



## **Complaints Policy**

### **JNBUK017**

Version 2.5, January 2025

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# 1 PURPOSE

This policy outlines the approach to the management of any Complaint raised to JN Bank UK Ltd (“JNBUK” or “the Bank”), from initial contact with the complainant, through to investigation of the complaint and a final response to the customer. It includes:

- How complaints are identified and the definition of complaints;
- How we make adequate arrangements for the capture and processing of complaints in a compliant manner;
- The complaints handling process and who is responsible for managing complaints;
- An outline of the complainant’s rights in the event of them being dissatisfied with JNBUK’s response;
- Our approach to complaints referred to FOS;
- How the Board manages and retains oversight of complaints;
- The requirement for us to collate and submit half yearly reports to the FCA in respect of all reportable complaints; and,
- JNBUK’s commitment to the effective monitoring and analysis of complaints, both to identify actual and emerging risks and to identify opportunities to improve our service, based on lessons learned.

# 2 SCOPE

This policy applies to any JNBUK employee or any person working on JNBUK’s behalf in a customer-facing role, together with any person charged with the investigation, analysis or reporting of complaints or complaint-related data.

# 3 CONSUMER DUTY

In implementing this policy JN Bank UK will pay due regard to Consumer Duty, which includes:

- A new Consumer Principle that requires firms to act to deliver good outcomes for retail customers.
- Cross-cutting rules providing greater clarity on the expectations under the new Principle and helping JN Bank UK interpret the four outcomes (see below). The cross-cutting rules require us to: – act in good faith – avoid causing foreseeable harm – enable and support retail customers to pursue their financial objectives.

Rules relating to four outcomes we want to see under the Duty. These represent key elements of the firm-consumer relationship which are instrumental in helping to drive good outcomes for customers. These outcomes relate to:

- products and services
- price and value
- consumer understanding

- consumer support

These rules require the Bank to consider the needs, characteristics and objectives of our customers – including those with characteristics of vulnerability – and how they behave, at every stage of the customer journey. As well as acting to deliver good customer outcomes, JN Bank UK will need to understand and evidence whether those outcomes are being met.

## 4 REFERENCED DOCUMENTS

The following documents are referred to within this document:

- Compliance Manual; and
- Complaints Handling Procedures.

## 5 INTRODUCTION

JNBUK is committed to providing a fast, efficient and reliable service for our customers, while keeping errors and causes for dissatisfaction to a minimum. However, we recognise that reducing errors and dissatisfaction to zero is not possible in practice, and that complaints will occur. JNBUK recognises the distress and inconvenience such events can cause and has put this policy in place to set out the Bank's approach to dealing with customer dissatisfaction and how the Bank learns from these issues.

Our aim is to ensure that all complaints – whether or not justified – are treated fairly and sympathetically. This goes further than simply following the relevant regulations – it also means having a culture in place that takes customer feedback seriously and addresses the issues appropriately.

JNBUK will ensure that customers have access to information explaining the firm's procedures for complaint management. We will also make this information available at, or immediately after, the point of sale; as well as providing such information free of charge to eligible complainants on request and when acknowledging a complaint.

In line with our business model JNBUK aims to operate a simple and efficient complaint handling process to provide prompt responses and restore customer faith and trust in the Bank. This will include obtaining additional information as necessary, to allow us to investigate the complaint competently, diligently and impartially.

JNBUK acknowledges that failure to adhere to the expectations and requirements under this policy exposes us to reputational, financial and possibly regulatory risk. Given its importance, this policy and the associated Complaint Handling Procedures will be closely monitored by the business, with oversight from the Compliance function. Results will be presented at Executive and Board level.

## 6 REGULATORY BACKGROUND

The Financial Conduct Authority (FCA) has in place rules and principles that financial services firms are expected to interpret for their businesses and apply them appropriately. With respect to complaint management, these rules and principles are set out in the FCA's Dispute Resolution Sourcebook (DISP). There are also regulatory requirements setting out how firms should interact with the Financial Ombudsman Service (FOS), and how they ensure that their customers are fully aware of the service.

DISP provides high-level information on the management of complaints. This includes the fair treatment of customers, clear communication, the process steps and time limits. The rules and guidance are designed to ensure that complaints are handled fairly, effectively, promptly and free of charge, and resolved at the earliest possible opportunity – thus minimising the number of complaints referred to FOS.

