

POLICY INFORMATION

Policy title:	Complaints Management Policy
Policy number:	1.0
Policy category: (Corporate / Operational / Divisional)	Corporate Policy
Type of policy document:	Policy
Origination department:	Credit and Legal Services
Purpose of the policy:	The Complaints Management Policy formalizes the practices required for effective management and handling of customer complaints within Iemas Insurance Brokers (the FSP).
Mandatory compliance by:	This policy applies to all employees, brokers, contractors and representatives of the FSP, regardless of classification and status of employment in relation to escalated complaints and feedback about programs and services provided to our members.
Policy author:	Preyesh Nundkisun
Policy owner:	Insurance Managers
Date of approval:	TBC
Approved by:	Directors of Iemas Insurance Brokers
Previous policy number (if any):	1.0

POLICY HISTORY

Version	Date	Amendments
1.0	2018	Original signed by the Managing Director on behalf of the Executive Directors of Iemas Insurance Brokers

Recommended

Approved on behalf of the Board of Directors

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1. Introduction and objective

This procedure provides general principles to guide the way complaints are managed within the FSP. Where an entity or business unit within the FSP has a policy, process, procedural guide or training manual relating to complaints management, all such documents must comply with, and not contradict, this policy.

This policy sets out the way all complaints including escalated ones are handled, resolved and maximised. (Maximised refers to conducting analysis of complaints for root cause analysis to ensure processes are improved to reduce complaints where necessary).

The objective of this policy is to ensure effective standards of complaints management in order to:

- (a) ensure fair outcomes for stakeholders;
- (b) protect and enhance the FSP's reputation;
- (c) allow for effective reporting, detailed analysis and identification of trends related to complaints;
- (d) achieve effective and timely resolution of complaints within acceptable turn-around times;
- (e) provide guidelines for acknowledging complaints and for recording stakeholder complaints in a centralised manner;
- (f) improve organisational effectiveness through learning from stakeholder feedback and root cause analysis;
- (g) ensure effective management of complaints;
- (h) restore and enhance relationships with complainants and non-complainants for the purpose of on-going business retention and growth.

2. Definitions

Complaint:

Means an expression of dissatisfaction by a person to an insurer or, to the knowledge of the insurer, to the insurers service provider relating to a policy or service provided or offered by that insurer which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a policyholder query, that:

- (a) the insurer or its service provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the insuree or to which it subscribes;
- (b) the insurer or its service providers maladministration of wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- (c) the insurer or its service provider has treated the person unfairly

Complainant:

Means a person who submits a complaint and includes the following persons:

- (a) the policyholder or the policyholders successor in title;
- (b) beneficiary or the beneficiaries successor in title;
- (c) person whose life is insured under a policy;
- (d) person that pays a premium in respect of a policy;
- (e) member of a group scheme; or
- (f) potential policyholder or potential member of a group scheme whose dissatisfaction relates to the relevant application, approach solicitation or advertising or marketing material, who has a direct interest in the agreement, policy or service to which the complaint relates, or a person acting on behalf of a person referred to in paragraphs (a) to (f).

Complaints Management System:

Includes but not limited to the Policy, guidelines, escalated form, employees and any technology used by the FSP for receiving, recording, responding to, monitoring and reporting on complaints.

Complaints Officer:

The appointed Compliance Officers of the FSP.

Complaints Register:

Means a register kept at a central location in Centurion which includes complaints received at the FSPs geographical locations.

Escalated Complaint:

Means a complaint received in writing via an Escalated Complaints Registration Form. A complaint is also considered escalated in the instance of complaints sent by Regulators, Industry Bodies & specific FSP selected stakeholders. It does not include Social Media Complaints unless specifically catered and in the sole discretion of the FSP or where Social Media Complaints are also sent to Regulators, Industry Bodies and applicable stakeholders.

Complaints Registration Form:

The form used to submit an escalated complaint.

Repetitive:

This means 2 or more complaints about the same matter over a period of 2 calendar months.

Reportable Complaint:

Means a complaint other than a complaint that has been –

- (a) upheld immediately by the person who initially received the complaint;
- (b) upheld within the insurers ordinary processing for handling policyholder queries in relation to the type of policy or service complained about, provided that such process does not take more than five business days from the date the complaint is received; or
- (c) submitted to or brought to the attention of the insurer in such a manner that the insurer does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints

Upheld:

Means that a complaint has been finalised wholly or partially in favour of the complainant and that –

- (a) the complainant has explicitly accepted that the matter is fully resolved; or
- (b) it is reasonable for the insurer to assume that the complainant has so accepted; and

(c) all undertakings made by the insurer to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the insurer within a time acceptable to the complainant.

Responsible Person:

Persons responsible for resolving complaints in various divisions.

3. Commitment

The FSP is committed to:

- 3.1. recognising a member's right to make complaints, comments or suggestions about the standard and quality of services and products provided;
- 3.2. providing an efficient, fair and accessible mechanism for resolving complaints and ensure appropriate procedures in order to submit a complaint will be openly disclosed and made readily available to complainants in writing;
- 3.3. ensuring that all complaints are heard and equitably resolved as soon as possible by means of a practical resolution process that is managed effectively;
- 3.4. monitoring complaints to improve the quality of services;
- 3.5. training and empowering all relevant employees to facilitate and resolve complaints;
- 3.6. providing members with information about the complaint management process;
- 3.7. promoting a positive attitude towards resolving complaints;
- 3.8. providing assistance to complainants who may be disadvantaged in any way and require additional assistance i.e. regional or remote location, language or other impairment, children and young persons through persons duly authorised to represent them;
- 3.9. Where the complaint is resolved in favour of the complainant, the FSP will offer the appropriate level of redress to the complainant without delay;
- 3.10. Should the complaint require an Insurers decision, the FSP will engage with the Insurer so that a fair outcome is negotiated;
- 3.11. Where the complaint is not resolved in favour of the complainant, the FSP will provide written reasons for its decision and inform the complainant of any rights afforded so that the complaint may be escalated to another forum if applicable.

