

FSA OPERATIONAL SUPERVISOR MANUAL

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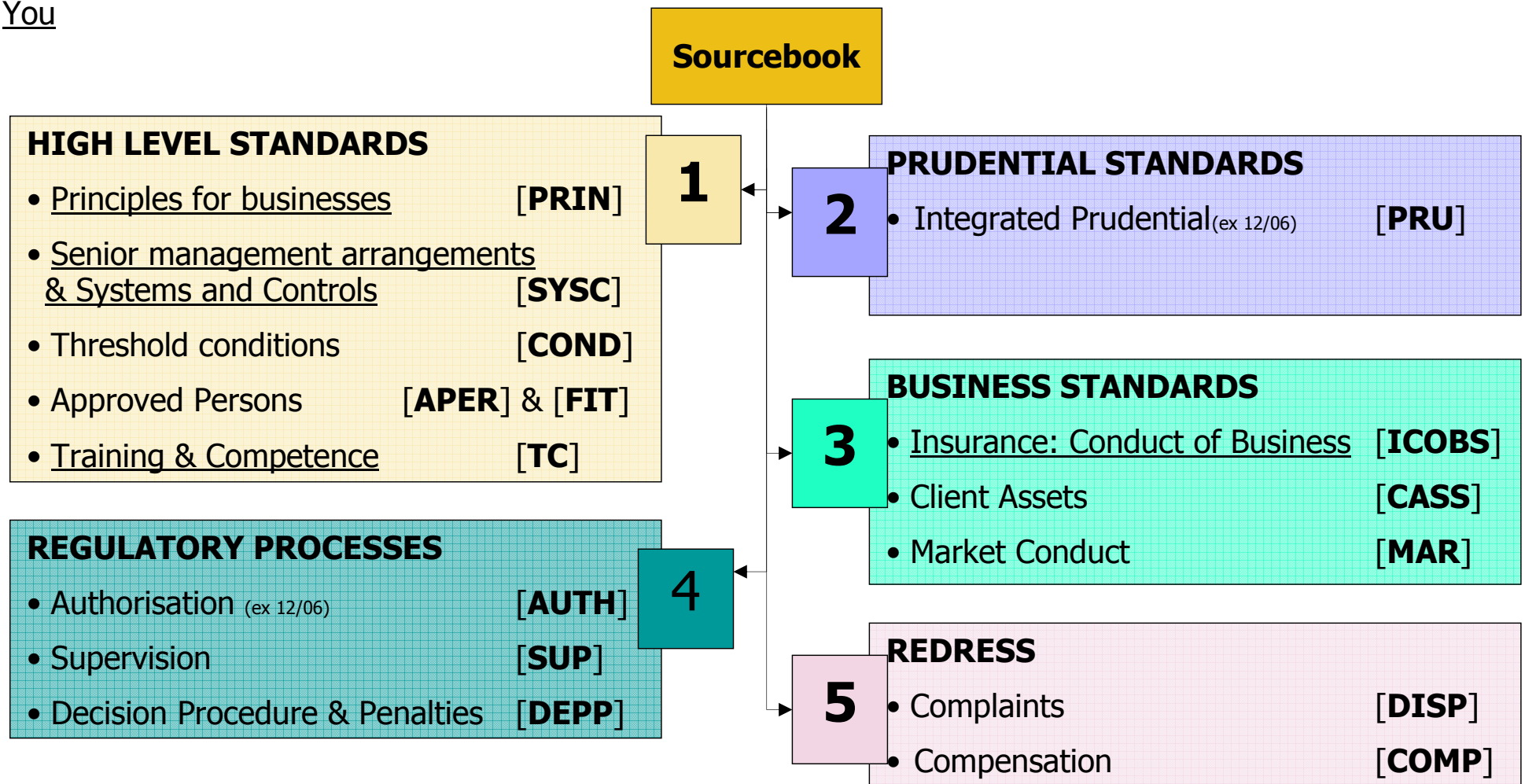
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Regulatory Framework Source Book ⁸³

Regulatory Framework

This chapter provides a brief Renrod management overview to the main FSA business standards that a firm selling General Insurance must have established and continually adhere to. Some of the standards have already been adopted into Renrod's guidelines and procedures, therefore have already been detailed in the manuals that have preceded this one. These business standards are referred to by the FSA as '*Sourcebooks*'. Although not definitive, those that are underlined are additional requirements for Renrod's supervisory management level. I.e You



High Level Standards

Principles for Businesses

The principles will apply to every Manager/FSA Supervisor in Renrod. They are general statements of the main regulatory obligations that Renrod have to adhere to, and set out the high level standards that must be met. If we contravene one or more of the principles we could have enforcement action, which could result in our authorised status being removed.



1 Integrity	A firm must conduct its business with integrity.
2 Skill, care and diligence	A firm must conduct its business with due skill, care and diligence.
3 Management and control	A firm must take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems.
4 Financial prudence	A firm must maintain adequate financial resources.
5 Market conduct	A firm must observe proper standards of market conduct.
6 Customers' interests	A firm must pay due regard to the interests of its customers and treat them fairly.
7 Client Communications	A firm must pay due regard to the information needs of its clients , and communicate information to them in a way which is clear, fair and not misleading.
8 Conflicts of interest	A firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client .
Customers relationships of trust	A firm must take reasonable care to ensure the suitability of its advice and discretionary decisions for any customer who is entitled to rely upon its judgment.
10 Clients' assets	A firm must arrange adequate protection for clients' assets when it is responsible for them.
11 Relations with regulators	A firm must deal with its regulators in an open and cooperative way, and must disclose to the FSA appropriately anything relating to the firm of which the FSA would reasonably expect notice.

