



**Global Transport  
& Automotive Insurance**

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## ***Complaints Handling Procedure***

## Overview

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**Purpose**

The purpose of this document is to:

- Set out the procedure for managing, tracking and resolving complaints.
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**Scope**

This document is applicable to Global Transport & Automotive Insurance Solutions (GTAIS) and the general public.

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**Distribution**

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

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## Definitions

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### 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.

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### Complainant

Any person who logs a complaint. This includes our Insured, Claimant, Intermediary, Other Insurance Companies, Regulator, Suppliers, Staff, Government departments.

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### Complaints Handling Register ("CHR")

This is the electronic database in which complaints are logged and managed through a series of escalations through various levels of management. It is located on the Compliance Officer's Drive.

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### Dispute

A Dispute is an unresolved complaint where the complainant is dissatisfied with the complaint response. Any complaint about a **claim denial or partial denial** must be treated as a **Dispute in the first instance**.

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### EDR

External Dispute Resolution scheme: A formal process, operated by a relevant regulation that provides a mechanism to review and determine unresolved disputes from clients. Typically, disputes that have been through the insurer's IDR Process and are eligible to have their matter heard by the EDR Scheme. There are timeframes within which complainants must refer their dispute to the various EDR schemes.

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### IDR

Internal Dispute Resolution Process – A formal process that provides a mechanism to review unresolved complaints and claims denials by designated IDR officers who possess the appropriate experience, knowledge and authority.

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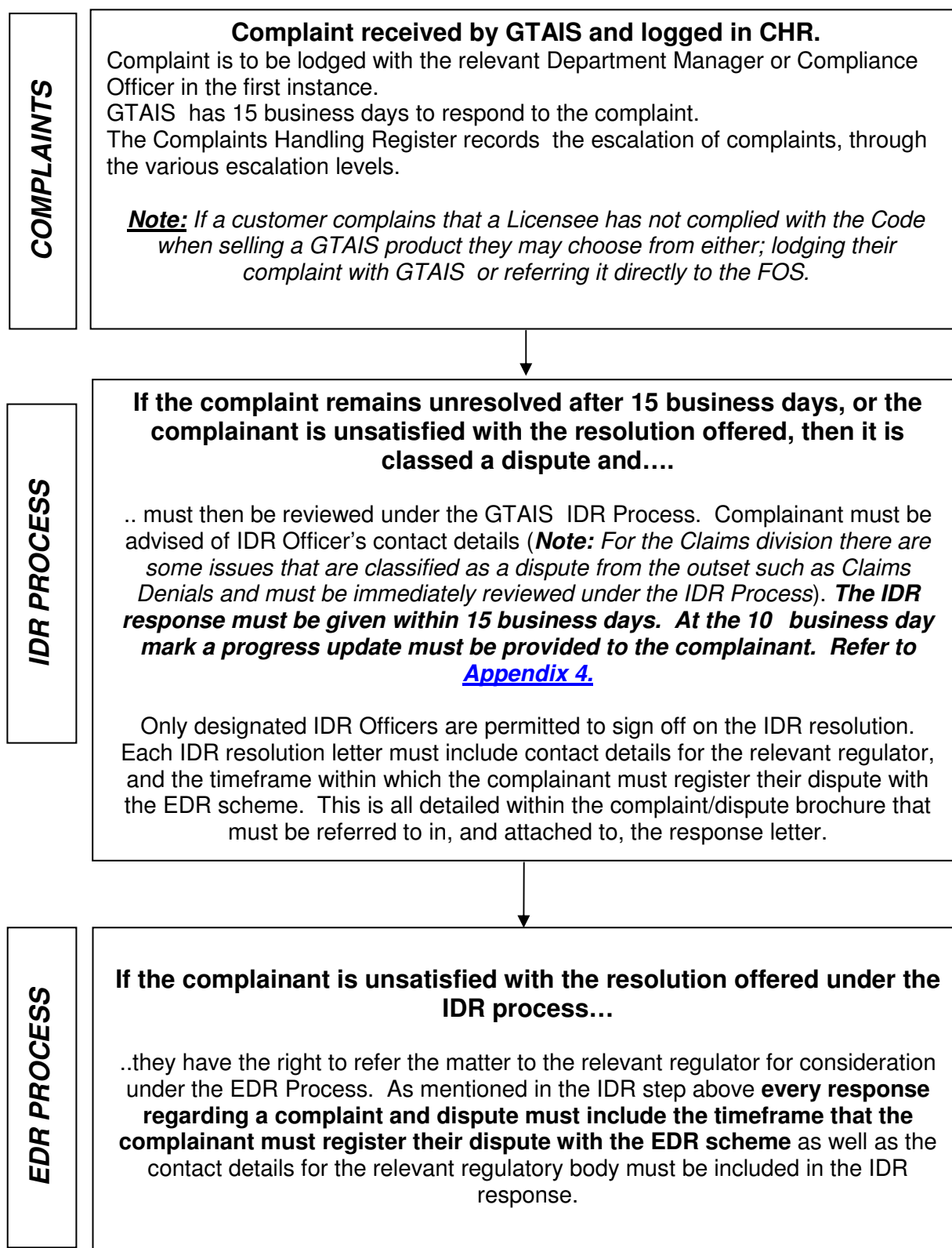
### FICS

