



COMPLAINTS HANDLING POLICY AND PROCEDURE

OVERVIEW

This document sets out our dispute resolution policy and procedure for the efficient and fair resolution of complaints and disputes that arise in the course of our financial services business.

DEFINITION OF COMPLAINT

A "complaint" is *"an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required."*

EFFECTIVE AND EFFICIENT HANDLING

We maintain effective and efficient complaints handling by:

- a) welcoming complaints from people who have dealt with us and who are dissatisfied with our services, decisions, actions or officers;
- b) ensuring all client facing staff and representatives understand the dispute resolution procedures;
- c) encouraging and empowering staff to resolve complaints early;
- d) ensuring sufficient resources are allocated to dispute resolution including training on requirements and number of staff available to manage complaints;
- e) having systems in place to assist in timely and effective complaints handling and monitoring;
- f) resolving systemic issues that may cause or contribute to a complaint.

INTERNAL DISPUTE RESOLUTION

Principle	Description
Ensuring no detriment to complainant	We accept anonymous complaints, however, the extent to which anonymous complaints can be addressed without the ability to obtain further information or make further inquiries of the complainant may be limited.
Visibility and Transparency	<p>The complaints process is readily available, written in plain English, and can be accessed:</p> <ul style="list-style-type: none"> a) upon direct request (via email, phone etc.); b) on our website; and c) within our FSG and Privacy Policy (for complaints relating to the handling of personal and credit (if applicable) information). <p>All client facing staff receive complaints handling training.</p> <p>Publicly available information about our complaints process will include:</p> <ul style="list-style-type: none"> a) where complaints can be made; b) how complaints can be made; c) when complaints can be made; d) when acknowledgement of complaints can be expected; e) what information should be provided by the complainant; f) our process for handling complaints; g) time periods associated with various stages in the process; h) where appropriate, possible options for redress; i) the complainant's options for review, both internally and externally; and j) how the complainant can obtain feedback on the status of their complaint.
Accessibility	<p>Complainants can make complaints over the phone, in person, via email or letter.</p> <p>Complainants who have limited literacy skills will be given assistance with filing any required forms, or otherwise assisted to ensure their complaint is expressed clearly.</p> <p>We accept complaints from family members, advocates, friends or other people who act on behalf of, or in support of, a person who might have limited capacity to make a complaint.</p>
No Charges	The complaints handling process is free for complainants.
Receipting complaints and responsiveness resolution	Refer to the Procedure section of this document.

<p>Objectivity and Fairness</p>	<p>Staff are required to address complaints in an objective, unbiased and equitable way. Staff are required to treat all clients equally.</p> <p>Staff are required to allow an opportunity for the client to make its case and not discourage a client from making a complaint. Where possible or appropriate, the staff member involved in the circumstances giving rise to the complaint will not be involved in resolving the complaint.</p> <p>The Compliance Officer will consider all complaints on its merits and will be considerate of any sensitivities based on the nature of the complaint or the client.</p> <p>Where a complaint is made against a particular staff member, the staff member will be notified of the complaint and be given a reasonable opportunity to explain the circumstances that gave rise to the complaint. The Compliance Officer will keep the staff member up to date on the progress of the complaint and the end result.</p>
<p>Confidentiality</p>	<p>Personal information concerning a complaint or dispute is only disclosed to third parties for the purpose of addressing or responding to the complaint or dispute or otherwise with the client's consent.</p> <p>Information regarding a complaint will only be made available to those staff members that are subject to the complaint or are otherwise involved in the complaint management process.</p>
<p>Client-focused</p>	<p>We have a client focused culture and all staff attempt to answer client concerns before they escalate to a complaint. In addition, we focus on communicating expectations with clients early to avoid misunderstandings.</p> <p>Staff are required to be friendly, helpful, open to feedback and communicate in plain English when resolving complaints (and generally in all other activities too!).</p>
<p>Accountability</p>	<p>The Compliance Officer will report regularly to the Board in relation to complaints received and actions taken. Systemic issues and items requiring improvement are documented in Compliance Committee meetings and actions items given for resolving systemic issues.</p>
<p>Continuous improvement</p>	<p>Complaints are reviewed to analyse whether systems or processes should be improved. Where possible, the continuous improvement process attempts to address items that could lead to a complaint to avoid future complaints.</p>

