

# Customer Experience Standard



Effective: 01 April 2020

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*It may be necessary to disclose this standard in part, or in full, to a third party. Prior to disclosure, approval must be obtained from the standard owner and either your business legal team or group legal.*

## Standard overview

### Standard objectives and scope

This business standard sets out the controls needed to act in the best interest of all customers, continuously improve our customer experiences and deliver great customer outcomes.

This applies to all customers throughout their relationship and interactions with Aviva, across all distribution channels and customer contact channels.

This is required to protect and grow the reputation of the business and enable future growth.

NB: Throughout the Customer Experience Standard we mention “customer outcomes”. Unless otherwise referenced, these should be taken in the context of Customer Experience Outcomes.

Reporting and performance against the **Customer Conduct Outcomes** are covered in the Regulatory Business Standard.

## Responsibility for implementation

It is the responsibility of business CEOs to ensure that their business operates in line with the objectives and controls set out in this standard. This includes any internally or externally outsourced activities.

Whilst authority may be delegated by the CEO, the CEO remains responsible and will be required to sign an annual declaration that with the exception of identified qualifications / weaknesses, the system of governance and internal control is effective.

## Risks from the Common Operational Risk Register (CORR)

Controls or control objectives have been aligned with the CORR risks which they are expected to mitigate. Risk owners are accountable for the assessment of residual risk against tolerance, and therefore determine if further controls are required.

The CORR risks in scope are:

ECAM14 – Customer Service

ECAM16 – Customer communication

COPB06 – Customer Complaints

The CORR can be accessed through this link: [Ctrl + click to follow link](#)

## Mandatory Controls and Control objectives

The **orange box** contains an Aviva Global Control Objective. The white boxes contain the Global Controls. Both the control objectives and controls are mandatory. Text in the **blue box** indicates the risk(s) from the Common Operational Risk Register (CORR), with which the control objectives and controls are associated. Text in a **grey box** is advice or explanatory text.

CEX-O-16	<p><b>Customers can be confident the experience they receive</b> recognises and meets their specific needs and circumstances, customer journeys are managed to an appropriate level, ensuring customer satisfaction.</p>	
CEX-C-12	<p><b>Customer Principles Framework</b>  <b>What:</b> Aviva Customer Principles exist to set a clear standard of what delivering great customer outcomes looks like for Aviva customers. The Principles provide a framework for all business areas to review themselves against and work towards improving customer experience across all customer journeys</p> <p>Markets will be required to achieve a baseline of Level 1 as described in the maturity assessment model across all four Customer Principles.</p> <ul style="list-style-type: none"> <li>• Where assessment is Level -1 a remediation plan must be in place to evidence improvement.</li> <li>• Markets can choose to set ambitions higher than Level 1 however governance will be limited to the achievement of Level 1.</li> <li>• Markets will have customer performance metrics in place which measure customer outcomes against the Customer Principles</li> </ul> <p>The Customer Principles should be reflected in <u>all</u> business activities not just customer facing teams. This includes, but not limited to, strategy and planning; propositions and marketing; people development; training, risk and compliance frameworks.</p> <p>Markets may wish to align or incorporate Customer Principles into the broader proposition oversight frameworks already in place (See Group Standard: Customer Propositions)</p> <p><b>Why:</b> By setting clear expectations as to the customer experience outcomes we want to deliver for Aviva customers, we minimise the risk of delivering poor customer outcomes. Using the Customer Principles to create the environment where we are clear on what we need to do to strengthen our customer experiences and grow our business in the long term. Regular assessment against strategic and organisational execution activities will enable greater focus on what is important to maintain focus on delivering great customer outcomes.</p> <p><b>How:</b> <i>Local markets to determine how they demonstrate they are delivering and assessing their performance against Customer Principles and driving improvements to deliver great customer outcomes.</i></p>	<p>ECAM14 Customer service</p>
CEX-C-23	<p><b>Vulnerable Customers</b>  <b>What:</b> Markets have in place a vulnerable customer definition and guidance which meets the expectation of any local regulatory requirements. Training exists for all appropriate staff to accommodate and proactively identify customers who are vulnerable. This includes customers in the following categories which broadly cover vulnerability due to:</p> <ul style="list-style-type: none"> <li>• channel &amp; access issues (e.g. hearing, sight, language barriers and physical disability);</li> </ul>	

