

# Lloyd's Brussels



## Complaints Handling

**Version: 0.4**

This document is one of a set of operational guidance documents to support Lloyd's Brussels Subsidiary processing. The guidance provided in this document is for general information purposes only. This document, and all other documents which together make up the Lloyd's Brussels Operational Guidance documents are owned by the Lloyd's Brussels Subsidiary. They are being made available to outsourced managing agents to supplement and support managing agents own internal operational processes.

Lloyd's Brussels Operational Guidance documentation are companion material to the Lloyd's Brussels Market Toolkit and addenda which provide high level guidance and impact considerations for managing agents and brokers.



Whilst Lloyd's Brussels Subsidiary endeavours to ensure that the material in this document set is correct, Lloyd's Brussels Subsidiary may make changes to the material in this document at any time without notice.

## DOCUMENT INFORMATION

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This document has been produced in consultation with the following individuals. The project team would like to express sincere thanks to the members of this group for their support and considerable effort in creating this documentation.

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# 1 INTRODUCTION

## 1.1 Background

Since the UK voted to leave the European Union, Lloyd's has been working to provide the market with an effective solution that ensures customers can continue to access Lloyd's underwriting expertise for EEA risks.

We have been working closely with the Lloyd's market to ensure that our Brexit solution is commercially viable, easy to use, future-proof and will maintain our commercial relationships and strong financial ratings.

The Lloyd's Insurance Company S.A. or Lloyd's Brussels Subsidiary ('**Lloyd's Brussels**') is a fully regulated insurance company, with a robust corporate structure, compliant with the regulator's requirements and capitalised according to Solvency II rules. This structure will provide you with a solid platform on which to continue to trade with, and grow in, the Single Market.

Lloyd's Brussels will:

- Maintain the subscription model and current market principles, retaining underwriting capabilities and the security of the Lloyd's market behind policies
- Maintain the current distribution network. That means the business relationships with brokers and coverholders will remain the same
- Minimise changes to your existing processes and systems
- Support continued trading under the Lloyd's brand and benefit from Lloyd's robust financial ratings
- Provide the market with a solid solution for future growth in Europe

### Structure

- Lloyd's Brussels will enter into an Outsourcing Agreement with managing agents allowing them to underwrite on behalf of Lloyd's Brussels. In this capacity managing agents will be outsourced underwriting service providers to Lloyd's Brussels. For the sake of consistency this document will continue to refer to outsourced underwriting service providers as managing agents.
- Lloyd's Brussels will authorise managing agents to appoint coverholders on its behalf, within agreed European business plans.
- Brokers will undertake negotiation of Coverholder Appointment Agreements (**CAAs**) between managing agent underwriters and coverholders, thus allowing the current relationships between these entities to continue. The only visible change between the original binder/new CAA will be the underwriting entity, which will be Lloyd's Brussels instead of the managing agent.
- Under the terms of the Outsourcing Agreement business will be reinsured back to the syndicates.

## 1.2 Purpose of Document

This document serves as guidance for both Lloyd's Brussels operations team and outsourced managing agents wishing to understand the complaints handling process as it applies to both the risks they write on behalf of Lloyd's Brussels and the outward reinsurance of that risk by Lloyd's Brussels back to the managing agents.

This document is written for the following audience:

**Managing Agents** – both in their capacity as the outsourced service provider and as the managing agents of the syndicates directly accepting the reinsurance of that risk.

**Lloyd's Brussels** – who should obtain a reasonable understanding of the operational process required to support recording and maintaining records relating to Lloyd's Brussels inwards and the outward ceding of that risk.

## 1.3 Lloyd's Brussels Scope and Exclusions

### 1.3.1 In-Scope

#### 1.3.1.1 Open market insurance contracts

Outsourced managing agents are permitted, under the Lloyd's Brussels outsourcing contract, to enter into contractual agreements with insureds, under which the managing agent binds an individual risk, or package of risks, on behalf of Lloyd's Brussels.

#### 1.3.1.2 Binding Authorities

Outsourced managing agents are permitted to enter into a delegated authority agreement on behalf of Lloyd's Brussels with an approved coverholder. A model agreement, the Lloyd's Brussels Coverholder Appointment Agreement ("CAA"), must be adopted when entering into a contract with a coverholder on behalf of Lloyd's Brussels.

#### 1.3.1.3 Service Company Coverholders

Outsourced managing agents can appoint approved service company coverholders on behalf of Lloyd's Brussels in the same way they appoint any other coverholder.

Lloyd's Brussels places the following constraint on service company business:

1. All premium or claim transactions **must** be processed by DXC; and
2. All premium or claim transactions **must** have a settlement means of cash.

#### 1.3.1.4 Lineslips

Outsourced managing agents are permitted, under the outsourcing agreement, to enter into lineslip agreements on behalf of Lloyd's Brussels.

#### 1.3.1.5 Consortia

Outsourced managing agents are permitted, under the outsourcing agreement, to enter into consortia agreements, on behalf of Lloyd's Brussels.

1. The arrangement must be executed in a contract delegating authority between outsourced managing agent which is material similar in form and content to the agreed Lloyd's Brussels EEA Consortia Agreement; and
2. All members of the consortia must be acting on behalf of Lloyd's Brussels.

Any such agreement must be registered with the Consortia Registrar.

#### 1.3.1.6 Facultative Reinsurance, Non Proportional and Excess of Loss Treaty

Outsourced managing agents are permitted, under the Lloyd's Brussels Outsourcing Agreement, to enter into contractual agreements with reinsureds, under which the managing agent agrees to reinsure an individual risk, or package of risks, on behalf of Lloyd's Brussels.

### 1.3.2 Exclusions

#### 1.3.2.1 Proportional Treaty Reinsurance Contracts

Proportional treaty reinsurance business should not be bound on behalf of Lloyd's Brussels<sup>1</sup>.

#### 1.3.2.2 Any Insurance or Reinsurance transactions settled outside Lloyd's Central Settlement

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<sup>1</sup> Lloyd's Brussels expects to be able to write proportional treaty reinsurance for risks inception 1/1/2020.

It is a requirement of Lloyd's Brussels that funds are settled through Lloyd's Central Settlement. All other settlement means are not permitted.

This achieves the following:

1. Supports transparency of money movement between the originating broker and Lloyd's Brussels on risks written on behalf of Lloyd's Brussels;
2. Supports transparency of money movement between Lloyd's Brussels and syndicates, on Lloyd's Brussels outwardly reinsured risks; and
3. Enables single collection channel by Lloyd's Brussels (as the reinsured) of reinsured ceding commission on Lloyd's Brussels outwardly reinsured risks.

### 1.3.2.3 Lloyd's Direct Reporting Service

Lloyd's Direct Reporting service is out of scope as premium and claim transactions reported via the service do not get settled through Lloyd's Central Settlement.

## 1.4 Document Information

### 1.4.1 General Information

Throughout this document reference is made to the direct and the reinsurance risk or claim.

1. In the context of this document, whenever the term 'Direct risk' is used, it refers to risk written by managing agent(s) on behalf of Lloyd's Brussels.
2. In the context of this document, and unless otherwise stated, whenever the term 'Reinsurance risk' is used, it explicitly refers to the risk ceded out to the managing agent syndicates by Lloyd's Brussels.

Throughout this document reference is made to the European Economic Area ("EEA"). The EEA consists of the European Union member states and Iceland, Liechtenstein and Norway. Monaco is part of the EU customs territory through an agreement with France. For convenience, whenever the term EEA is referred to throughout this document it refers to the EU member states, Iceland, Liechtenstein, Norway and Monaco<sup>2</sup>. In addition, please note that coverholders domiciled in Switzerland are only be able to write risks on behalf of Lloyd's Brussels within the EEA when both the insured and the risk are outside Switzerland.

### 1.4.2 Document scope

Lloyd's Brussels operational processes are documented in a suite of operational guidance documents, of which, this document is one. The table below identifies the core operational processes and the operational guidance document which details that process.

Operational Process	Operational Guidance	Comment
Open Market Placement	Open Market Operational Guidance	Excludes open market risks bound under a lineslip or consortia agreement
Accounting and Settlement	Accounting and Settlement Operational Guidance	<ul style="list-style-type: none"> <li>• Broker accounting and settlement submissions to DXC</li> </ul>

<sup>2</sup> At the time of production, Lloyds Brussels is seeking licenses to underwrite risks regulated in Monaco.

