

Forum Notes www.fsdc.eu

Complaints Handling Group - London

September 2019

Topics

- · PPI deadline
- · Complaint volumes
- FOS interaction
- · Vulnerable customers
- Measuring productivity
- · Complaint surveys
- · Digital landscape

PPI Deadline

- Firms had experienced very large volumes in the final days before the PPI deadline; a number of websites had crashed
- One firm had received a batch of 950 claims from a CMC on deadline day.
- Another had received PPI complaints from people that were not customers; some that were policy, not PPI, related; others that were PPP, not PPI related.
- One firm said that consumers were sending in claims, as they had nothing to lose.
- A large bank received the equivalent of five months' complaints in one day.
- Another firm had received a large batch of complaints, after the deadline.
- Firms were faced with consumers that called wanting 'something for nothing'.
- Insurers anticipated that 'renewal prices for old books' would be the next focus area for complaints leading to compensation.
- Some thought that solar panel financing compensation would also be an area for complaints.

Complaint Volumes

- One firm wondered whether the mentality of customers was changing; it seemed customers had realised that money could be made from small issues.
- Others agreed they had initially assumed that there had been a problem with their service offerings.
- However, some had only seen small increases in complaints.
- One firm felt that customers expected everything to happen very quickly, i.e. there was an 'instant' culture with a number of negative aspects.
- Another said that customers could be unreasonable, demanding that something should be delivered within two days, and if not, to be paid compensation.
- It was agreed that it would be expensive to implement new technology that would meet 'instant' expectations.
- One retail bank had seen a small increase in PSD2 complaints; others had seen increases in GDPR complaints.

FOS Interaction

- One firm had seen an increase in cases going to FOS; the ombudsman had implemented a new computer system, but felt that staff had not been trained.
- Some felt that Investigators had poor product knowledge.
- Others complained about haphazard responses from the FOS.

- One had sent cases in May and not heard anything, but then received a call about one it had sent two weeks previously.
- It was agreed that there was a lack of experienced individuals that could review cases.
- One firm had tried to build relationships with both adjudicators and investigators, but had found little interest.
- All agreed that the quality of output from the FOS was very poor, with many spelling mistakes and errors.
- One said that cases were often rushed through and decisions were sometimes wrong.
- Another gave an example of a vulnerable customer who was ill; had a disabled son, and whose husband had left her. FOS had said that the firm had not followed process (both had not signed a document). The firm had decided to argue the case.

Vulnerable Customers

- One firm had created a policy 18 months ago. It had introduced a training programme for staff, with e-learning modules, as well as face-to-face training.
- The firm had installed a new system, with flags covering various situations.
- However, it was unable to manage all of its data across its customer touchpoints.
- One firm wondered whether it would be better to forget its vulnerable customer policies and just significantly improve its customer service.
- It said that consistency was better than pockets of good practice.
- Another firm analysed calls and found some customers asking the same scripted question.
- Some firms had come across an algorithm that could predict vulnerability.
- One firm said that staff had to make a connection with what customers were saying.
- Another said it was difficult for the front line, as firms were asking them to make different decisions.
- Some felt that it was difficult to have hard-and-fast rules for when a call should be passed on to a specialist group.
- Staff could also be vulnerable and subject to verbal abuse and threats.
- Some could be affected for a long period.
- A number of firms had a zero-tolerance approach to verbal abuse and threats.
- Some had cancelling motor policies.
- Others would stop telephone contact and revert to email communications.
- One firm had had to call the Police.
- A number of firms had seen a rise in the number of violent or abusive cases in the last six months.



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Measuring Productivity

- · Firms discussed complaint completion targets.
- One firm did not set hard targets but aimed to close two complaints per day.
- It had set expectations and left individuals to explain if there were variances.
- Another had a triage system; it expected three simple complaints to be closed per day, but had different expectations if complaints were complex.
- Very complex complaints were escalated to its head office, which attempted to complete five a week.
- Most measured performance, but did not necessarily have targets.
- Firms discussed to what extent front-line staff remained involved in complaints.
- One completely centralised complaints handling, but felt that it had lost front-line accountability.
- It found that a 'load and go' attitude often developed among front-line staff.
- Another firm said that some issues were beyond what could be resolved by complaint handlers e.g. pricing issues.

Complaint Surveys

- A recent survey had highlighted a difference between firms' perceptions of complaints-handling performance and those of the general public.
- Unsurprisingly, customer satisfaction dropped off if resolution became an extended process.
- One insurance firm had trialled customer surveys but found that results were inconclusive, as customers confused claims with complaints.
- Another that had surveyed its customers found that if complaints were resolved, all customers were happy.

Digital Landscape

- One firm had seen an increase in comments across Twitter, where people were more open. However, most interactions were negative.
- Another said that social media was a problem, insofar as an individual making negative comments could be taken out of the group discussion, and complaints resolved, but often, the negative discussion would continue within the group.
- One firm had found that webchat was increasingly being used for communications; some complaints were received across this channel.
- Another said that it had 27 staff in its webchat team; each person dealt with four or five chats at a time.
- One had found a significant difference in responses, depending on the picture that was displayed.
- It was agreed that routing complaints, which originated in social media, to the correct department was crucial.
- Some felt that social media was a double-edged sword: it allowed customers to easily raise complaints, but also set very high resolution expectations.

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