

COMPLAINTS MANAGEMENT STANDARD OPERATING GUIDELINES



Complaints Management Standard Operating Guidelines

Author	Reviewer	Approver
Service Quality Unit	Gabrielle Banbury-Kelly Senior AGM – Strategy & Transformation	NCB Board of Directors

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1.0 INTRODUCTION

This policy document is designed to ensure the effective and efficient handling of complaints by all staff within the NCB Financial Group Limited and its wholly owned subsidiaries, in Jamaica. The procedures outlined are based on guidelines provided by the regulatory bodies including the Bank of Jamaica (BOJ) and Financial Services Commission (FSC), as well as standards documented in the organisation's Customer Service Manual.

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

The Code of Conduct describes a complaint as 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 institution¹

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 resident in Jamaica. Deviations from these guidelines shall result in disciplinary actions.²

2.0 OBJECTIVES

The Bank's Complaints 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

¹ The Banking Services Act- Code of Conduct 2016

² NCB's Disciplinary Policy

4. Ensure adherence to regulatory requirements

3.0 ROLES AND RESPONSIBILITIES

Effective complaints 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 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 Complaints Management Standard Operating Guidelines Framework is documented and receives Board approval
3. Reviewing the Complaints 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 resolution
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 Complaints 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, using details provided by our organization. In accordance with the Legislation, 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.

Complaints Management (L2) Team is the official NCBFG 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 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 complaints management include:

1. Retrieving and investigating complaints logged in the complaints 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 processed

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 Officers³ 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. Tracking monetary value of recovery efforts and reporting information to the Service Quality Unit

³ 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. ⁴
2. Staff members shall log all complaints in the Complaints 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 Customer Service/Complaints Management online course
 - participate in complaints management and soft skills training offered via the Corporate Learning Campus or online
 - read the Complaints 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 COMPLAINTS MANAGEMENT

Complaints can be managed:

1. At point of service- First Contact Resolution (FCR)
2. Through the structured Complaints 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.

⁴ Customer Service Manual

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

4.2 Making a Complaint

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

- a) Customer's name
- b) Telephone/email contact
- c) Complaint date
- d) Details of complaint
- e) Date and/or time of complaint
- f) Account number /Financial account number for credit cards (when applicable)
(format for writing credit card number shall conform to PCI guidelines)

4.3 Channels to Lodge Complaints

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

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

1. The Customer Care Centre (888-622-3477)
2. The NCB One Number (876-9294622)
3. Email to:
 - a. CEM@jncb.com
 - b. Complaintmanagementgroup@jncb.com
 - c. Ncbinfo@jncb.com
 - d. ncbcmcomplaintsgroup@jncb.com
 - e. ncbic@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 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, Analytics & Digitization Division 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 complaints management system upon returning to office.

4.4 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

Additionally:

- a) All complaints will be acknowledged within twenty-four (24) hours either in writing or by calling the customer.
- b) All complaints received must be logged in the Complaints Management System (CMS) and the tracking number communicated to the customer. If one is not provided, the customer should ask to be provided with the reference number.
- c) All complaints will be resolved and responded to within the communicated Service Level Agreement (SLA) timeframe.
- d) Where a complaint cannot be resolved within the communicated Service Level Agreement (SLA) timeframe the customer should be advised two (2) business days before breach of SLA, either in writing or by calling.
- e) Ensure that all correspondence associated with the complaint are attached to the case in the complaints management system, to include final decisions taken.

In cases where the customer does not feel comfortable making a complaint to front-line staff, the matter shall be referred to the Supervisor/Service Quality Manager/Unit Manager. If the customer does not wish to speak to the Supervisor/ Service Quality Manager/Unit Manager, he/she shall be provided with the contact details for the complaints management group - complaintmanagementgroup@jncb.com.

4.4 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, Financial Services Commission, 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/Service Quality Manager/Unit 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, Analysis & Digitization Division shall be notified.

4.5 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

4.6 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.

4.7 Complaint Resolution - Final Response

Final responses, where applicable, can be in the form of a letter signed by Supervisor/ Service Quality Manager/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 876-9294622)

4.8 Service Recovery

Service Recovery is the systematic approach to proactively solicit customer feedback while responding to complaints in a manner that creates loyalty.⁵ 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

5.0 COMMUNICATING WITH REGULATORY/EXTERNAL BODIES

As required by Law, relevant reports will be sent to the regulatory bodies. The 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. Financial Services Commission

5.1 Additional Requirements - Bank of Jamaica

(The reporting of complaints to the Bank of Jamaica shall be as required by the Banking Services Act, Credit Reporting Act or regulations made under either legislation).

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.

⁵ Service Recovery Framework

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

5.2 Additional Requirements - Financial Services Commission (Insurer/Intermediary)

(Any disclosures to the Financial Services Commission shall be as required by Law).

1. The insurer/intermediary will provide the complainant with the name of one or more individuals appointed by the insurer/intermediary to be the complainant's point of contact in relation to the complaint until the complaint is resolved.
2. The insurer/intermediary will provide the complainant with regular written updates on the progress of the investigation of the complaint at intervals of not greater than twenty business days.
3. The insurer/intermediary will attempt to investigate and resolve a complaint within forty business days of having received the complaint. Where the forty business days have elapsed and the complaint is not resolved, the insurer/intermediary will inform the complainant of the anticipated timeframe within which the insurer/intermediary expects to resolve the complaint.
4. The insurer/intermediary will advise the complainant in writing of the outcome of the investigation, within five business days of the completion of the investigation of a complaint, and where applicable, explain the terms of any offer or settlement being made.
5. Insurers and intermediaries should log and keep a record of all complaints and the actions that were taken to resolve them. The log and record must be available for examination by the Commission, in accordance with regulations 142(3) (p) and (q), of the Insurance Regulations.

