

# The Complaints Forum

Supporting Best Practice in Complaints Handling Across Sectors

17<sup>th</sup> November 2025

Hosted by

**SHOOSMITHS**

Sponsored by

**Aptean Respond**  
Complaints Management

## Case Study:

**Aptean Respond**  
Complaints Management

Moving with the times - Adapting processes to a Changing Organisation



SHOOSMITHS

**Jonathan Herne**

Senior Compliance Manager,  
Shoosmiths

# Moving With the Times

Adapting Procedures to a  
changing organisation

# Growth of Shoosmiths

Year	Revenue (approx.)	Employees (approx.)	Key Milestones & Context
2000	£100 million	1,000	Regional UK law firm, expanding beyond Midlands roots; focus on commercial/real estate.
2015	£154 million	1,500	National presence, 10+ offices, recognised for rapid growth and client service.
2025	£217 million	1,900	Record revenue, 13 UK offices, PEP > £1m, major deals, tech & sustainability focus.

## Growing Pains?

Higher revenue leads to a larger workforce and a greater number of cases

Rapid growth presents challenges, including stretched management and a perceived reduction in time available for compliance

An increase in institutional and commercial clients replaces personal relationships, bringing different expectations

Partners have less direct control over client relationships

# Conduct & Regulation

As a regulated business, law firms are guided by two key entities in their handling of complaints

## SRA expectations

- Provide a good standard of service
- Be honest with clients when things go wrong
- Have a published complaints procedure
- Ensure clients are aware of their right to refer to the Legal Ombudsman

## Legal Ombudsman

- Firms should deal with complaints promptly and fairly
- Firms given 8 weeks to respond to complaints
- Considers poor service rather than conduct or negligence

# Shoosmiths Guidance

“To be forward thinking, commercially aware and collaborative in a way that **protects** the business, our people and the firm’s reputation.

To **mitigate risk** in a way that promotes **innovative** but **ethical** business decisions enshrined by **legal and regulatory compliance** and to act as a key stakeholder in the continued growth and commercial needs of the firm.”

## We Promote:

Gold standard client service which includes when things go wrong

Ethical and objective approach to claims and complaints handling – prioritising the right outcome over the best outcome for the firm

Claims and Complaints as opportunities to learn and improve – Feedback given to the board regularly and process improvement

‘No Blame’ culture to encourage openness and honesty when mistakes are made or relationships break down

# Why Change?

1. **Client Service** and procedural fairness – Every client gets an independent and objective review
2. **Regulatory Compliance** – Complaint Handling by trained investigators
3. **Employee Protection** – Employees are treated fairly, receive adequate support and training needs are identified
4. **Collect Data and Process Improvement** – Identify trends and potential systemic issues
5. **Profitability** – Reduce the burden on Fee Earners' time
6. **Transparency** across the business – identify problems and offer support

# How we operate

## Now vs Then

### Pre 2025

Partners dealt with complaints direct

No centralised investigation – minimal risk involvement at 1<sup>st</sup> tier

No standardised information

No uniform approach to communicating LEO rights, compensation or remedy

### Post April 2025

Centralised complaints process

Independent Investigation by Risk

Standard form responses

Remedies agreed centrally by Risk

Standardised communication of rights of referral / escalation

# Our 2025 Process

8 WEEKS



## **Complaint Acknowledgement**

Complaints are acknowledged within three working days to ensure timely communication and transparency.



## **Investigation Procedure**

Independent investigators review case files and consult involved personnel for a thorough examination.



## **Communication with Complainant**

Complainants may be contacted for additional information, and are informed about investigation timelines.



## **Final Response Delivery**

Findings and decisions are communicated via a final response letter with rationale and remedies.

# Internal Challenges

Change Resistance – “We’ve always done it this way”

Training Needs – Establishing a new team and redefining job roles

Communication – Publicising the change

Open to feedback – What works, what doesn’t?

# External Challenges

Changing Client Base = Changing

Expectations

Exiting Markets – Uncertain / Unhappy individuals

Communication and Ownership

Regulator’s Expectations

Third Party Delays – LEO, Land Registry etc...

# Future Challenges

- 1. AI and Client Use** – Increasing number of complaints from gen AI and clients using AI to question advice / cost of services
- 2. Regulatory Compliance** – More onerous / costly compliance requirements in the regulated sectors – changes to AML, SRA complaints consultation, LEO fees?
- 3. Online Presence** – Online review websites, increased online presence of individuals, social media
- 4. Data Protection** – How we process our complaints and claims data & GDPR
- 5. Plans for Growth** – More matters = More revenue = More clients = ?

Fireside Chat:

With Krissy

**Aptean Respond**  
Complaints Management



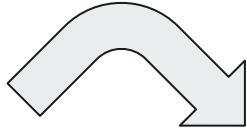
**Kristina Karasjova**

Customer Relations and Lived  
Experience, DHL Parcel UK

# Hi I'm Krissy - Customer Relations Advisor



Became



Becoming...