		<ul style="list-style-type: none"> <li>• Direct to reinsurance Underwriter Signing Message ("USM") transformation rules</li> <li>• Lloyd's Brussels USM processing rules.</li> </ul> <p>Excludes.</p> <ul style="list-style-type: none"> <li>• Bordereau submissions to DA SATs and Lloyd's Brussels processing of the same.</li> </ul>
<b>Delegated Authority (Agreements and Processing)</b>	Delegated Authority Operational Guidance	<p>Includes:</p> <ul style="list-style-type: none"> <li>• Binding Authority Agreements</li> <li>• Consortia Agreements</li> <li>• Lineslip Agreements</li> <li>• Open Market risks placed bound under a lineslip or consortia</li> <li>• Service Company Agreements</li> </ul>
<b>Claims Agreement and Processing</b>	Claims Agreement and Processing Operational Guidance	
<b>Query and Notification Processes</b>	Query Handling Operational Guidance	
<b>Endorsement Processing</b>	Endorsement Operational Guidance	
<b>Lloyd's Brussels Reporting</b>	Lloyd's Brussels – Overall principles and High Level Guidance	

## 2 Complaints Handling in Lloyd's Brussels

### 2.1 Overview

Where complaints arise, complainants (policyholder or third party) should expect to have their complaints dealt with in a prompt and reasonable way. At the same time, different countries have different local rules for the handling of complaints. Lloyd's Brussels' arrangements for complaints are intended to allow for the oversight of complaints handling outside of Belgium, consistent with the regulatory expectations of the National Bank of Belgium (NBB), whilst allowing flexibility for coverholders and TPAs in the way they handle complaints in accordance with local rules.

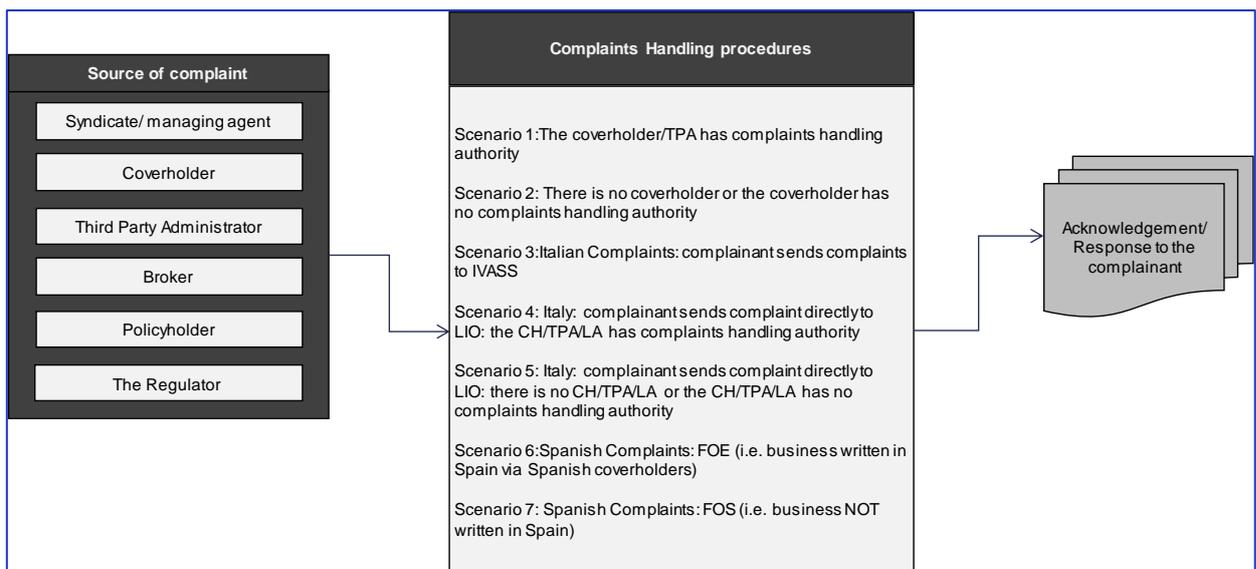
The following two scenarios, i.e. scenario 1 and scenario 2, depict the process in which complaints are expected to be handled in all the countries within the EEA, with the exception of Italy and Spain which will have slightly different procedures to comply to local regulatory compliance requirements.

Note: the following abbreviations have been used in all the process flows

- CH: coverholder
- DGS: The Spanish regulator
- EDR: External Dispute Resolution scheme
- IVASS: Italian institute for insurance supervision
- LA: loss adjuster
- LBS: Lloyd's Brussels Subsidiary
- LIO: Lloyd's Italian Office
- MA: managing agent
- PH/TP/Broker: Complainant/Third Party/Broker
- TPA: third party administrator

### 2.2 Source of complaints

Lloyd's Brussels may receive complaints directly from the policyholder/third party or broker or via syndicates, managing agents, coverholders, TPAs or from the Regulator. After the complaint is received, the procedure through which the complaint will be acknowledged and dealt with will mainly depend upon whether a coverholder or TPA with complaints handling authority is present or not. The procedure might also depend on whether the complainant is received via the regulator.



### 3 Lloyd's Brussels Complaints Handling process – all EEA countries except Italy and Spain

#### 3.1 Scenario 1: The coverholder/TPA has complaints handling authority

In the case where the coverholder/TPA has delegated authority to handle complaints, the complaint will be sent directly to the coverholder/TPA to action and Lloyd's Brussels will have the responsibility to oversee the delegated activity of complaint handling, and to ensure that all complaints are handled in accordance with local regulatory requirements.

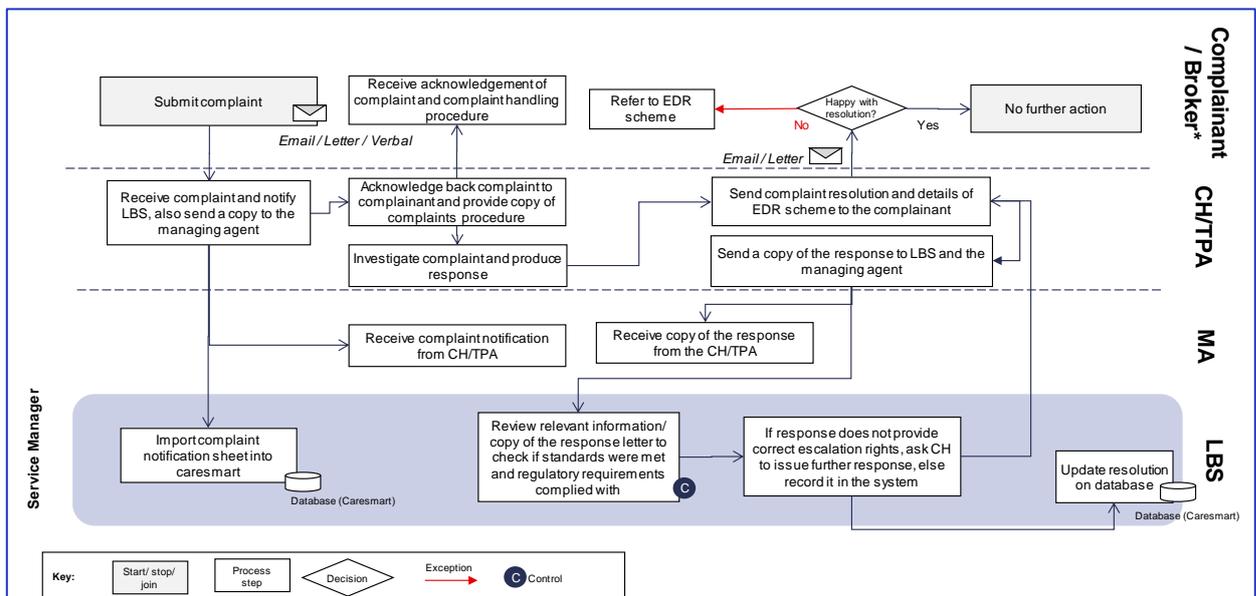
It is the responsibility of the coverholder/TPA that has complaints handling authority to handle all complaints appropriately and ensure they are compliant with all relevant local rules. This includes any requirement to acknowledge complaints, provide information to the complainant and meet the applicable timescale.