5.3 Additional Requirements – Financial Services Commission (Pensions Regulations)

1. The complaints resolution policy and procedures of a fund or scheme shall provide for dealing with complaints from:
 - a) sponsors
 - b) beneficiaries
 - c) participants
 - d) trustees
 - e) agents of person falling within any category specified in sub-paragraph (a) to (d)
 - f) any individual who falls within any category specified in the preceding sub-paragraphs at any time within the six months prior to the making of a complaint
2. Any person specified above may nominate a representative to make or continue the complaint on his behalf, and if the complainant is deceased, unable to act for himself or is a minor, then a family member or some other person suitable to represent the person may make or continue a complaint.
3. **Complaints Register** - Trustees, investment managers and administrators shall each keep a complaints register, which records the following:
 - a) the name of the fund or scheme concerned
 - b) the full name and address of each complainant
 - c) each complainant's relationship to the fund or scheme
 - d) the full name and address of any agent or representative acting on behalf of a complainant including his address for service of documents in connection with the complaint
 - e) a statement as to the nature of the complaint with sufficient details to show why the complainant is aggrieved
 - f) the date the complaint was filed
 - g) the date the decision was communicated to the complainant
4. Trustees, investment managers and administrators shall ensure that complaints registered are resolved as soon as may be reasonably practicable.
5. Trustees, administrators and investment managers shall, subject to point (4) above, within fourteen days after making a decision on a complaint, in writing, notify the complainant thereof and of:

- a) The reason for the decision
 - b) The provisions of the constitutive documents which have been relied upon
 - c) The complainant's right, where he/she is a member of the fund or scheme, of recourse to the Commission if he/she is of the opinion that his/her benefits are in jeopardy.
6. In any event, where three months have elapsed without a decision being made, the trustees, administrators and investment managers, as the case may require, shall immediately notify the complainant or his representative, if applicable, of the reasons for the delay, the efforts at resolution and an expected date for issuing the decision.

6.0 Service Level Agreements

The Service Standards⁶ 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 established Service Level Agreement (SLA)
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

6.1 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.

6.2 Poor Service Delivery by Staff Member

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

⁶ Customer Service Manual

COMPLAINTS MANAGEMENT STANDARD OPERATING GUIDELINES

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.
3. The complaint shall be reviewed by the Unit/Branch Manager and contact made with the customer. Care shall be taken to ensure adherence to the guidelines in the Complaints 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

Complaints Management Standard Operating Guidelines shall be reviewed annually 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.

Complaints Management

Complaints 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 Complaints 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. Complaints Management Process Document
3. Service Recovery Framework
4. Bank's Disciplinary Policy
5. Bank of Jamaica (BOJ) - Code of Business Conduct
6. Financial Services Commission (FSC) – Revised Guidelines on Market Conduct for Insurance Companies & Intermediaries
7. Pensions Regulations

Appendix 1

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

Complaint Type	Responsible Unit
eChannels (Internet, IVR, POS, ABM)	Customer Care Centre
ABM Other (Deposits, service issue)	Channel Operations
ABM-NCB only (Branch or Off Site)	Debit Reconciliation
Account Debited Funds Not Received (NCB/Other Bank ABM)	Service Quality Unit
Accounts Administration	Direct Banking Unit
All Multi Link Queries	Debit Reconciliation
Branch Related Issues	Relevant Branch
Business Online	Customer Care Centre
Credit Bureau	Service Quality Unit
Credit Card	Card Services DCU (Sub Units being; Channel Operations, Card Issuing)
Current Account Statement Issues	Centralized Operations
Disputed Credit Card Transactions	Channel Operations
Failed ABM Top-Up	Service Quality Unit
Failed Bill Payment	Service Quality Unit
Fraudulent ABM & POS Transactions	Fraud Prevention Unit

Appendix 1

Table 1 (cont'd): List of Responsible Units and related Complaints in Complaints Management System

Complaint Type	Responsible Unit
Fraudulent NCB Online Transactions	Fraud Prevention Unit
iABM Cheque/Cash Deposit Discrepancies	Centralized Operations
International Wire Transfer	Centralized Operations
Loan Related Complaints	Service Quality Unit
Loans and Credit Card Application Processing	Service Quality Unit
Merchant Services	Payment Services Unit
NCB Insurance	NCB Insurance Company
NCB Insurance (Fees, Rates, Service Delivery)	NCB Insurance Company
NCBCM – NCB Capital Markets	NCB Capital Markets
NCBIC Inaccurate reporting Group Product	NCB Insurance Company
NCBIC Linking of Accounts	NCB Insurance Company
NCBIC Pensions	NCB Insurance Company
Online Purchases - Disputed Transactions (Credit / Visa Debit)	Channel Operations

Appendix 1

Table 1 (cont'd): List of Responsible Units and related Complaints in Complaints Management System

Complaint Type	Responsible Unit
Pension Payment/Direct Deposit (Local)	Customer Care Centre
Pension Payment/Direct Deposit (Overseas)	Centralized Operations
POS Disputed Fees - Debit Card (NCB/Other Bank)	Channel Operations
POS Disputed Transactions (NCB/Other Bank)	Channel Operations
Reward Redemption Disputes	Channel Operations
Salary Deduction	Centralized Operations
Service Experience	Service Quality Unit
Standing Instructions	Service Quality Unit

Steps in the Complaints Management Process