**EVRi** premium

A network of



# DHL Group Structure



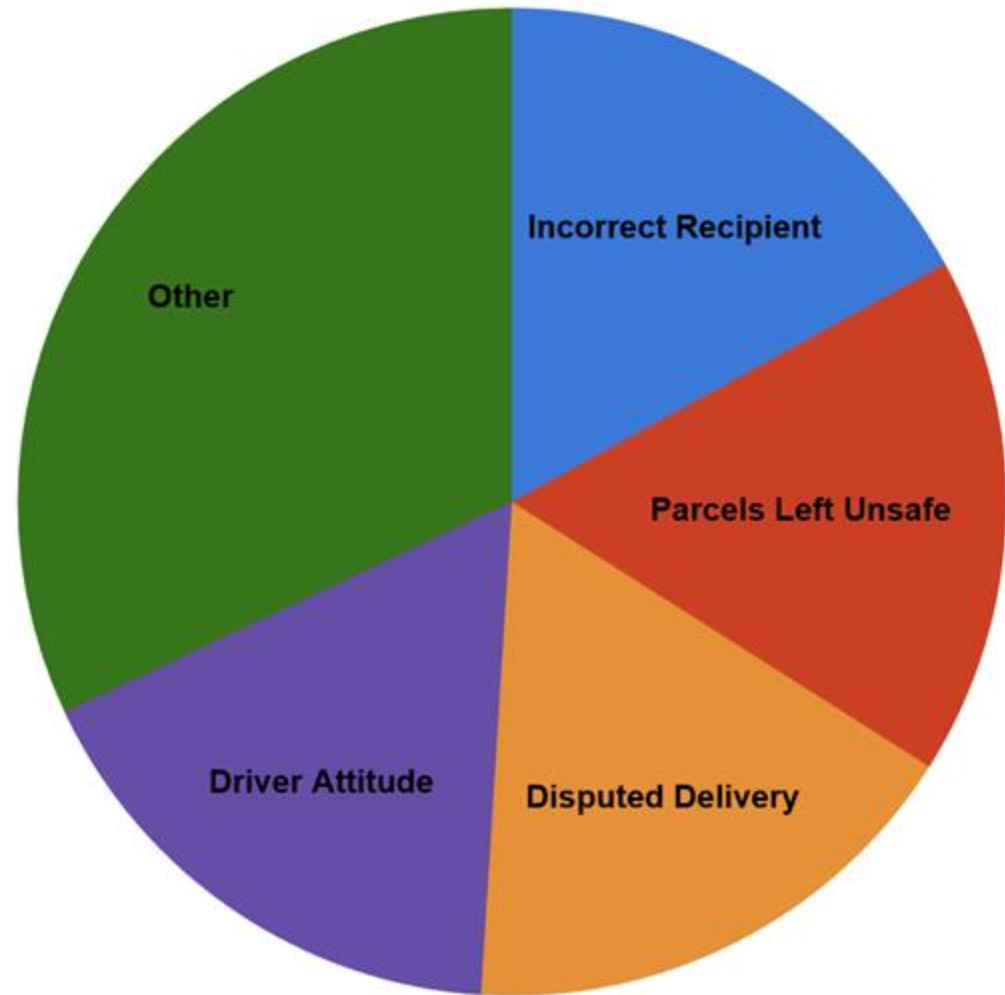
# Biggest Challenges

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- Growing demand - we built a new £230 million distribution hub
- More people sending parcels directly domestic and international - created a new team +portal
- High costs for operations - merger to solve?
- Shortage of drivers
- High expectations - Next Day, Sunday, 24 hour depots



# Top 4 Reasons For Complaints



# Sensitive/Challenging Cases



1. eBay Sellers - high expectations, reputation at stake
2. Driver damage - negotiations can be lengthy and adversarial
3. Lost Luggage - always full of phones and too big for someone to accept it can be “lost”

Examples - Burglary , kitchen counter

# About Me

First Languages - Latvian, Russian

Moved to the UK when I was 13

Diagnosed with - Anxiety, Depression, C-PTSD as a result of childhood abuse and neglect (difficulties in emotion regulation, self-perception, and relationships. Symptoms can involve intense emotional outbursts, chronic feelings of worthlessness or shame, and problems forming or maintaining close relationships)



# Child Language Brokering



Language brokering, also known as child language brokering, refers to the informal act of translation by children and young people between a family member and a dominant language speaker, whereby children can influence both the message and its portrayal. Because their inter-family language differs from the predominant language in society, these children are or must become bilingual.

Language brokering requires children to perform tasks that go beyond the typical expectations for bilingualism. For example, these children also help adults navigate new and different cultures.

# Challenges For Child Brokers



- Pressure from family
- Poor language and understanding of processes and rules/rights
- Data Protection - Identity Verification
- Feelings of personal responsibility/accountability for the result
- Call centre agents having difficult accents

# How To Help a Child Broker



- Add my name to the account if possible
- Speak clearly and slowly
- Email or post clear information to confirm what will happen next
- Skip jargon/acronyms and don't skip the “obvious” details

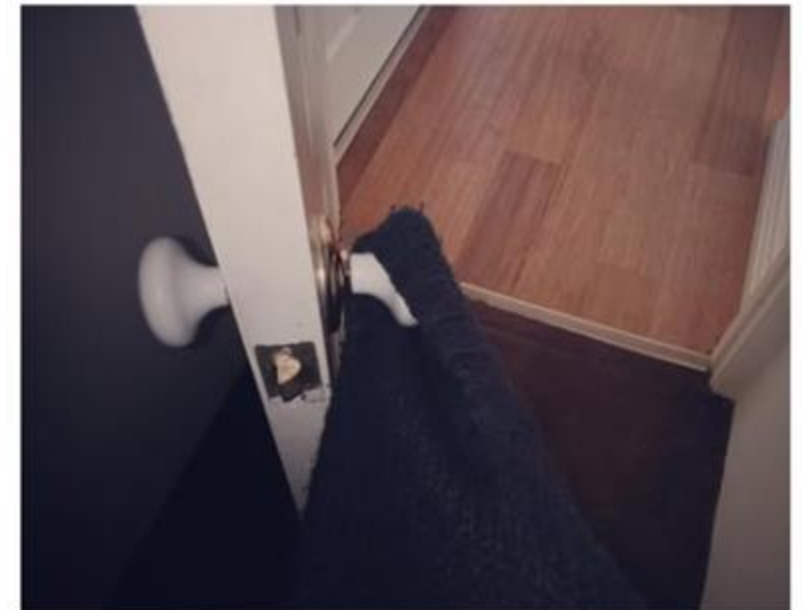
# How To Help An Anxious Customer Like Me

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- **I Catastrophise**- give me a reality check. How likely is this to get fixed vs worst case scenario?
- **I Spiral** - give me timescales, clear action plan, what to expect
- **I'm Already Emotional** - take it seriously and have patience.

