at and what are the procedures for this prioritisation?

Do you consider customers who have not yet complained, i.e. not just the population of complainants but the population of potentially affected customers?

How does your front line operation and complaints root cause analysis team link together, how do they talk to each other?

Do you create complaints root cause analysis action plans and are they monitored regularly?

Do you report on 'open' complaints root cause analysis action plans?

Are management information reporting processes in place?

Do you have procedures and authorisation limits for complaints root cause analysis change decision making? Do you test this through your action plan reporting?

Outcomes

When was the last time you changed something due to complaints root cause analysis?

How do you test that complaints root cause analysis has delivered both commercial and customer benefits?

How do you communicate and celebrate your complaints root cause analysis successes with your customers, staff and shareholders?

Management information

All firms need data to evidence what is being done correctly, what could be done better and what is failing. Without meaningful management information firms will not have sight of what is happening, leaving effective complaints root cause analysis an impossible task.

Complaints root cause analysis management information should provide a snapshot of:

- Issues identified
- Activities undertaken
- Decisions made
- Updates on progress

Management information not only indicates how things are going, but why they are not going as well as planned, if that is the case. It facilitates:

- Decisions on resource, time and budget by acting as quantitative evidence
- Early identification of issues and provides information to take targeted corrective action
- A firm's ability to react and take advantage of new opportunities
- Strategic focus on the future and drive improvements
- Improved governance of the firm as a whole and will often help solve other problems

A robust governance and reporting structure underpins good quality complaints root cause analysis management information. This facilitates the visibility of management information ensuring the right information gets to the right people. Ask the following questions of your process:

How and when are report packs created?
Who should they be sent to?
What are the arrangements in place to discuss the findings of the report packs?
Is time for review built in?

The mechanism by which firms can maintain high quality of management information is by ensuring that senior management regularly challenges data. By asking fundamental questions, seeking and expecting improvements and eventually reaching a clearer picture of the activities and trends in firms, senior management play their role in an increasingly IT driven function.

Good quality management information in complaints root cause analysis will ensure that the results of the process are documented and:

- Inform the business where problems exist
- Help with planning and defining priorities
- Provide levels of customer detriment
- Help to underpin and demonstrate a positive, proactive culture exists
- Create high levels of visibility across the organisation

A software expert's view on management information

Complaints root cause analysis in 2013 relies on effective technology. IT systems enable your data in management information to be comprehensive, accurate, consistent and timely.

Effective management information in the context of complaints root cause analysis removes guesswork and introduces proactivity. It is about analysis and trends; comparing like with like and right with wrong.

Best practice management information:

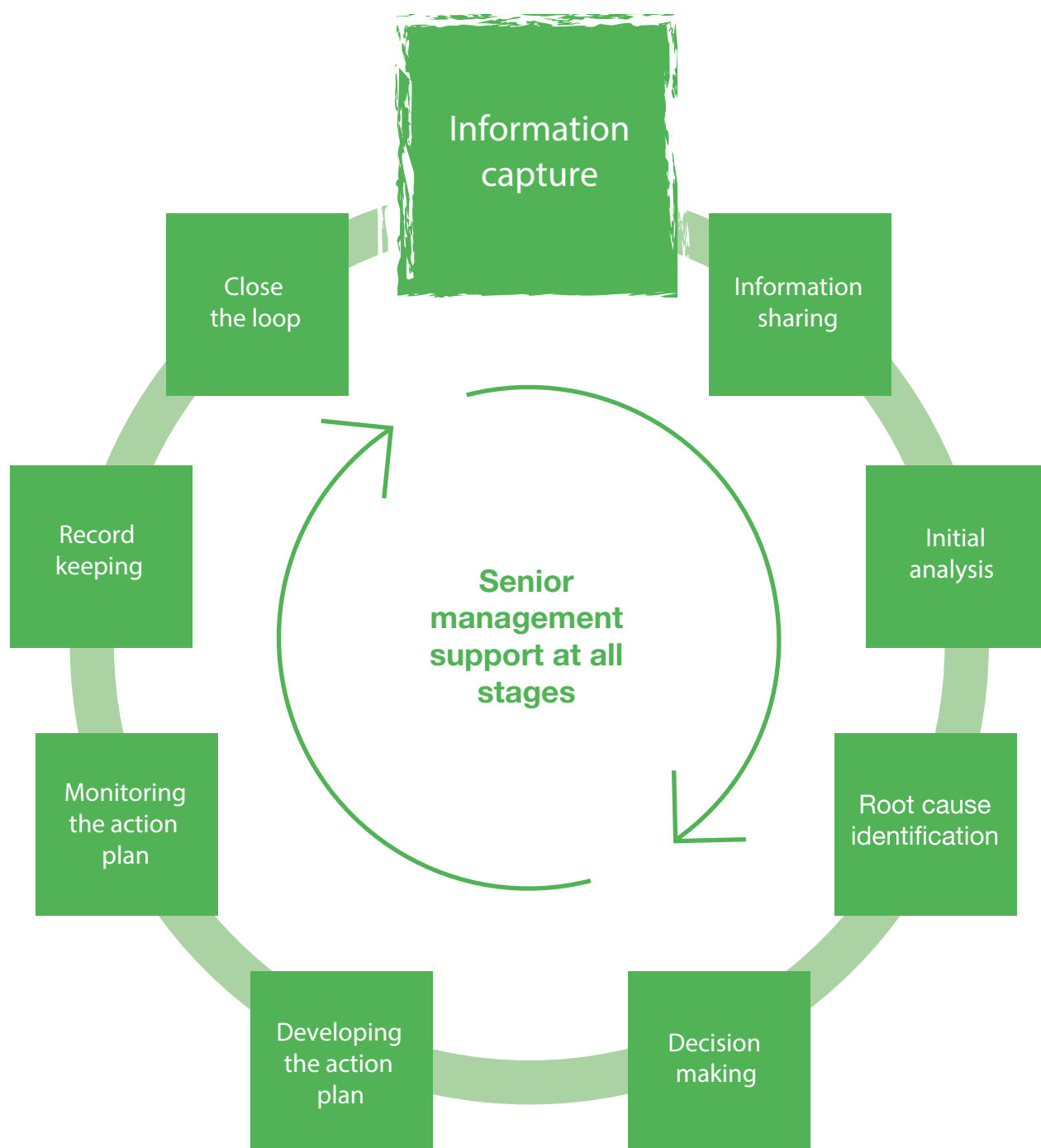
- Automated, visual and real time
- Reporting tool agnostic
- Highlights business and operational trends
- Compares seasonal, regional and individual trends
- Uses multiple data sources: sales, complaints, marketing and customer feedback
- Linked to individuals, specific teams and business units

The key to successful complaints root cause analysis is not solely the responsibility of the analyst; it starts at the point where feedback is captured within the organisation.

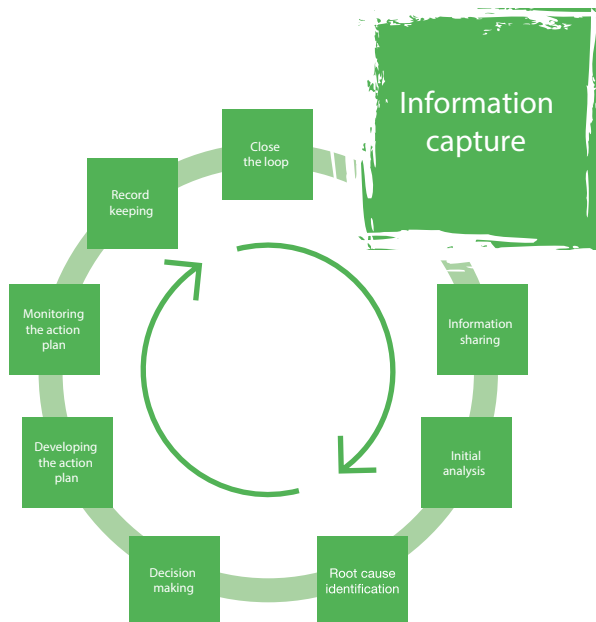
Supported by the right technology, firms can gain valuable insight to drive organisational improvements resulting in service improvements, customer loyalty and increased revenues.

Model for effective complaints root cause analysis

Firms of different size, scale and complexity have different systems for complaints. We provide this high level guide to good complaints root cause analysis for firms to interpret in the context of their own operations to challenge their processes and explore weaknesses.



