

Disputes Facility

Internal Complaints Handling Policy

What is a complaint or dispute?

A complaint is an expression of dissatisfaction with a product or service provided by a licensee accompanied by an expectation that the licensee will correct the situation and prevent it from happening again.

It is up to our company to satisfy a dissatisfied client by fixing a service or product breakdown. If the client is not satisfied by our response to the complaint, it may then become a dispute. Whether or not the complaint actually becomes a dispute is ultimately decided by the client. The client may decide to accept our response, or the client may decide that they want the issue treated as a dispute under the terms of our process. Disputes that are not resolved need to be referred to an external dispute resolution scheme (IBD).

Complaints represent an opportunity to obtain feedback from clients about a product or service experience. Complaints can also provide valuable insight into the ways we can rapidly (and perhaps inexpensively) change products, service style and market focus to meet our clients' needs, maintain their confidence and continuously improve your service and relationships. So, we encourage staff to treat complaints as a marketing opportunity - not a nuisance or a cost.

TIP

A dispute is a complaint which is not satisfied and is pursued by the client.

What we can learn from a complaint?

Complaints are, in fact, a valuable and important part of ongoing business relationships. They provide a flag to potential problems and difficulties, and a repetition of complaints can indicate a systemic problem that needs immediate attention.

Prompt resolution of complaints is a good indicator of whether, generally, the organisation is cohesive and presenting the best possible image to clients and prospective clients.

Obligation

Austgroup Insurance Brokers provides financial services to retail clients and is therefore obligated under s912A(1)(g) to have a dispute resolution system.

The requirements of the dispute resolution system are stated at s912A(2).

Austgroup Insurance Brokers must have a dispute resolution system that consists of:

- internal dispute resolution procedures that comply with standards and requirements made or approved by ASIC and that cover complaints made by retail clients about the financial services provided; and
- membership of one or more external dispute resolution schemes approved by ASIC that covers, or together cover, complaints made by retail clients in relation to the financial services provided.

'Retail clients' are defined in s761G and related regulations.

942B(2)(h) requires that the Financial Services Guide presented to retail clients contain information about the dispute resolution system and how that system may be accessed.

Expectation

ASIC sets out its expectations for dispute resolution systems in Policy Statement 165 [PS 165] Licensing: Internal and external dispute resolution.

ASIC expects that internal dispute resolution contain the essential elements from Section 2 of Australian Standard AS 4269-1995: Complaints handling.

External dispute resolution schemes must be approved by ASIC. A list of approved schemes is published on the ASIC site.

Commitment

Austgroup Insurance Brokers is committed to the efficient resolution of complaints received in relation to the services that are offered by our organisation, and its representatives and staff.

Austgroup Insurance Brokers understands that complaints can be a valuable source of information and can assist in our organisation to improve the manner in which we deal with our clients. Therefore, all current complaints will be reviewed at a quarterly Compliance Meeting to ensure systemic problems are addressed and are prevented from recurring in the future.

Austgroup Insurance Brokers recognises the importance of the claims handling process. It is important that any complaints are handled in the correct manner in order to protect the reputation of our organisation, representatives and staff and to build client confidence in us as a financial advice provider. Our complaints handling procedure will be reviewed on an annual basis to ensure that it continues to address requirements.

Responsibility

Frank Starvaggi has been charged with the responsibility of handling complaints and the dispute resolution process.

- Austgroup Insurance Brokers have authorised the following people to approve remedies for a complaint.
- Directors/Responsible Manager - Frank Starvaggi

Remedies may include full or partial fee refunds, additional information referral, financial assistance or compensation. Under no circumstance, can any other representative or employee offer remedies to clients to resolve disputes. Austgroup Insurance Brokers is committed to providing a complaints handling system that:-

- recognises, promotes and protects clients' rights, including the right to complain;
- supports a positive attitude amongst its staff and representatives towards Austgroup Insurance Brokers clients and complaints handling.
- provides information to clients on the complaints handling process via the distribution of a Financial Services Guide; and
- monitors complaints in order to improve the quality of service to its clients.

Review

The complaints handling process will be subject to annual review to ensure its efficiency in delivering the most effective outcomes.