	<ul style="list-style-type: none"> <li>• comprehension (e.g. mental capacity, low financial awareness, age related issues);</li> <li>• circumstances (e.g. bereavement, illness etc.) and</li> <li>• customers whose financial resilience is low. Often this may be temporary (e.g. flood victims).</li> </ul> <p><b>Why:</b> It is important that we are able to meet the needs of all of our customers and that our staff are adequately trained and empowered to consider alternative options where the usual process does not meet customer needs.</p> <p><b>How:</b> <i>Local markets to determine how they create the environment to accommodate the needs of vulnerable customers</i></p>	
CEX-C-24	<p><b>Customer Experience Performance Management</b></p> <p><b>What:</b> In order to know if we are delivering great customer outcomes, there should be a regular review process in place that looks at performance against customer experience outcomes. This review process should contain:</p> <ul style="list-style-type: none"> <li>• multiple data sources to demonstrate customer experience outcomes e.g. complaints, first point resolution, TNPS/RNPS, customer demand and vulnerable customers data.</li> <li>• a feedback loop from customer experience which is channelled into change programs within the appropriate function(s) to increase the success of tackling root causes across the end to end customer journey</li> <li>• progress against clear action plans to close gaps (where they exist). This should be regularly discussed and escalated through the appropriate forums or boards.</li> <li>• Details of where actual or potential customer detriment is identified must be reported through the conduct reporting framework.</li> </ul> <p><b>Why:</b> Delivering great customer outcomes is important for the ongoing strengthening of our reputation and increasing the levels of customer advocacy and trust among new and existing customers. Using Customer Performance metrics to identify improvement opportunities will ensure that actions can be tracked and monitored and emerging issues quickly identified and acted upon.</p> <p><b>How:</b> <i>Local markets to determine how they demonstrate they are delivering and assessing their performance against delivering great customer outcomes and driving improvements .</i></p>	
<p><b>CEX-C-23 Vulnerable Customers:</b>  The following is an example of a vulnerable customer definition which is provided by the UK regulator, the Financial Conduct Authority, but other regulators may have their own definition:  <b>“someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care”</b></p>		
CEX-O-15	<p><b>Customers receive relevant, adequate and clear information</b> throughout their relationships with us.</p>	
CEX-C-25	<p><b>End-to-End Customer Communications</b></p> <p><b>What and Who:</b> Senior marketing, propositions and communications leaders have a detailed understanding of all Aviva guidelines related to communications and oversight of the end to end customer communications journey. This is to ensure</p>	

	<p>clarity and consistency of customer contact points across all channels, journeys and multiple product holdings (where feasible).</p> <p><b>Why:</b> To confirm customers understand our communications; to avoid creating communications that adversely impact the Aviva brand / reputation and to ensure communications are compliant, simple, transparent and meaningful.</p> <p><b>How:</b> <i>Local market to determine appropriate oversight and control</i></p>	<p>ECAM16 Customer communications</p>
<p>CEX-C-01</p>	<p><b>Customer Communications Review &amp; Sign Off Process</b></p> <p><b>What:</b> There is a process that allows for ongoing review and testing of all communications material and channels including but not limited to voice scripts, web pages, marketing material and social media against the identified customer needs of the target market.</p> <ul style="list-style-type: none"> <li>• The communication is relevant, adequate, clear and appropriate for the channel being used.</li> <li>• Review of communications to ensure vulnerable customer specific requirements that could manifest are considered including web content accessibility guidelines – <b>see web link in the guidance box.</b></li> <li>• Progress against clear action plans to close gaps (where they exist) should be regularly discussed and escalated through the appropriate forums or boards.</li> <li>• An appropriate sign off process for all customer communications involving Legal, Compliance, Marketing and Operations. All communications are signed off and meet the regulatory, brand and legal requirements of the market.</li> </ul> <p><b>Why:</b> To confirm customers understand our communications; to avoid creating communications that adversely impact the Aviva brand / reputation and to ensure communications are compliant, simple and transparent.</p> <p><b>How:</b> <i>Local market to determine appropriate consumer testing and the internal sign off process to ensure legal and regulatory compliance.</i></p>	
<p>CEX-C-05</p>	<p><b>Alternative Communication Formats</b></p> <p><b>What:</b> A process must be in place and understood by customer facing staff where provision of accessible communication formats or channels are required (e.g. braille, large text, or translations).</p> <p><b>Why:</b> To ensure that customers are communicated with in a way which is suitable for their needs.</p> <p><b>How:</b> <i>Local markets to determine how they demonstrate they can provide alternative communication formats.</i></p>	
<p>CEX-C-01 and CEX-C-25 customer communications are viewed individually and part of a holistic customer journey in order to remove duplication, inadequate or unclear communications. Both controls complement that overall ambition and there should be clear feedback loops between the control owners in order to achieve this.</p> <p>Wherever possible, communications should be tested with customers directly, and where this is not possible, markets should use existing consumer research / insight or internal /external customer / brand expertise. Markets should take a proportionate approach to testing, and the frequency of it, for both new or existing propositions relative to the volume of communications, distribution and channel ownership.</p>		

Markets should satisfy themselves that the communications, and the communications channel itself, is meeting the needs of all customers including those who have specific vulnerabilities both in new and existing propositions and that communications are perceived as relevant, adequate and clear to all customers.