Information capture



Appropriate complaint categorisations may be:

- Product type: e.g. current account, mortgage, savings, home insurance, investment
- Product: e.g. terms and conditions, product features, level of cover
- Policy: e.g. how the product was sold or the advice given
- Service: e.g. service received, claims handling

Depending on your firm's size, scale and complexity, training, IT systems and initial categorisation will be different. However, timely review of this system and testing of staff competency in this important skill require time and attention to make your complaints root cause analysis and data relevant to your firm.

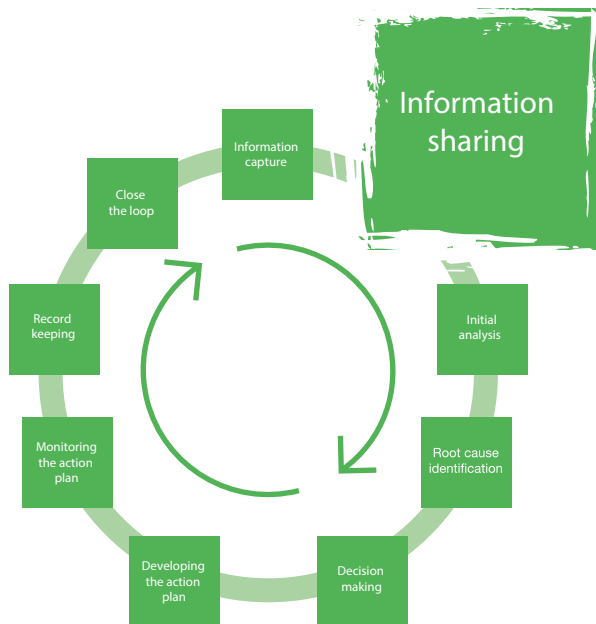
Falling at the first hurdle in complaints root cause analysis is all too simple. Being equally clear with staff at all points of customer contact – branch, phone, email, social media, letter – about how to log a complaint accurately will significantly increase the probability that resulting management information will be meaningful.

The key to success is to ensure that employees are specifically trained and refreshed in this vital skill of capturing information accurately. They are therefore able to understand the information that needs to be recorded and where it is going. By sharing the importance of this information, staff are better able to think in terms of effective complaints root cause analysis.

Support from IT systems will not only reduce staff administrative errors by having ready-made options for complaints to be categorised; firms can build IT systems which aid the staff member, asking them the right questions to produce the right answers.

Having too many or too few complaint categories can result in the wrong complaint type being selected for complaints root cause analysis.

Information sharing



‘receiving’ business entity or unit does not accept that it is the appropriate ‘owner’. Evidencing decisions made and changes in responsibility will enable good and effective internal communications within inevitably complex firm structures.

When it comes to justifying information capture internally with senior management or with the regulator, having ‘owners’ in place will aid the sharing of information, evidence the process to date and make subsequent dialogue less challenging.

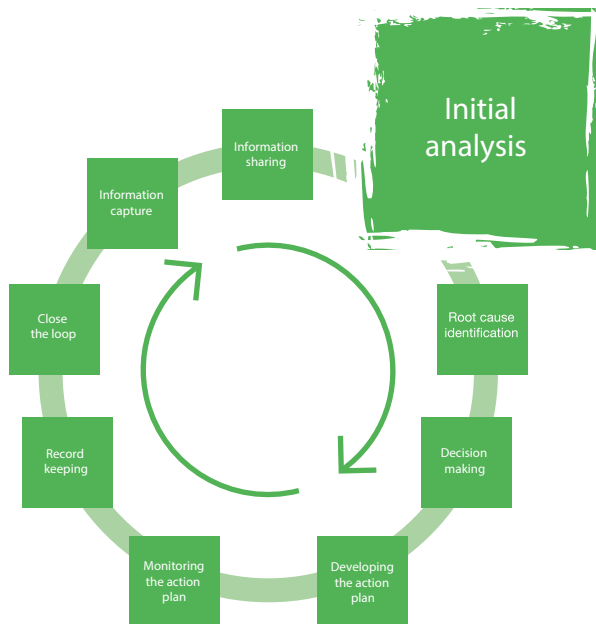
Firms often state that issues identified ‘belong’ to another part of the firm, in part due to complex structures within firms. In these instances it is common for no one to own the issue. Without ownership, however, nothing gets done.

