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Complaints & IDR Handling Procedure

July 2015

Overview

Purpose The purpose of this document is to set out the procedure for managing tracking and resolving complaints.

Scope This document is applicable to Global Transport & Automotive Insurance Solutions Pty Ltd (GT) and the general public.

Distribution The information in this document is unrestricted and is available to all GT employees and the general public.

Definitions

Complaint	A complaint means an expression of dissatisfaction made to us related to our products or services or to our complaints handling process where a response or resolution is explicitly or implicitly expected.
Complainant	Any person who makes a complaint. This includes our Insured, Claimant, Intermediary, Other Insurance Companies, Regulator, Suppliers, Staff, Government departments.
Complaints Register	This is the register in which details of complaints, and their progress through to attempted resolution through Stage One, are logged.
Dispute	A Dispute is an unresolved complaint where the complainant is dissatisfied with the complaint response.
EDR	External Dispute Resolution scheme: A formal process, operated by an external qualified party, providing a mechanism to review and determine unresolved disputes from clients. Generally, disputes that have been through the IDR process and remain unresolved are eligible to be considered by the EDR Scheme.
IDR	Internal Dispute Resolution process – A formal, internal process that provides a mechanism to review unresolved complaints and claims denials by designated IDR officers who possess the appropriate experience, knowledge and authority.
IDR Register	This is the register in which details of complaints, that are unresolved in Stage One and are referred for review through the IDR (Stage Two) Process, are logged.
FOS Australia	Financial Ombudsman Service Limited – is an independent EDR scheme approved by the Australian Securities and Investments Commission. GT is a member of FOS Australia and is bound by its ToR. FOS Australia provides advice and assistance to consumers to help them in resolving complaints involving members of the financial services industry.
Licensee acting on our behalf	Includes entities that sell or distribute GT products who have their own Australian Financial Services Licence allowing them to sell insurance. Examples may include brokers, credit unions, banks or other financial institutions.

ToR

Terms of Reference (ToR). All references to the ToR relate to the FOS Australia Terms of Reference – which set out the guidelines and rules that FOS Australia adopts in considering disputes.

The Code

The General Insurance Code of Practice is a **voluntary industry code** which GT has chosen to follow. It sets out service standards in relation to general insurance dealings including sales, underwriting and claims.

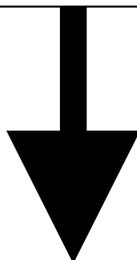
Flowchart of Steps in Complaints & IDR Handling Procedure

Stage One

COMPLAINTS PROCESS

Complaint received by GT.

1. Complaint is received by GT.
2. The GT Staff Member handling the complaint must:
 - a. identify him/herself to, and provide relevant phone and email contact details to, the Complainant;
 - b. obtain details of the complaint from the Complainant;
 - c. immediately take action to correct any errors or mistakes identified in relation to the complaint; and
 - d. attempt to resolve the complaint as soon as practicable and, if this is unsuccessful, promptly refer it to the relevant GT Manager for resolution.
3. The GT Staff Member or GT Manager must notify details of the complaint by completing the form on the GT Intranet – details of the complaint will then be entered on the Complaints Register. Updates on the complaint, as it progresses through the complaints process, must be provided to the complaints officer so that the Complaints Register can be updated.
4. If the Complainant is not satisfied that the complaint has been resolved after 5 business days, the GT Staff Member or GT Manager must provide a written response to the Complainant explaining:
 - a. the decision on the complaint, including reasons for the decision;
 - b. that the Complainant has the right to request the decision on the complaint be reviewed through our IDR process (ie. Stage Two), if they are not satisfied that the decision resolves their complaint;
 - c. phone and email contact details for the IDR process (ie. Stage Two);
 - d. that the Complainant has the right to take the complaint to FOS Australia if they remain dissatisfied with GT's decision after the completion of the IDR review (ie. Stage Two);
 - e. that the Complainant has 2 years from the date of the IDR review to take such a complaint to FOS Australia; and
 - f. the contact details for FOS Australia.
5. The written response to the Complainant must be provided within 15 business days of the date the complaint was first received.
6. If the written response cannot be provided within 15 business days, the GT Staff Member or GT Manager must let the Complainant know as soon as reasonably practicable within the 15 business days and:
 - a. agree an alternative timeframe with the Complainant; or
 - b. if an alternative timetable cannot be agreed, advise the Complainant of relevant phone and email contact details for the IDR process and that they have the right to request the complaint be reviewed through our IDR process (ie. Stage Two).