Where communications are being produced by a third party, e.g. partners, distributors, markets should be confident that they are satisfied that all third party communications reflect this standard

CEX-C-05 - It is not expected that all formats are available for all communications, only that different formats are available as needed. We would expect that there is a process in place to create such communication or channel when requested by customers.

CEX – C – 01 Web content accessibility guidelines can be accessed here for the most up to date version : <https://www.w3.org/WAI/standards-guidelines/wcag/>

CEX-O-19	<b>Customer Experts have the knowledge and skills</b> in order to meet customers' needs and are supported by regular, timely feedback to improve the overall customer experience.	
CEX-C-26	<p><b>Customer Expert Training &amp; Competency</b></p> <p><b>What:</b> Specific training for all relevant staff is in place, is subject to regular review, and should include:</p> <ul style="list-style-type: none"> <li>customer experience guidance: e.g. managing expectations; keeping promises; customer experience principles; empathy; negotiation skills; active listening and objection handling</li> <li>complaint handling in line with local regulatory requirements</li> <li>identification of customer vulnerability and how to respond and adapt to support the individual needs</li> </ul> <p>All customer experts (including leaders where appropriate) must complete the training prior to working with customers and have proportionate refresher training given subject to the requirements of the role.</p> <p><b>Why:</b> To ensure that customers have a good experience and are supported; dealt with fairly and consistently and managed with empathy throughout the customer journey. To evidence to the local regulator that we are handling customers in line with their expectations.</p> <p><b>How:</b> <i>Local markets to determine appropriate oversight and control.</i></p>	ECAM14 Customer Service
CEX-C-27	<p><b>Customer Expert Quality Assurance</b></p> <p><b>What:</b> There must be an appropriate and timely quality assurance approach across the business to provide a view of aggregated customer experience quality. This will support improvement in capability, including; regular reporting, documented actions and appropriate feedback loops which feed into training, coaching and competence building actions.</p> <p>This is applicable to all stages of customer contact including complaints and dealing with high risk customers such as those with vulnerabilities.</p> <p><b>Why:</b> To identify and remediate any potential poor customer outcomes by focussing on staff capability and systemic failings within the process.</p> <p><b>How:</b> <i>Local markets to determine appropriate oversight and control.</i></p>	

CEX-C-26 & CEX-C-27 – Training and quality assurance should include awareness and reference to local support tools available for customer facing experts such as on-line resources, virtual support and guides to aid customer sign-posting. Whilst it is acknowledged that technical knowledge is important to customer-facing roles, this should not be at the expense of staff soft skills.

It is recommended that a network of leaders and staff are trained as “champions” to support with specific customer needs including vulnerability and that customer facing staff can easily access the network for immediate support and to escalate cases if required. Where the customer vulnerability is beyond the capabilities of the organisation to address, it may be helpful to be able to ‘signpost’ customers to relevant external agencies (charities or local government social services) where this would be considered appropriate. It is also beneficial to have processes and escalation points in place for customers who are at imminent risk of harm so these situations can be addressed in a consistent manner and in line with the customers’ best interest.

Review activity of calls, coaching and training within local forums can both encourage sharing of best practice and demonstrate effectiveness of training and coaching. The use of artificial intelligence applications such as “Clever Nelly” both tests embedment and creates a culture of continuous learning and focus on customer service.

