

COMPLAINT MANAGEMENT STANDARD OPERATING GUIDELINES



Complaint Management Standard Operating Guidelines

| Author | Reviewer | Approver |
|---|--|------------------------|
| Retail Banking Division- Service Quality Unit | SGM- Retail Banking Division- Audrey Tugwell Henry | NCB Board of Directors |

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TABLE OF CONTENTS

| | |
|--|----|
| 1.0 INTRODUCTION..... | 3 |
| 2.0 OBJECTIVES | 3 |
| 3.0 ROLES AND RESPONSIBILITIES | 4 |
| 3.1 Service Quality Unit..... | 4 |
| 3.1.1 Complaint Management Team (L2) | 4 |
| 3.1.2 Credit Bureau Complaints | 4 |
| 3.2 Support Units (L3) | 5 |
| 3.3 Service Recovery Officers..... | 5 |
| 3.4 All Staff..... | 6 |
| 4.0 FRAMEWORK FOR COMPLAINT MANAGEMENT | 6 |
| 4.1 Point of Service Complaints | 6 |
| 4.2 Channels to Lodge Complaints..... | 7 |
| 4.3 Escalation Process..... | 7 |
| 4.4 Communicating with Regulatory/External Bodies..... | 8 |
| 4.4.1 Additional Requirements - Bank of Jamaica | 8 |
| 5.0 MAKING A COMPLAINT..... | 8 |
| 5.1 Receiving Complaints | 9 |
| 5.2 Registering and Acknowledging Complaints..... | 9 |
| 5.3 Investigating Complaints..... | 10 |

COMPLAINT MANAGEMENT STANDARD OPERATING GUIDELINES

| | |
|---|----|
| 5.4 Resolving Complaints | 10 |
| 5.5 Complaint Resolution - Final Response..... | 11 |
| 5.6 Service Recovery | 11 |
| 6.1 Service Level Agreements | 12 |
| 6.2 Complaints and Root Cause Analysis | 12 |
| 6.3 Poor Service Delivery by Staff Member | 12 |
| 7.0 POLICY REVIEW | 13 |
| 8. 0 DEFINITIONS..... | 14 |
| 9. 0 Supporting Policies..... | 16 |
| Appendix 1 | 17 |
| Appendix 2 | 18 |
| Steps in the Complaint Management Process..... | 19 |

1.0 INTRODUCTION

A complaint is an expression of protest, grievance, objection, discontent or dissatisfaction made by a complainant against a deposit taking institution or any agent thereof regarding a product or service of a deposit taking institution, or regarding the conduct of a deposit taking institution or agent thereof in contravention of the Code (BOJ Banking Services Act- Code of Conduct 2016) before, at the time of, or after the acquisition of the product or service by the complainant, and which complaint is made in accordance with the procedures for handling customer complaints that are established by the deposit taking institution ¹

In accordance with the Banking Services Act- Code of Conduct, 2016 and in compliance with generally acceptable complaint management standards, NCB has established a centralised complaints handling team and implemented an Enterprise Complaint Management System (CMS) and framework to facilitate the logging, tracking and management of all complaints received across the Group.

This policy document applies to all complaints received from customers irrespective of the channel used to register the complaint.

Compliance with this policy document is mandatory for all staff. Deviations from these guidelines shall result in disciplinary actions.²

2.0 OBJECTIVES

The Bank's Complaint Management Framework is intended to:

1. Provide a framework to guide employees in handling customer complaints
2. Ensure consistency within the NCB Group in handling and resolving complaints
3. Ensure that staff members are aware of their responsibilities and are empowered to manage complaints
4. Ensure adherence to regulatory requirements

¹ The Banking Services Act- Code of Conduct 2016

² NCB's Disciplinary Policy

3.0 ROLES AND RESPONSIBILITIES

Effective complaint management requires the active involvement of all staff with clear points of accountability for logging, tracking, monitoring and reporting:

3.1 Service Quality Unit

The Service Quality Unit, within the Retail Banking Division, provides oversight and guidance in relation to the effective management of complaints. Among its responsibilities are:

