Complaints Management Framework

Innovation Group South Africa

DATE: 04 June 2024 **PREPARED BY: Customer Service** **VERSION**:1.5

Revision history

Version	Status	Date	By	Summary
1.0	Approved	31 January 2020	Customer Service	Initial framework
1.1	Approved	01 April 2021	Customer Service	Annual review
1.2	Approved	06 May 2021	Customer Service	Update resolution TAT
1.3	Approved	11 July 2022	Customer Service	Annual review and update of TAT
1.4	Approved	29 November 2023	Customer Service	Annual review
1.5	Approved	04 June 2024	Customer Service	Update Ombuds Complaints details

Sign-off

Version	Date	By	Title	Signature
1.5	04 June 2024	B. Mariga	GM Customer Operations	: 
1.5	04 June 2024	K. Kruger	Executive Operations	: 

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1. Purpose

The purpose of this framework is to establish principles of complaints resolution and management by Innovation Group South Africa.

The framework and its principles are guided by global best practice in relation to complaints management and resolution. Treating Customers Fairly (TCF) principles are at the core of this framework.

2. Scope

This framework aims to foster a culture of compliance, as well as optimizing relations with stakeholders which warrant a multidisciplinary approach that can only be effective once all relevant role-players support the complaints process.

This framework governs the management of complaints across all legal entities of Innovation Group namely, Innovation FSP(Pty) Ltd, Innovation Group Distribution (Pty) Ltd, Innovation Risk Services (Pty) Ltd and Innovation Group Services (Pty) Ltd.

3. Principles

The aim is to ensure the effective resolution of all complaints and the framework is designed in conjunction with the below mentioned principles:

- Customer focus
- Accessibility and transparency
- Responsiveness
- Alignment to the TCF Outcomes including Policyholder Protection Rules
- Continuous learning and improvement; and
- Risk awareness and risk tracking including mitigating factors thereof.

4. Definitions

Complaint

An expression of dissatisfaction by a person to a service provider, to the knowledge of the service provider, relating to a policy or service provided or offered by that service provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a policyholder query.

Complainant:

- A person who submits a complaint and includes a –
- Policyholder or the policyholder's successor in title.
- Beneficiary or the beneficiary's successor in title; or
- Person that pays a premium in respect of a policy.
- Potential customer whose dissatisfaction relates to the application, approach, solicitation or advertising or marketing material.
- A person on behalf of policyholder/customer, who has a direct interest in the agreement, policy or service to which the complaint relates, or a person acting on behalf of a person referred to a) to e)

Policyholder Query

Means a request to the service provider by or on behalf of a policyholder, for information regarding the service provider's policies, services, or related processes, or to carry out a transaction or action in relation to any such policy or service.

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5. Allocation of responsibilities

Any person that is responsible for deciding or recommending in respect of complaints must-

- be adequately trained.
- should have correct knowledge, experience, and skill in complaints handling, should understand the fair treatment of customers, the subject matter of the complaints concerned and relevant legal and regulatory matters.
- not be subject to a conflict of interest; and
- sufficiently authorised to make impartial decisions or recommendations.

6. Complaints Handling Approach

The approach in handling complaints is outlines below:

6.1. Receive and Acknowledge

On receipt of a customer complaint, feedback is provided to the complainant acknowledging receipt of the complaint. The complaints management process is explained to the customer to manage the customers' expectation. The acknowledgement times vary based on the channel of choice by the complainant.

6.2. Gather information.

Information is obtained prior to the resolution of the complaint. The complainant is informed of required information that is essential to the complaint resolution. Depending on the nature of the complaint and period, this will inform the time that it will take to gather all the necessary information.

6.3. Resolve or escalate.

Given the information provided, this will inform on whether the complaint is within the mandate of the Complaints Function to resolve, or escalation to the responsible discipline to resolve.

6.4. Review and decide solution.

All decisions made adhere to the TCF objectives, as such beneficial to the complainant including mitigating of the organisation's reputational risk.

6.5. Feedback and area of concern.

Once a decision and a solution has been achieved, feedback is provided to all the relevant stakeholders and the outcome of the complaint is clearly communicated and actioned were required. The area of concern is highlighted to relevant stakeholder(s) to ensure mitigation is put in place.