## 7 DEFINITIONS

### 7.1 COMPLAINT

The Financial Conduct Authority (FCA) defines a complaint as: *“Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a financial service or a redress determination, which:*

- a. Alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience; and*
- b. Relates to an activity of that respondent, or of any other respondent with whom that respondent has some connection in marketing or providing financial services or products, which comes under the jurisdiction of the Financial Ombudsman Service.”*

It should be noted that the customer does not have to specifically use the word “complaint” in order for a complaint to be registered, at which point the complaints handling process should be implemented.

Customers may mention that they are dissatisfied with a product or service, in one of the following ways; these and similar examples are considered an Expression of Dissatisfaction:

- ‘I’m not happy’;
- ‘I’m very unhappy’;
- ‘I cannot accept this’;
- ‘I’m really angry/annoyed’;
- ‘I’m confused’;
- ‘I’m tired of..’;
- ‘I want to speak to a manager/supervisor/team leader’;
- ‘I want to talk to a real person’;
- ‘This is ridiculous’;
- ‘This is ludicrous’; or,
- ‘This is unbelievable’.

Furthermore, staff will be trained to distinguish a query from a complaint, to enable prompt and appropriate handling of issues.

**Non-regulatory complaints**, such as those that could be dealt with swiftly and by front line staff, could be treated alongside **regulated complaints** in which there is a claim that financial loss or material distress or material inconvenience has occurred.

## 7.2 ELIGIBLE COMPLAINANT

The FCA defines eligible complainants as per its Handbook, under heading DISP 2.7.3R. The full definition is as follows:

- (1) a consumer;*
- (2) a micro-enterprise;*
  - (a) in relation to a complaint relating wholly or partly to payment services, either at the time of the conclusion of the payment service contract or at the time the complainant refers the complaint to the respondent; or*
  - (b) otherwise, at the time the complainant refers the complaint to the firm;*
- (3) a charity which has an annual income of less than £1 million at the time the complainant refers the complaint to the firm; or*
- (4) a trustee of a trust which has a net asset value of less than £1 million at the time the complainant refers the complaint to the firm.*

This definition sets the parameters for whether a customer can refer a complaint to the FOS; whether their complaint is reportable; and whether the complaint handling rules under DISP apply.

For the purposes of JNBUK's business, most customers will be eligible complainants. For our remaining customers, other than for FCA reporting purposes we will deal with all complaints applying the same processes and seeking to achieve fair outcomes. Typically, those customers defined above will have higher information needs than other clients that fall outside of the definition above. Therefore, we may apply a differentiated approach to decision-making in respect of customers that we consider to be of higher acumen based on their knowledge and experience, however, as a general rule we seek to treat all of our customers fairly. If you are in doubt about the eligibility for the purposes of providing FOS rights, then please ensure you seek guidance from the Head of Compliance.

## 7.3 TIME BARRING

Time barring refers to a test applied to assess whether a customer complaint is required to be reviewed by a firm in line with DISP rules. These rules state that a complaint is not required to be considered if the customer raises a complaint:

- Six months from the business sending the consumer a final response (which has to mention the six-month time limit); and

- Six years from the event the consumer is complaining about (or – if later – three years from when the consumer knew, or could reasonably have known, they had cause to complain).

## 7.4 BUSINESS DAY

For the purposes of calculating time limits, JNBUK's business days are Monday–Friday, 09:00–17:00. Any complaint received outside these hours should be processed as though it had been received on the next business day, and any time limits will apply from that date.

# 8 GOVERNANCE

JNBUK has a robust governance framework in place to ensure that its business operates in line with regulatory requirements and business strategy, and that it takes a customer-centric approach. This framework consists of a 'Three Lines of Defence' model:

- The first line of defence is the business. As such, business management has immediate responsibility for owning feedback and complaints from customers. They will ensure that their respective areas undertake a regular sample check of complaint cases and include the results of this (using a Red/Amber/Green classification) within the monthly MI that is reported to the Risk Management and Conduct Committee.
- The Compliance and Risk functions sit within the second line of defence and provide oversight and support.
- Internal Audit constitutes the third line of defence.