1. Participating in and managing the process of logging, tracking, investigating and resolving complaints
2. Ensuring that the Complaint Management Standard Operating Guidelines Framework is documented and receives Board approval
3. Reviewing the Complaint Management Standard Operating Guidelines Framework periodically to ensure effectiveness and continued relevance.
4. Managing the Enterprise Service Recovery Programme

3.1.1 Complaint Management Team (L2)

1. Owns the management of complaints from the initial report to resolution³
2. Ensures tracking, monitoring and reporting of complaints to internal groups and external bodies, such as regulatory entities.
3. Executes Post Resolution Contact Surveys after complaints have been resolved
4. Supports the periodic training of staff in Complaint Management and Service Recovery

3.1.2 Credit Bureau Complaints

These are complaints arising from customers' dissatisfaction with the completeness of information on a Credit Report issued by a Credit Bureau. In accordance with the Legislature, customers are required to report these complaints to the respective Credit Bureau. The Bureau shall then submit the complaint to National Commercial Bank for investigation.

³ Appendix 2 - Complaints managed and closed by L2 team

Complaints Management (L2) Team is the official NCBJ liaison between the Credit Bureaus and customers regarding the management of all complaints relating to 'accuracy of information on the Credit Report' and 'non receipt of consent'. The official communication channel with the bureaus is complaintmanagementgroup@jncb.com

Complaints shall be resolved within 3-10 business days to achieve the timelines outlined in the Credit Bureau Act.

3.2 Support Units (L3)

The responsibilities of the Support Units as they relate to complaint management include:

1. Retrieving and investigating complaints logged in the complaint management system
2. Ensuring that complaints are updated with appropriate narration before closure
3. Resolving complaints within Service Level Agreements
4. Closing complaints which have been actioned

Support Units shall identify and appoint dedicated resources to investigate and resolve complaints. A minimum of 1 FTE shall be assigned per Support Unit.

3.3 Service Recovery Officers

Service Recovery Officers ⁴ support the unit management in branch/unit/division/subsidiary in managing the process of re-engaging customers who have had a less than satisfactory service experience. Their role includes:

1. Proactively identifying and reporting service irritants to the Service Quality Unit
2. Ensuring proper escalation of complaints
3. Assessing complaints and making a determination regarding suitable restorative actions in keeping with guidelines
4. Track monetary value of recovery efforts and report information to the Service Quality Unit

⁴ Service Recovery Framework

3.4 All Staff

1. Staff members, in their interactions with customers, shall behave in a manner consistent with this policy document and the Bank's Customer Service Standards.⁵
2. Staff members shall log all complaints in the Complaint Management System, irrespective of customer touch point and including those that are resolved at first point of contact. Reference numbers shall be given to customers to facilitate follow-up, if necessary.
3. In executing their duties, staff shall "get it right the first time" thereby minimising the number of complaints received from customers.
4. All staff members shall be required to:
 - complete the mandatory bi-annual Complaint Management online course
 - participate in Complaint Management and soft skills training
 - read the Complaint Management Standard Operating Guidelines Document on an annual basis and confirm via signature that the details have been read and understood

4.0 FRAMEWORK FOR COMPLAINT MANAGEMENT

Complaints can be managed:

1. At point of service- First Contact Resolution (FCR)
2. Through the structured Complaint Management Process
3. Through escalation to the Service Quality Unit

4.1 Point of Service Complaints

Ideally, most complaints shall be dealt with directly and quickly at the point at which the problem arises. Escalation of complaints shall be avoided where staff members have clear authorisation to resolve complaints at first contact.

In cases where the customer does not feel comfortable making a complaint to front-line staff, the matter shall be referred to the Unit Manager/Service Quality Manager. If the

⁵ Customer Service Manual

customer does not wish to speak to the Unit Manager/Service Quality Manager, he/she shall be provided with the contact details for the complaint management group (complaintmanagementgroup@jncb.com.)

Once a complaint has been reported, the customer should receive a reference number. If one is not provided, the customer should ask for the reference number.

4.2 Channels to Lodge Complaints

All employees of the NCB Group shall ensure that complaints are appropriately logged using our Complaint Management System (CMS).