For root cause analysis to be effective information should be officially handed to the appropriate ‘owner’ in the root cause analysis team. In practice, this will mean the issue needs to be transferred from one business entity or unit to another and accountability tracked appropriately.

Full details of the complaint and any reference numbers already allocated will be part of the handover so there is a clear history of decisions taken to date. Ensuring there is a system of reference numbers and then obtaining that number from the new ‘owner’ business area provides evidence that it has been logged on that area’s complaint root cause analysis register or tracker. Therefore, responsibility has been officially handed over, including responsibility for the action to be investigated.

There should be a documented process for hand-offs. These procedures need to include what happens if the

Initial analysis



The aim here is to achieve a high level view of what caused the complaint. A key requirement of effective complaints root cause analysis is that it identifies weaknesses in products, policies, process, procedures and service highlighted in customer complaints.

Firms should not investigate and perform complaints root cause analysis on all complaints simultaneously. Firms must prioritise complaints root cause analysis, focusing on high risk products, policies, process, procedures and service and where potential impact on consumers is high.

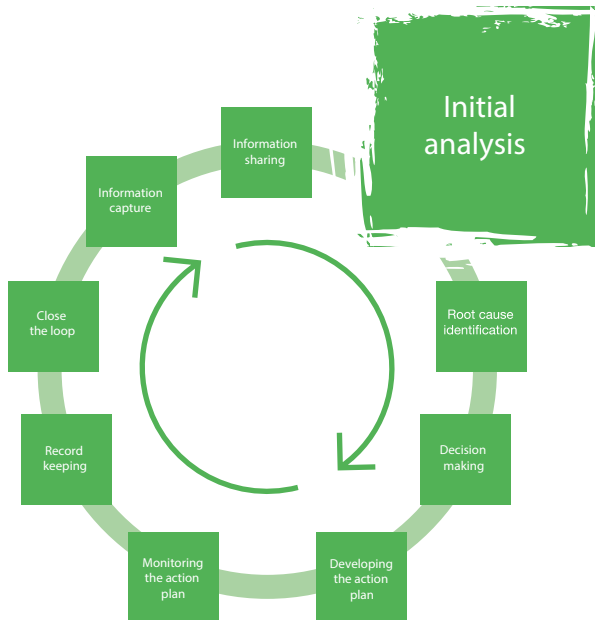
High complaint volumes are not the sole indicator of potential high impact issues; they always begin with a trickle of complaints e.g. payment protection insurance (PPI). When the first PPI complaints arrived, root cause analysis teams could have noted the type of complaint, root cause and potential impact. Questioning how many policies were sold, and therefore the customer population potentially at risk, should have raised alarm bells.

68% survey respondents believe that effective complaints root cause analysis could have identified issues with PPI in advance.

Analysis of complaint root cause analysis management information should consider various elements:

- Percentage of upheld and rejected complaint decisions: e.g. a high number of accepted decisions could be indicative of a design flaw in a sales process, whereas a high number of rejected complaints could indicate customers have not understood the terms and conditions
- Redress amounts: e.g. customers to whom significant c.£500+ for distress and inconvenience is paid could be those most impacted by the complaint. However, the inverse should also be considered because large numbers of customers receiving small distress and inconvenience payments for the same issue could indicate a flaw in service / product design
- FOS referrals: consider types of complaints that are being referred to the FOS. Whether the FOS upholds or rejects the referral is an indicator that this type of complaint is not being handled in the manner the customer expects
- FOS decisions: firms should consider FOS decisions and published ombudsman decisions in 2013
- Increased complaints trends month on month: this is an early warning system and could indicate the 'next big thing'
- Quality assurance activity is a rich source of information to inform prioritisation of future complaints root cause analysis
- The regulatory authority and the FOS publish qualitative guidance and speeches on their intentions based on thematic work and communications with firms to date. This is another source of information to inform root cause analysis

Initial analysis



Categorising the extent of the impact

The following issues should be deemed high impact:

- Any issues which have the potential to be a material breach of regulation
- Issues with the potential to affect a substantial segment of customers holding a product or receiving a service. The definition of substantial can be calculated only at a firm level
- Agree an appropriate redress figure per customer, above which your firm deems the issue to be high impact. For some firms £500 per person in redress may be high impact
- Those causes which are likely to attract adverse media coverage in the national press

Impact assessment

Once the root cause of the complaint type has been initially identified and categorised the next step is to assess the impact this cause is having on the firm as a whole. Consider:

- All customers affected
- Impact to each customer affected – not just financially
- Media coverage
- Impact on firm reputation
- Regulatory censure

Once this has been assessed each impact can be categorised. High, medium or low and red, amber and green are typically used.

It remains a theme throughout this model that the number of complaints alone should not be the driver of the impact assessment; instead, the main measure of the issue should be focused on the actual or potential impact on customers. For example, is the issue likely to cause significant worry, stress, concern and inconvenience, or result in a financial impact to a typical customer?

Where agreement can be achieved on what percentage of customers is affected, or what level of likely redress is high impact, boundaries can also be drawn for medium and low impact complaints. However, note that complaints with high risk of adverse press coverage may cause a small number of affected customers to remain a high impact cause to the business as a whole.

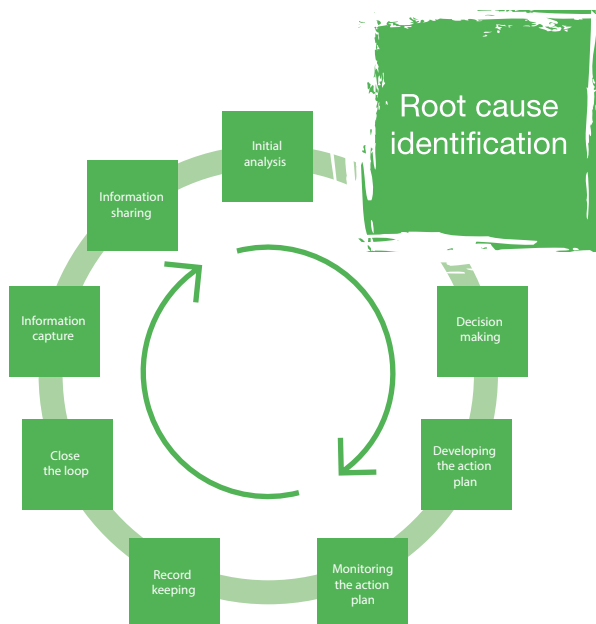
Agreement on these boundaries is vital. Timely review of these agreements will keep these rules fresh and relevant to your firm. They are alarm triggers. If complaints are high risk in any of these areas, your systems are providing a call to action.

The right place to hold information on the definition of high, medium and low impact on the firm is the complaint root cause analysis tracker or register.



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”

Root cause investigation



Having performed the initial analysis and impact assessment, the foundation for prioritisation has been laid. This high level prioritisation prior to the detailed root cause investigation is vital to ensure the firm's resources are reasonably distributed.

Agreement

Your team now knows which complaints may require action and, crucially, the impact that this complaint population could have on the firm's customers, reputation and commercial position. High impact complaints – made up of any of the above causes – are higher risk and therefore higher priority for investigation.

Agreement that investigation will go ahead on the high impact complaints groups must be reached by staff of an appropriate seniority. The required level of seniority will differ depending on firm size; it may range from one or two individuals to a wider committee.

Investigation

This is where the detailed root cause analysis begins in the process. Review a sample of the relevant complaints to establish the principal issue. This will typically involve a review of individual complaint letters, emails, telephone calls and any factual evidence. The underlying root cause for each complaint will be recorded on the associated complaints root cause analysis register or tracker.

The focus of the investigation is on the relevant product, procedure, sales process, sales policy or customer service to ascertain whether or where an intrinsic weakness exists. There are wide ranging reasons that complaints are lodged about one product. If there is a common thread, this must be found. However, it is possible that the causes are disparate, e.g. reasons for a complaint about incorrect interest paid on a savings account could be:

- Incorrect information given by staff member
- Wrong account opened by staff member (or customer if online)
- Account not opened correctly on system (for example monthly interest typed rather than annual)
- System error when interest was calculated
- Incorrect literature at point of sale
- Taxation forms logged so interest paid net when customer expected gross
- Customer misunderstanding

A statistically meaningful number of complaints must be investigated to be able to draw conclusions. This will depend on your firm's sales and complaints volumes.