Examples - RAC

I just want to know why my clothes only get caught on the door handle when I'm in a bad mood



## Ombudsman Panel Discussion:

### Complaints Outlook

**Aptean Respond**  
Complaints Management



**Martin Canwell**  
Account Director  
Aptean Respond



**Judith Turner**  
Deputy Chief  
Ombudsman  
TOG



**Alessandro Pulzone**  
Senior Ombudsman  
Financial Ombudsman  
Services



**Simon Williams**  
Ombudsman  
Legal Ombudsman



**Michael Hill**  
Go-to-Market Director  
mycomplaints.ai

Case study:

**Aptean Respond**  
Complaints Management

# Protecting Trust in the Complaints Process



**Suzanne Rogers**

Senior Department Manager  
HSBC

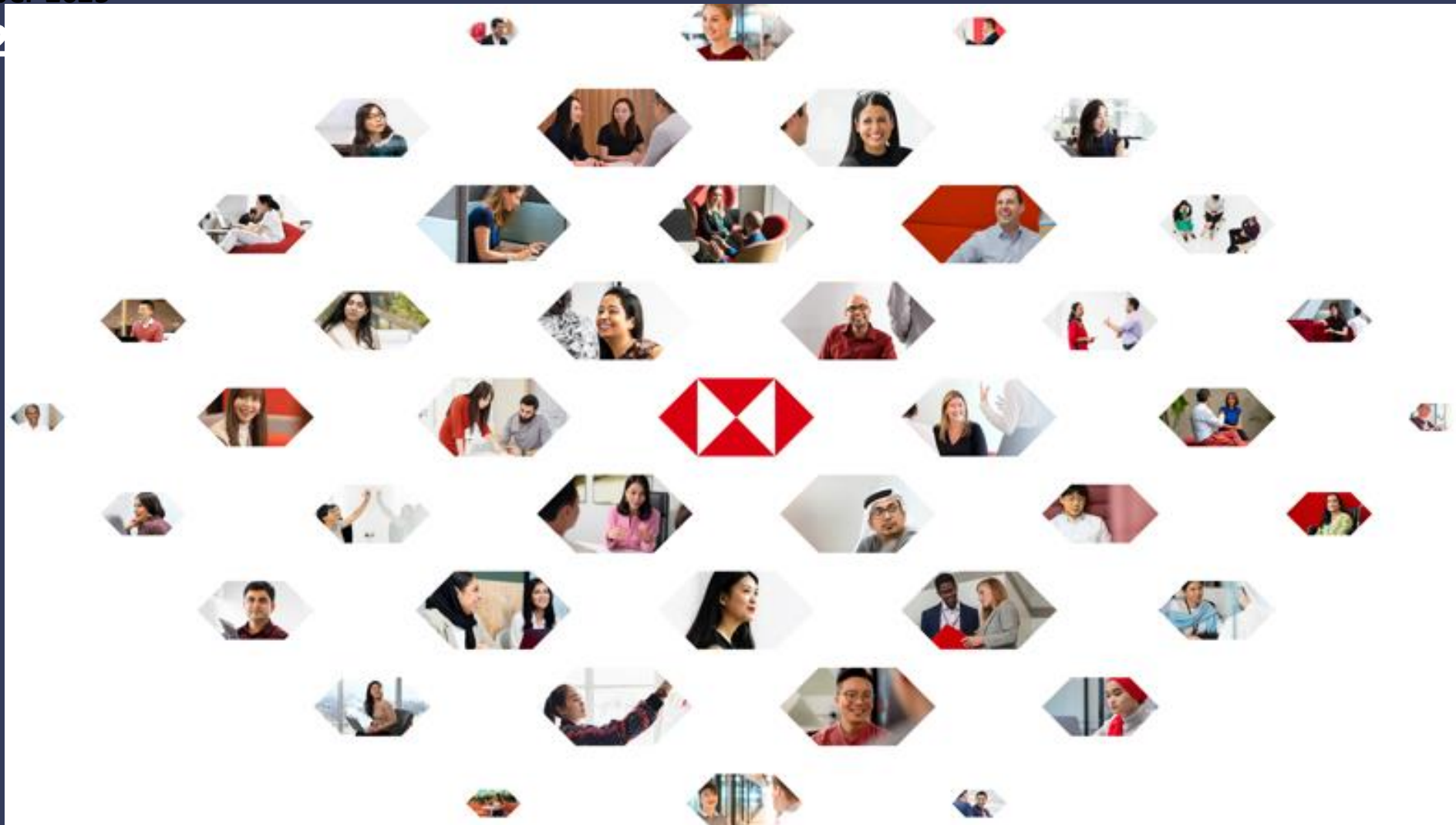


# Complaints Management

Hosted by: Suzanne Rogers

Date: 17 November 2025

14 July 202



# Background – our story

Black Friday digital outage - 2025



The Incident - A major outage impacted digital banking channels during Black Friday 2023.



Immediate impact: Customers were unable to access accounts or complete transactions, leading to a spike in complaints.



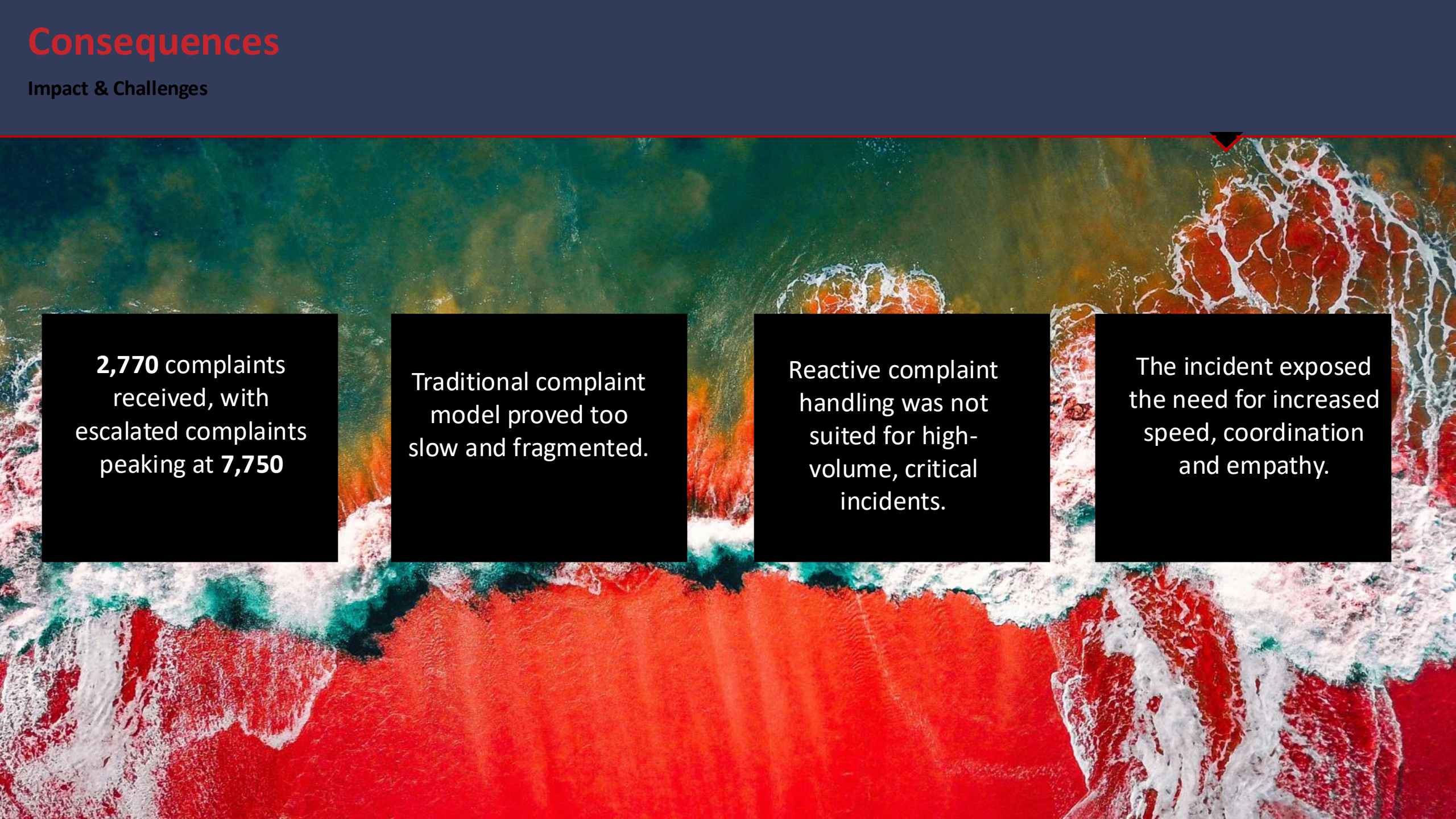
Our initial response: Activation of incident management processes and involvement of complaints teams.