If the coverholder/TPA receives a complaint directly from the complainant, the coverholder should send the acknowledgement of the complaint to the complainant, within 2 business days by using a standard template provided by Lloyd's Brussels.

The coverholder/TPA should respond to the complainant and send a copy of the response (along with the original complaint and a copy of the acknowledgement letter) to Lloyd's Brussels and to the respective managing agent. The response has to be provided in the local language unless the complaint was formulated in English, in which case, the response can also be sent in English. If the response does not conform to the required standards or does not provide correct EDR escalation rights, Lloyd's Brussels will ask the coverholder/TPA to issue a further response. Lloyd's Brussels will expect managing agents to oversee the quality of complaints handling by the coverholder/TPA.

As required, Lloyd's Brussels will consult with the local Country Manager to better understand cultural aspects that may impact the compensation given to the complainant.

If the outcome arises where the complainant is not happy with the resolution, the complainant has the option to appeal to the External Dispute Resolution scheme (EDR). If the coverholder/TPA or managing agent is informed by the complainant about their intention to appeal to the EDR, the managing agent should inform Lloyd's Brussels as soon as possible.



Note: \* indicates that the Broker acts on behalf of the complainant

**C** Control - refer to section 6 on Oversight

### 3.1.1 Informal complaints handling – UK

This section covers UK complaints that are considered as 'Informal' and can be resolved by the close of the third business day following receipt.

Where a coverholder/TPA considers a complaint to be resolved by close of business on the third business day following the day on which it is received, the coverholder/TPA must promptly send the complainant a 'summary resolution communication' (SRC) which complies with DISP 1.5.4R of the FCA handbook.

A complaint is resolved for the purposes of this paragraph where the complainant has indicated acceptance of a response from the coverholder/TPA, with neither the response nor acceptance having to be in writing. Lloyd's Brussels will provide model wording to be included by the coverholder/TPA in all 'summary resolution communications' to ensure compliance with this paragraph.

The coverholder/TPA will need to notify Lloyd's Brussels about all 'Informal' complaints received along with information on SRC date, SRC decision, SRC grounds for justification, SRC action taken, SRC redress amount, SRC redress date paid via the notification sheet (refer to section 7.2)

Lloyd's Brussels will conduct a quarterly sample review on the Informal complaints received for that quarter, during which they will request for the copy of the original complaint, the response letter and other details, as needed for the review from the coverholder/TPA.

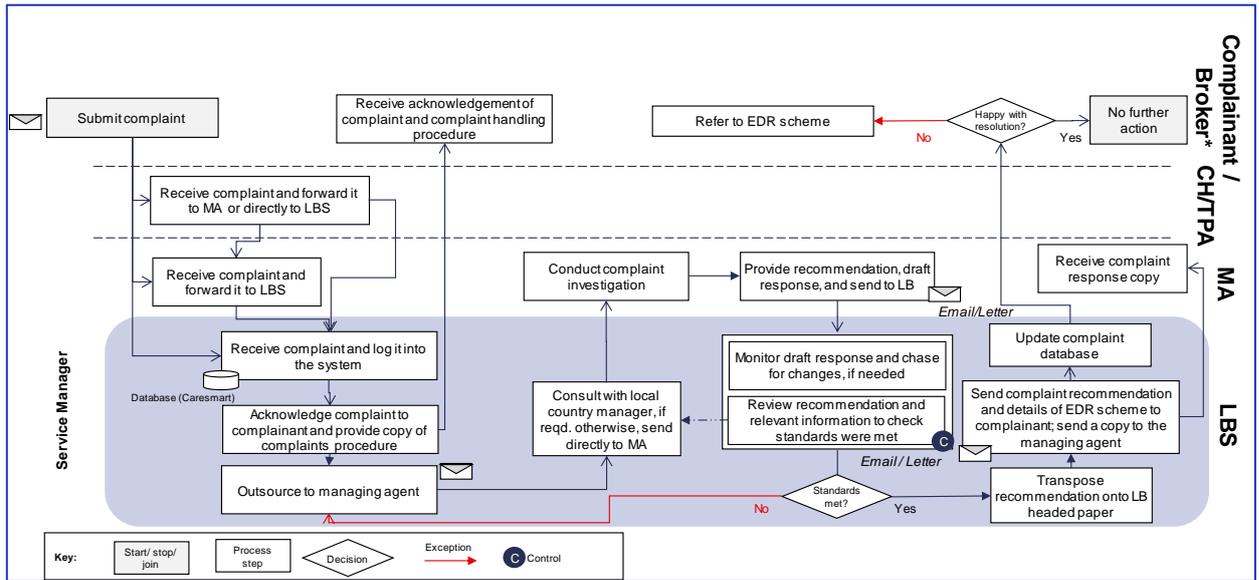
## 3.2 Scenario 2: There is no coverholder/TPA or the coverholder/TPA has no complaints handling authority

Due to regulatory restrictions that exist on the ability of managing agents to have contact with complainants without triggering a requirement for them to be authorised in the EU/EEA, the complaints process needs to be conducted through Lloyd's Brussels rather than directly with the managing agent.

In the case where there is no coverholder/TPA or the coverholder/TPA has no complaints handling authority, the complaint needs to be outsourced to the managing agent to conduct the investigation and preparation of the draft response. The draft response has to be provided to Lloyd's Brussels in the local language unless the complaint was formulated in English, in which case, the response can also be sent in English. Lloyd's Brussels will review the draft response to check whether all relevant information has been provided and that standards have been met, thereafter to send the final response to the complainant. If Lloyd's Brussels decides to change the response provided by the managing agent, they will give the MA an opportunity to comment (unless the changes are not substantive) before sending final response. LBS will also send a copy of the final response to the managing agent.

If the outcome arises where the complainant is not happy with the resolution, they have the option to appeal to the External Dispute Resolution scheme (EDR). If the coverholder or managing agent is informed by the complainant about their intention to appeal to the EDR, the managing agent should inform Lloyd's Brussels as soon as possible.

In the event that the complainant sends a complaint directly to the managing agent, the managing agent needs to send the complaint to Lloyd's Brussels as soon as is practicable. If the complainant sends a complaint directly to a coverholder or TPA, they should send it to Lloyd's Brussels with a copy to the managing agent. Lloyd's Brussels will then acknowledge the complaint back to the complainant and provide a copy of the complaints procedure. As required, Lloyd's Brussels will consult with the local Country Manager to better understand cultural aspects that may impact the compensation given to the complainant.



Note: \* indicates that the Broker acts on behalf of the complainant

**C** Control - refer to section 6 on Oversight

## 4 Lloyd's Brussels Complaints Handling Process – Italy

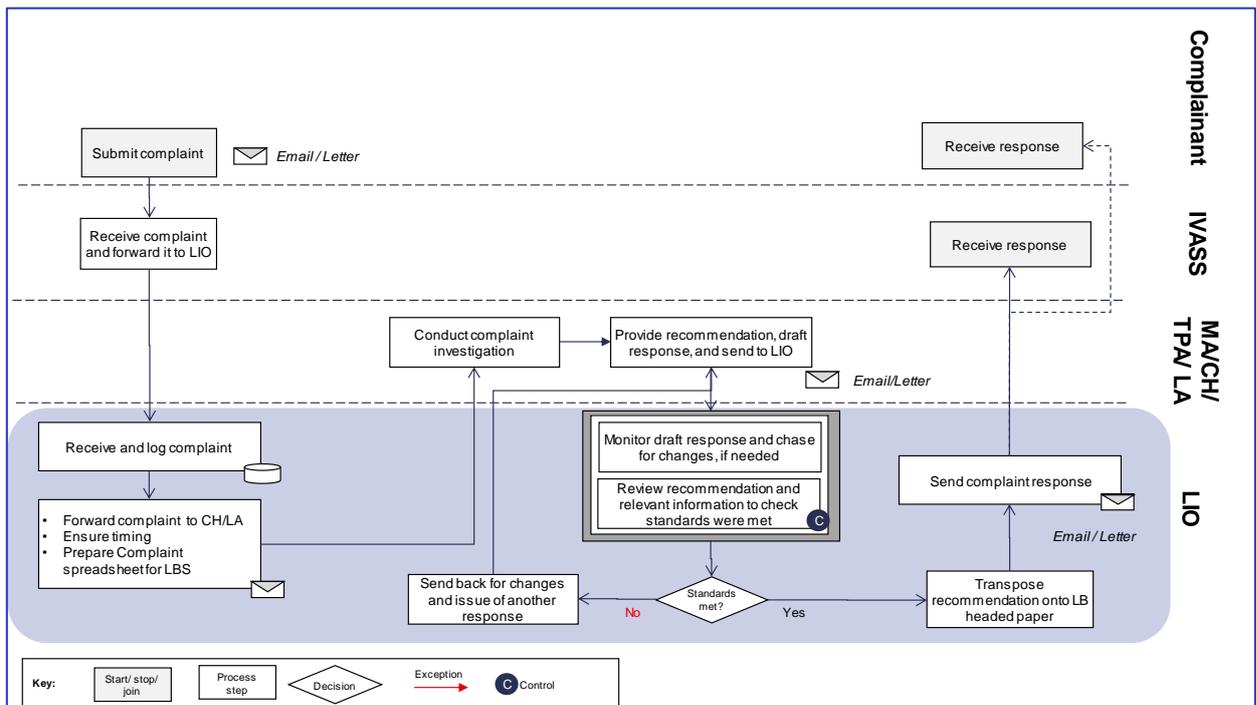
### 4.1 Scenario 3: Italy: complainant sends complaints to IVASS