Where a common theme is established and agreed, the root cause of this group of complaints is ascertained. Relevant agreement, parties and causes must be added to the complaints root cause analysis register to build up the complete picture of how this problem has been identified.

Recommendation

A recommendation should be made by the appropriate individuals or committee following the impact assessment. The recommendations should fall into the following categories:

No further action required

This could be recommended where:

- The firm is already aware of, and acting on, this issue
- An action plan in place is on track to deliver a solution to the issue
- The issue does not warrant remedial action
- Senior management accepts the identified risk in full

Further action required

This could be recommended where:

- It is a new issue with sufficient impact
- It is an existing issue where the impact and priority has increased
- No action plan is in place or has been finalised
- There is significant risk of financial loss or customer detriment
- The issue has previously been identified, however the action plan in place has not delivered the required outcome meaning a new amended plan is required
- The issue is known; however, the scale of that issue has now changed requiring a new, amended plan

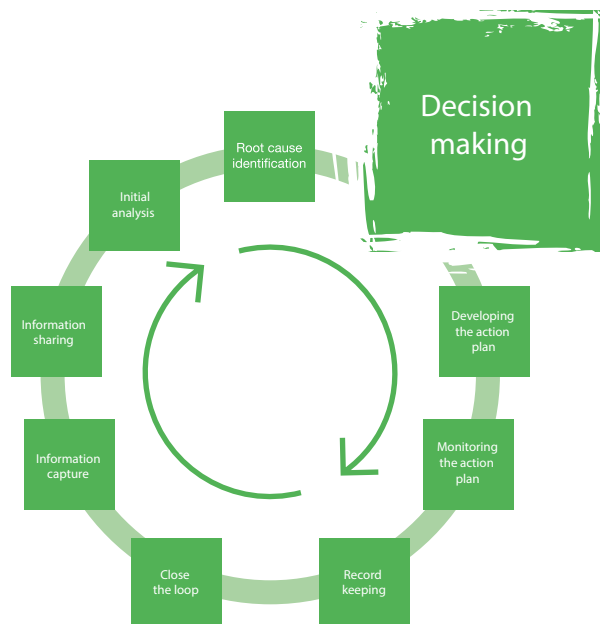
As well as updating the complaints root cause analysis register, the firm must understand the consequences of a committee recommending that further action is required. This means that resource, time and money must be allotted to this action, depending on the priority of the associated risk.

Warning: Moving from review into action.

Coordinated action is challenging to effect in large organisations due to the required levels of motivation, internal communication and other daily activities with which it may compete.

Senior managers and staff across different business units will require clarity on the journey of the complaints root cause analysis team to making this recommendation turn into action. It is only through strong internal communication, clarity of causes and outcomes that the effective work to date will result in the outcomes firms require from their root cause analysis of complaints. This may not run smoothly the first time, but requires continuous effort, monitoring and improvement.

Decision making



Following the recommendation of action, the authorised individuals must decide which actions should be taken as a result of the complaints root cause analysis. Other relevant information should be considered to make the right decision:

- The outcomes of previous investigations
- Previous successful action plans
- Previous unsuccessful action plans
- FOS guidance
- Regulatory guidance
- Levels of customer detriment and business impact

Once these are considered, make the following decisions:

Approve: further action required

Where the recommendation is to take further action, a senior committee, including representatives from the business unit and root cause analysis team, should review and consider the investigation results and recommendation. They will take into account all relevant factors before approving the next steps. At this stage it will be necessary to consider the impact and priority of

the issue in relation to other known recommendations and apportion appropriate budget, time and resource.

Approve: no further action required

Where the recommendation is to take no further action a senior committee, including representatives from the business unit and root cause analysis team, should review and consider the investigation results and recommendation, taking into account all relevant factors before approving the closure of the issue.