Material issues will be discussed at the Executive Committee, with corrective action plans agreed and put in place to ensure timely resolution. In the case that material changes are recommended to this policy, this will be escalated to the Head of Compliance or Chief Risk Officer for approval.

Underpinning this policy, the business must have in place Complaints Handling Procedures, which describe each specific part of the Complaints Policy (e.g. dealing with complaints, reporting complaints, creating MI) and assign clear roles and responsibilities. Where possible, these processes are automated – for example, where a customer services officer logs a complaint, this will trigger automated case management, escalation and MI aligned to mandatory reporting requirements.

Where the investigation and resolution of a complaint identifies a process failure, amendments to the process will be made and testing undertaken.

# 9 ROLES AND RESPONSIBILITIES

Responsibility for ensuring that the business adheres to the relevant complaints handling rules is led top-down by senior management and will be embraced by staff at all levels and across all functional activity, including areas of outsourced operations.



## 9.1 BOARD

The Board is responsible for:

- Ensuring that a senior manager is appointed responsible for ensuring there is a policy in place and complaints are managed effectively.
- Reviewing and approving this Complaints Policy when material changes are made as a result of business or regulatory change.
- Ensuring that sufficiently robust management information (MI) is produced, with appropriate Key Performance Indicators (KPIs) agreed and included within the Board reporting pack.
- Receiving reports and minutes of the Risk Management and Conduct Committee with respect to complaint volumes, trends and key complaint categories together with corrective action plans where required.

The day-to-day responsibility for complaints handling will sit with the Operations function with oversight from the Head of Compliance. The Risk Management and Conduct Committee will also be responsible for handling escalations and exceptions to the policy, and it is their responsibility to enable robust process and procedures to be created that will effectively implement the policy.

## 9.2 EXECUTIVE MANAGEMENT

Executive Management is responsible for ensuring that:

- Appropriate training is given to all staff to develop sufficient knowledge and understanding of the Complaints Policy.
- Appropriate MI is collated and reported to the Risk Management and Conduct Committee.
- The Complaints Policy is clearly and simply communicated to customers.
- Appropriate responsibilities for complaint handling are included in all job descriptions.
- Prompt action is taken to remediate products and service issues that are identified through complaints.

Management will be engaged in overseeing and managing any risk related to complaint handling; setting a clear tone from the top; and taking a leading role in maintaining a customer-centric culture.

## 9.3 ALL EMPLOYEES

It is the responsibility of each and every member of staff to ensure that the service provided by JNBUK is of a standard that does not lead to complaints. All employees are expected to be familiar with this policy, however, so that they know what to do should a complaint be received. All employees need to know how to recognise a complaint and escalate it to the appropriate colleagues to ensure it is logged for processing.

Training will therefore be provided to all staff during induction and annually thereafter with complaint handling colleagues receiving additional training on the logging and handling of complaints.

It is each staff member's responsibility to ensure all requirements under this policy are adhered to, and to ensure that relevant training necessary for their role is completed as required.

If any member of staff considers there is a lack of clarity or believes that this policy could be improved, they are encouraged to contact the Head of Compliance.

## **9.4 COMPLIANCE FUNCTION**

The Compliance function is responsible for overseeing the implementation of this Complaints Policy in the business, and must report at least quarterly to the Executive Committee on:

- Organisation and Resources;
- Execution of the Policy;
- Risks, Trends, and Regulatory Developments;
- Results of periodic risk assessments; and
- Any material breaches of policy.

The Compliance function supports the business in ensuring that this policy meets not just the letter of the regulations, but also the spirit. It operates as part of the second line of defence, with responsibility for monitoring, reporting and providing responsible complaint-handling and regulatory advice. The Compliance function is also a source of support should the business require such in respect of achieving fair outcomes.

The Compliance function will review complaint handling as part of its risk-based Compliance Monitoring Programme, with the frequency of monitoring determined by the Compliance Manual.

## **9.5 RISK**

The Risk function provides input to the Complaints Policy as needed. Risk will also analyse and provide input to the learnings from complaints, through the monitoring of issues relating to affordability and operational risk matters.

## **9.6 INTERNAL AUDIT**

As the third line of defence, the Internal Audit Department is responsible for providing independent assurance of implementation of the policy, including the oversight of the appropriateness and effectiveness of system and controls.