All Italian complaints will be handled by LIO on behalf of Lloyd's Brussels.

In case the Italian regulator, IVASS, receives a complaint directly from a complainant, IVASS will forward it to LIO. LIO will receive the complaint and send it to the managing agent (who will, in turn, forward it the coverholder/TPA/loss adjuster) for investigation and preparation of a response. The Regulator may want to have a response within a period shorter than 45 days (usually 30 days). LIO will always highlight the deadline to respond whenever forwarding such complaint to the addressees.

The managing agent or the coverholder/TPA/loss adjuster will prepare a draft response and send it to LIO for review and confirmation. They are expected to provide all relevant documents to LIO in support of their recommendation. LIO will expect the managing agent to oversee the quality of complaints handling by the coverholder/TPA/LA.

LIO needs to ensure that the response fully complies with regulatory requirements, while appropriately addressing the complainant's request. Moreover, since such responses must be signed by the General Representative (or his proxy), it is essential that LIO reviews the draft response to check whether all relevant information has been provided and that standards have been met, before responding back to IVASS.



Note: **C** Control - refer to section 6 on Oversight

## 4.2 Scenario 4: Italy: complainant sends complaint directly to LIO: the CH/TPA/LA has complaints handling authority

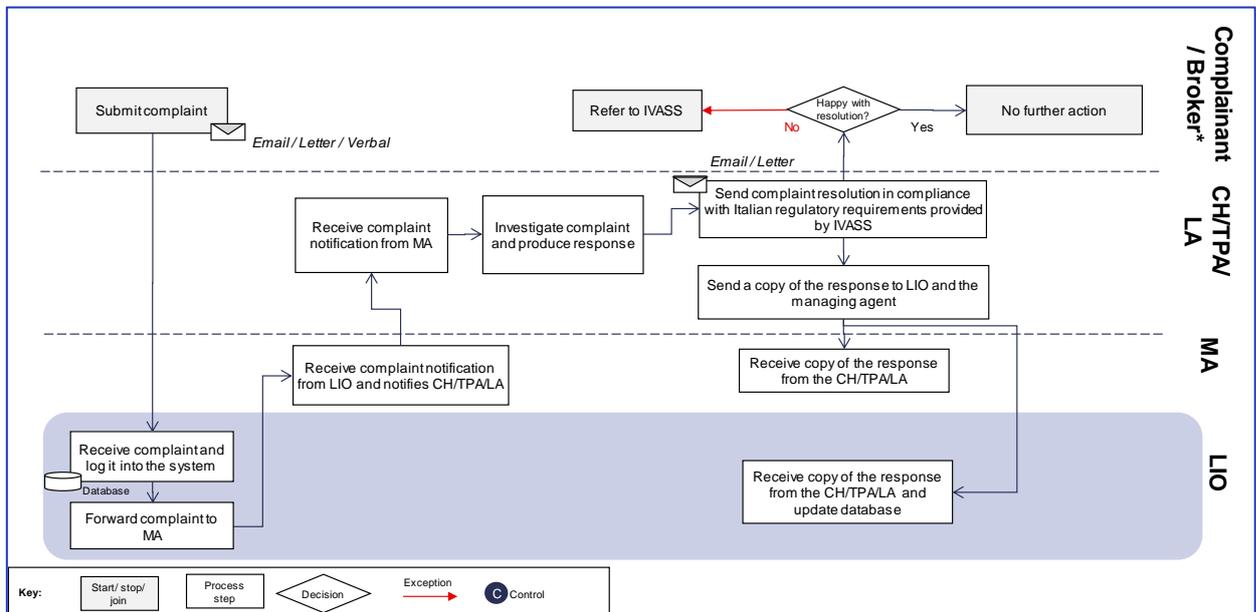
All Italian complaints will be handled by LIO on behalf of Lloyd's Brussels.

In case the complaint is received directly by LIO from the complainant, LIO will forward the complaint to the managing agent (who will, in turn, forward it to the appointed coverholder/TPA/loss adjuster), to conduct the investigation and prepare the response.

In case the coverholder/TPA/LA has delegated authority to handle complaints, it is the responsibility of the coverholder/TPA/LA to investigate the complaint and respond back to the complainant in compliance with the local rules.

The coverholder/TPA/LA should respond to the complainant in the local language. The quality of the complaint response should meet the Italian regulatory requirements provided by IVASS Regulation 24 about complaints handling. In addition, LIO requires that such response should always include IVASS escalation rights.

Once the response has been sent out to the complainant, the coverholder/TPA/LA will make sure that a copy of that is sent to the managing agent and to LIO for their information and for regulatory reporting.



## 4.3 Scenario 5: Italy: complainant sends complaint directly to LIO: there is no CH/TPA/LA or the CH/TPA/LA has no complaints handling authority

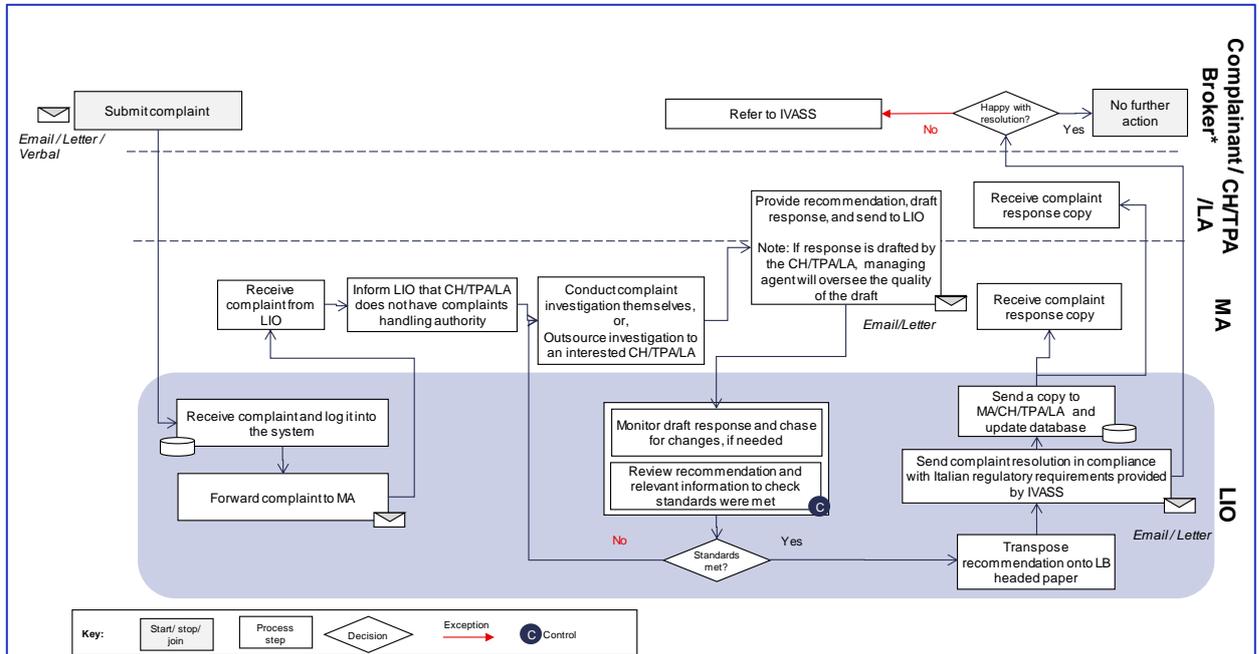
All Italian complaints will be handled by LIO on behalf of Lloyd's Brussels.