Financial Industry Complaints Service Limited: an external dispute resolution (EDR) scheme that was established to provide free advice and assistance to consumers to help them in resolving complaints relating to members of the financial services industry. On 01 July 2008 the FICS merged with the Banking and Financial Service Ombudsman (BFSO) and the Insurance Ombudsman Service (IOS) to form the **Financial Ombudsman Service (FOS)**. The new scheme will continue to operate under the existing rules and procedures of the three existing schemes.

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<b>FOS</b>	Financial Ombudsman Service – is an amalgamation of the Insurance Ombudsman Service Limited (IOS), the Banking and Financial Service Ombudsman (BFSO) and the Financial Industry Complaints Service (FICS). The new scheme commenced on 01 July 2008 and will continue to operate under the existing rules and procedures of the three existing schemes.
<b>IOS</b>	Insurance Ombudsman Service Limited – independent body appointed by the Insurance Council of Australia (ICA) to administer the External Dispute Resolution Scheme. The IOS also monitors members compliance with the General Insurance Code of Practice. On 01 July 2008 the IOS merged with the Banking and Financial Service Ombudsman (BFSO) and the Financial Industry Complaints Service (FICS) to form the Financial Ombudsman Service. The new scheme will continue to operate under the existing rules and procedures of the three existing schemes.
<b>Licensee acting on our behalf</b>	Includes entities that sell or distribute GTAIS 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.
<b>ToR</b>	Terms of Reference (ToR). All references to the ToR relate to the IOS ToR which still operates under the FOS scheme.
<b>The Code</b>	The General Insurance Code of Practice is a <b>voluntary industry code</b> which GTAIS has chosen to opt in under. It sets out service standards in relation to general insurance dealings including the sales, underwriting and claims departments.

## Flowchart of Main Steps in Complaints handling Procedure



## Description of Procedures

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### Complaint is received and logged into CHR.

**Important Note:** *If a customer contacts GTAIS to complain that a Licensee has not complied with the Code whilst selling our product, they may choose from either; lodging the complaint with GTAIS, or immediately referring it to the FOS.*

Any complaint that remains unresolved after 15 business days becomes a “dispute” and must then be escalated to a designated IDR Officer for review under the IDR process. The complainant must immediately be advised of the escalation, and provided with the name and contact details of the IDR Officer who has been assigned their dispute. Furthermore they must also be advised of the IDR process and that if they’re not satisfied with the outcome of that, they can refer the matter to FOS within a certain time frame.

A resolution, under our IDR process must be provided within 15 business days (note: If no resolution by 10 business days, the complainant must be contacted and provide with progress update).

The IDR resolution must include contact details for the relevant regulator, should they wish to have the matter reviewed under an EDR program.