Senior Management Arrangements

Risk Management

The FSA require that organisation and responsibilities of a risk assessment function should be documented. The function should be adequately resourced and staffed by an appropriate number of competent staff who are sufficiently independent to perform their duties objectively. The primary areas of risks are those risks which relate to the fair treatment and protection of our customers, and to the adequate running of the control systems that Renrod have in place i.e the implementation of the guidance in these manuals.



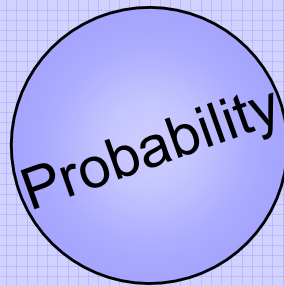
Priority for the FSA

Risk =
assessment



Of the problem
if it occurs

X



Of the problem
occurring

IMPACT:

Systemic significance of the company
Perceived importance of the company
Retail customer base
Compensation policy

Renrod Guidelines

As managers you are responsible for assessing any area's of possible risk, and implementing a risk strategy policy in order to prevent them from occurring. You should pay particular attention to the following areas:

- Statutory obligations [ICOBs].
- Staff competencies.
- Staff recruitment.
- Complaints handling procedures.

PROBABILITY:

Business environment

Business Risk:

- liquidity
- Market
- Nature of customers/products

Control Risk:

- Treatment of customers
- Internal systems & Control
- Staffing & Compliance culture

Senior Management Arrangements

Senior Management Arrangements.

Encourage firms' directors and senior managers to take appropriate practical responsibility for their firms' arrangements. To encourage firms to delegate responsibility for effective and responsible organisation in specific senior managers.

It is your responsibility as a manager to take reasonable care to organise and control your staff responsibly and effectively with adequate management systems that are appropriate to monitor your department.

Senior Management Competences:

Renrod require that, as a manager you are responsible for your direct under-managers and so on. (*Please refer to our FSA Management Structure in the Foundation Guide*)

In order to do this, you must be able to successfully demonstrate;

- Leadership
- Communication Skills
- Problem Solving
- Personnel Development
- Maximising Performance
- Technical Knowledge
- Experience

Renrod Standards:

- Managers must take reasonable steps to ensure that the regulated business of their departments for which they are responsible is organised so that it can be controlled effectively.
E.g. A clear understanding of reporting lines, authorisation levels, job descriptions and responsibilities. Ensuring suitability of staff.
- Managers must exercise due skill, care and diligence in managing the regulated business of their department.
E.g. Appropriate delegation. Not expanding business without assessing risks. Understanding the sales process and the ICOBs.
- Managers must take reasonable steps to ensure that the regulated business of their department for which they are responsible complies with the regulatory requirements.
E.g. Appropriate use of systems and controls, Ensuring; the monitoring of staff compliances understandings reasons for breaches and implementing procedures when requested.
- Personal culpability arises where an employees standard of behaviour is below that of which would be reasonably expected (incompetent) or was deliberate.

Senior Management Arrangements

Systems and Controls.

As a manager you are responsible for, and expected to police, the Renrod guidelines and procedures that have been set out in previous manuals. Comply with the relevant FSA regulations and requirements that are appropriate to your department.

All managers and supervisors are responsible for;

- Training and Competence
- Reporting
- Complaints Log and Manual [**CLAM**]



The Guidelines:

It is mandatory that any sale of insurance is conducted by an appropriate accredited member of staff, who has successfully completed their Sales Manual. It is also a mandatory requirement to use the Customer Information Form [**CIF**] and The Customer Recommendation Form [**CRF**] when selling.

Managers are required to demonstrate accurately, review and give advice on, the suitability of the insurance products to be offered. You can only do so if the forms are completed fully, failure to do so may result in misconduct.

You must follow the guidance under the ICOB rules, and use the Approved software and guidelines as an aid to product suitability, signing the [**CRF**] to validate the advice and thus taking responsibility.

You should not allow a new starter, trainee or non competent employee to engage in any unsupervised regulated activity, therefore you must conduct the business on their behalf.

As a manager you are required to take responsible steps when signing off your departmental staff. Full details of staff competence and grading are given in the Training & Competence chapter of this manual.

You are responsible for conducting Performance Reviews for your staff in accordance to the timescales and requirements laid out in the Supervisory chapter.

Staff training and competency records must be updated and maintained at all times, with systematic reviews to insure compliance.

Systems & Control Process

Systems & Controls:

In order to help you and Renrod effectively manage our process, control procedures have been designed to ensure any failures or breaches in policies are appropriately indentified.



Renrod Guidelines

As a Line Manager you are responsible for FSA processes at your dealership, you are expected to ensure that all reports are completed accurately and represent a true and correct reflection of your site. The purpose of these controls are to help you manage and identify areas of potential risk allowing them to be documented and reported.

System & Controls	Responsible position	Description / Overview
Deal File Check List	Sales Manger Sales Admin	Deal by deal sign off by Sales Manager and Sales Admin to ensure all relevant documentation is correctly completed and in the deal file. To be completed prior to the deal file being closed.
Monthly MIS	Sales Manager Brand Manager	Monthly F&I reports issued by PFS, detailing Dealership and individual performances against target and peer group. Includes a r a g monthly and YTD performance rating highlighting potential sales anomalies.
Accountants Check	Site Accountant	This is a monthly audit on all those clients that have purchased an insurance product. Statement of 'Needs and Demands' and Recommendations must be fully completed and signed by the customer before any commission is paid to the Sales Executive.
½ Yearly FSA returns	Sales Managers	A document summary detailing all staff employed during that period along with their FSA status, training and procedures, signed as either competent or non competent by their line manager. Dealership / Individual cancellations with reasons if known. Summary of complaints received during period.
¼ly Management Reviews	Sales Managers Brand Managers	Formal review with the Board of Directors incorporating agenda items for Finance and Insurance, Dealership KPI's, individual sales performances, sales process and FSA compliancy.