Reject

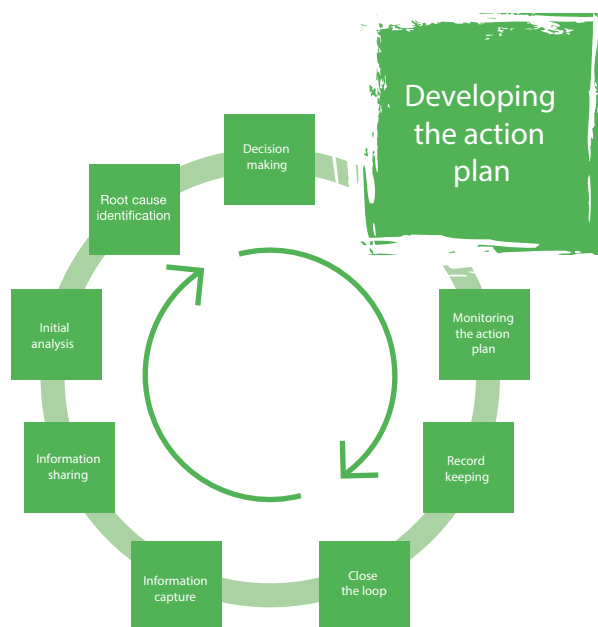
If the recommendation is rejected by the senior committee, the reasons for the rejection should be documented with a revised recommendation developed and submitted for approval.

If the business area does not agree with the action plan or issues highlighted then there must be a 'risk acceptance process'. Typically, this is owned by the risk function. Compliance and risk departments should be involved and liaise with the business areas to understand the issues and get the business owners to accept the risk and potential consequences of not carrying out appropriate root cause rectification.

Ultimately, where agreement cannot be reached, there should be a documented escalation process so that someone with the appropriate authority can make a final decision on how best to move the issue forward.

Once established, this information must be recorded on a complaints root cause analysis register or tracker. In all of these areas it is of the utmost importance that any discussions, decisions and justification are clearly documented and in a readily retrievable format.

Developing the action plan



- Benefits to both customer and the business. Commercial benefits are important to note; there should be no fear in highlighting these

Depending on the complexity of the actions, judgement should be exercised to decide if a separate project is required to monitor the action plan.

Owning the action plan

Typically it is expected that the complaints root cause analysis team or individual(s) own any action plan, but the business area would be responsible for progressing the individual actions. Apportioning accountability or “owning” the plan is vital to ensure momentum can take the plan and effectively translate this into action over time.

Where actions are required to address an issue, a formalised action plan should be developed in tandem by the business and root cause analysis representatives to document what actions are to be taken and to provide effective oversight. This must be documented on the complaints root cause analysis register or tracker. As best practice, the following information should be recorded:

- A summary of the recommended solution
- Detailed actions
- Action point owners
- Level of risk and impact
- Priority
- Governance arrangements e.g. senior committee meetings, operational updates, reporting requirements and process for risks and issue escalation
- How changes to product / process / procedure / marketing literature will be communicated
- Training requirements
- Timescales, including milestone dates, if appropriate
- What evidence is required to demonstrate the action plan is complete and has been successful

Monitoring the action plan



Monitoring the action plan is a critical phase and this should be a continuous process with oversight provided by the complaints root cause analysis team. Action plans should be updated and progress reported at least quarterly. Actual frequency of review and update will depend on the proposed governance.

Actions should be monitored and tracked against agreed milestones and outcomes measured to confirm the change delivers the expected outcome for customers. Where key milestones are missed, or are likely to be missed, the reasons and recovery plan must be escalated in accordance with the proposed governance.