6.6. Corrective Action.

After receipt of feedback and area of concern, the relevant stakeholder(s) commit by providing an action plan to correct behaviour and/or enhance processes.

6.7. Continuous Improvement

Feedback on all complaints is presented to the different areas to ensure continuous improvement to enhance customer experience.

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7. Complaints Escalation and Review

There is a formal complaints process that covers the following:

- There is a non-bias view on complaints, keeping in mind the authentic interests of all parties involved including fair treatment of complainants.
- Provide an internal escalation process on complex or rare complaints at occurrence of the initial complaint handler.
- Provide for complainants to escalate complaints not resolved to their satisfaction.
- Clear communication with complainants / authorised representatives on the complaints and the complaint process and procedures; and
- Annual review of the complaints management framework.

8. Decisions

There are various factors considered when the outcome of the complaint is achieved, the factors listed below contribute to the outcome:

8.1. Rejected Complaints:

- This relates to a complaint that has not been upheld, the complaint is regarded as being finalised by the administrator / insurer. The complaint is regarded as invalid, or where the complainant does not respond or accept proposals from the administrator / insurer to resolve the complaint.

    - Invalid:
        - The complainant does not accept or respond to proposals to resolve the complaint within 7 days, this includes sending relevant documentation, acting upon the advice of FSP as well as not being able to reach the complainant via telephone, SMS and E-mail (if applicable).

    - Unjustified:
        - The policy terms and conditions have been met, complainant has been treated fairly as far as possible, there is no legal leg to stand on to assist complainant, complainant refuses to accept outcome of merit assessment, and nothing further can be done to assist complainant.

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8.2. Upheld:

- Means that a complaint has been finalised wholly or partially in favour of the complainant.

    - Wholly
        - Complaint finalised in favour of the complainant. Outcome is favouring the complainant.

    - Partially
        - FSP and Complainant agree to resolve the complaint through amicable means.

        - Compensation Payment:

            This refers to a payment in monetary form, benefit, or service, by administrator /insurer to a complainant to compensate the complainant for a proven financial loss, incurred because of administrator or insures' contravention, action, failure to act, service failure that has impact on TCF or details of requirements that are outstanding.

        - Payment Contractually due:

            The complainant should have received the assistance and help from the start, a justified complaint.

        - Payment not Contractually due:

            The complainant does not have legal standing or a legal argument, however, due to the poor handling by FSP in the form of negligence, FSP for example refunds the complainant his/ her premiums and cancels the policy.
    - Goodwill Payment:
        - The complainant is not covered in terms of the policy, but FSP is willing and able to sponsor the matter due to extraordinary circumstances.

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9. Complaints Channels and Response Times

The complaints management framework ensures that there is presence across multiple customer touchpoints. The formal method of communication with the complainant is conducted via email and/or telephone and in plain language. Response times are applicable during normal working hours (08:00 - 16:30) Monday to Friday.

Table 9.0: Channel and Response Times

CHANNEL	DESCRIPTION	RESPONSE TIME
Phone call	Complaint logged at point of contact when complainant called	Immediate
Social media	Logged via: • Facebook • HelloPeter • Twitter	30 minutes
Innovation Group website	Logged via Innovation Website	30 minutes
Email	Email sent to complaints mailbox	60 minutes

10. Complaints Classification

Our complaints are classified between two categories namely:

Service Complaints

Complaints related to following TCF principles:

- TCF Outcome 1 – Customers must feel confident that they are dealing with an institution where TCF is at the core of their culture.
- TCF Outcome 2 – Products and services in the retail market which are sold and marketed are designed according to the needs of the customers identified and targeted accordingly.
- TCF Outcome 5 – Service is of an acceptable standard and products perform as customers have been led to expect.
- TCF Outcome 6 – Customers do not face unreasonable post-sale barriers when they want to change a product, switch providers, submit a claim or make a complaint.

Sales Complaints

Complaints related to following TCF principles.

- TCF Outcome 2 – Products and services in the retail market which are sold and marketed are designed according to the needs of the customers identified and targeted accordingly.
- TCF Outcome 3 – Customers are provided with clear information and kept appropriately informed before, during and after point of sale.
- TCF Outcome 4 – Advice is suitable and according to the customer's circumstances.