Internal Audit reports will be submitted directly to the Board Audit Committee, to promote independence.

## 10 COMPLAINT HANDLING

### 10.1 CONSUMER DUTY

JNBUK is committed to providing products and services of the very highest standards. If customers feel that we, as a firm, have not lived up to their expectations, we would like to collect their feedback to improve the products and services that we offer.

In delivering a complaints management process that facilitates simple and quick complaint resolution, we aim to address issues for customers at the earliest opportunity. We will also use key Management Information (MI) to improve our listening and learning culture, by means of lessons learned being fed back into the processes and training to drive improvement.

Staff are expected to uphold professional and ethical standards when dealing with customer complaints, in line with the spirit of Consumer Duty. We also expect staff to ensure that they collect sufficient information to fully understand the issue.

To ensure that customers have complete transparency regarding the handling of their complaint, JNBUK will publish on its website an appropriate summary of its internal process for dealing with complaints promptly and fairly.

In arriving at a conclusion, we expect all staff to consider the customer's position and needs, to arrive at an outcome that is individual to the customer. Where there is any concern in reaching an appropriate outcome, staff should consult with the Head of Compliance for further guidance.

### 10.2 RECEIVING AND RECORDING COMPLAINTS

Customers are able to complain via the following routes:

- Via the Bank's website;
- In writing (email and postal);
- By telephone;
- By secure message through their JN Bank online portal; and
- By SMS message

All complaints must be recorded on the electronic Complaints Register held on Salesforce. All complaints are categorised by the nature of the complaint, which facilitates the production of MI. It is also important that accurate and timely updates are made to reflect the status of any given case.

### 10.3 TIMESCALES

JNBUK will endeavour to resolve all complaints at the earliest possible opportunity and keep the complainant well informed of progress to resolution.

Any complaint received after the end of the business day or on a non-business day will be treated as being received on the next business day for timescale purposes.

The FCA has set timescale standards for responding to complaints; these are shown in Appendix A.

- Complaints that are resolved within the first 3 business days of receipt are processed as described in section 10.4.2.
- Complaints that are *not* resolved within the first 3 business days of receipt are processed as described in section 10.4.3.

## 10.4 COMPLAINT RESOLUTION

A complaint will be deemed as resolved when either of the following applies:

- A complaint is received and resolved within 3 business days and the communication to confirm FOS rights has been sent.
- A final response letter has been sent to the customer providing them with FOS rights.

Where a customer is offered redress, JNBUK will provide written confirmation of the redress offer and request acceptance of the offer from the complainant.

### 10.4.1 INVESTIGATION OF COMPLAINT

JNBUK will investigate the complaint diligently, taking into account as much information as possible. The assessment will be fair, consistent and prompt. The investigation will look at the subject matter of the complaint; whether the complaint should be upheld; what remedial action or redress (or both) may be appropriate; and, where relevant, whether JNBUK has reasonable grounds to be satisfied that another firm may be solely or jointly responsible for the matter alleged in the complaint, taking into account all relevant factors.

Each complaint will be resolved in its own right; however, other factors that may be relevant in the assessment of the complaint include the following:

- Similarities with other complaints received by the respondent.
- Relevant guidance published by the FCA, other relevant regulators, the Financial Ombudsman Service or former schemes.
- Appropriate analysis of decisions by the Financial Ombudsman Service concerning similar complaints received by others regarding a similar issue.

### 10.4.2 COMPLAINTS RESOLVED BY THE CLOSE OF THE THIRD BUSINESS DAY

When a complaint is resolved by the close of the third business day after receipt, JNBUK will send the complainant a summary resolution communication at the earliest opportunity. This includes confirmation that JNBUK considers the complaint to be resolved, and that the customer is able to further escalate their complaint to the FOS if they remain dissatisfied.

### 10.4.3 COMPLAINTS NOT RESOLVED BY THE CLOSE OF THE THIRD BUSINESS DAY

If the complaint cannot be resolved within three working days, communication with the customer is maintained as follows:

#### *Acknowledgement of the Complaint:*

JNBUK will send the complainant a prompt written acknowledgement providing early reassurance that we have received the complaint and are dealing with it. This communication will be sent within 5 business days of receipt of the complaint and will include a copy of the complaint handling process, to ensure that the customer is aware of the next steps.