Due to regulatory restrictions that exist on the ability of managing agents to have contact with complainants without triggering a requirement for them to be authorised in the EU/EEA, the complaints process needs to be conducted through LIO rather than directly with the managing agent.

In case the complaint is received directly by LIO from the complainant, LIO will outsource the complaint to the managing agent. In this scenario, the managing agent, within 3 business days, will inform LIO about the fact that there is no coverholder/TPA/LA or the coverholder/TPA/LA has no complaints handling authority.

The managing agent may want to deal with the complaint themselves, or, as an alternative, may decide to outsource the investigation and preparation of the draft response to the interested CH/TPA/LA.

LIO will then review the draft response to check whether all relevant information has been provided and that standards have been met, before sending the final response to the complainant. LIO will also send a copy of the final response to the managing agent and the appointed CH/TPA/LA.



Note: **C** Control - refer to section 6 on Oversight

Intermediaries enrolled in section “A” of the RUI and coverholders (regardless of the kind of registration in the RUI) will bring to the managing agent’s attention any complaint filed in regard of their conduct. This is irrespective of whether or not the coverholder/TPA/LA has complaints handling authority.

The process for handling such complaints is the same as outlined in Scenario 5

## 5 Lloyd's Brussels Complaints Handling Process – Spain

### 5.1 Scenario 6: Spain: Freedom of Establishment (i.e. business written in Spain via Spanish coverholders)

All Spanish complaints related to Freedom of Establishment will be handled by Lloyd's Spanish Office on behalf of Lloyd's Brussels.

In case complaints are received by a CH/TPA in Spain, the investigation and preparation of the response will be done by the CH/TPA.

In this scenario, irrespective of whether the complaint is received by the CH/TPA/MA or by the Lloyd's Spanish Office directly, the Lloyd's Spanish office will send the acknowledgement and response directly to the complainant.

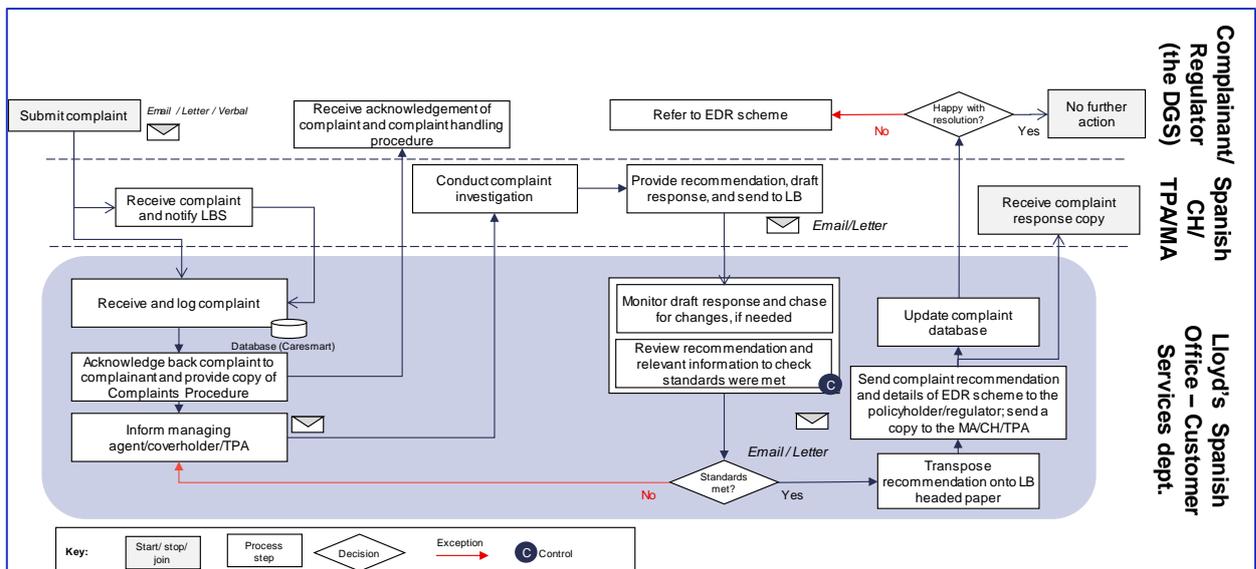
In case the complaint comes directly to the managing agent, coverholder or TPA, they should notify Lloyd's Brussels using the notification sheet (refer to section 7.1).

In case complaints are received by the Lloyd's Spanish Office itself, they would send the complaint to the relevant CH for investigations and proposed response, in conjunction with the managing agent. Lloyd's Spanish Office will expect managing agents to oversee the quality of complaints handling by the coverholder/TPA.

The Lloyd's Spanish Office customer service department expects to receive a clear response within the deadline in order to provide adequate response to the complainant. The draft response has to be provided to Lloyd's Brussels in the local language unless the complaint was formulated in English, in which case, the response can also be sent in English. Lloyd's Spanish Office will not conduct a full review of the quality of the response, but will check whether the standard requirements of the response letter template have been met.

Lloyd's Spanish Office will also log the complaints data in the CareSmart complaints database.

In case complaints are received directly from the Spanish regulator (the DGS), Lloyd's Spanish Office will send it to the coverholder for onward transmission to the managing agent, if needed, for investigation. The Spanish CH/TPA/MA will send the proposed response to the Lloyd's Spanish Office. The Lloyd's Spanish Office will directly respond to the regulator.



Note: **C** Control - refer to section 6 on Oversight

## 5.2 Scenario 7: Spain: Freedom of Services (i.e. business NOT written in Spain)

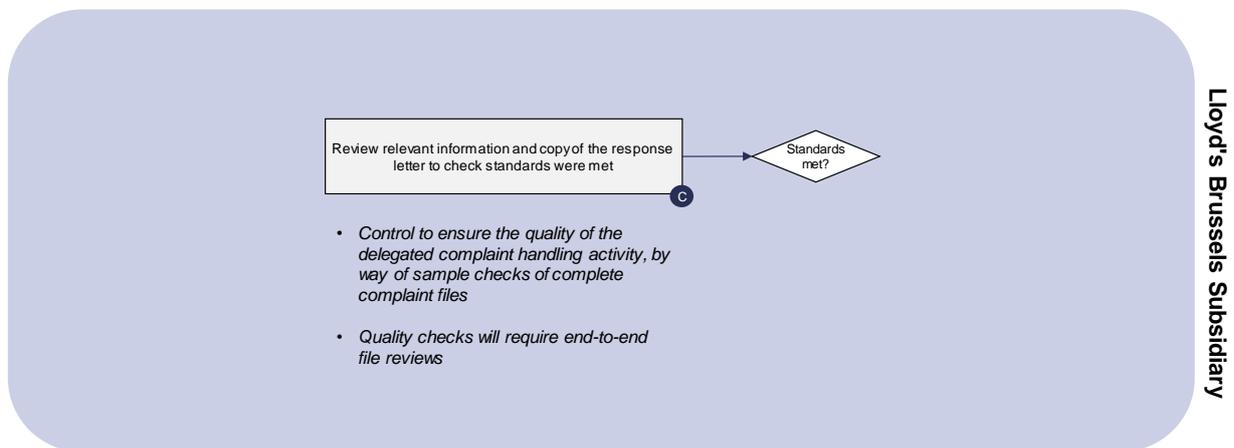
For businesses written on a FOS basis, complaints could be received either by the Lloyd's Brussels - Service Manager (Operations Team) or by the non-Spanish coverholder/TPA if they have complaints handling authority.

For such FOS complaints, Lloyd's Brussels will handle them exactly as per the process flows stated in scenario 1 and scenario 2 (refer to sections 3.1 and 3.2).