***This became the turning point for our Complaints Strategy.***



# Consequences

## Impact & Challenges

An aerial photograph of a coastline. The top half of the image shows greenish-blue water with some white foam from waves. The bottom half shows a rugged coastline with bright red rocks and white foam from waves crashing against them. Four black rectangular boxes with white text are overlaid on the image, arranged horizontally across the middle.

**2,770** complaints received, with escalated complaints peaking at **7,750**

Traditional complaint model proved too slow and fragmented.

Reactive complaint handling was not suited for high-volume, critical incidents.

The incident exposed the need for increased speed, coordination and empathy.

# Our approach

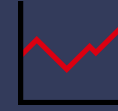
## Strategic shift in complaint handling



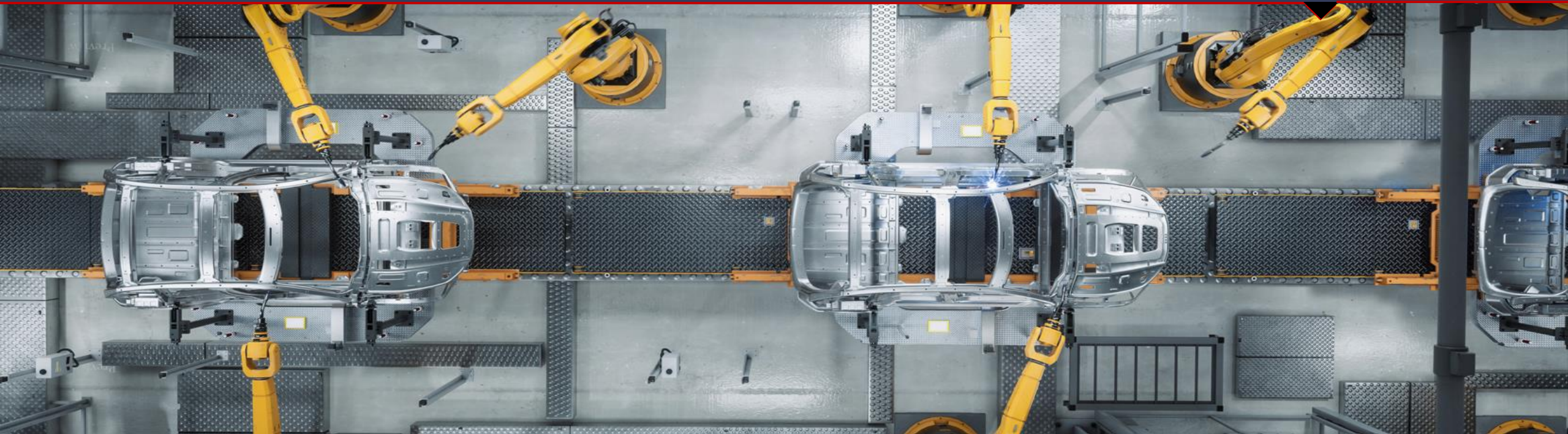
Creation of the complaint's taskforce: A dedicated group of specialists deployed during high-impact events.



Our new Strategy - Shift from reactive processing to proactive customer care, focusing on fast action, targeted expertise, and empathetic engagement.



Tell the Story - Implementation of structured communication plans, clear roles and enhanced MI reporting.



# Execution

Strategic shift in complaint handling Implementations and results

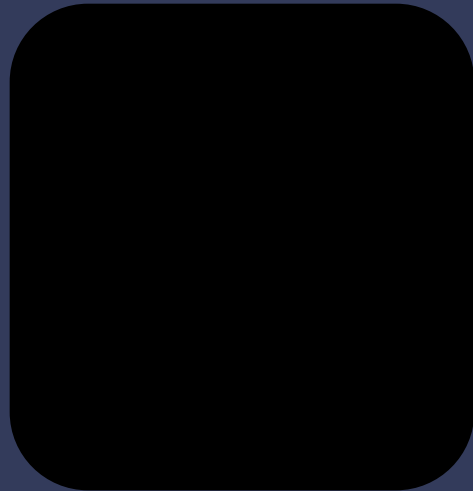


- ✓ Creation of templated response plans, pre-agreed escalation paths, and role-based playbooks.
- ✓ **11.9%** increase in complaints resolved within three days, lowest bank error rate among competitors.
- ✓ Introduction of robust feedback loops and root cause analysis for continuous improvement. Creation of tools, like A&E Hub and Customer Contact Standard (CCS)