We will also ensure the complainant is kept informed thereafter of the progress of the measures being taken for the complaint's resolution.

#### *Interim Communication with the Customer:*

Whilst we hope that complaints will be resolved swiftly and effectively, we recognise that there may be times when we are unable to resolve complaints as quickly as we might like. In order to ensure that customers are kept updated, JNBUK will communicate with them at the 4-week stage to apologise for the delay and explain that a final letter will be sent in due course.

#### *Final Response to the Complainant:*

We will provide a final response to the customer setting out our decision in respect of their complaint. We will do this within 8 weeks of receipt of the complaint. In the same letter, we will inform eligible customers of their right to refer the complaint to the Financial Ombudsman Scheme (FOS) if they are unhappy with the final response. We will also inform the customer of the six-month deadline for contacting the FOS from the date of the final response.

Where a final response cannot be provided within 8 weeks of receipt of the complaint, we will write to the customer notifying them of the reasons, and if they wish to refer their complaint to FOS they now have the right to do so. We anticipate that it is unlikely that we will take more than 8 weeks to resolve complaints and expect staff to make every effort to work together to avoid such a situation arising.

#### **10.4.4 REFERRING COMPLAINTS TO OTHER FIRMS (COMPLAINT FORWARDING)**

The investigation may reveal that a complaint relates to a service that is not provided directly by JNBUK – for example, a complaint regarding a customer's creditworthiness score returned from a credit reference agency.

The regulator provides rules for such situations and, as such, JNBUK will normally only investigate complaints concerning the actions and services directly relating to its own business (including activities undertaken on JNBUK's behalf by outsourcing partners in our ordinary course of business, as they are directly operating on behalf of JNBUK).

Complaints concerning the actions or services of any other organisation will be forwarded promptly to that organisation, in writing, for attention. Additionally, JNBUK will notify the complainant, in writing, that their complaint has been forwarded. This notification will include:

- The name and contact details of the organisation to which the complaint was forwarded (and who will therefore be responsible for responding to them).
- The reason why the complaint has been forwarded.

- A reminder to the complainant that they may refer their complaint to the FOS if they remain dissatisfied with the response.

Copies of all correspondence relating to forwarded complaints will be retained for three years from the date the complaint was received for record keeping purposes.

These standards apply to all complaints relating to third parties.

#### **10.4.5 AWARENESS OF FOS RIGHTS**

JNBUK will ensure that eligible customers are aware of their rights to refer a complaint to FOS in certain circumstances:

- Information will be provided on the JNBUK website and in our complaint handling information to the effect that the FOS exists, together with an overview of when and under what circumstances a customer can refer their complaint.
- Upon resolution of a complaint, we will write to customers to confirm that they have the right to refer the matter to the FOS if still not satisfied.
- A copy of the FOS leaflet will be included with the final response letter.

#### **10.4.6 COMPLAINTS REFERRED TO FOS**

The Head of Operations must be notified immediately of any FOS referral and should be provided with any relevant information to allow the case to be considered.

If more than 3 complaints against JNBUK are referred to the FOS in any one year, a flat fee of [£650](#) (subject to change) is payable for each further case referred. This fee is in addition to the funding fees that JNBUK pays by virtue of its regulated status.

If a case does need to be investigated, it becomes a chargeable case, regardless of the outcome.

The fee is only payable once the complaint is resolved. The FOS's finance team will send JNBUK an invoice at the end of the month in which they close the case.

The Head of Operations will ensure that the following information is prepared for submission to the FOS in response to any referral to them so that they can fully consider JNBUK's position:

- A brief overview of the complaint.
- An outline of the principal reasons behind the decision made.
- A copy of the complaint file.
- Additional comments if required (including any challenge to FOS's ability to consider the matter on the grounds of customer eligibility, breach of time limits for referral, etc.).

This material will be submitted to the FOS as soon as possible, and any further enquiries from the FOS will be dealt with in a timely manner.

It is JNBUK's policy to fully support all FOS investigations, and to quickly implement any decisions and recommendations that are made.