# 6 Oversight

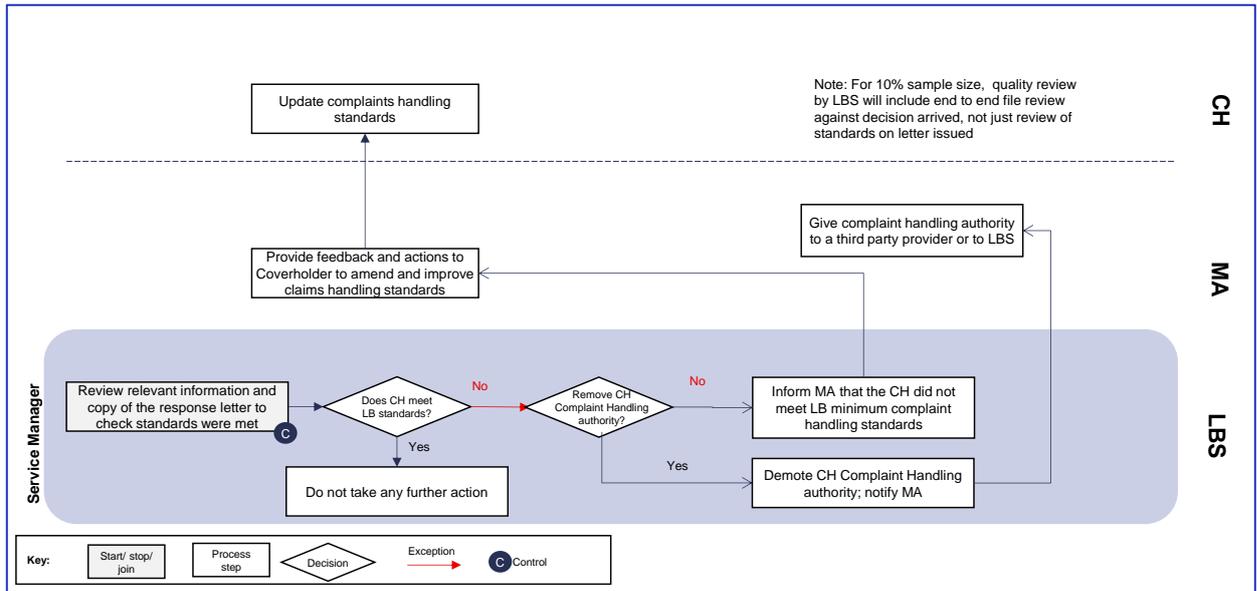
## 6.1 Control: Delegated complaint handling QA

If there is a coverholder involved, Lloyd's Brussels will monitor complaints handling to ensure regulatory compliance, review complaint response time and the final recommendation to ensure that standards are met. Moreover, to ensure the quality of the delegated complaint handling activity, Lloyd's Brussels will conduct sample checks every quarter of complete complaint files.



## 6.2 The coverholder is not meeting Lloyd's Brussels complaints handling standards

If Lloyd's Brussels finds a coverholder has fallen below a threshold standard in complaints handling based on the control mentioned in 2.3.1, then the managing agent that delegated the authority will be notified. If Lloyd's Brussels deems it necessary, it can withdraw delegated complaints authority from the coverholder and require the managing agent to either delegate to another third party or to Lloyd's Brussels.



### 6.3 The managing agent wants to give or withdraw complaints handling authority to/from the coverholder

The CAA delegates complaints handling authority to the coverholder by default.

However, in case a managing agent wants to withdraw complaints handling authority from a coverholder, it must be approved by Lloyd’s Brussels. The following process should be followed for procuring the approval –

The managing agent will need to formally submit the request for withdrawal of authority to Coverholders@lloyds.com in the first instance. The request will then be passed through internal channels to procure approvals/decisions from Lloyd’s Brussels.

In order that we can satisfy ourselves that it would be in the interests of the policyholder for Lloyd’s Brussels to handle complaints instead of the coverholder, please provide us with the following information:

- The country the coverholder is based in
- The likely volume of complaints (based on experience in the previous year)
- A comparison between your complaint handling skills, resources and procedures, and those of the coverholder

## 7 Complaints notification

### 7.1 Complaints notification template

**Applicable to all countries within EEA except UK and Italy (refer to scenario 1,2,6,7):**

In case a complaint is received by a coverholder/TPA with complaints handling authority, Lloyd's Brussels should receive the notification from them within 7 calendar days of complaint receipt. This effectively implies that on a weekly basis, the coverholders/TPA or the corresponding managing agents with delegated oversight authority of the coverholder/TPA, must complete the LBS complaint notification template, providing details of all new complaints received.

In case the coverholder/TPA does not have complaints handling authority, this complaint notification template should be completed and sent to Lloyd's Brussels as soon as possible, i.e. within 2 business days of complaint receipt.

In case a complaint is received by a managing agent, Lloyd's Brussels should receive the complaint notification template from them within 2 business days of complaint receipt.

Lloyd's Brussels will send back a confirmation of the complaint notification template including a unique LBS complaint's reference for every new complaint. This complaint's reference shall be used in every communication related to the complaint.

Complaints will be entered onto the complaints monitoring database by Lloyd's Brussels to enable effective monitoring and regulatory reporting.

The Lloyd's Brussels complaint notification template will be available on the Lloyd's Brussels official website and will be similar to Lloyd's International Complaints Notification Template with the exception of a few additional fields.

The standard complaint notification template for Lloyd's Brussels should contain the following fields:

Field	Comments
Submitting Company	This is the name of the company or its representative, who is completing the template.
Coverholder	If the policy was underwritten by a coverholder, insert the coverholder name in this field.
Third Party Administrator (TPA)	If a TPA is involved, select the TPA name from the drop down list.
Complaints handling authority	Indicate whether the coverholder/TPA receiving the complaint has complaints handling authority. Select from drop down list.
Email address	Insert the email address of the coverholder/TPA to whom Lloyd's Brussels can send the unique reference number of the complaint
Type of complainant	Select from drop down list
Complainant Surname	This is the name of the insured individual. Either the surname or company name must be completed.
Complainant First name	This is the first name of the insured individual

Complainant Company Name	This is the name of the insured entity. Either the surname or company name must be completed.
Address (Optional)	Insert a correspondence address for the complainant.
Post Code	Insert the complainant's postcode. Completion of this field is required to facilitate identification of duplicate complaints
Policy Number	
Complaint Process	The territory in which the insured is located. Select from drop down list
Date Received	Insert the date the complaint was received by the coverholder or the TPA from the complainant.
Complaint Code	Select from drop down list
Class of Business	Select from drop down list
Product type	Select from drop down list
Line of Business	Select from drop down list
Placement	Select from drop down list
Syndicate Number	Lead syndicate on the coverage
Claims Related	Select from drop down list
Root Cause	Select from drop down list

## 7.2 Complaints notification template – UK

In order to reflect the 'Informal' complaints handling for UK, the notification template will be somewhat different from the template used by the other EEA countries. The UK template (as detailed below) is similar to the UK notification sheet currently used by Lloyd's. However, the procedure through which 'Formal' complaints are notified in UK is the same as that followed by other EEA countries.

Field	Comments
Informal / Formal*	Select from drop down list. Informal complaints are those resolved by close of business on the third business day following receipt and a summary resolution communication is issued
Submitting Company	This is the name of the company or its representative, who is completing the template.

Coverholder	If the policy was underwritten by a coverholder, insert the coverholder name in this field.
Third Party Administrator (TPA)	If a TPA is involved, select the TPA name from the drop down list.
Complaints handling authority	Indicate whether the coverholder/TPA receiving the complaint has complaints handling authority
Email address	Insert the email address of the coverholder/TPA to whom Lloyd's Brussels can send the unique reference number of the complaint
Policyholder Title	This field is optional and selected from drop down list
Policyholder Forename	This field is optional
Policyholder Surname	This is the name of the insured individual. Either the surname or company name must be completed.
Policyholder Company Name	This is the name of the insured entity. Either the surname or company name must be completed
Address Line 1	Insert a correspondence address for the complainant. This field is optional
Address Line 2	Insert a correspondence address for the complainant. This field is optional
Address Line 3	Insert a correspondence address for the complainant. This field is optional
County	Select from drop down list. This field is optional
Post Code	Insert the complainant's postcode. Completion of this field is required to facilitate identification of duplicate complaints
Policy Number	
Date Received	Insert the date the complaint was received by the coverholder or the TPA from the complainant.
Complaint Code	Select from drop down list
Product type	Select from drop down list
Line of Business	Select from drop down list
Placement	Select from drop down list

Syndicate Number	Lead syndicate on the coverage
Claims Related	Select from drop down list
Summary Resolution Communication Date	Mandatory for Informal Complaints
Summary Resolution Communication Decision	Mandatory for Informal Complaints – do not enter for Formal Complaints. Select from drop down list
Summary Resolution Communication Grounds for Justification	Mandatory for Informal Complaints – do not enter for Formal Complaints. Select from drop down list
Summary Resolution Communication Action Taken	Mandatory for Informal Complaints – do not enter for Formal Complaints. Select from drop down list
Summary Resolution Communication Redress Amount	Mandatory for Informal Complaints – do not enter for Formal Complaints. If no redress is being paid, or figure is not yet known enter 0.00
Summary Resolution Communication Redress Date Paid	Mandatory for Informal Complaints if redress is being paid – do not enter for Formal Complaints
Root Cause	Select from drop down list. This field is optional for formal complaints

\* Complaints are considered informal for the purposes of Lloyd's Brussels reporting where they have been resolved within three business days following receipt provided that the resolution is agreed with the complainant.

