



Complaints & IDR Handling Procedure

November 2018

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

AFCA	Australian Financial Complaints Authority – is an independent EDR scheme approved by the Australian Securities and Investments Commission. GT is a member of AFCA and is bound by its ToR. AFCA provides advice and assistance to consumers to help them in resolving complaints involving members of the financial services industry.
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.

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

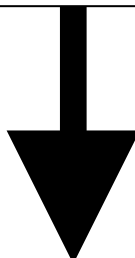
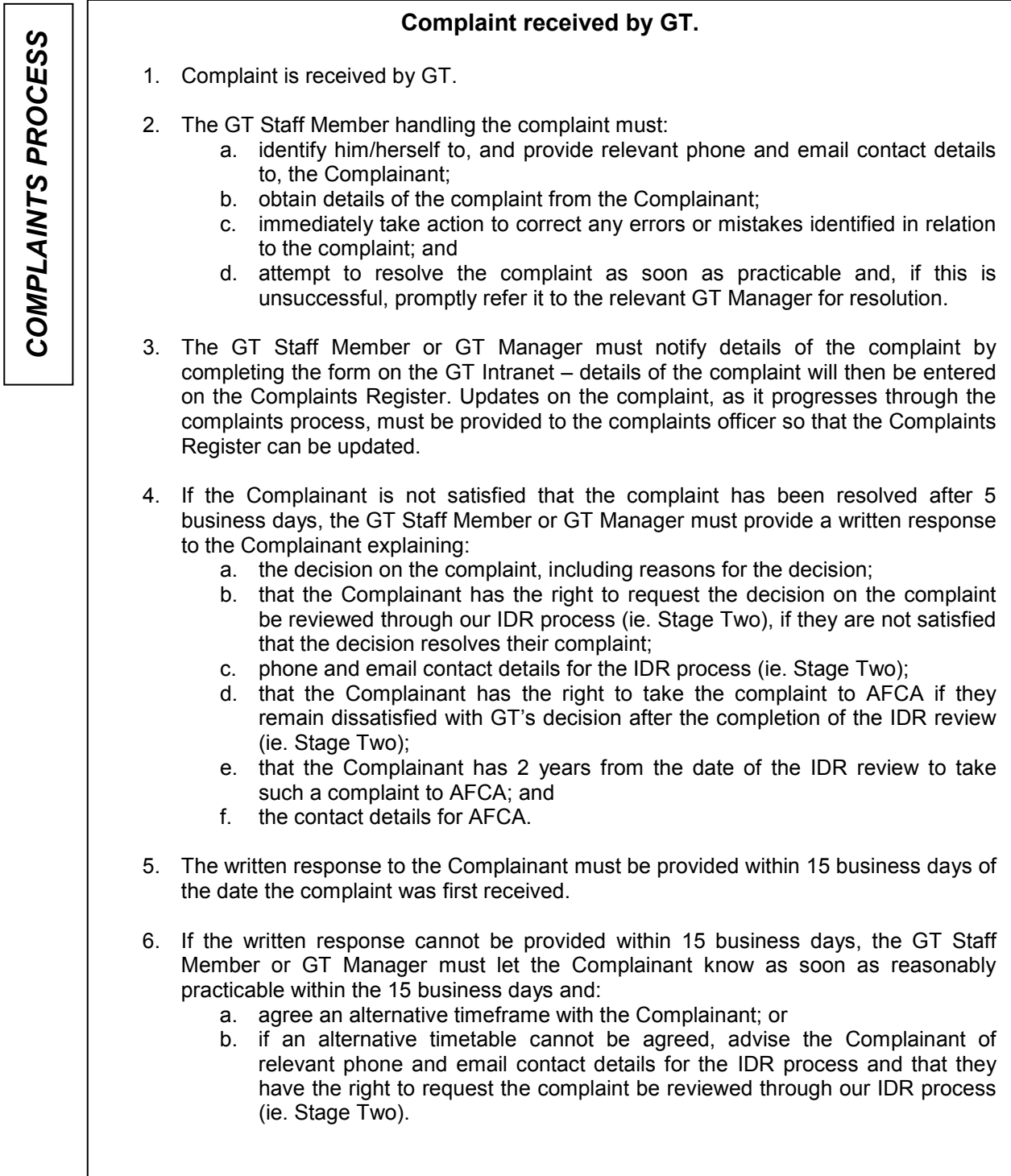
Terms of Reference (ToR). All references to the ToR relate to the AFCA Terms of Reference - which set out the guidelines and rules that AFCA adopts in considering disputes.

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

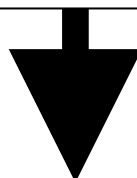


Stage Two

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 AFCA, 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 AFCA; and
 - e. the contact details for AFCA.
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 AFCA 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 AFCA; and
 - d. the contact details AFCA.
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 AFCA;
 - ii. that the Complainant has the right to take the complaint to AFCA (ie. Stage Three – External Dispute Resolution); and
 - iii. that the Complainant has 2 years to take such a complaint to AFCA.



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 AFCA for consideration under the EDR Process. Details of AFCA, the Complainant's right to take the complaint AFCA 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 AFCA

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

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:

AFCA (Australian Financial Complaints Authority)
GPO Box 3, Melbourne VIC 3001
Website: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678