11. Complainant Responsibilities

The complaints management framework's objective is to have a clear and transparent process communicated to the complainant; the process entails factors mentioned below to be clearly articulated to the complainant:

- Provide all relevant information when logging the complaint; and
- Understand that a complex complaint requires ample time to resolve, however the complainant will be communicated with in respect of the progress of the complaint.

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12. Reporting of Complaints

Weekly, monthly, quarterly, and yearly reports are distributed to all relevant areas to understand concerns raised. All concerns raised provides an opportunity for the business to improve on our customers experience through training, correcting behaviour, coaching / disciplinary action and enhancing processes.

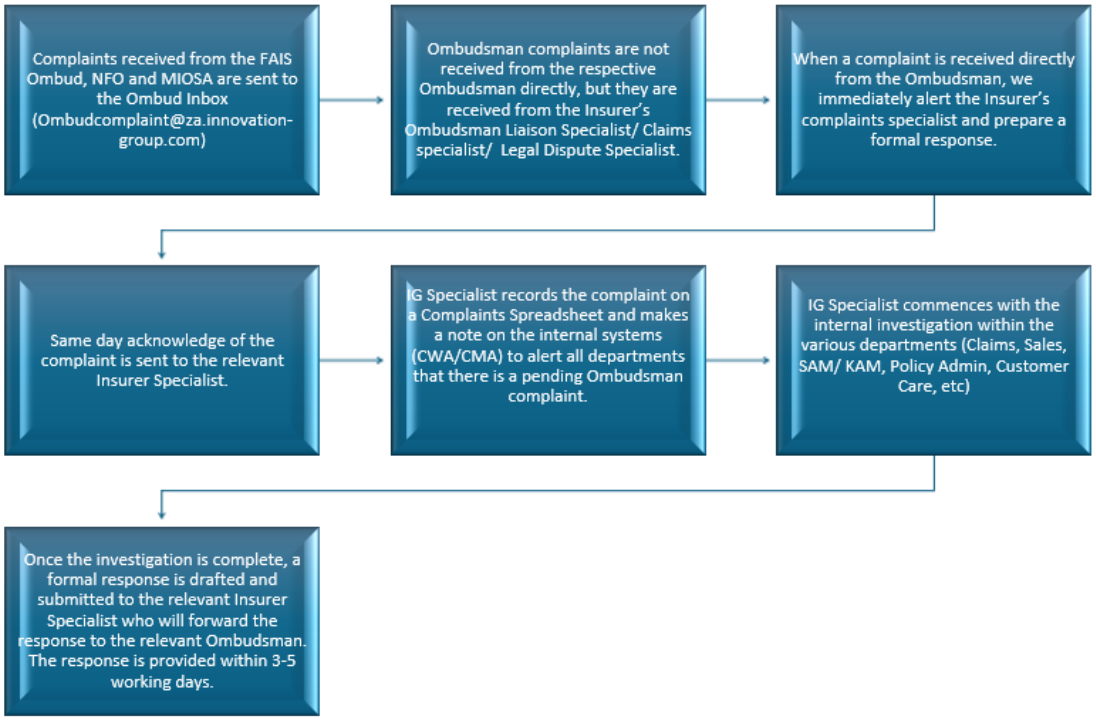
The complaints handling process is further supported by our inhouse quality framework that seeks to improve, quality, compliance and process through ongoing assessments and coaching initiatives to remedy any issues identified. Detailed analysis is conducted on all Legal/Ombudsman complaints raised and proactive mitigating measures are adopted within the complaints team to address any future complaints resulting into a Legal/Ombudsman matter.

In the event where the complainant is unhappy with the outcome given by Innovation Group. The complainant may approach the National Financial Services Ombud Scheme, Innovation Group does not impose any barriers to the complainant during and after the internal complaints process.

Particulars of the National Financial Services Ombud Scheme.

National Financial Services Ombud Scheme of SA (NFOSA)
Postal address: PO Box 74571, Lynwood Ridge, 0040
Tell: 0860 800 900
Fax: 011 388 8250
Website: www.nfosa.co.za
Email: info@nfosa.co.za

12.1. Ombudsman Process



13. Record keeping

Complaints are logged on our complaints system which provides a single view of all complaints logged irrespective of area.

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