# Future Focus

Building for the future

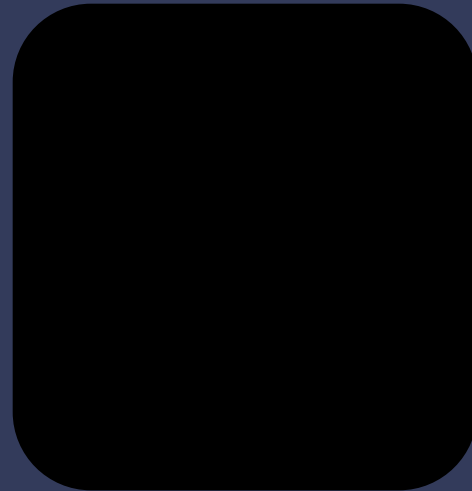
Prevention



Training



Empowerment



Future goals



## Workshop:

**Aptean Respond**  
Complaints Management

# A Christmas Carol - Complaints of the Past, Present and Future



ageas.

**Paula Cornwall**

Customer Relations Manager,  
Ageas

# Workshop: A Christmas Carol of Complaints

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# Our team



**Paula Cornwall**

Senior Customer  
Relations Manager



**Kaylea Wheawall**

Customer Relations  
Manager

# About Ageas

1

£1.5bn GWP  
92% COR  
(2024)

2

Over  
2,000  
employees

3

Over  
4.5 million  
customers



**top**  
EMPLOYER

United  
Kingdom  
2025

FOR A BETTER WORLD OF WORK

**ServiceMark**  
with distinction



The Institute of  
Customer Service



Insurance POST  
**BEST**  
Insurance Employers  
2025

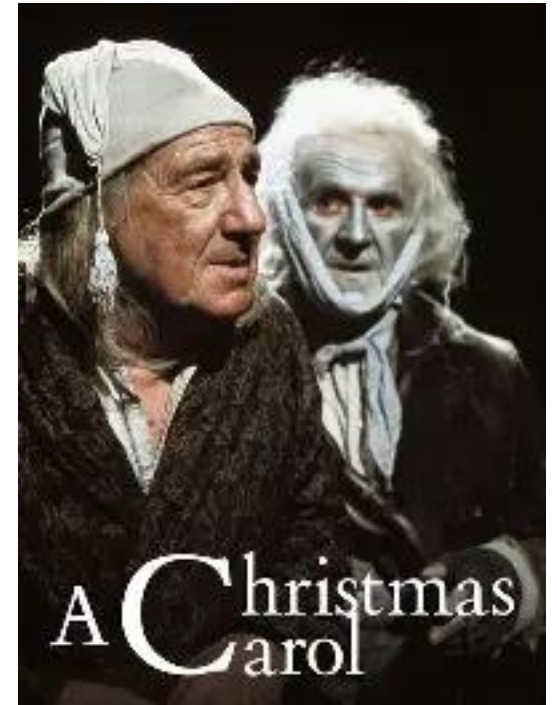
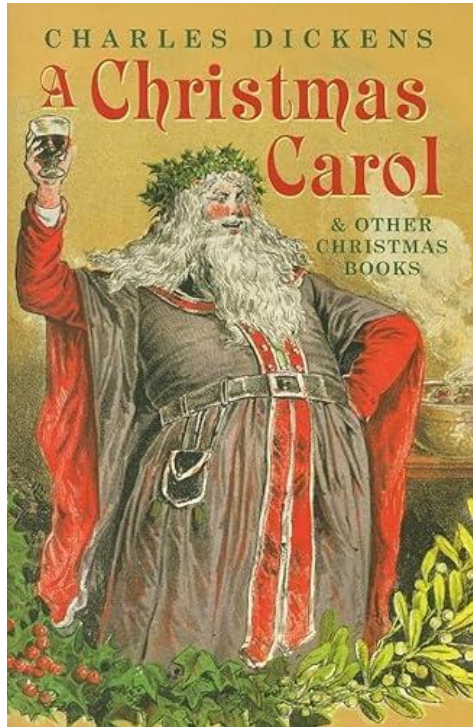
Ageas are one of the largest and well-regarded personal lines insurers in the UK. We're part of Ageas Group, which is headquartered in Brussels with roots back to 1824.

Ageas has been shortlisted for more than 50 awards over the last few years. These include winning the **Personal Lines Insurer of the Year** at the Insurance Times Awards 2024 for the second consecutive year, and for the same award at the British Insurance Awards in 2021, 2022, 2023 and 2025.

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ageas.

# A Christmas Carol



# Interesting Facts

1. Written in Just Six Weeks
2. Helped Revive Traditions
3. Ghosts with Symbolism
4. Sparked Social Change
5. It's One of the Most Adapted Stories Ever

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# Workshop Objectives

- ✓ Reflect on the past
- ✓ Understand the present
- ✓ Envision the future
- ✓ Identify how you can prepare for the complaint's environment of the future

# Complaints of the Past (2015)



- 
1. What did customers complain about?
  2. How did you communicate with customers?
  3. How did you support customers needs?
  4. What challenges did you face?
  5. How was technology used?



# Complaints of the Present

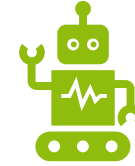
## Same Question



1. What do customers complain about?
2. How do you communicate with customers?
3. How do you support customers needs?
4. What challenges do you face?
5. How is technology used?

What has  
changed  
since  
2015?

# Future



Is there anything which is unchanged from the past or present, which could remain in the future? If so, what can you do to improve or remove this?

What are the indicators already coming through for the complaint's environment of the future, and what can you do to be ready for this?

How will technology be used, where are the benefits and consequences?  
What could you do to minimise the consequences?



# Summary & Action

- Complaints are evolving at pace
- Customer expectations continue to rise
- Trust is critical
- The future demands a proactive and empathetic approach
- Technology will advance

**What one thing will you take back to your business,  
to help you get ready for the complaint's  
environment of the future?**



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THANK YOU

Keynote:

# Protecting Trust in the Complaints Process

**Aptean Respond**  
Complaints Management



**Martin Canwell**  
Account Director  
Aptean Respond

**Aptean Respond**  
Complaints Management

# Protecting Trust in the Complaints Process

Exploring the impact of artificial intelligence on trust within  
financial services complaint handling



# Protecting Trust in the Complaints Process



WHAT THREATENS TRUST IN  
THE COMPLAINTS PROCESS



HOW TO PROTECT TRUST

# Quick recap - Why Trust Matters

Trust is a  
core feeling

It impacts:  
1. Retention  
2. Reputation  
3. Compliance

90% will stay  
if valued



Fairness &  
Transparency



Feeling Valued  
& Heard



Speed &  
Efficiency



Competence  
& Expertise

# Current state of play

AI is increasingly used in complaint handling for

- Triage
- Case processing
- Decision support
- Customer communication

Trust in the process depends on whether customers feel outcomes are fair, transparent, and empathetic.