Complaints may be shared with the organization via the following channels:

1. The Customer Care Centre (1888-622-3477)
2. Calls to the NCB One Number (9294622)
3. Email to:
 - a. CEM@jncb.com
 - b. Complaintmanagementgroup@jncb.com
 - c. Ncbinfo@jncb.com
4. Visit to a branch
5. Customer Relationship Mail box via Internet Banking
6. Face to face/email (non-branch staff)

4.3 Escalation Process

Complaints shall be escalated to the Service Quality Unit if they:

1. remain unresolved and Service Level Agreements have been breached
2. disclose possible misconduct on the part of a staff member
3. require communication with or reporting to external entities including regulatory bodies such as Bank of Jamaica, Credit Bureau, Fair Trading Commission and Consumer Affairs Commission
4. are received by NCB Executives or Senior Managers

The general escalation process shall be as follows:

1. Supervisor/Manager

2. Business District Manager/Division Head
3. Manager - SQU

Where possible, complaints shall be dealt with by the unit involved. However, for issues with negative implications for the NCB brand, Service Quality Unit along with Group Marketing & Communications Unit shall be notified.

4.4 Communicating with Regulatory/External Bodies

Regulatory and external bodies to which customers register complaints shall be advised in writing of the final outcome of the complaints. These bodies include:

1. Bank of Jamaica
2. Credit Bureau
3. Fair Trading Commission
4. Consumer Affairs Commission

4.4.1 Additional Requirements - Bank of Jamaica

1. Where a complaint is upheld in whole or in part, the response to the Bank of Jamaica shall include a description of the action taken or to be taken to remedy the situation.
2. Where a complaint is rejected in whole or in part, a reason for the rejection of the complaint shall be provided to the Bank of Jamaica in writing.
3. The acknowledgement of the complaint must state an indicative period within which an initial response to the complainant on the progress of the investigation shall be provided

If a decision cannot be made within 45 days, the customer as well as the Bank of Jamaica shall be notified. The communication shall include:

1. nature of the complaint
2. reason for the delay
3. expected completion time

5.0 MAKING A COMPLAINT

Complaints can be made verbally or in writing and details entered in the CMS shall include the following information:

1. Customer's name
2. Telephone/email contact
3. Complaint date
4. Details of complaint
5. Date and/or time of complaint
6. Account number /Financial account number for credit cards (when applicable)
(format for writing credit card number shall conform to PCI guidelines)

5.1 Receiving Complaints

Complaints may be received in person, via the telephone, or in writing. Complaints may also arise through the social and print media. Any complaint shared via social or print media shall be referred to Group Marketing & Communications Unit for guidance.

Staff at all levels can accept complaints and shall ascertain what action they can take to resolve them or refer to the responsible unit or individual for assistance. Some complaints may be received by Sales Personnel/Relationship Officers while visiting customers. It is expected that they shall capture the relevant information about the complaint and log it in the complaint management system upon returning to office.

5.2 Registering and Acknowledging Complaints

As soon as a complaint is received staff members shall:

1. Calmly acknowledge the customer's concerns and provide an explanation of the possible contributing factors
2. Offer a sincere apology without speculating or attributing blame to the organisation/ other team members and/or units
3. Log the complaint in the Complaint Management System; provide the customer with the ticket number and the expected resolution time. Ensure that all correspondence associated with the complaint are attached to the case in the complaint management system, to include final decisions taken.
4. Advise the customer of the expected resolution time and that they shall be notified of the outcome of the complaint.

5.3 Investigating Complaints

In each case, the staff member investigating the complaint shall:

1. Consider if it is necessary to obtain specialist or expert advice e.g. from Group Legal & Compliance Division, Group Operations & Technology Division
2. Consider whether information is needed from an external vendor e.g. bill payment merchants
3. Determine the applicable standards/procedures/policies relating to the complaint

The investigation process shall include:

1. a review of the complaint details in CMS
2. using the relevant applications to resolve the complaint
3. moving the complaint to the “Resolve State” in CMS with appropriate notation of results of investigation
4. updating CMS with all interactions (conversations and written correspondence) with the customer during the process

5.4 Resolving Complaints

Once the complaint has been investigated and resolved, the staff to whom the complaint has been assigned shall update CMS with appropriate resolution comments.

