

NON-CONFIDENTIAL ACTION PLAN



	PHASE 1 Completed	PHASE 2 April – September 2019	PHASE 3 October 2019 onwards
FORWARD FIX	<p>Customer Groups 1 and 2: Manual solution implemented to transfer RBS address data for open policies.</p> <p>Customer Group 1: Returned mail processes implemented.</p> <p>Guidance published on RBS's internal website for front-line staff regarding address changes for MPPI customers.</p>	<p>Customer Group 1: Automated solution was designed and implemented in August. Manual data transfers were provided in interim on a quarterly basis.</p> <p>Customer Group 2: Contractual agreement between parties for longer term fix has been agreed. Manual data transfers to be provided on quarterly basis in interim.</p>	<p>Customer Group 2: Longer term fix put in place. Update to be provided to the CMA once complete.</p>
REMEDIATION	<p>Customer Group 1: The bank will issue apology letters inviting customers to contact them. Operational team established to take customer calls</p> <p>Customer Group 2: The bank will understand the number of customers affected.</p>	<p>Customer Group 1: Remediation payments to be made to customers and any complaints addressed. Follow-up communications will be issued to customers who have not responded to initial letter. Update to be provided to the CMA once complete.</p> <p>Customer Group 2: Apology letters to be sent out inviting customers to contact the bank. Operational team established to take customer calls. Update to be provided to the CMA once complete.</p>	<p>Customer Groups 1 and 2: Continue to process on an ongoing basis customer responses, ensuring the correct customer treatment is applied.</p> <p>Customer Group 2: Remediation payments to be made to customers and any complaints addressed. Update to be provided to the CMA once complete.</p>
ASSURANCE / CONTROLS	<p>Customer Group 1: Agreement and build to be able to produce six-monthly monitoring of (i) the number of ARLs returned; (ii) the % change in the number of ARLs returned year on year; (iii) a comparison of the number of ARLs sent by RBS and the number which Provider 1 would expect to be sent.</p> <p>Read-across exercise completed regarding ARL address data supplied to other third parties for other PPI policies.</p>	<p>Customer Group 1: First of a new ongoing six-monthly monitoring review completed in June. Review of the adequacy and effectiveness of processes and controls regarding third party data transfer for ARLs is underway to be completed by the end of September. Update to be provided to the CMA once complete.</p>	<p>Implementation of any additional controls based on Phase 2 review and six-monthly monitoring findings. Notify the CMA of any proposed changes to systems and controls.</p> <p>Independent assurance audit to be completed and report submitted at the same time as submitting the PPI Compliance Report. Update to be provided to the CMA when any relevant actions arising from audit completed.</p>