

Trans-West Insurance Brokers (NSW) Pty Ltd

79 Bathurst Street Liverpool NSW 2170

AFS Licence 230142

Internal Complaints and Disputes Policy

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OUR COMPLAINTS POLICY

We are committed to meeting if not exceeding our clients' expectations whenever possible. As much as we all dislike receiving complaints, we recognise that dissatisfied clients have a right to complain and to have their complaint managed. Clients who take the time to complain may still have confidence in us and want to continue dealing with us.

Our procedures for handling client complaints and disputes (a dispute being an unresolved complaint that is pursued by the client) are set out below. The overriding aim of these procedures is to turn a dissatisfied client into a satisfied one and speedy and effective remedies at the first point of contact best do this.

DEFINITION OF COMPLAINT

A complaint is defined as:

"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."

Complaints can be made verbally, in writing, or via a social media account maintained by the business.

COMPLAINTS OFFICER

Our Complaints Officer is the General Manager. If he/she is not available, the backup is the Chief Executive Officer or Senior Portfolio Manager.

Our Complaints Officer is responsible for:

- Dealing with and attempting to resolve all client complaints that cannot be resolved by the provision of clarification or information;
- Advising clients of their rights to lodge complaints with AFCA;
- Managing all disputes with clients; and
- Liaising with AFCA.

WHAT TO DO IF A COMPLAINT IS MADE

Oral Complaints

When a client makes a complaint, it is an opportunity to ensure that they feel important and appreciated and to demonstrate our commitment to excellent service and respect for our clients. We aim to turn any client's frustration into satisfaction. Also, depending on the complaint, non-action may result in an errors and omissions claim at a later date.

Members of staff will initially receive most client complaints. If you receive a complaint:

- Listen to what the client says – this is the first step in reducing tension;
- Acknowledge the complainant's feelings – denying that the complainant is, or has the right to be, upset may antagonise them;
- Record details and determine what they want – ask the necessary questions in a polite and even-handed manner to obtain the most detailed response;
- Confirm the information you have received to ensure that your understanding is correct;
- Empathise with the complainant courteously, without making any admission;
- Do not offer excuses or argue with the complainant;
- Do not attempt to lay blame or be defensive;
- Attempt to resolve the problem with an explanation or information;
- Ask the client if they are satisfied;
- If the client is still not satisfied, tell them that we have a person who is dedicated to resolving client problems and that you would like to refer the matter to them to see if they can help the client further. Seek to obtain the client's agreement to this. Tell them the name of our Complaints Officer and that the Complaints Officer will contact them within 24 hours.

Alternatively, the client may seek further review by:

Contacting the Steadfast Customer Advocacy service.

This service provides Steadfast Brokers' clients with a means to obtain support, advice, and assistance regarding customer satisfaction and experience. If you are unhappy with any aspect of the services provided, and no acceptable resolution can be reached, the Steadfast Customer Advocacy service can be accessed.

E: customeradvocacy@steadfast.com.au
Or Ph: 02 9495 6500

- Immediately complete a Client Complaints Form and record on the Complaints Register. These are located in the CCX360 portal. Provide the form to the Complaints Officer, or the backup if the Complaints Officer is not available.

When a client complains you should:

- Try to remain calm even in the most demanding situations. Help the client maintain their control, no matter how angry they are;
- Treat the client courteously and fairly at all times;
- Be convincing in your expressions and actions to earn client trust;
- Listen to the client – while they are not always right, a dissatisfied client is a liability, not an asset;
- Be patient if your client communicates poorly. Help them to get their meaning across; and
- Understand when to say "no" and be firm without antagonising the client.

Skilful communication skills are vital. For example, a client may complain that a telephone call had not been responded to for two weeks, but the client could be inferring that they may be considering going to a competitor when the contract of insurance comes up for renewal.

You must differentiate between these two messages. Most people do not like to hear complaints and put up enormous psychological blocks. If you only listen to the surface message, it will result in a mismanaged complaint and possibly, the loss of the client. If we can listen to clients with open minds and flexible points of view, complaints may then be considered as opportunities to rectify client problems and cement our relationship.

Written Complaints

If you receive a written complaint, complete a Client Complaints Form and hand it to the Client Complaints Officer (or back-up). The complaints register should be updated to include the complaint, or the Complaints Officer may complete this based on the information obtained and subsequent investigation.

Timeframes for Complaints Management

Complaints must be managed within certain timeframes; it is important the Complaints Officer is notified immediately when a complaint is received. The timeframes for responding to and managing complaints are as follows:

Timeframe	Action
24 Hours (1 business day)	<i>Acknowledge the complaint in writing or verbally. (if verbal make an appropriate file note). Provide the customer with the name and contact details of the person managing the complaint.</i>
5 business days	<i>IBCOP requires a written response if the complaint is closed within this timeframe (this exceeds ASIC's requirement) to the satisfaction of the customer or where no further action can be taken, or an apology has been given to the customer.</i> <i>Whilst IBCOP requires a written response on all complaints, ASIC's requirements for a final response are as follows:</i> (a) <i>the complainant requests a written response; or</i> (b) <i>the complaint is about:</i> i) <i>hardship;</i> ii) <i>a declined insurance claim; or</i> <i>the value of an insurance claim</i>
10 Business Days	<i>If the complaint is not resolved within 5 business days, the customer must be kept informed of the progress of the investigation into the complaint at least every 10 business days.</i>
30 Calendar Days	<i>A final response must be provided to the customer.</i> <i>If a response cannot be provided within 30 days due to the complexity of the complaint and requires further investigation, then an 'IDR delay notification' must be provided before the expiry of 30 days. This must inform the customer about:</i> (a) <i>the reasons for the delay;</i> (b) <i>their right to complain to AFCA if they are dissatisfied; and</i> (c) <i>the contact details for AFCA</i> <i>The customer must be updated every 10 business days until the complaint is finalised.</i>

OUR CHARGES

We do not charge our clients for handling complaints or disputes