AI can both enhance and undermine that trust depending on how it is applied and communicated.

# Potential AI Impact on Customer Trust

Trust Theme	Positive Impact	Trust Risk	Key Mitigation
Speed & Responsiveness	Faster acknowledgment and resolution. Tailored updating and response.	Customers feel dismissed and out in an automatic process.	Clear human involvement & named ownership.
Fairness & Consistency	Uniform decisioning; reduced human bias.	Bias in training data; opaque rules.	Human oversight & ownership. Auditable outcomes.
Transparency	Improved audit trails and tracking. Earlier named ownership.	Opaque 'black box' decisions.	Be open about AI's role in the process & human oversight.
Empathy & Human Touch	Skilled staff for human empathy.	Interactions feel impersonal & insincere.	Keep appropriate human involvement and ownership.

# Human Strengths in the Complaints Process

Human Strength / Role	Why It's Valuable
Empathy & Emotional Intelligence	Builds customer trust and reassurance through understanding and compassion.
Ethical Judgment & Discretion	Applies moral reasoning where rigid rules don't fit the situation.
Complex Case Resolution	Uses cross-system knowledge and context awareness to resolve multi-issue complaints.
Communication & Relationship Building	Restores trust through authentic, human dialogue.

# Human–AI Partnership in Complaint Handling

Human Role	Complementary Role of AI
Empathy & Emotional Intelligence	Triages and summarises cases, freeing time for human empathy and reassurance.
Ethical Judgment & Discretion	Provides historical data and case comparisons to inform but not dictate judgment.
Oversight & Governance	Flags anomalies and bias for human validation and accountability.
Handling Vulnerable Customers	Detects language or tone signals to alert human handlers to vulnerability.
Training & Continuous Improvement	Clusters complaint data and trends; humans interpret and design service improvements.
Regulatory Accountability	Supports documentation and consistency, but humans remain accountable for fairness.

# Not just an AI strategy – but a human strategy using AI

- Help your leaders realise value
- Help your colleagues adapt and deliver that value to the business and customers
- Protect and fight for what's human. You and your people still and will matter!