### 7.3 Complaints notification – Italy

#### **Applicable to Italy (refer to scenario 3.4 and 5):**

In Italy, most of the complaints are received directly by LIO. However, if a managing agent or a coverholder/TPA receives a complaint, they must report it to LIO within 2 business days of receipt. This includes, but is not limited to all complaints that are subject to the local regulatory complaint handling rules or where the complainant has a right of referral to IVASS.

Managing agents or coverholder/TPA must include the original complaint when reporting complaints to LIO.

Managing agents or coverholder/TPA should be aware that LIO has to receive the following information regarding a complaint. LIO expects managing agents or coverholder/TPA to check the complaint on missing information before sending it to LIO. Therefore, it is highly recommended that when a complaint does not include the information mentioned in the following table, the missing information is added to email before forwarding the complaint to LIO. If some of the information is missing, LIO shall contact the managing agent or coverholder/TPA to provide the missing information as soon as possible.

Managing agents or coverholder/TPA should ensure that they provide the information in a way that is compliant with the applicable data protection laws.

Field	Comments
Submitting company	This is the name of the managing agent or its representative who is completing and submitting the template.
Coverholder	If the policy was bound by a coverholder, select the coverholder name from the drop down list.
Third Party Administrator (TPA)	If a TPA is involved, select the TPA name from the drop down list.
Email address	Insert the email address of the coverholder/TPA to whom Lloyd's Brussels can send the unique reference number of the complaint
Complainant Surname	This is the surname of the insured individual. Either the complainant surname or Complainant company name field must be completed.
Complainant First name	This is the first name of the insured individual
Complainant Company Name	This is the surname of the insured entity. Either the complainant surname or Complainant Company Name field must be completed.
Address (Optional)	Insert a correspondence address for the complainant.
Post Code	The postcode, mailing code, zip code, etc. for the complainant.
Policy Number	Please ensure that the Policy Number detailed on the spreadsheet is referenced on the complaint response.
Complaint Process	The territory in which the insured is located. Select from drop down list.
Date Received	Insert the date the complaint was first received by the managing agent or its representative. For example where the complaint was initially received by a coverholder who subsequently notifies the managing agent of the matter the date the complaint was first received by the coverholder should be entered.
Complaint Code	Select from drop down list.
Class of Business	Select from drop down list.
Placement Type	Select from drop down list.
Line of Business	Select from drop down list
Syndicate Number	Lead syndicate on the coverage.
Claims Related	Select from drop down list.
Root Cause	Select from drop down list.

Third party claimant (individual)	Name and surname of the individual (person) filing the complaint
Third party claimant (company)	Name of the company filing the complaint
Third party claimant address (Optional)	Address of the individual/company filing the complaint
Third party claimant post code	Post code of the individual/company filing the complaint

## 8 Complaints Handling – Performance Metrics

### 8.1 Timescales Lloyd's Brussels

The following table gives an overview of timescales for CH/TPA and/or MA. LBS will do the oversight of the complaints handling. In this matter LBS will escalate their concerns to the MA compliance officer when timescales are not met.

Measure	Turnaround time	Impacted scenario
Time by which a coverholder or TPA should notify LBS that a complaint has been received	Scenario 1: Within 7 calendar days of receipt of the complaint by the managing agent, coverholder or TPA.  Scenario 2: Within 2 business days for coverholders/TPAs with no complaints handling authority	Scenario 1 and 2
Time by which coverholders or TPA should acknowledge the complaint to the complainant	All complaints (except UK Informal complaints), received by coverholders/TPA should be acknowledged to the complainant within the local deadline. This metric will be measured based on the 'complaint received date'. It is expected that most of the complaints are received directly by LBS if there is no coverholder involved	Scenario 1
Time by which Lloyd's Brussels will forward a complaint received directly from the complainant to the managing agent or coverholder / TPA for investigation	Within 2 business days of complaint receipt	Scenario 1 and 2
Time by which managing agents, coverholder or TPA should get back to LBS with draft response	All draft responses should be received 10 business days before the local country deadline (where the deadline is greater than or equal to 30 days), or  5 business days before the local country deadline (where the deadline is shorter than 30 days).	Scenario 2

	This metric will be measured based on the 'complaint received date and the 'local deadline' of the complaint.	
Time by which a coverholder or TPA should respond to the complainant with their final response	All complaints (except UK Informal complaints), should be responded by the coverholder/TPA 5 business days before the local deadline  This metric will be measured based on the 'complaint received date and the 'local deadline' of the complaint.	Scenario 1
Timescales for handling Informal complaints for UK	For handling UK Informal complaints, the coverholder/TPA should resolve the complaint informally within 3 business days of receipt of the complaint. The complainant must accept the proposed resolution.  If resolved informally, the coverholder/TPA should issue a Summary Resolution Communication (SRC) within 5 business days of receipt of the complaint.  If the complaint cannot be resolved within 3 business days, the coverholder/TPA should treat the complaint as a Formal complaint which will follow the usual timescales for acknowledgement, notification and response as mentioned in this section	Scenario 1
Request for files for a full sample checking or an EDR complaint	Files are to be provided within 3 business days	Scenario 1 and 2
Provision of Files	Files should be provided in PDF format in chronological order.	Scenario 1 and 2

## 8.2 Timescales LIO

The following table gives an overview of timescales for CH/TPA and/or MA. LIO/LBS will do the oversight of the complaints handling. In this matter LIO/LBS will escalate their concerns to the MA compliance officer when timescales are not met.

Measure	Turnaround time	Impacted scenario
Time by which a coverholder or TPA or LA or managing agent should notify LIO that a complaint has been received	Within 3 business days for coverholders/TPAs with no complaints handling authority	Scenario 4 and 5
Time by which LIO will forward a complaint received directly from the complainant to the	Within 3 business days of complaint receipt	Scenario 3, 4 and 5

managing agent or coverholder / TPA or LA for investigation		
Time by which a CH/TPA or LA or managing agent should notify LIO that it concerns a complaint regarding scenario 5: there is no CH/TPA/LA or the CH/TPA/LA has no complaints handling authority	Within 2 business days of complaint receipt	Scenario 5
Time by which LIO should receive a draft response from CH/TPA/LA	The time depends on the deadline given by IVASS and is based on 50% of the available time given by IVASS. <b>LIO will indicate the expected deadline for receiving the first draft of response for IVASS.</b>	Scenario 3
Time by which a coverholder or TPA or LA should respond to the complainant with their final response	All the responses should be responded by the coverholders/TPAs 5 business days before the local deadline (45 calendar days).  This metric will be measured based on the 'complaint received date and the 'local deadline' of the complaint.	Scenario 4
Time by which managing agents, coverholders/TPA or LA should get back to LIO with draft response	All draft responses should be received 10 business days before the local country deadline (45 calendar days), or earlier based on the deadline indicated by LIO.  This metric will be measured based on the 'complaint received date and the 'local deadline' of the complaint.	Scenario 5
Request for files for regulatory requirements or sample checking (audit)	LBS and/or LIO reserve the right to request require files for regulatory requirements or sample checking (audit).  Files are to be provided within 3 business days	Scenario 3,4 and 5
Provision of Files	Files should be provided to LIO in PDF format in chronological order.	Scenario 3, 4 and 5

### 8.3 Timescales Lloyd's Spanish Office

The following table gives an overview of timescales for CH/TPA and/or MA. Lloyd's Spanish Office/LBS will do the oversight of the complaints handling. In this matter Lloyd's Spanish Office/LBS will escalate their concerns to the MA compliance officer when timescales are not met.