## **11 RISK MANAGEMENT**

### **11.1 MONITORING AND CONTROL**

JNBUK will undertake effective monitoring and analysis of complaints. This is a key tool allowing us to identify, manage and mitigate emerging risks relating to conduct within our operations. This will help us to identify opportunities for improving customer outcomes, and to prevent recurrences of poor outcomes and errors.

The first line of defence will be primarily responsible for customer experience and complaints handling. Operations will be responsible for conducting root cause analysis, which will help JNBUK to:

- Identify any recurring or systemic issues in order to make improvements to services;
- Increase the Bank's understanding of what is important to the customers; and
- Address issues of concern to individual complainants.

This should include Senior Management oversight and challenge.

The Head of Compliance will report complaint volumes (together with their complaint category and SLA adherence) to the Risk Management and Conduct Committee monthly.

Within the second line, the Head of Compliance will include complaints management within its overall Compliance Monitoring Programme, with results of their review also being reported to the Risk Management and Conduct Committee on a monthly basis.

### **11.2 MANAGEMENT INFORMATION**

The Head of Compliance is responsible for producing regular reports, which may include, but are not limited to the following items:

- Volume of complaints received, indicating upward / downward trend on a periodical basis.
- Number of final responses made within the period, with a breakdown to show those made within:
  - close of third business day;
  - four weeks;
  - eight weeks; and
  - more than eight weeks.
- Number and percentage of complaints upheld.
- Type of redress offered.

- Number of breaches recorded.
- Number of referrals to FOS.
- 'Progress through the levels of the FOS process'.
- 'FOS uphold rates'.
- Compliance with Complaints Handling Procedures.
- Statistical analysis and follow-up of actions identified.
- Information demonstrating fair handling of complaints, ensuring that redress is applied consistently and fairly.

### 11.3 11.3 CUSTOMER OUTCOMES

A review will be done of complaints on a monthly basis to determine in addition to standard complaints requirements that good outcomes have been provided for customers and where required, appropriate remediation is done. This will form part of monitoring through quality assurance, quality control and MI produced on a monthly basis.

## 12 RECORD-KEEPING

All complaints records are to be electronically stored within the Complaints Register held on Salesforce, against the specific customer record. Any postal / written letters are to be scanned and stored electronically.

The FCA Handbook (DISP 1.9) sets out the complaints record rule, which states that each firm will keep a record of each complaint received and the measures taken for its resolution for three years for all complaints, from the date on which the complaint was received. However, in order that we fully appreciate a customer's situation, JNBUK intends to retain complaints records for 6 years.

## 13 COMMUNICATION / TRAINING

All employees will receive induction training on this policy and will be made aware of the internal complaints handling procedures where this is relevant to their role. The policy will be readily accessible at all times, via SkillCast.

Role-specific training will be provided as required. This shall be refreshed periodically and updated as necessary (including any changes made in response to the results recorded in the MI and the ongoing monitoring activity by the first, second and third lines of defence).

Training needs will vary by role but will ensure as a minimum that all staff are able to identify complaints; and are able to direct them to the appropriate colleagues for action. This will ensure that any person who receives or identifies a complaint can take proactive steps in progressing towards resolution at the earliest opportunity.



Further training and communication will take place in the event of a regulatory change, to ensure that staff remain up to date.

Where necessary, the Head of Compliance will provide additional guidance.

## **14 REPORTING**

### **14.1 REPORTING COMPLAINTS TO THE FCA**

JNBUK is required to submit two reports (CCR-Complaints/ Complaints Return (Disp 1 Ann 1R)) to the FCA on a six-monthly basis, in November and May.

Reports will be submitted to the FCA within 30 business days of the end of the relevant reporting periods. Submissions are made via the FCA Complaints Reporting System or the appropriate section of the FCA website, in the electronic format specified by the FCA.

The data in the report is numerical and is categorised according to the type of complaint and the time taken to resolve the matter.

The report will be collated by the Compliance function, using information contained in the Complaints Register.

If no complaints were received during the reporting period and there were no complaints outstanding from previous periods, a nil return must be submitted.

### **14.2 PUBLICATION OF COMPLAINTS DATA**

For organisations that receive in excess of 500 complaints per year there is also a requirement to publish complaints data twice a year. Most firms will make this available via their website.

### **14.3 INTERNAL REPORTING**

Internal reporting is as follows:

- Submission of standard monthly report to Risk Management and Conduct Committee;
- KPIs included in Board Management pack every month.