## Case Study:

**Aptean Respond**  
Complaints Management

# AI in Complaints Management



**Paula Currey**

Head of Complaints & Continuous  
Improvement, British Gas



# AI in Complaint Management

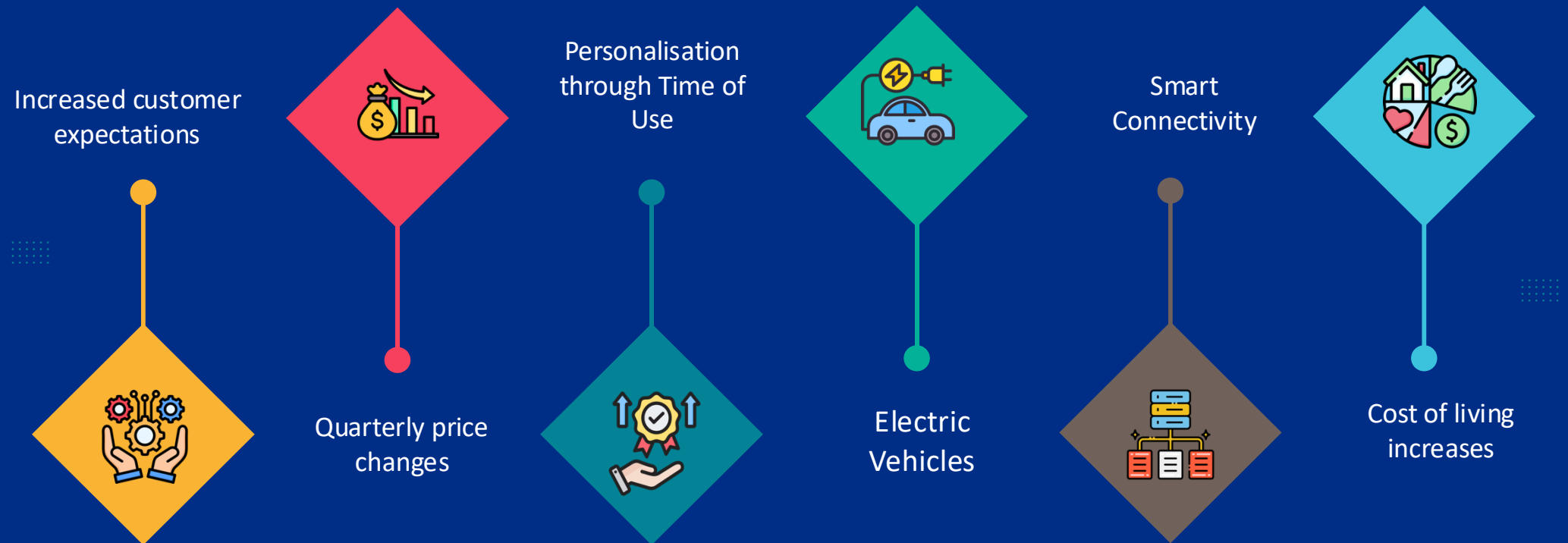
November 2025



# Why is it so hard to get things right?

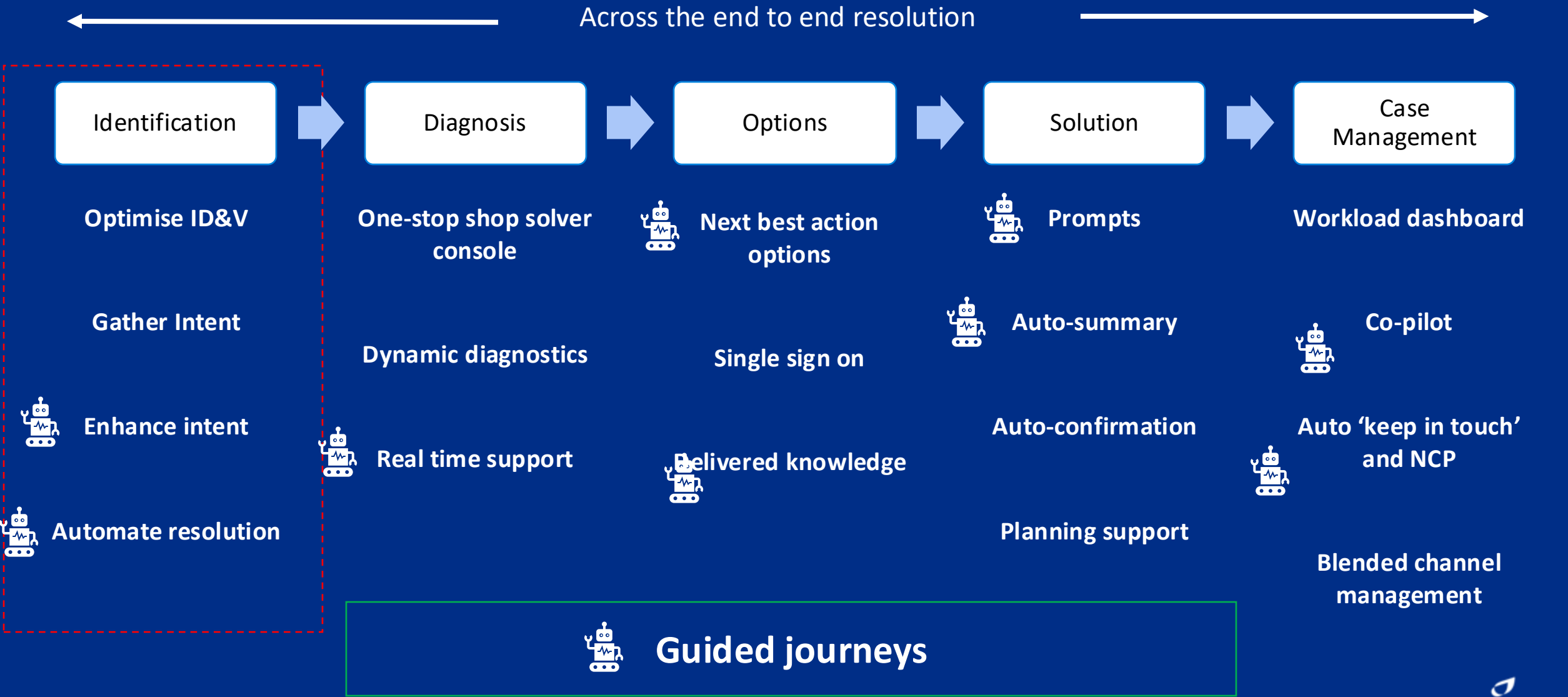
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We are a heavily regulated industry with complex calculations required to create something as simple as a gas statement and with the introductions of new innovative products into the market, it's not going to get an easier for our solvers, especially with households coming under more and more financial pressure!



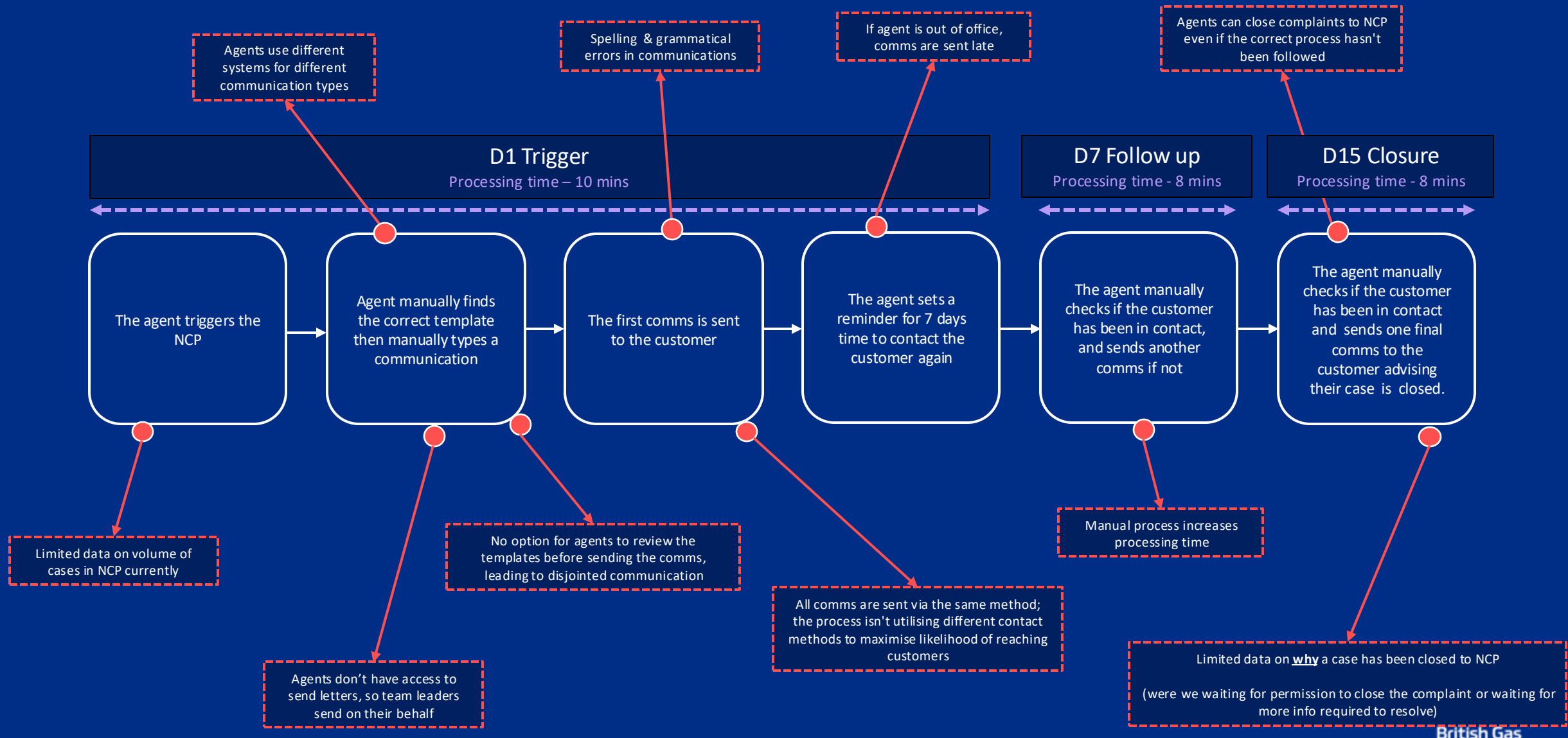
This has led to an increase in complaints so we have been looking to AI to support our teams.