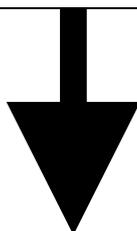


Stage Two

IDR PROCESS

If the complainant advises that they wish to have the complaint reviewed through GT's IDR process (ie. Stage Two)

1. The GT Staff Member or GT Manager must immediately refer the complaint to the relevant IDR Officer for review.
2. The IDR Officer must as soon as reasonably practicable provide a written acknowledgement to the Complainant advising:
 - a. the IDR Officer's phone and email contact details;
 - b. that the complaint will be reviewed and that a decision will be advised at the completion of the review;
 - c. that the Complainant has the right to take the complaint to FOS Australia if they remain dissatisfied with GT's decision after the completion of the IDR review (ie. Stage Two);
 - d. that the Complainant has 2 years from the date of the IDR review to take such a complaint to FOS Australia; and
 - e. the contact details for FOS Australia.
3. The IDR Officer must enter details of the dispute on the IDR Register and update those details as the dispute progresses through the IDR review process.
4. If the IDR Officer has all necessary information to complete the IDR review and has completed the investigation into the complaint, the IDR Officer must provide a written response to the Complainant, within 15 business days of receiving the IDR review request, explaining:
 - a. the decision on the IDR review of the complaint, including reasons for the decision;
 - b. that the Complainant has the right to take the complaint to FOS Australia if they remain dissatisfied with GT's decision on the IDR review of the complaint;
 - c. that the Complainant has 2 years from the date of the IDR review to take such a complaint to FOS Australia; and
 - d. the contact details for FOS Australia.
5. If the IDR Officer is not able to complete the IDR review within 15 business days, the IDR Officer must let the Complainant know as soon as reasonably practicable within the 15 business days and:
 - a. agree an alternative timeframe with the Complainant; or
 - b. if an alternative timetable cannot be agreed, advise the Complainant:
 - i. of relevant phone and email contact details for FOS Australia;
 - ii. that the Complainant has the right to take the complaint to FOS Australia (ie. Stage Three – External Dispute Resolution); and
 - iii. that the Complainant has 2 years to take such a complaint to FOS Australia.



Stage Three

EDR PROCESS

If the complainant is unsatisfied with the outcome of the IDR process (ie. Stage Two)...

The Complainant has the right to refer the matter to FOS Australia for consideration under the EDR Process. Details of FOS Australia, the Complainant's right to take the complaint to FOS Australia and the 2 year timeframe in which to do so are explained to the Complainant as part of written notices provided in Stage One and Stage Two.

Other Information

Referring matters to FOS Australia

As part of its IDR (Stage Two) process GT must provide to the complainant the relevant contact information for FOS Australia and the timeframe within which the dispute must be lodged with FOS Australia. **The onus is on the complainant to refer the dispute to FOS Australia if they wish to have it reviewed by FOS Australia.**

Fair and Reasonable Resolution

At all times GT will seek to implement a resolution to complaints and disputes that is fair and reasonable to the Complainant and GT, having regard to the circumstances of the matter and relevant industry standards. In considering how to resolve the complaint or dispute, the relevant GT employee handling it must have regard to the interests of both the Complainant and GT in deciding what is fair and reasonable.

Keeping the Complainant informed

The Complainant should be kept informed during the various stages of the Complaint and IDR process. If GT is seeking further information from either the Complainant and/or a third party, and it is likely to extend beyond the 15 business days due date, GT must contact the Complainant to notify them that additional time is needed in order to review the complaint or dispute.

All Complainants should be advised of the progress of their complaint at least every 10 business days.

Important Contact Details:

1. For complaints & disputes:

IDR Officer, Nichole Mitchell
nichole.mitchell@gtins.com.au ph: 02 9966 8820

IDR Officer, Greg Walsh
greg.walsh@gtins.com.au ph: 02 9966 8820

2. External Dispute Resolution Scheme:

FOS Australia (Financial Ombudsman Service Limited)
info@fos.org.au ph: 1800 367 287