Measure	Turnaround time	Impacted scenario
Time by which CH/TPA in Spain should notify Lloyd's Spanish Office that a complaint has been received	All complaints received by Spanish CH/TPA should be notified within 2 business days of receiving. This metric will be measured based on the 'complaint received date'	Scenario 6: Spanish Complaints – FOE
Time by which Lloyd's Spanish Office will forward a complaint received directly from the complainant to the managing agent or coverholder / TPA for investigation	Within 2 business days of complaint receipt	Scenario 6: Spanish Complaints – FOE
Time by which MA, Spanish CH/TPA should get back to Lloyd's Spanish Office with draft response	All draft responses should be received 10 business days before the local Spanish deadline (60 calendar days) for complaints raised by complainants, or  All draft responses of the DGS should be received 5 business days before the Spanish regulatory deadline (15 business days) for complaints received via the regulator (the DGS).  This metric will be measured based on the 'complaint received date and the 'local deadline' of the complaint.	Scenario 6: Spanish Complaints – FOE
Request for files for a full sample checking or an DGS complaint	Files are to be provided within 3 business days	Scenario 6: Spanish Complaints – FOE
Provision of Files	Files should be provided in PDF format in chronological order.	Scenario 6: Spanish Complaints – FOE

Regarding scenario 7: Spain – Freedom of Services, section 7.1 Timescales Lloyd's Brussels will be applied.

## 9 Regulatory requirements

### 9.1 Definitions

Local definitions will apply for all EEA countries where specific guidelines are provided.

In UK, definitions stated in the FCA Handbook, which provides specific guidance around 'Eligible complainants', will apply. Lloyd's Brussels seeks to ensure that all complainants, irrespective of their eligibility, are treated fairly and that complainants can have confidence that their valid complaints will be met. Although there are no regulatory requirements for non-eligible complaints in UK, Lloyd's Brussels wants to be notified about them and expects to receive a copy of the original complaint and the response to the complainant. However, Lloyd's Brussels will not set up any performance metrics around timescales and will not recommend EDR referral rights for these non-eligible complaints. The complaints handling scenarios delineated in section 3 of this document refer only to eligible complaints.

The FCA are currently consulting on expanding the definition of an eligible complainant and this is planned to come into effect on 1 April 2019.

The definitions of complaint and complainant in the EIOPA Guidelines will be applicable for all those countries where no local definitions are available.

Definition	Complaint	Complainant
EIOPA Guidelines definition (BoS 12/069 14 June 2012)	A statement of dissatisfaction addressed to an insurance undertaking by a person relating to the insurance contract or service he/she has been provided with. Complaints handling should be differentiated from claims handling as well as from simple requests for execution of the contract, information or clarification.	A person who is presumed to be eligible to have a complaint considered by an insurance undertaking and has already lodged a complaint e.g. a complainant, insured person, beneficiary and in some jurisdictions, injured third party. (Lloyd's understands that this applies to individual persons and commercial entities.)
UK definition (FCA handbook)	<p>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, which:</p> <p>(1) alleges that the complainant has suffered (or may suffer) financial loss, material distress or material inconvenience and</p> <p>(2) 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 in the UK</p>	<p>Eligible complainants are:</p> <ul style="list-style-type: none"> <li>- individuals acting for purposes outside their trade, business or profession</li> <li>- "micro-enterprises" (which are smaller business that have a turnover or annual balance sheet of not more than €2m and fewer than ten employees)</li> <li>- a charity with less than £1m annual income</li> <li>- a trustee of a trust with net asset value of less than £1m</li> <li>- Professional clients and eligible counterparties, where the person is an individual acting for purposes outside his trade, business, craft or profession.</li> </ul>

## 9.2 Timescales for the LBS procedure

The following table indicates the local deadlines by country for acknowledging and responding to complaints.

Country	Timescale for acknowledging complaints	Timescale for responding to complaints
Austria	5 business days	8 weeks
Belgium	3 business days	1 month (2 weeks is highly recommended)
Bulgaria	3 business days	1 month
Croatia	5 business days	6 weeks
Cyprus	2 business days	15 business days and 45 business days if additional time is necessary
Czech Republic	5 business days	8 weeks
Denmark	3 business days	8 weeks (1 month is highly recommended)
Estonia	5 business days	8 weeks
Finland	5 business days	8 weeks
France	5 business days	8 weeks
Monaco*	5 business days	8 weeks
Germany	5 business days	6 weeks (4 weeks is highly recommended)
Greece	5 business days	50 calendar days
Hungary	5 business days	30 calendar days
Iceland	5 business days	4 weeks
Ireland	5 business days	40 business days, an update in writing is needed within 20 business days
Italy	5 business days	45 calendar days
Latvia	5 business days	8 weeks
Liechtenstein	5 business days	8 weeks
Lithuania	5 business days	15 business days and 35 business days in exceptional cases

Luxembourg	5 business days	8 weeks
Malta	5 business days	8 weeks (15 business days is highly recommended)
Netherlands	5 business days	6 weeks
Norway	5 business days	8 weeks
Poland	5 business days	30 calendar days
Portugal	5 business days	20 business days (30 business days if it concerns a complex complaint)
Romania	5 business days	8 weeks
Slovakia	5 business days	30 calendar days (60 calendar days if additional time is necessary. In this case an update in writing is needed at 30 calendar days.)
Slovenia	5 business days	30 business day.
Spain Complaints received from the Spanish Regulator	5 business days	15 business days
Spain (Complaints from PH/ Insured/TPA)	5 business days	2 months
Sweden	5 business days	14 calendar days
UK	5 business days	8 weeks

\*LBS is in the process of applying for a licence in Monaco. No Monegasque business should be written on behalf of Lloyd's Brussels until this licence has been obtained.

Please note that the LBS is considering whether to join Assuralia (Belgian Insurance Association) in the future. In this event, membership of Assuralia may require Lloyd's Brussels to review its procedures to meet the timescales that Assuralia members must comply with. Therefore Lloyd's Brussels recommends that complaints are resolved at the earliest possible opportunity and preferably within the month receiving the complaint.

## 10 Email Contacts

Email id for communicating with	Email address
Lloyd's Brussels	<a href="mailto:lloydsbrussels.complaints@lloyds.com">lloydsbrussels.complaints@lloyds.com</a> (for all communication regarding LBS complaints except the notification sheet) <a href="mailto:lloydsbrussels.complaints-notification@lloyds.com">lloydsbrussels.complaints-notification@lloyds.com</a> (for LBS notification sheet)
LIO	<a href="mailto:lloydsbrussels.servizioreclami@lloyds.com">lloydsbrussels.servizioreclami@lloyds.com</a> or <a href="mailto:lloydsbrussels.servizioreclami@pec.lloyds">lloydsbrussels.servizioreclami@pec.lloyds</a> (certified mail)
Lloyd's Spanish Office	<a href="mailto:lloydsbrussels.madrid@lloyds.com">lloydsbrussels.madrid@lloyds.com</a> (for all communication regarding Spanish complaints FOE)

## 11 Frequently Asked Questions

- Will there be an internal 2 stage complaint handling process for UK complainants who write their business through Lloyd's Brussels?  
*No, there will not be any internal 2-stage complaints handling process followed for business written through Lloyd's Brussels.*
- Which complaints notices are to be used for EU risks, i.e. what must the insured client receive in their policy document?  
*Information about which complaints notice should be used for which EEA/EU territory is on the Lloyd's Brussels part of Crystal under the Pre-contractual information and Insurance documents sections. The enquirer should look at these sections for the relevant countries. The complaints notices themselves are on the Lloyd's Wordings Repository.*
- What will be audited as part of the sample check of complaints handling cases?  
*Lloyd's Brussels will perform full end to end file reviews and investigation for a selected sample of the complaints handled by a coverholder or a TPA. LBS will select the candidates for the sample and then request for the required files via the managing agent. This will be done to check the quality of delegated complaints handling authority on top of the usual checks done on regulatory compliance, complaints response time and adherence to standards.*
- Will there be a model wording endorsement to the CAA on complaint handling produced to the market?  
*Yes, a model wording endorsement will be produced; we have started engaging with LMA to discuss that.*