INTERNAL ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

Board	Compliance Officer	All Staff
Ensure sufficient resources are available to maintain a robust complaints handling process.	Monitor resources to ensure that adequate resources are allocated to complaints management.	Have a thorough understanding of the complaints management process.
Ensure that sufficient complaints management policies and procedures are implemented and promote staff awareness of these policies and procedures.	Implement the complaint management system.	Understand how to identify and report complaints to the Compliance Officer.
Ensure that information about our complaint management process is publicly available.	Regular reporting to the Board and senior management of any significant complaints, systemic issues, the complaint management process generally and any suggested improvements.	Identify complaints and report them to the Compliance Officer.
Appoint someone to manage the complaint management process.	Report to staff members about any systemic or other issues identified through the ongoing monitoring of the complaint management system.	
Prescribe the nature and level of reporting of significant complaints, systemic issues and the complaint management process generally to the Board and senior management.	Review reports from staff summarising complaints, investigate the complaint and attempt resolution of the complaint.	
Ensure complaints are managed effectively.	Undertake annual reviews to monitor and review the complaint management system and to review the adequacy and effectiveness of this Policy.	
	Implement internal escalation procedures where a complaint remains unresolved.	
	Develop and maintain the Complaint Register.	

ROLES AND RESPONSIBILITIES OF PARTIES TO THE COMPLAINT

Client	Staff
Rights	
<ul style="list-style-type: none"> • To make a complaint and to express their views, providing it is done in a reasonable, lawful and appropriate way. • To receive information about our complaint management procedure. • To be treated in a fair, reasonable and impartial way. • To be informed about the actions taken by us in relation to the complaint and the outcome of the complaint. • To be given an explanation about the reasons for our decision in relation to a complaint. • To be treated with courtesy and respect at all times. 	<ul style="list-style-type: none"> • To determine how a complaint will be dealt with. • To implement outcomes that are considered satisfactory in the circumstances. • To receive honesty, cooperation and reasonable assistance from clients. • To be treated with courtesy and respect at all times.
Responsibilities	
<ul style="list-style-type: none"> • Treating our staff with courtesy and respect at all times. • Identifying the issues of complaint or asking for help from our staff to help them identify the issues. • Providing us with all information relevant to the complaint. • Being honest, cooperative and reasonable in dealing with our staff in relation to the complaint. 	<ul style="list-style-type: none"> • Providing reasonable assistance to clients to assist them to make a complaint. • Dealing with all complaints and clients in a professional, fair and impartial way. • Giving clients a reasonable opportunity to explain the nature of their complaint. • Keeping clients informed about the progress of their complaint, any actions taken, the outcome of the complaint and the basis for the decision made. • Treating the client with courtesy and respect at all times.

DEALING WITH UNREASONABLE CLIENTS

A client may at times act unreasonably when dealing with us in relation to their complaint. Examples of this include where the client refuses to accept a decision made by the Compliance Officer, refused to reasonably cooperate with us or is aggressive or offensive.

We apply the following principles when dealing with unreasonable clients:

- a) focus on the content of the complaint, rather than the behaviour of the client;
- b) accept that we can't control how the client behaves, but we can control how we react to the client's behaviour and can modify the way in which we communicate with the client based on the client's behaviour (i.e. where the client may have a tendency to be verbally abusive, we may request that all communications are by email);

- c) aim to provide a better level of service to the client; and
- d) always keep in mind the rights and responsibilities we, and the client, have in relation to a complaint.

