

Market Bulletin

Ref: Y5091

Title	International Complaints Handling: EEA Countries and Switzerland
Purpose	To advise that all EEA countries and Switzerland are in-scope for Lloyd's international complaints handling arrangements with effect from 1 July 2017
Type	Event
From	Paul Brady Head of Third Party and Policyholder Oversight Performance Management 0207 327 5750 paul.brady@lloyds.com Direct telephone number & email address
Date	15 May 2017
Deadline	1 July 2017
Related links	www.lloyds.com/complaintshandling

In January 2016 Lloyd's notified updated arrangements for international complaints handling – see [Market Bulletin Y4961](#). As noted in that bulletin, the implementation of the new arrangements to further territories will be notified to the market from time to time.

Managing agents are accordingly asked to note that **with effect from 1 July 2017 all EEA countries and Switzerland are in-scope** for Lloyd's arrangements for international complaints handling.

In addition to the EEA countries previously notified to the market as in-scope, this means that the following countries will now also be in-scope:

Austria	Bulgaria	Croatia	Czech Republic	Estonia
Finland	Gibraltar	Hungary	Iceland	Latvia
Liechtenstein	Lithuania	Luxembourg	Malta	Romania
Slovakia	Slovenia	Switzerland		

Managing agents should therefore take steps to comply with the procedures set out in [Market Bulletin Y4961](#) in relation to complaints arising from the territories now in-scope. Copies of all relevant material including full details for all in-scope territories can be found at www.lloyds.com/complaintshandling including summary pages for each in-scope territory.

Please note that this Market Bulletin supersedes [Market Bulletin Y4774](#) in relation to complaints handling in Lithuania.

Comments on Lloyd's approach

Managing agents are asked to note the following points regarding complaints handling in EEA territories and Switzerland:

1. Where there are local definitions and rules for complaints handling we have provided the key details of these in the International Complaints section on Lloyds.com for the country in question. In a number of countries, where the local rules do not provide details of how a complaint should be addressed, we have included Lloyd's minimum expectations of managing agents. We have not, however, provided comprehensive details of all local rules for complaints handling. Further details, however, may be found on [Crystal under the Complaints section](#). In all cases, it remains the managing agent's responsibility to ensure that it is compliant with all local rules, as well as with Lloyd's requirements.
2. Lloyd's is aware that in some instances local External Dispute Resolution (EDR) services may be willing to consider complaints that do not fit strictly within their criteria provided the insurer gives permission for the complaint to be considered. In such cases, Lloyd's believes that policyholders are generally better served by being allowed to have their complaint considered by the local EDR and it is Lloyd's policy, subject to considering all the circumstances of the particular complaint, to agree to authorise the local EDR service to consider the complaint.
3. Lloyd's is also aware that in some territories Lloyd's general guidance on Lloyds.com stipulates that referral rights are to be to the local EDR service but that, in some cases, due to the nature of the product the local EDR service will be unwilling to consider the complaint and will generally look to refer the complaint to the UK Financial Ombudsman Service. In such cases the managing agent may decide it is more appropriate at the outset to give policyholders referral rights to the UK Financial Ombudsman Service.

Further information

In relation to the new Lloyd's insurance company that will be established in Belgium, further communication will be provided to the market regarding the process for handling EEA complaints at the appropriate time.

Any questions regarding the arrangements for complaints handling at Lloyd's can be sent to the Complaints Team by email at: complaints-enquiries@lloyds.com. Alternatively managing agents can contact the Complaint Handling Helpline on 020 7327 5696.