There will also be reporting of results of testing / monitoring by the second and third lines of defence relating to complaint management, which will be included in discussions with senior management and the Board to ensure the issues are fully understood and actions take place.

## **15 QUALITY ASSURANCE**

Quality assurance and first line monitoring arrangements will ensure that JNBUK staff are treating customers who fall into arrears fairly and in accordance with their individual circumstances. With a focus on customer outcomes and alignment to Consumer Duty, we will seek to identify any issues with JNBUK's awareness and customer treatment and address any non-compliance (e.g. by provision of training and remedial action).

Where Customer Support colleagues are concerned, the QA Officer, Customer Support Manager and/or Senior Customer Support Specialist will complete first line quality checks. In cases where they have spoken to or interacted with a customer, these checks will be completed by someone else from the referenced group

## **16 DEVIATION FROM THIS PROCEDURE**

Any deviation from this procedure shall be made only with the written agreement of the Head of Compliance.

## **17 FURTHER ADVICE**

Further advice on all matters relating to complaints and complaint management is available from the Head of Compliance.

## 18 APPENDIX A

### 18.1 FCA COMPLAINTS-HANDLING TIMETABLE

The FCA has set standards for responding to complaints. Where exact timescales are not specified, JNBUK has agreed internally our expectation for these timescales. This information is shown in below.

*Table 1: FCA complaints-handling timetable*

FCA Time Limit	JNBUK Procedure Action
Within 3 Business Days	<p>After 3 business days, we will send a written communication ('summary resolution communication'). This must, amongst other things:</p> <ul style="list-style-type: none"> <li>• refer to the complaint and inform the complainant that the Bank considers the complaint to be resolved;</li> <li>• make the complainant aware that, if they are dissatisfied with the resolution of the complaint, they may be able to refer it to the Financial Ombudsman Service; and</li> <li>• refer to further information on the ombudsman service's website.</li> </ul> <p>It is at the Bank's discretion as to the means of communicating the resolution of a complaint to the customer (e.g. by email, text or letter). The FCA, however, believes it important that the communication be in writing, particularly given that it is easy for oral communications to be circumvented or inadequately provided.</p>
Within 5 Business Days	When a complaint is received but not resolved within 3 days, the firm must send the complainant a prompt written acknowledgement providing early reassurance that it has received the complaint and is dealing with it.
Minimum of 4 weeks	<p>Contact with the Customer: FCA DISP rules require the firm to keep the complainant informed of progress of the measures being taken to resolve the complaint. It does not specify the method of contacting the customer, or how often it should be done. Many complaints procedures still include the requirement to send the customer a holding letter after 4 weeks, which relates to a previous version of DISP. Whereas this might suit some firms, it may not help build and maintain a good relationship with the customer. The Bank's internal procedures should state how JNBUK will contact the customer about progress at the 4-week point.</p>
8 Weeks (40 Business Days)	<p><b>EITHER</b></p> <p>A final written response which:</p>

	<ul style="list-style-type: none"> <li>• Accepts the complaint and, where appropriate, offers redress or remedial action; or</li> <li>• Offers redress or remedial action without accepting the complaint; or</li> <li>• Rejects the complaint and gives reasons for doing so.</li> </ul> <p>The final response must also include a copy of the Financial Ombudsman Service's standard explanatory leaflet; provide the FOS website address; inform the complainant that if they remain dissatisfied with our response, they may now refer the complaint to the FOS; and indicate whether or not we consent to waive the relevant time limits if the complaint was not received in the timeframe outlined in DISP 2.8.2 R or DISP 2.8.7 R, by including the appropriate wording set out in DISP 1 Annex 3R.</p>
	<p><b>OR</b></p> <p>A written response which explains why JNBUK is not in a position to make a final response and indicates when we expect to be able to provide one. We are also expected to inform the complainant that they may now refer the complaint to the FOS. JNBUK must now indicate whether or not we consent to waive the relevant time limits in DISP 2.8.2 R or DISP 2.8.7 R (if it becomes apparent that the complaint has been made or is referred outside those time limits).</p> <p>The written response must also enclose a copy of the FOS standard explanatory leaflet and provide the website address of the FOS.</p>