Any unreasonable client should be immediately referred to the Compliance Officer who will continue to deal with the client and attempt to resolve the complaint.

When attempting to resolve a complaint of an unreasonable client, the Compliance Officer should consider the most appropriate way to deal with the unreasonable client, including whether it is appropriate to:

- a) restrict the subject matter of communications that the Compliance Officer will consider and respond to;
- b) restrict the persons that the client can communicate with in relation to the complaint;
- c) restrict the frequency that the client can contact us in relation to the complaint;
- d) restrict how the client can contact us in relation to the complaint (i.e. telephone, written or face-to-face); or
- e) terminate the client's engagement with us.

Where determined to be appropriate by the Compliance Officer, staff will be required to undertake training to assist them to deal with unreasonable clients.

EXTERNAL DISPUTE RESOLUTION

We are at all times required to be a member of the external dispute resolution scheme AFCA. Where a client indicates that they may lodge a dispute with AFCA, the Compliance Officer must promptly inform the Board.

Clients must be informed of their right to refer their complaint to AFCA (and how they can contact AFCA). The Compliance Officer must inform ASIC within 3 Business Days after any change in its AFCA membership status including where there is a failure to renew membership or membership termination.

COMPLAINT REGISTER

The Compliance Officer is responsible for maintaining the Complaints Register which records all details regarding each complaint including whether it has been referred to AFCA.

Any request to access a client's complaint record will be dealt with in accordance with our Privacy Compliance Plan.

ANALYSIS AND EVALUATION

The Compliance Officer will regularly review, analyse and evaluate the complaints recorded in the Complaints Register to ensure that any systemic or recurring issues or items for improvement are identified. Systemic issues are reported to the Board who will, in conjunction with the Compliance Officer, prepare a plan to rectify any systemic or recurring issues.

The Compliance Officer will seek feedback from clients regarding our complaint management process, as determined appropriate by the Compliance Officer.

TRAINING

It is the Compliance Officer's responsibility to ensure that all client facing staff have training on our complaints procedure and understand their obligations and role in relation to client complaints. The Compliance Officer will keep a record of the training staff receive on the complaint procedure.

OUTSOURCING

Any outsourced service providers involved in client facing activities must be required to comply with this document.

REVIEW OF COMPLAINT MANAGEMENT PROCESS

The Compliance Officer will review the performance of our complaint management process on an annual basis. The review will consider and report on:

- a) the suitability, adequacy, effectiveness and efficiency of our complaint management process;
- b) any instances of noncompliance with our complaint management process;
- c) any deficiencies of our complaint management process; and
- d) any improvements or potential changes to our complaint management process.

The Compliance Officer will take into consideration the following when conducting the review:

- a) any changes to this Policy, our objectives or organisational structure;
- b) the resources available for complaint management, including best practices in complaint management;
- c) the services we offer;
- d) any changes in legislation or technological innovations affecting complaints management;
- e) results of any audits or reviews;
- f) status of any corrective or preventative actions;
- g) follow-up actions from previous management reviews; and

- h) recommendations for improvement.

The Compliance Officer will report all findings from the review to the Board.

The Responsible Managers (or their delegate) will conduct an audit of the performance of our complaint management process on a regular basis, as determined appropriate by the Responsible Managers. The audit will consider the extent to which the complaint management process has been complied with and the suitability of the complaint management process to achieve our complaint management objectives.

CONTINUAL IMPROVEMENT

We continually seek to improve the effectiveness and efficiency of our complaint management process by taking the following steps:

- a) identifying and implementing (where relevant) best practices in complaint management;
- b) encouraging a people focused approach to complaint management amongst staff;
- c) encouraging innovation in the complaint management process; and
- d) identifying excellent complaint management behaviour of staff.