CEX-O-18	<b>Complaints are managed effectively, taken seriously and investigated thoroughly.</b> Data analysis is used to drive continuous improvements across the business.	
CEX-C-28	<p><b>Complaints Management Framework</b></p> <p><b>What:</b> Customer dissatisfaction is identified at the earliest opportunity and managed in accordance with the market’s own regulation. Within each market there exists:</p> <ul style="list-style-type: none"> <li>• a clear complaints policy, including a clear definition of a complaint to ensure complaints are identified, logged, managed consistently and deliver a fair outcome to customers.</li> <li>• a market complaint’s policy to include Aviva Complaints purpose and principles (see grey box below), embedded across all customer facing staff (internal and outsourced) to drive a consistent approach to managing customer dissatisfaction across Aviva.</li> <li>• appropriate and proportionate training programmes which will be in place to reflect the market’s complaints policy, operating model (handoffs to expert teams) and the level of accountability that different staff require to be trained to.</li> <li>• a quality review process for everyone handling complaints (including leaders, expert teams, insourced and outsourced suppliers) to monitor competency</li> <li>• a process to investigate complaints thoroughly provide an outcome to the customer on a timely basis.</li> </ul> <p><b>Why:</b> To ensure that customer complaints are identified and managed effectively delivering a fair outcome for customers in accordance with the market’s regulation.</p> <p><b>How:</b> <i>Local markets to determine:</i></p> <ul style="list-style-type: none"> <li>• a local market complaint policy which is applied effectively</li> <li>• clear customer metrics used to monitor complaints performance</li> <li>• Aviva customer purpose and principles are embedded</li> </ul>	CPB06 Customer complaints
CEX-C-22	<p><b>Complaint Governance and Continuous Improvement</b></p> <p><b>What:</b> Market’s are able to demonstrate continuous and effective analysis of multiple customer data sources to identify the root cause of customer dissatisfaction and opportunities to improve. Markets will have in place</p>	

- clear metrics to track, monitor and improve customer and regulatory outcomes
- customer dissatisfaction / impact considerations alongside volume metrics to maximise customer benefit from changes implemented
- root cause analysis which is undertaken to establish why customers are complaining and actions taken to address the cause.
- 'Read across' considerations when addressing an issue – what could the wider impact be to other customers across the business
- governance and oversight frameworks with regular / visible reporting to local market committees / boards to understand and improve causes of complaints

**Why:**

To reduce the level of complaints and avoidance of reoccurrence of complaints thanks to a robust continuous improvement process.

**How:**

*Local markets to determine*

Given the complexity of different market business models and regulatory environments, each market will articulate their own definition of a complaint. This must as a minimum ensure compliance with the local regulatory requirements, consider what customers would expect and include the agreed Complaints Customer Purpose and Principles below:

## Aviva Complaints Customer Purpose and Principles

Purpose	Understand me when something goes wrong and put it right												
What we do	Ensure the complaint policy has the customer at it's centre and delivers positive customer outcomes. It has been designed around a core customer complaints purpose												
Principles	<table border="1"> <tr> <td style="background-color: #003366; color: white;">Give me the benefit of the doubt</td> <td style="background-color: #663399; color: white;">We trust our customers to give a fair account of issues they're facing and won't try to justify what's happened</td> </tr> <tr> <td style="background-color: #003366; color: white;">Listen first ask questions later</td> <td style="background-color: #663399; color: white;">We'll actively listen to our customer to understand their issue and not assume we know what the issue is.</td> </tr> <tr> <td style="background-color: #003366; color: white;">I only want to tell you once</td> <td style="background-color: #663399; color: white;">We will take ownership and aim for first point resolution wherever possible. Where someone else is better equipped to help our customer, we'll inform our colleagues of the customer's issues and not expect the customers to repeat themselves.</td> </tr> <tr> <td style="background-color: #003366; color: white;">Don't hide behind your process or policy</td> <td style="background-color: #663399; color: white;">We will challenge process / policy when it's causing customer dissatisfaction</td> </tr> <tr> <td style="background-color: #003366; color: white;">Make it easy for me</td> <td style="background-color: #663399; color: white;">We will ensure our complaints process requires no more customer effort than necessary</td> </tr> <tr> <td style="background-color: #003366; color: white;">Understand what is important to me and treat me as an individual</td> <td style="background-color: #663399; color: white;">We will engage and listen to our customers to understand their individual needs, shaping our interaction and resolution to the individual customer</td> </tr> </table>	Give me the benefit of the doubt	We trust our customers to give a fair account of issues they're facing and won't try to justify what's happened	Listen first ask questions later	We'll actively listen to our customer to understand their issue and not assume we know what the issue is.	I only want to tell you once	We will take ownership and aim for first point resolution wherever possible. Where someone else is better equipped to help our customer, we'll inform our colleagues of the customer's issues and not expect the customers to repeat themselves.	Don't hide behind your process or policy	We will challenge process / policy when it's causing customer dissatisfaction	Make it easy for me	We will ensure our complaints process requires no more customer effort than necessary	Understand what is important to me and treat me as an individual	We will engage and listen to our customers to understand their individual needs, shaping our interaction and resolution to the individual customer
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To maximise the insight into customer issues, it is recommended that all expressions of dissatisfaction are captured where it is feasible to do so, including those that fall outside of the local market regulatory definition as they form a high volume of insight that can support accelerated understanding of trends and issues.