Staff Recruitment

Recruitment:

If you intend to recruit an individual with a view of that individual engaging in or overseeing an activity with or for retail customers, we must as part of our recruitment procedures:

- Take into account the **knowledge and skills** of the individual in relation to the knowledge and skills required for the role.
- Take reasonable steps to obtain sufficient information about the individual's **previous activities and training.**

Obtaining Sufficient Information:

The individual you employ must be able to achieve accreditation within the timetable laid out in this manual in the Road to Competence section. Until they have successfully passed the required training modules they will not be allowed to carry out their specific job function. Therefore it is vital that the prospective individual employee has the learning ability to be able to perform that function.

There are a number of methods designed to help to assess an individuals capabilities which Renrod have devised:

- GAP assessment form (highlights areas of weakness or concern).
- Asking the candidate questions at the interview on technical and regulatory knowledge. Appendix [F]
- Ensuring the candidate gives a presentation to demonstrate technical and regulatory knowledge held.
- Discussing with the candidate the technical and regulatory aspects of the role.

It is also expected that you take as many references that you deem fit, to ensure that all previous activities or relevant training is disclosed.



Renrod Guidelines

H.R have designed new application and reference forms which will help ascertain candidate suitability. It is also advised that character traits and aptitude tests are conducted before recruitment. It is your responsibility to write full job spec's for each role and to ensure correct procedures. Appendix [F]

Senior Training and Competency Assessments

Training Manuals

As a manager you are responsible for monitoring your staffs performance and proficiency required in their role. Firstly you need to establish an employees level of competency then continue to develop and record their ability to remain competent.

You must ensure that no person performs an insurance function without being satisfied that the person is fit and proper to conduct our affairs soundly and prudently I.e **accredited** by a supervisor function.

To help you and your staff gain and maintain competency we have produced four progressive training manuals dependant on the job functions of an individual employee, coupled with Computer Based Training & exam software.

A breakdown of the content of the training modules together with a minimum requirement for a particular job function can be found in the Foundation Course Manual. Employees must first complete the Foundation Course and subsequent levels until they reach their required standard E.g. Sales consultant must first sit and pass the foundation and advisory level before sitting the sales consultant assessment.

The manuals have been designed to take into account the knowledge and skills necessary to fulfill a required role and have timed multiple choice examinations to evaluate and grade that individual.

Colour	Description	Required Mark	Resulting Action
g	Accredited	> 60%	Continued monitoring of KPI's by line manager. Re-sit when necessary or when change in process or product.
a	Supervision Required	50 – 60%	Can continue performing insurance functions until retest but <u>must</u> be supervised by appropriately accredited line manager.
r	Non Competent	Below 50%	Employee must not continue to perform an insurance function, and must re-sit.



Training and Competence

Training Ongoing – Performance Reviews

Once an employee has achieved a sufficient pass mark on their training modules they will be allowed to sell unsupervised until their accreditation status changes. At this time their direct line supervisor will be required to do a consultants performance review. These reviews are necessary for both an insurance sales function and an operational supervisors function, it will not apply to those at the foundation and advisory level. See Appendix [A] for copy of Performance Review Form [PRF].

The [PRF] will look at the performance levels from the time an employee is initially accredited or from the date of the last review. As well as looking at the employees sales performance the form will ask the supervisor to grade in 6 key performance indicators and to subsequently assess the overall risk of that employee using the red, amber and green rating from the training module section.

The 6 continual Key Performance Indicators, with suggested action.

Customer File Quality:

- Check a cross section of 2 sale files per month.
- Rate for quality, content and document checklist.

Complaints:

- Number of complaints in received in period expressed as a percentage of new insurance sales.

Range of Advice:

- Check suitability of advice from reviewed customer files, ascertaining all relevant products recommended.

Completed Observed Sales:

- Observe a minimum of 2 random sales a month.
- Use observation sheets appendix [B].

Insurance Penetration:

- Combined insurance sales as a percentage of total sales (GAP, CPI and Warranty).

Training Module Examination:

- Relevant training modules retaken to take into account changes in the market and to the products, legislation and regulation.