PROCEDURE

STEP 1 – ACKNOWLEDGE COMPLAINT

Staff are required to acknowledge a complaint immediately (or as soon as possible). The staff member should inform the client about the complaints process, the client's likely involvement in that complaints process and the timeframes within which the client can expect a response to their complaint.

The staff member should request the following information from the client:

- a) the client's contact information;
- b) details of the complaint;
- c) the outcome sought by the client;
- d) any other information that is required to properly respond to the complaint; and
- e) any support requirements needed by the client.

The staff member may, if the complaint is simple, attempt to resolve the complaint directly with the client.

STEP 2 – LODGE FORM WITH COMPLIANCE OFFICER

Staff must immediately complete an entry to the Complaints Register, regardless of whether the complaint was resolved in the first instance by the staff member. The entry in the Complaints Register should contain all of the information collected in Step 1. Where a staff member does not have direct access to the Complaints Register, they must notify the Compliance Officer who will complete the entry to the Complaints Register.

STEP 3 – COMPLIANCE OFFICER UPDATES REGISTER

The Compliance Officer will review the draft entry and accept or edit it in the Complaints Register.

STEP 4 – INVESTIGATE COMPLAINT

The Compliance Officer is responsible for making an initial assessment of the complaint to identify the best process for managing the complaint, including:

- a) severity;
- b) complexity;
- c) impact on the client;
- d) potential to escalate the complaint;
- e) the need and possibility of immediate action; and

- f) outcomes sought by the client.

After the initial assessment, the Compliance Officer will investigate each complaint and will take a proactive approach to obtain information, consult with relevant staff and obtain information directly from the client where required. The Compliance Officer may delegate investigation of the complaint to another staff member. The Compliance Officer will prioritise the resolution of a complaint on the basis of the urgency of the subject matter of the complaint.

STEP 5 – ATTEMPT RESOLUTION

The Compliance Officer or staff member tasked with resolving the complaint must attempt to resolve the complaint promptly with the aim to avoid a complaint being referred to AFCA.

The Board has authorised the Compliance Officer to resolve complaints except where the complaint involves payment of any amount to any person, involves a breach of obligations or may negatively impact our reputation. In these situations, the complaint must immediately be reported by the Compliance Officer to the Board.

Depending on the nature of the complaint or dispute, remedies may include an apology, write off of all or part of fees or termination of any arrangement. The Compliance Officer is required to approve any remedy involving a fee write down or write off.

The Compliance Officer or staff member tasked with resolving the complaint must provide an update of the progress of the complaint to the client every 3 weeks.

STEP 6 – NOTICE OF OUTCOME

Where a complaint is resolved within 5 business days after receiving the complaint but the client asked for a written response, the Compliance Officer must respond to the client advising them of the outcome in writing.

Where a complaint is not resolved to the client's satisfaction within 5 business days after receiving the complaint, the Compliance Officer must give a written response to the client within a maximum of 45 calendar days (or a maximum of 30 days for complaints in relation to the handling of personal and credit (if applicable) information). The response must explain:

- a) the final outcome of the complaint;
- b) the actions taken by us in response to the complaint;
- c) the reasons for any decisions that have been made;
- d) any remedy or resolution offered to the client; and
- e) the client's right to take the complaint to AFCA along with AFCA's contact details (or, in the case of a complaint in relation to the handling of personal and/or credit (if applicable) information, the client's right to take the complaint to the Office of the Australian Information Commissioner).

Where staff are unable to respond within 45 days (or 30 days for complaints in relation to the handling of personal and credit (if applicable) information), the Compliance Officer will contact the client in writing before the expiry of the 45 day period explaining the reasons for the delay and the client's right to take the complaint to AFCA along with AFCA's contact details (or, in the case of a complaint in relation to the handling of personal and/or credit (if applicable) information, the client's right to take the complaint to the Office of the Australian Information Commissioner).

The Compliance Officer will record the outcome of the complaint in the Complaints Register, including the steps taken to address the complaint and any follow up action required.