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### FOS Or other alternatives

If the complainant is unsatisfied with the resolution offered via the IDR process they are within their right to have the matter reviewed under a relevant EDR scheme (e.g. FOS). This is provided the matter falls within the relevant scheme’s terms of reference.

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## Other Information

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### Referring matters to the Regulator

In its’ IDR resolution GTAIS must provide to the complainant the relevant contact information for FOS and the timeframe within which the dispute must be lodged with the FOS. **The onus is on the complainant to refer the dispute to the FOS.**

**Exception:** *As noted above, if a customer contacts GTAIS to complain that a Licensee has not complied with the Code whilst selling our product, they may choose from either; lodging the complaint with GTAIS , or immediately referring it to the FOS.*

In matters falling within the Terms of Reference, it will be referred to FOS. If no EDR scheme exists, then the matter may need to be decided via alternative mediation or in court.

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### Remedies

Remedies may be offered to the complainant to compensate for any direct loss or damage caused by a breach of any obligation owed in

relation to the provision of a financial product or service. The concepts of fairness and relevant industry best practice would also be taken into account in determining any possible remedies.

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### **Reporting**

The data captured within the CHR can be turned into reports or exported into Microsoft Excel for analysis. This reporting feature provides business units with the ability to track their performance regarding the management of complaints. It may also help identify any systemic issues or other trends in complaints. These reports will be published monthly and available to the HR Manager and the GTAIS Board.

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### **Complaint resolution**

A complaint is not considered to be resolved until a proposed resolution / solution has been communicated to the complainant.

Any resolution must include the complaint disputes timeframe within which the complainant must register their dispute with FOS if they choose this option.

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### **Complainant informed**

The complainant should be kept informed during the various stages of the Complaint and IDR process. If you are seeking further information from either the complainant and/or third party service providers, and it is likely to extend beyond the 15 business day due date, you **must** contact the complainant and agree on an extension of time in which to provide your IDR response.

A designated IDR Officer must sign off all correspondence arising from the IDR process

All complainants applicable to the General Insurance Code of Practice are advised of the progress of their dispute no later than 10 business days.

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### **Staff Complaints**

*Regarding Employment Circumstances:* Complaints from GTAIS staff (or its subsidiaries) regarding any circumstance relating their employment must be handled by the GTAIS HR Manager.

*Regarding their Insurance Policy:* Complaints from GTAIS regarding their GTAIS insurance policies must be recorded in the CHR and treated with the same impartiality as a non GTAIS staff member.

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## Verification and Control

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### **1<sup>st</sup> Level Monitoring**

Within the Complaints Handling Procedure, there are a number of escalations that the complaint will go through if a resolution (to the complainant's satisfaction) is not achieved within the prescribed timeframe.

Part of the Complaints Procedure functions includes a notification that is sent to the next level of management whenever a complaint is resolved. This is referred to as a "follow up". This allows the designated staff member, assigned the follow up notice, to check the performance of the complaint and its resolution to ensure that it falls within GTAIS procedures.

The Follow Up function only exists on those complaints logged at Level 1.

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### **2<sup>nd</sup> Level Monitoring**

GTAIS is required to lodge with the FOS **the annual disputes statistics for each business class.**

The Compliance Officer will produce reports for senior management on a monthly basis for the business to analyse and help identify possible ways to improve current practices.

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### **What reports are available**

The Compliance Officer will produce reports for senior management on a monthly basis (**by the 10<sup>th</sup> business day of each month**) for the business to analyse and help identify possible ways to improve current practices.

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## **Important Contact Details :**

### **1. For Complaints:**

Contact GTAIS Compliance Officer, Andrijana Najdova  
[andrijanan@gtais.com.au](mailto:andrijanan@gtais.com.au) ph: 02 9966 8820

### **2. For disputes:**

IDR Officer, Don Smith  
[dons@gtais.com.au](mailto:dons@gtais.com.au) ph: 02 9966 8820

### **3. External Dispute Resolution Scheme:**

FOS ( Financial Ombudsman Service)

[info@fos.org.au](mailto:info@fos.org.au) ph: 1300 78 08 08