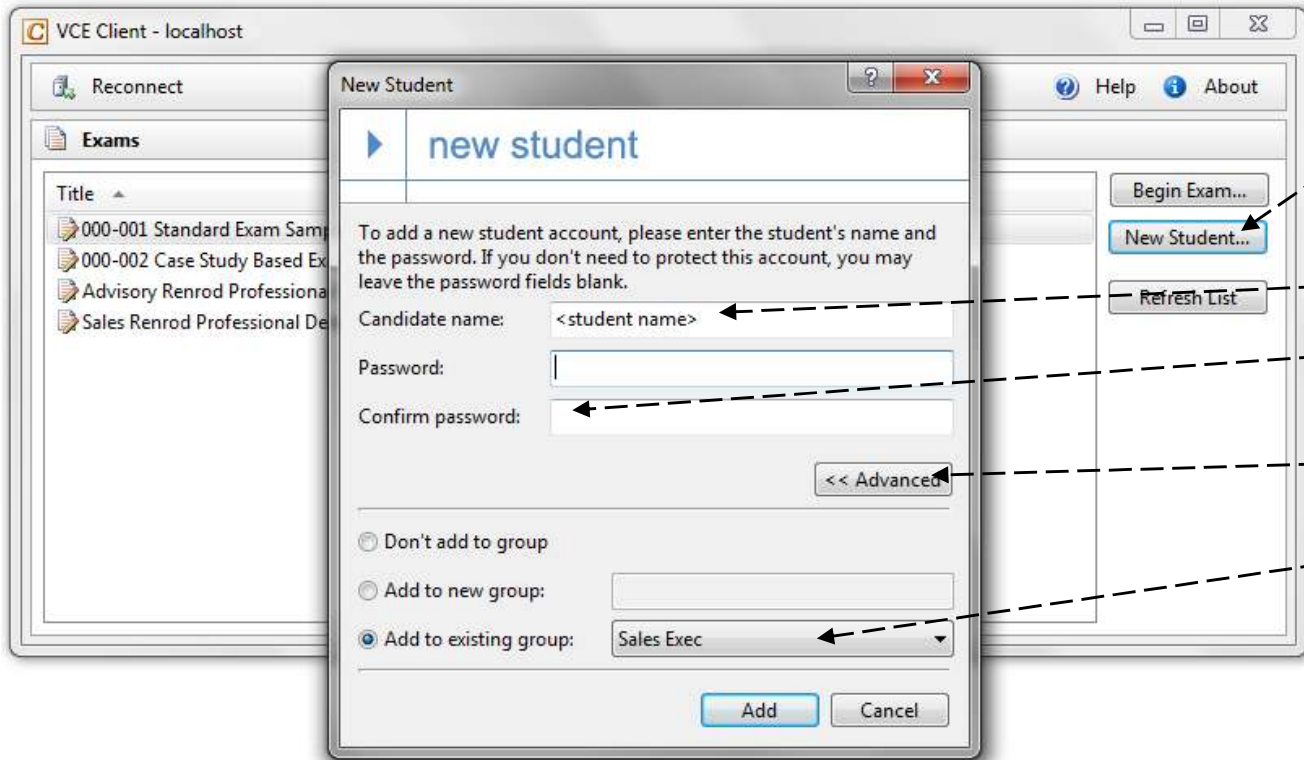
Training and Competence

2012 FSA Sales Consultant/ Operational Supervisor Track				Foundation/ Advisory
Stage	Description	Suggested Time	Suggested Action	Suggested Action
1 FSA	Foundation	Week 1	Examination Module CBT	Examination Module
	Advisory	Week 2	" "	" " (Advisor)
	Sales Consultant	Week 3	" "	
	Op. Supervisor	Week 4	" "	
	TOTAL TIME	3 / 4 Weeks	Once passed can sell supervised	TOTAL TIME: 1 / 2 Weeks
2	F & I Intro module	2 weeks	Distance learning work book, with self assessment.	<i>N/A</i>
	Conversion and Presentation Skills	1 weeks Sign Off	1 Day course followed by Role Plays at Dealership with Man.	
3	Observations *if required*	ETA 2 Weeks Minimum 4 Sign Off	Line Manager to observe all customer contact/sales. Observation Sheet – App. [B]	<i>N/A</i>
4	Customer File Review	ETA 2 weeks Minimum 4 Sign Off	Review deal files grade for; Quality 1/3 rd Marks - Content 1/3 rd Marks - Check List 1/3 rd Marks	
5	Performance Review Meetings [PRM] – App. [A] *if required*	If change in status	Review summarised and personal development plan created.	<i>Re-sit modules only no [PRM]</i>
6	Sign Off TOTAL TIME	Post [PRM] 11 / 12 Weeks	New accreditation given.	New accreditation given for period.

Training and Competence

Exam Software - VCE Client

As a line manager it is your responsibility to set your staff up on the exam software. This is done using the VCE Client software loaded onto your dealership PCs'.



VCE Client:

- Select 'New Student' from main menu

New Student:

- Enter Students name
- Ask student to enter and confirm a password
- Select 'Advance'
- Choose 'Add to existing group' and select the students Dealership from the drop down

Phone PFS to amend any details or if password needs resetting.