Record keeping

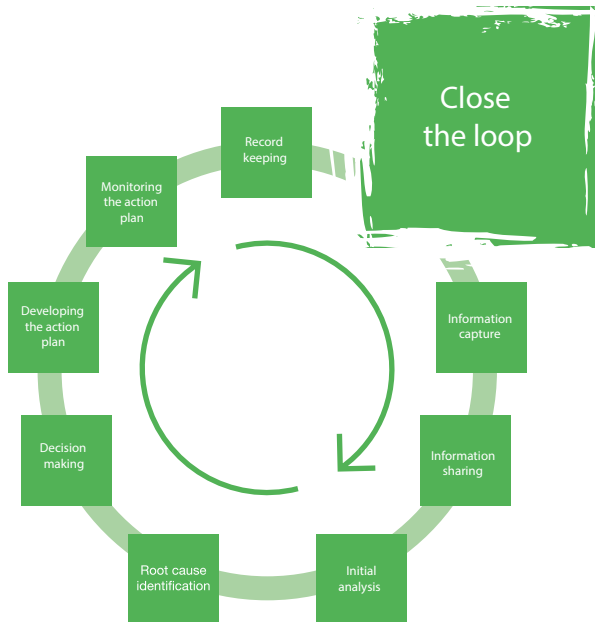


It is a deceptively simple, but critical, discipline of complaints root cause analysis. It ensures that accurate records are kept of management information, ownership, methodology, action plans, decisions made, governance within the complaints root cause analysis process and updates to the action plans. This is vital to maintaining effectiveness of complaints root cause analysis in this model. It allows the relevant information to be shared with all necessary parties: regulators, senior managers, decision makers and action plan owners.

Good record keeping is a regulatory requirement and will continue to be emphasised under the FCA's "show me" culture. When considering the standard of record keeping in relation to complaints root cause analysis firms must, of course, reference the FSA handbook, SYSC 9. This outlines the general rules in relation to record keeping. It states:

A firm must arrange for orderly records to be kept of its business and internal organisation, including all services and transactions undertaken by it. These must be sufficient to enable the FSA to monitor the firm's compliance with the requirements under the regulatory system, and in particular to ascertain that the firm has complied with all obligations with respect to clients.

Close the loop



communicated to business units or individuals is vital to make sure changes in product, process and people are not undermined.

Effective complaints root cause analysis delivers reinforces a positive culture. It also allows staff directly involved in complaint handling, complaints root cause analysis, and those further afield, to understand the importance of listening to customers and resolving issues.

Firms must remember that customers do not only have complaints to make and dissatisfaction to express. The feedback loop from the firm to customer is important; however, when your customers have good things to say about you, make sure the specific business units and staff hear about it too.

Action has not only taken place, it has been successful or uncovered new challenges previously not visible. An effective feedback loop is necessary in order to allow your firm, staff and customers to understand that something has changed and was successful or needs more work.

Close the loop with customers who have given you feedback by sharing positive action plan progress with them. By making your internal measures visible to customers, their perceptions of your firm can change for the good. Sharing your progress prevents customers from feeling that they are kept in the dark after communicating with your firm. However, only 10% respondents to our survey strongly agreed that they tell customers about improvements.

Close the loop with front-line staff and the business when there are improvements to products, policies, procedures and service as a result of complaints root cause analysis. These changes are being made for a reason; celebrate these changes as your firm's success stories. Feedback to business units is vital when the news is positive or negative. If there are poor behaviours, attitudes or conduct within certain departments, making sure this is

Contact

We will continue to support and innovate with firms in this area. We look forward to exploring ways in which complaints root cause analysis can be a source of pride, insight and differentiation in your firm in 2013 and beyond.



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Research methodology

Huntswood collected the data for this report from root cause analysis, complaints and customer services stakeholders within the retail financial services sector.

Fieldwork was conducted online between 1 December 2012 and 24 December 2012 using a research platform operated by Huntswood. In total, the survey comprised 31 questions and was designed by Huntswood in collaboration with YouGov.

Research was conducted amongst retail financial services stakeholders with the following frequency:

Sector	Frequency
Insurer	27%
Retail bank	28%
Private bank	4%
Building society	6%
Friendly society	4%
Retail intermediary	10%
Other	21%

150 relevant persons were asked to participate in this programme of research via an online survey. In total, 108 eligible respondents completed the survey. Over 60 firms, including the top four UK retail banks, took part.

The scale of firms' complaints operations ranges from those with under 100 complaints per quarter to over 100,000 a quarter. The teams handling root cause analysis range in size from one to over 50.

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Credits

Thanks to YouGov, Financial Ombudsman Service, Aptean and Herald Chase for their invaluable support in producing this report

About Huntswood

Huntswood is the retail conduct risk specialist and has provided professional services to clients since 1999. It has grown to be one of the UK's leading business process outsourcing organisations to the retail financial services industry.

We specialise in providing governance, risk management and compliance solutions. We are trusted advisers to tier one retail banks, insurers, building societies and retail intermediaries across the UK market.



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