We would recommend embedment of a local complaints training & competency scheme to ensure all customer facing staff are able to identify and manage complaints effectively. Mandatory complaints training for all new entrants is recommended.

Each market must ensure they have clear oversight in place and are able to monitor the effectiveness of their complaint handling – both from a customer and regulatory perspective. The oversight must include the agreed customer metrics and regular sampling of complaints to ensure they are being handled effectively.

Wherever possible effort should be made to discuss the complaint with the customer prior to resolution to ensure a fair outcome is provided.

Whatever method is used to conduct root cause analysis it is important to identify “real root causes” to ensure the issues are fixed at source - “turning the taps off” rather than dealing with the symptoms. Using “The 5 Whys” and “Fishbones” techniques can provide a solid framework to assist with this.

It is expected that where service is provided by a third party (either an intermediary or an outsourced partner) businesses must satisfy themselves that the third party is delivering against our expectations in terms of customer service levels. The service quality third parties provide to customers must be measured and reviewed regularly to ensure it continues to meet our expectations.

The analysis should ensure it is using multiple data sources, rather than complaints data in isolation. Complaints will always be a ‘lag measure’ and so use of wider customer data (TNPS, customer demand, conduct metrics, etc) will help us prevent complaints from arising.

Having identified the underlying issue each market must be able to demonstrate action taken to address the issue and the subsequent impact. Regular reporting in to customer and conduct market committees / boards will help ensure that root cause analysis remains a key focus area.

All markets must be able to demonstrate continuous analysis of customer issues and actions being taken. This requirement is not mandating any methodology as there are several viable options, for example, Systems Thinking, Customer Journey Mapping, Lean & Six Sigma.

### “At a glance” summary of matters for escalation to Group

Matter for escalation	Escalation point
1. Significant or unexpected movement in metrics against tolerance	• Group Standard Owner
2. Non-compliance with the control or control objectives in this standard	• Group Standard Owner
3. Emerging risks to meeting requirements of this Standard	• Group Standard Owner

### References to supporting material

The following risk policies and business standards should be read alongside this business standard:

- Regulatory business standard
- Group conduct risk policy
- Group operational risk policy
- Brand business standard

- Group Propositions Standard
- Distribution business standard
- Procurement and outsourcing business standard
- People business standard
- GI, Life and Asset Management PDAM business standards
- GI and Life claims handling business standards
- Life in-force management standard
- Remuneration standard
- Global Data Governance Standard

### Additional information

Guidance on:

- Scope of Aviva standards
- Non-compliance with a control or control objective in this standard
- Permanent modifications and exceptions
- Non-compliance

can be accessed through the following link: [Ctrl + click to Appendix A](#)

### Version control

Version	Date	Status	Remarks
1.0	October 2012	Draft	For circulation and comments
2.0	November 2012	Draft v2	For final additions or changes
3.0	November 2012	Draft	Reviewed and updated in line with annual business standard refresh
3.1	December 2012	Draft	Update to standard owner
3.2	December 2012	Final	For publication from 1 January 2013
2014 (1)	December 2013	Final	Reviewed and updated in line with the annual refresh. Effective from 1 January 2014.
2015	November 2014	Draft	Significant review and refresh including adaptation for the Conduct Risk Policy and the standard consistency review. Approved by ORC.
2015	November 2014	Draft	Approved by the BRC, with some proposed amendments on the treatment of high-risk products
2015 (1)	November 2014	Final	Reviewed and updated in line with the annual refresh. Effective from 1 January 2015.
2015 (2)	June 2015	Draft	IAI refresh
2016	September 2016	Draft	Reviewed and updated in line with annual refresh and to move to new IAI standard.

2016 (2)	December 2016	Final	Finalised version
2017	August 2017	Draft	Reviewed and updated in line with annual refresh and to move to new IAI standard.
2018	December 2018	Final	Updated Responsibility for Implementation section
2020	March 2020	Draft	Significant review and refresh to include and expand on customer principles, complaints, QA and training, performance measures and vulnerable customers. Removal of sales training objective control which is included in DIS-O-06. Inclusion of Customer Principles Guidelines

**Glossary** - [Ctrl + click to Mega Glossary](#)