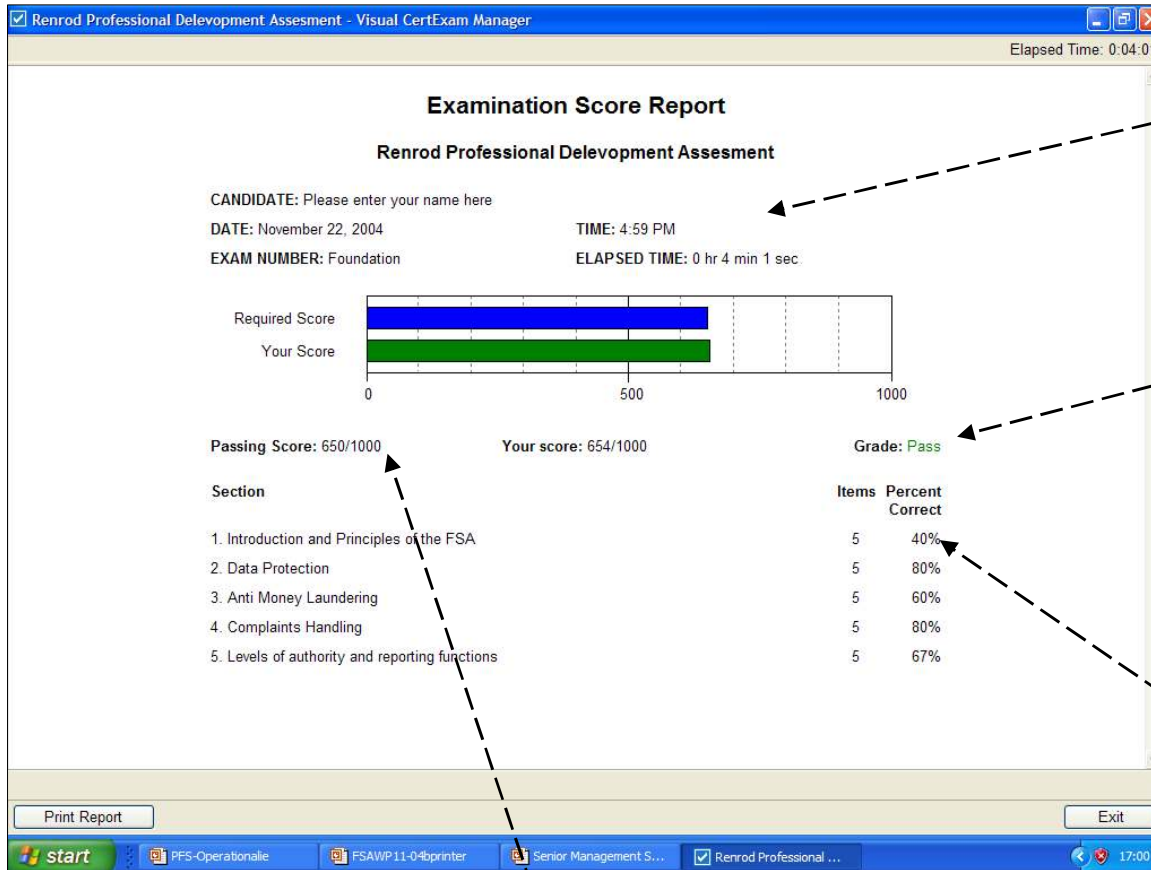
Renrod Guidelines

- It is your responsibility to ensure all members of your department, that fall under the scope of the FSA, are setup on the VCE Exam system and have a Personal Development File.
- Exams must be kept up to date. Change of job function or new starters must be recorded.
- As a line manager / supervisor you are responsible for ensuring the training records and [PDF] of your staff.

Training and Competence

Understanding the Examination Score Report

These print out are required as evidence of examination result. They should be kept in accordance to T&C requirements for six years. The information should be entered onto staff records and form part of the [PRF].



General Information:

Documents Name, Time & Date information along with Elapsed Time in order for a supervisor to help assess general ability and skill level and to build a pattern in the event of a re-sit

Grade:

Use **r** **a** **g** rating to determine overall pass level

Percentage Pass:

g = re-sit exam B/C on failed sections only. E.g below 60%

a = Requires full re-sit of exam B/C. However can still sell with supervision of accredited supervisor/line manager

r = Must re-sit exam B/C before permitted to conduct an insurance function.

Score Information:

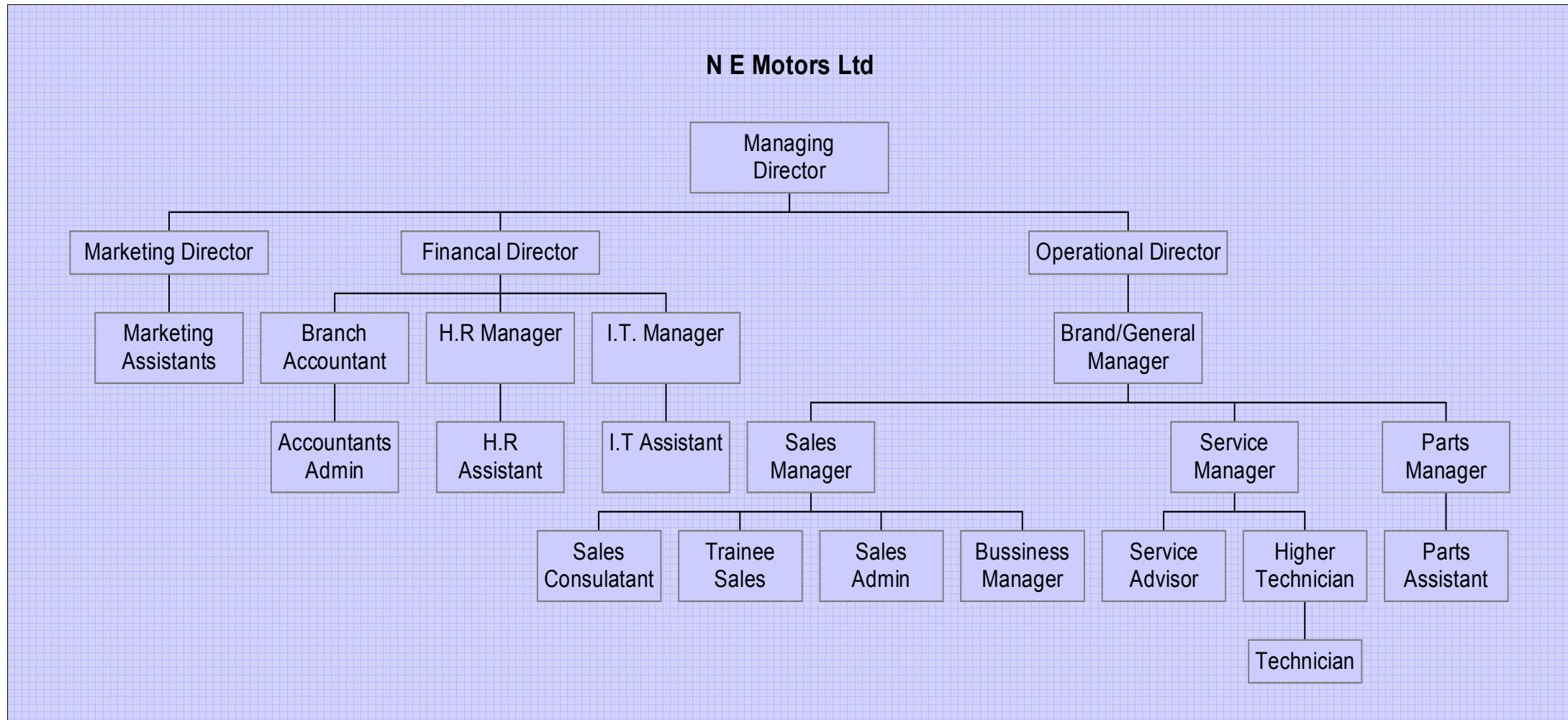
Passing Score - Shows **g** minimum.