Options for appropriate resolution shall include, but not limited to:

1. Correcting the cause of the complaint and advising the customer e.g. account linked, internet banking profile unlocked, bill payment updated at utility provider, account credited, address change completed
2. Despatching an Apology letter to the customer and copied to external body (where required)
3. Waiving/discounting fees and advising the customer (permission shall be granted by the responsible business unit, by someone at the appropriate level))
4. Delivering a recovery token to the customer

Support Units shall thereafter flag the complaint “resolved” in CMS with appropriate notation.

5.5 Complaint Resolution - Final Response

Final responses, where applicable, can be in the form of a letter signed by Supervisor/ Unit Manager, Manager within the Service Quality Unit or Division Head. The final response shall be factually correct and shall:

1. Include an apology
 - a. NB: This is not necessarily about accepting blame or fault, but shall sometimes be an acknowledgement of the customer's experience and their feelings.
2. Address each of the points the customer has raised with full explanation
3. Give relevant specific details about the investigation, i.e. what was discovered, etc.
4. Give details of action taken as a result of the complaint (if applicable)
5. Provide channels through which the customer may contact the Bank shall they have further queries/questions. (Customer may contact us at: Complaintmanagementgroup@jncb.com or via telephone at 929-4622)

5.6 Service Recovery

Service Recovery is the systematic approach to proactively solicit customer feedback while responding to complaints in a manner that creates loyalty.⁶ It also involves utilizing information to make procedural and process improvements in an effort to win back customer goodwill, once it has been lost due to a service failure.

Service Recovery is a four-stage process that:

1. Identifies failed service expectations
2. Resolves service problems
3. Identifies root-cause
4. Uses data for continuous improvement

⁶ Service Recovery Framework

6.1 Service Level Agreements

The Service Standards⁷ for responding to complaints are:

1. All complaints shall be acknowledged within twenty-four (24) hours either in writing or by calling the customer. (Customer shall be advised when to expect initial response)
2. Complaints shall be resolved within agreed Service Level Agreement
3. Where a complaint cannot be resolved within the communicated Service Level Agreement (SLA) timeframe, the customer shall be advised two (2) business days before breach of SLA, either in writing or by calling

6.2 Complaints and Root Cause Analysis

Some complaints shall be subject to Root Cause Analysis (RCA) based on high volumes, loss of revenue, depth of inconvenience to customers or if they indicate non-conformity to policies. The intent of the Root Cause Analysis is to find, correct or eliminate the cause and thereby prevent the problem from recurring. In such cases, the Service Quality Unit through the L2 Team shall execute analysis of complaints in collaboration with Support Units, with a view to identify the root cause.

6.3 Poor Service Delivery by Staff Member

The following procedure shall be adopted when a customer registers a complaint regarding poor service delivered by staff:

1. Complaint shall be logged in CMS and ticket number forwarded immediately to the Branch management (Manager and Service quality Manager/Supervisor) or Unit Manager to which the staff member is assigned.
2. Service Quality Unit shall be copied on all such emails via the CEM@jncb.com mailbox.

⁷ Customer Service Manual

3. The complaint shall be reviewed by the Unit/Branch Manager contact made with the customer. Care shall be taken to ensure adherence to the guidelines in the Complaint Management Standard Operating Guidelines.
4. The staff member involved shall be required to submit a report to the Unit/Branch Manager. The Unit/Branch Manager shall provide an update to the Service Quality Unit within 2 business days of receiving the complaint. The report shall include:
 - An overview of the findings
 - The staff's perspective
 - Actions taken to address the issue(s) raised
 - Disciplinary action taken (where necessary)
 - Recommendation(s) for service recovery , if applicable
 - Recommendation (s)/action(s) taken to bridge service gap

Importantly, where disciplinary action is required, unit managers shall act in accordance with the Bank's Disciplinary Policy.

7.0 POLICY REVIEW

Complaint Management Standard Operating Guidelines shall be reviewed once per year to assess effectiveness and continued relevance.

8.0 DEFINITIONS

Apology

An apology is an expression of sympathy or regret, or of a general sense of compassion, in connection with any matter whether or not the apology admits or implies an admission of fault in connection with the matter.

