

ROOT CAUSE ANALYSIS AND COMPLAINTS - 2 half days

Introduction

Relevant FCA Principles
Different rules for MiFID and non-MiFID cases
Core idea

Identifying recurring or systemic problems

Analyse causes of complaints
Identify root causes common to them
Reasons for rejecting claims and complaints
Firms' sales practice evidence
Analysing FOS decisions, guidance and regulatory materials

Techniques or methods for doing root cause analysis

Narrative
Five or is it fifty whys
Barrier analysis
Events and causal factor charting
Reality charting

Training

Training staff on their cases, patterns, regulatory guidance and FOS materials
Tell staff management information

Necessary Processes – things you have to be seen to be doing

Collect MI on causes, products and services
Identify root causes
Prioritise dealing with them
Consider whether root causes affect other processes or products

More processes

Decide whether causes should be corrected or how
Report regularly to seniors when they need it
Identify, measure, manage and control regulatory risk
MI on how customers are treated and contextualisation

Acting on recurring or systemic problems

Identify customers actually or potentially damaged and its scope and severity
Find proportionate measures
Compensate or invite to claim
Expand complaints to include known weaknesses
Retain analysis and decisions taken by senior management

Systems

Feedback to relevant units: marketing, service, technical and compliance
Changes made to improve customers' treatment not just efficiencies

Ongoing monitoring

Act on MI
Withdraw or change products
Compensate
Learn