Your Score - Details Percentage Pass

Training and Competence

Case Study:

Below is an organisational structure of a fictitious dealership, set detailed in Appendix [C] is a brief job description of the employees of this company. You are required to say whether each of these persons are covered under the scope of the FSA, and to what level they would need to be trained up to (Foundation/Advisor/Consultant/Supervisor).



Supervisory Functions

FSA Rules on Senior Manager Responsibility

Under the Senior Management responsibilities a Company must take reasonable care to maintain a clear and appropriate apportionment of significant responsibilities among its managers in such a way that:

- It is clear who has which responsibilities
- The business and affairs of the company can be adequately monitored and controlled by the relevant Senior Managers.

A Company must appropriately allocate to one or more individuals, as detailed below the functions of:

- Dealing with the apportionment of responsibilities opposite.
- Overseeing the establishment and maintenance of systems and controls opposite.

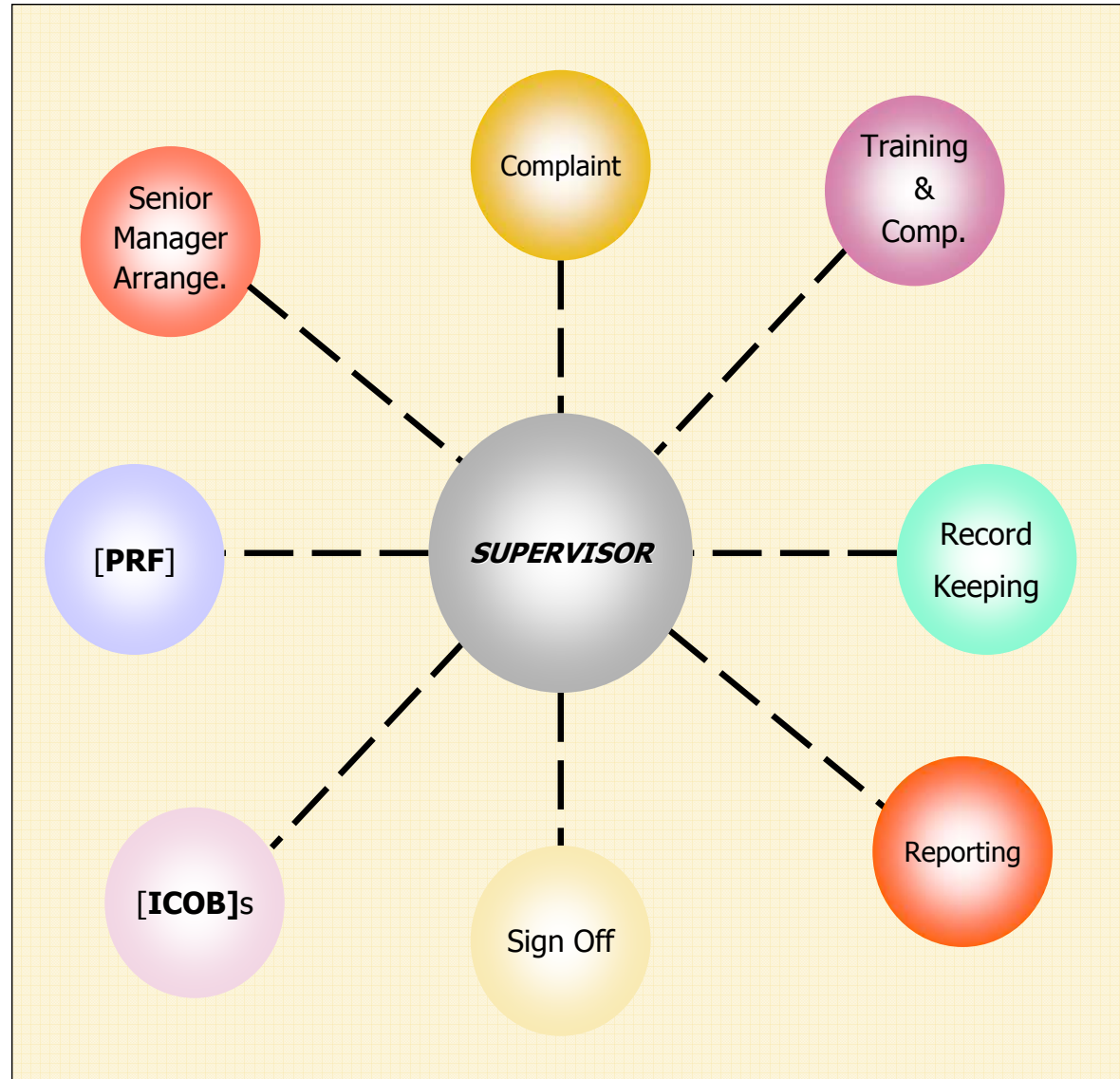
Renrod Guidelines

As a Manager the following regulated activities will **not** be within your scope unless expressly authorised, but are the responsibility of Renrod Directors:

- Staff remuneration.
- ICOBs/Sales process/[CIF]/[CRF]
- Insurance product pricing.
- Negotiating, approving or amending insurances.