Customer

A customer is any person to whom a deposit taking institution or any agent thereof provides or offers to provide a product or service, and any person who requests such a product or service

Complaint

A complaint is an expression of protest, grievance, objection, discontent or dissatisfaction made by a complainant against a deposit taking institution or any agent thereof regarding a product or service of a deposit taking institution, or regarding the conduct of a deposit taking institution agent thereof in contravention of The banking Services Act- Code of Conduct 2016 before, at the time of, or after the acquisition of the product or service by the complainant, and which complaint is made in accordance with the procedures for handling customer complaints that are established by the deposit taking institution (*Adopted from the Banking Services Act- Code of Conduct 2016*)

Complainant

A complainant is a customer who is an individual or a person meeting the description of a 'small company' under the Companies Act who or which makes a complaint to a deposit taking institution or agent thereof.

Complaint Management

Complaint Management is the process by which organizations receive, handle, manage, respond to and report on customer complaints.

Logging

The process of entering information about a complaint in the Complaint Management System.

Service Recovery

Service Recovery is the systematic approach to proactively solicit customer feedback while responding to complaints in a manner that creates loyalty.

RCA (Root Cause Analysis)

A method used to investigate and analyse a complaint to identify the causes and factors that contributed to the complaint and to recommend actions to prevent a similar occurrence.

Level 3 (L3)

Support Units that are responsible for investigating and resolving complaints.

9.0 Supporting Policies

1. Customer Service Manual
2. Complaint Management Process Document
3. Service Recovery Framework
4. Bank's Disciplinary Policy
5. Code of Business Conduct

Appendix 1

Table 1: List of Responsible Units and related Complaints in Complaints Management System

| Complaints Queue | Responsible Unit (For discussion) |
|---|---|
| ABM-NCB only(Branch or Off Site) | Debit Reconciliation |
| ABM Other (Deposits, service issue) | Cash Operations |
| ABM Fraud | Fraud Prevention Unit |
| Accounts Administration | Direct Banking Unit |
| All Multi Link Queries | Debit Reconciliation |
| Branch Related Issues | Relevant Branch |
| Business Online | Customer Care Centre |
| Credit Card | Card Services DCU (Sub Units being; Channel Operations, Card Issuing) |
| Current Account Statement Issues | Centralized Operations – Document Processing Unit |
| Customer Care Centre/ eChannels (Internet, IVR,POS,ABM) | Customer Care Centre |
| Disputed Credit Card Transactions | Chargeback Unit |
| Loans and Credit Card Application Processing | Service Quality Unit |
| Merchant Services | Payment Services Unit |
| NCB Insurance | NCB Insurance Company |
| NCBIC Pensions | NCB Insurance Company |
| NCB Insurance (Fees, Rates, Service Delivery) | NCB Insurance Company |
| NCBIC Linking of Accounts | NCB Insurance Company |
| NCBIC Inaccurate reporting Group Product | NCB Insurance Company |
| NCBCM – NCB Capital Markets | NCB Capital Markets |
| Statement Related Issues (Current Account Related) | Centralized Operations- Document Processing Unit |
| Credit Bureau | Service Quality Unit (Complaints Management L2 Team) |

Appendix 2

Table 2: List of complaints that are managed and closed by L2 Team

| |
|--|
| Branch Payment not posted |
| Credit Card Application Status |
| Credit Bureau Disputes |
| Credit Report Issues |
| CRM Profile Not Updated |
| Cheque Book Request (Not Processed/not delivered) |
| Dispute Interest Charges- Loan |
| Failed Bill Payment (Via Internet Banking) |
| Failed Top-Up |
| Fees/Interest Rate on bank account |
| Interest Charges-Loan |
| Interest Not Credited to Customer's Account |
| Limit Increase not Processed (Credit Card) |
| Loan Application Status |
| Loan Payment Issues |
| Loan –Service experience |
| Loan –Turn Around Time |
| Missing Loan Document |
| Midas Card Not Added to Internet Banking Profile |
| Midas Plus Related Complaints |
| Negative Service Experience |
| Transfer of Limits Not Done-(Credit Card) |
| Transfer from one product to another |
| Standing Instructions (Duplication/Not paid/Decline Fees |
| Paid off Account Not Closed |
| |

Steps in the Complaint Management Process