This Policy will ensure that specific employees are tasked to resolve such complaints and that they possess the necessary skills and independence to manage expressions of dissatisfaction by the various stakeholders in order to ensure the best possible outcome.

4. Applicability of Policy

This policy applies to all employees, brokers, contractors and representatives of the FSP regardless of classification and status of employment in relation to complaints and feedback about programs and services provided to our members.

A complaint does not include expressions of dissatisfaction, concerns or complaints received from members in respect to:

- 4.1. government policies and/or legislation outside the control of, and not the responsibility of Iemas;
- 4.2. matters that are the subject of current legal action in a court of law or tribunal;
- 4.3. decisions made by any Court of Law;
- 4.4. approaches made directly to a specific Minister or the State Ombudsman;

- 4.5. allegations of misconduct by employees involving unethical or criminal conduct (these cases must be reported to the South African Police Services or Iemas Fraud Hotline).

5. Principles

The FSP confirms that this Policy is guided by the following principles:

- 5.1. Visibility - information about how and where to complain is well publicised to Iemas members, members of the public, employees and other interested parties. Iemas does this by providing a direct link to 'complaints' on the home page of the Iemas website and making it available at each branch, regional office and at the head office;
- 5.2. Accessibility - the process for making a complaint is easy to access and use and interpreters are provided when needed;
- 5.3. Responsiveness - receipt of complaints are acknowledged to the complainant within three working days and the complainant is kept informed throughout the process;
- 5.4. Member focus – The FSP is committed to effective complaint management and values feedback through complaints;
- 5.5. Confidentiality - personal information collected in relation to a complaint is confidential and only used for the purposes of addressing the complaint and any follow up actions;
- 5.6. Accountability - complaint management processes are clearly established and complaints and responses to them are recorded, monitored and reported to management;
- 5.7. Assessment and action - there are opportunities for internal and external review and/or appeal about the department's response to the complaint, and complainants are informed about these avenues;
- 5.8. Objectivity and fairness - complaints are dealt with in an equitable, objective and unbiased manner applying the principles of natural justice;
- 5.9. Monitoring effectiveness - complaint data will be analysed to identify and address recurring or systemic issues and used to improve service and program satisfaction and performance.

6. Resources

The FSP will strive to ensure:

- 6.1. all brokers, contractors and representatives comply with the approved Code of Conduct;
- 6.2. all employees are trained in the Relationship Management Framework and Complaint Management Policy and Procedures through the induction process and training sessions;
- 6.3. employees handling complaints will be supported by management and should receive effective supervision, guidance and feedback on their work;
- 6.4. The FSP will timeously engage with relevant insurers on a complaint by complaint basis;
- 6.5. continuous training and development of skills in the areas of customer service.

7. Responding to Complaints

A complaint can be made in person, by phone, fax, on-line or in writing.

When a complaint is received, the FSP will:

- 7.1. attempt to resolve the complaint by talking to the relevant employee or business unit or, if this is not satisfactory refer the complaint to the relevant manager;
- 7.2. acknowledge receipt of the complaint within three working days;
- 7.3. where a complaint is not fully understood, contact will be made with the complainant to ensure FSP understands the issue correctly;
- 7.4. aim to resolve the complaint and respond to the complainant within:
 - 7.4.1. 21 calendar days for minor complaints;
 - 7.4.2. up to 60 calendar days for more complex complaints.

where timeframes cannot be met the complainant will be contacted to negotiate a revised response date and provide reasons for the delay.

The FSP is committed to achieving the best possible outcomes for all complainants while we endeavour to resolve all complaints in an unbiased, fair and timely manner. In the event members are not satisfied with the outcome of their complaints they may seek an internal review or alternatively refer to the Ombudsman or Regulator.

Anonymous complaints will be accepted and assessed, on condition that sufficient information is available to enable an investigation.

Vexatious, trivial or previously finalised issues will not be pursued.

8. Costs associated with the lodgement of a complaint

There is no charge or fee applied for the lodgement of a complaint.

9. Accountability and continuous improvement

Information from the Complaints Management Register will be regularly reviewed and analysed to assess its efficiency and effectiveness.

Any actual or proposed improvements to services and programs will be followed up and acted on.

Reports on complaint handling and resolution will be presented to the Executive Management on a quarterly basis.

10. Retention of Records

All complaints received which includes non-escalated and social media complaints must be recorded and retained for a minimum period of 5 years from the date a complaint is resolved. All correspondence relating to feedback and complaints will be managed in accordance with Iemas Recordkeeping Plan, policies and procedures.

11. Compliance Monitoring and Reporting

The Complaints officer shall monitor the complaints procedure and report regularly to specific governance structures within the FSP. All staff are urged to assist in providing all documents and information that is needed by the Compliance officer to make the necessary reports.

12. Review

This Policy will be reviewed as and when required, but subject to an annual review.

13. Conclusion

The FSP confirms its commitment to the improvement of member, potential member and client relations together with the establishment of measures to ensure better corporate governance. The FSP therefore recognises that effective complaints management is considered to be an integral part of good business practice.