# Where do they need help?

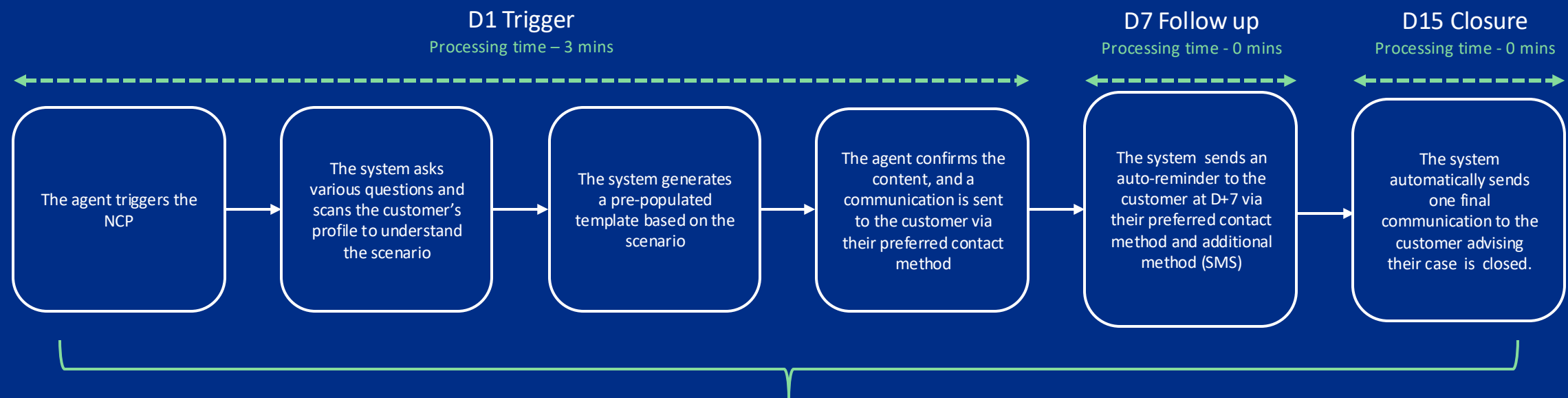


# An example ... NCP ...

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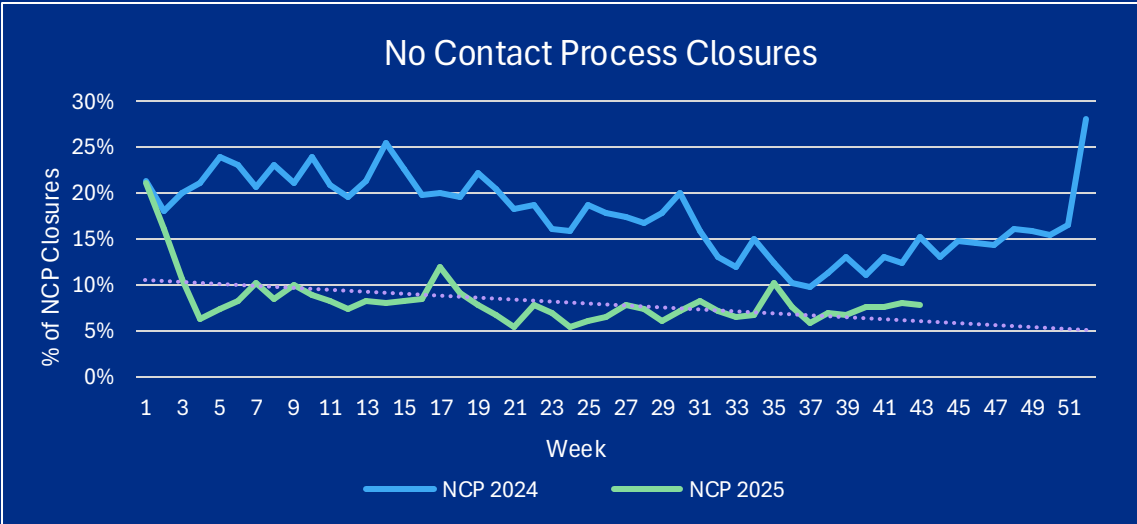
# ...with results



If the customer responds at any time throughout the duration of the case, the system automatically pulls the case out of the NCP and notifies the agent

Increased customer response rates by over **55%**

Improved customer experience



Improved employee experience and reduced agent effort

Improved processing time by **13 mins / case**

# We've threaded AI through our Quality model

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- ✓ Utilising Artificial Intelligence to listen to a contact live and provide information and prompts to an agent on the best course of action through 'real time alerts'
- ✓ Supports our Regulatory Requirements, and customer service



**Real Time Alerts**



**Automated Quality Assurance**

- ✓ Use Artificial Intelligence to transcribe and assess contacts
- ✓ Regulatory and Conversational (5 Steps) activity
- ✓ Automation will assess 60% of all contacts (will increase further in 2026)
- ✓ Contacts provided to front line to allow them to listen back and develop

- ✓ Using Behavioural Psychology to help agents interact effectively with customers
- ✓ 5 Steps covering, 'Welcome', 'Understanding Needs', 'Helping Customers', 'Setting up', and 'Looking after'



**5 Steps to Customer Excellence**



**End to End Complaint Assurance**

- ✓ Full assessment and analysis of all elements of complaint handling
- ✓ High Level complaints assessment covering Ombudsmen and Citizen's Advice
- ✓ Root Cause analysis identifying the drivers of complaints and contact

# And all embedded using AI Coach

Thank you



# Thank you for Joining us



[www.collaborationnetwork.co.uk](http://www.collaborationnetwork.co.uk)

*Together, we can go further*

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