Renrod Guidelines

All Renrod Managers are required to take on a supervisory function for their relevant department.



Supervisory Functions

Renrod Guidelines

Managers are responsible for recording their own arrangements for the apportionment and allocation of staff responsibilities and take reasonable care to keep these records up to date for a 6 year period from the date which it was superseded. In the space below insert your own *Job Specifications* for your management team who have an involvement in a regulated activity , together with an *Organisational Chart* for your Dealership/Franchises.

Job Specifications: (appendix [E] example)

Organisational Chart:

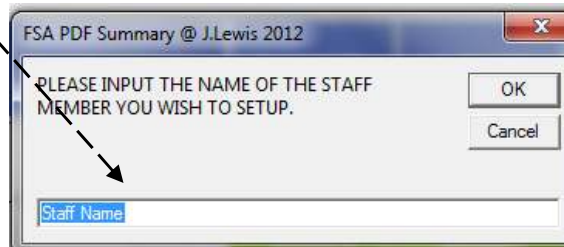
Supervisory Function

Personal Development File – Online Training Records & Set Up

Every member of staff should have a Personal Development File [PDF] to collate and store all their staff records which relate to their FSA status within Renrod and their ongoing training, competency and status. The control screen is used to set up new staff, monitor progress and accreditation level and next review dates.

Staff Name:

- To set up a new staff member click on a blank 'Sales Executive' box – This will create a new individual record.
- To access this record once setup just click on the staff name



Active:

- The Active box will be green to show an FSA function is being performed.
- If they leave or change role, click the box to amend and date stamp to inactive. Once inactive the record will be greyed.

FSA Summary

Control Sheet

TODAY
30/12/2011

Total Reviews Outstanding: 6

Supervisor **Ray King**
 Email **Rayking@renrodmg.co.uk**

Franchise **Vauxhall**

Location **Trowbridge**

Sales Executive	FOUND	ADVIS	SALES	SUPER	Next Review	Outstanding	Active
Tressa Green	GREEN	GREEN	GREEN		27/12/2012	1	
Tommy Gunn	GREEN	GREEN	GREEN		15/12/2011	1	
Anna Key	GREEN	GREEN	AMBER		17/02/2012	1	30/12/2011
Ray King	GREEN	GREEN	GREEN	GREEN	21/12/2012	1	
Sales Admin	GREEN				13/07/2012	1	

Supervisory Function

Personal Development File – List & Amend Staff Records

Once set up, a summary sheet should be kept within each file to detail every FSA event and relevant staff training. Items that must be recorded include: **Training, Complaints, Policy Cancellations**, Changes in **rag** status or **Job Function**.

Occurrence:

- Explanation as to purpose of entry
E.g Complaint/Status Change/Training

Result:

- Examination percentage grade or out come of complaint/action.

Detail:

- Reason and brief explanation for next review E.g Training or **[PRM]**.

Name		Franchise		Location		13/12/2011 TODAY			
Supervisor		Start Date		Required Level		Personal Development File			
Ray King		Vauxhall		Trowbridge					
Tressa Green		14/03/2011		Foundation					
DATE	EVENT DETAIL	ACTION / RESULT	FOUND	ADVIS	SALES	SUPER	REVIEW DATE	NEXT OCCURRENCE	DATE ACTIONED
14/04/2011	Foundation exam taken	Pass 97%	GREEN				14/05/2011	Advisory exam	01/01/1900
07/05/2011	Advisor exam	Pass 82%	GREEN	GREEN			28/08/2011	Sales exam	24/08/2011
24/08/2011	Sales Course 2days at PFS	Pass 86%	GREEN	GREEN	GREEN		24/02/2012	12 month review	
07/10/2011	CCD TRAINING REQUIRED						14/11/2011		

Flags:

- Indicate the FSA level E.g Foundation or Consultant.

Grading:

- Indicate the employees current **rag** status. Blank means not required.

Review Date:

- Date of next review, red indicates that this is out standing.

Supervisory Function

Amending Employee Compliance Status:

As a supervisor you will be expected to maintain up to date employee competency records. Records are updated and kept in the individuals Personal Development File [**PDF**], below is a table outlining what causes may change an employees competency rating. If unsure of offence/action please speak to a Brand Manager or Controlled Function.

Training and Competence Staff Records			
Status Level	Reason for Amendment	Resulting Action	Action Required
<p style="text-align: center;">(g)</p> <p style="text-align: center;">Accredited</p>	[PRF] Result	Review in given period	Update [PDF]
<p style="text-align: center;">(a)</p> <p style="text-align: center;">Supervision Required</p>	Compliance track Stage 1 completed [PRF] Result Complaint High cancellation rate Minor policy breaches (non ICOB) Non completion of occurrence	Can sell whilst supervised Set short [PRF] Review Investigate validity Investigate reason Training Requirement Update [PDF] Review records for 2 weeks	Complete further Stages E.g 6 months Change to (g)/(r) If miss-selling (r) Observation Sheets Change to (g)/(r)
<p style="text-align: center;">(r)</p> <p style="text-align: center;">Non Compliant</p>	[PRF] Result Breach in significant policy/procedures Valid complaint	Retraining (a) for 1 month Investigate/Retrain Retrain employee	Reassess suitability Review job function

Supervisory Functions

Record keeping

For the staff training and compliance issues, every employee under the scope of the act must have a Personal Development File [**PDF**] created and kept responsibly at the dealership, typical information kept in this should include.

Training and Competence Staff Records				
Subject of Record	Contents of Record	Date Recorded	Retention Period	Medium
Attaining Competence CV - Appendix [E] Exam results	Data on competence	On a continuing basis	3 years only after an employee ceases to engage in or oversee an activity	[PDF] Copy to PFS
Maintaining Competence Performance Review	Criteria for and application of assessment [PRF]	On a continued basis after competence	“ ”	[PDF] & Copy to PFS
Supervising and monitoring Observation sheets	Criteria in deciding a level of supervision and how it is carried out KPI's	When an employee begins in an activity and on an ongoing basis	“ ”	[PDF] & Copy to PFS
Compliance issues Job specification Organisation chart	Data on compliance with relevance to FSA guidelines	On establishment and subsequent change	6 years from the date previous records were superseded.	[PDF] & Copy to PFS
Complaint Information	Details of valid complaint with resulting action	Date complaint made updated on resolution	3 years	[PDF] & Copy in [CLAM]

Supervisory Functions

Record keeping

The table below details the record keeping requirements for a range of subjects, together with a brief content overview and the required retention periods.

Customer Records				
Subject of Record	Contents of Record	Date Recorded	Retention Period	Medium
Personal recommendation to customer [CIF]/[CRF]	Explanation of why the personal recommendation is suitable for the customer's demands and needs	At the time recommendation is made	3 years	Deal file
Copy of Policy Summary	As set out in ICOB 5.5.5R (ref. sales manual)	At the time policy summary provided	3 years	Deal file
Copy of Policy Document	All contractual terms and conditions	“ ”	3 years	Deal file
Claims Information	Details of clam, the date of which the claim was concluded. Details relevant to outcome	Date of conclusion	3 years	Deal file
Complaint Information	Details of complaint, the date of which the complaint was made & concluded. Details relevant to outcome	Date of complaint, updated on date of conclusion	3 years	Deal file [CLAM]

Supervisory Function

Understanding the Complaints Procedures:

As managers you must take reasonable steps to ensure all employees are aware of Renrods internal Complaints handling procedures and must endeavour to ensure that they act in accordance to them.

You must put in place appropriate management controls and take reasonable steps to ensure that in complying with our complaints handling requirements you handle complaints fairly, consistently and promptly and that you identify any recurring or systematic problems as well as any specific problem identified by a complaint.

For example: *You may wish to review a sales consultants previous 12 months of deal files to establish whether there is a pattern of mis-advising which consequently has resulted in the complaint/cancellation. This may also be conducted on a Dealership/Franchise level.*



Case Study:

As the Operational Director for N E Motors Ltd you are responsible for individuals involved in insurance mediation. You have 12 dealerships in the South West but you are based centrally in Trowbridge.

You have just received a letter from Mr Client saying he intends to right to the Financial Ombudsman Service if he does not receive any satisfaction regarding his complaint against your dealership.

Your task including all relevant information required to complete it can be found in appendix [D]

Providing Compensation:

Where you decide that redress is appropriate you must provide the complainant with fair compensation for any acts or omissions for which an employee was responsible and comply with any offers of redress which a complainant accepts.

When deciding upon the amount of compensation you must take into consideration the gravity of the offence and the resulting consequence. This figure must then be agreed by a Controlled Function and endorsed by a Director. At all times abiding by the FSA and FOS statutory compensation and redress guidelines.

Supervisory Function

Time limits for dealing with a complaint:

This section has been written to supplement the basic complaints handling procedures detailed in the FSA Foundation Course manual. It takes a more in-depth look at the FSA fixed complaint period timeline and details what is required at each stage.

- A Complaints handling guide must be given to the customer within 48 hours of the complaint being received.
- You must send a written acknowledgement of a complaint within **five business days** of receipt, giving the name and job title of the individual handling the complaint on your behalf. *(Remember to ensure that a copy of Renrod's internal complaints handling procedures are sent to the complainant within two working days).*
- Within **four weeks**, unless a complainant has already indicated in writing acceptance of a response (provided the response informed the complainant how to pursue his complaint if he remained dissatisfied), send the complainant either:
 - A final response; or
 - A holding response, which explains why it is not yet possible to resolve the complaint and indicate when you will likely to make further contact.
- By the end of **eight weeks** from the receipt of the complaint, unless the complainant has accepted the complaint in accordance to the above, send the complainant either:
 - A final response; or
 - A response which:
 - Which explains that Renrod is still not in a position to make a response, giving reasons for the delay and indicating an expected date for the response; and
 - Informs the complainant that he may refer the complaint to the Financial Ombudsman Service [**FOS**] if he is dissatisfied with the delay and enclose a copy of the Financial Ombudsman Service's explanatory leaflet. (To order our leaflet, download the order form from our website at www.financial-ombudsman.org.uk/publications/index.htm or phone for details on 020 7964 0092.)



Renrod Guidelines

An introduction to the [**FOS**] guide is included in your [**CLAM**].