

Financial Independence

Insure Your Future



Financial Independence

Complaints Process

Version 1.3

Complaints expectations and philosophy

Any phone call, email or contact with a client that you see as not a satisfactory one should be recorded in the complaints register. Even if you do not think it will progress to a serious complaint. If the client expects a resolution for an issue, then it should be recorded, along with how we resolve it.

A complaint is: *“an expression of dissatisfaction, where a response or resolution is explicitly or implicitly expected.”* (FSCL)

Once you have established that it is a complaint then you will start the following process.

We will:

- resolve the complaint as soon as possible.
- treat complaints with priority and give a timely response.
- try to see things from the client’s perspective, to understand and address why they think we were wrong.
- be fair and act with integrity.
- take a genuine, fresh look at the issues raised and not be defensive.
- acknowledge our mistakes and put them right if we can.
- manage complaints in accordance with the defined and agreed processes.
- train our staff to apply the policy and processes for complaints resolution.

Complaints disclosure for client

<https://www.financialindependence.co.nz/complaints-process>

Complaints register

Life CRM under complaints tab.

Emails will automatically come to you from the CRM when you create a complaint to remind you of the following process for each stage.

This will be used for biannual review of complaint trends and internal changes required.

It will also be used for FMA reporting.

Our current complaints provider

Financial Services Complaints LTD
P O Box 5967
Lambton Quay
Wellington 6145
New Zealand
Freephone: 0800 347 257
Email: info@fscl.org.nz
Website: www.fscl.org.nz

Complaints process

Step 1

Early resolution – Identify and respond to initial complaint and, if possible, resolve.

- Include a manager in the conversation before you respond, if you are unsure.
- You can handle this stage yourself if you feel you understand the client and the situation, without management involved.
- Always Record the complaint in the Life CRM under the complaints tab
- Include a link to our complaints process at the bottom of your email.

<https://www.financialindependence.co.nz/complaints-process>

Step 2

Formal complaints process – If the client is still unhappy and the complaint is unresolved after your initial response, escalate the complaint for an objective review and create a formal response to the client.

- Review the case with a manager.
- Send a detailed email that includes the dates and times of communication events that led to the complaint.
- If you have no further resolution at this time let the client know what happens next and how long you expect that to take. E.g. *“I have sent this complaint to your insurer and will come back to you once they respond I expect this to be within....”*
- If you haven’t already then include a link to our complaints process

<https://www.financialindependence.co.nz/complaints-process>

- Step 2 can include several emails between the client, yourself and potentially insurers with updates and resolutions to the complaint.

Step 3

Unresolved & Deadlock – Refer complaints that cannot be resolved to the FSCL scheme.

- A manager should always be involved b this stage.
- Before Deadlock is reached review your process as follows:
 - Is there any new information or issues that you need to look into?
 - If yes, then go through review again with new information
 - Are you happy with your position on the basis of
 - Your contract with the client?
 - As a reflection of our business culture
- If the response remains unchanged, we will advise the client that we have reached the end of our internal complaints process by notifying them of “deadlock” (“the final response”). That means if they want to pursue the complaint, the client can make a complaint to the FSCL Scheme

Email templates that can be used

Dear [client]

Thank you for taking the time to let us know about the issue you have had. We aim to provide you with the highest quality service and support. We value your feedback, and it will help us improve the services we offer to all our clients.

Kind regards

Dear [client]

Thank you for taking the time to let us know about the issue you have had. We aim to provide you with the highest quality service and to respond to any issues/ problems raised by clients within 7 days.

However, due to [explanation for delay], we will be unable to respond to the issue you have raised until [new timescale].

Please do not hesitate to call or email me if you would like to discuss this [contact details].

Kind regards

Dear [client]

Thank you for taking the time to let us know about the issue you have had. As we discussed, [explanation or information which seeks to resolve the complaint].

If this does not resolve your issue, please call or email me/us so that I/we can advise you of the next steps in the process.

Kind regards

Dear [client]

Thank you for taking the time to let us know about the issue you have had. We aim to provide you with the highest quality service and support.

Our complaints process aims to address your concerns.

Our complaints process

<https://www.financialindependence.co.nz/complaints-process>

You have now completed Step 1 of our complaints process. The next stage is “*Step 2 – Review*”.

To help us make sure we understand and address your complaint fully, it would be helpful if you could please complete the attached Complaint Form.

If you would like to discuss our complaints process or your complaint with me, please call or email me on [contact details] .

Yours sincerely

Name of contact person

[Business name]

Dear [client]

I received your complaint of [date]. As we discussed by telephone/at our meeting, your complaint is about *[give short summary of complaint]*.

As we discussed, I am making some enquiries into this matter and will be back in touch with you by [date].

In the meantime, if you would like to discuss this further, please feel free to contact me on *[contact details]*.

Yours sincerely

Dear *(client name)*

As I/we discussed on [date], I have reviewed the information you have provided about your complaint and confirm [my/ the company's] position is that [I/we] do/ do not agree with your complaint.

Your complaint

You have explained that *[include a description of the complaint]*. You have indicated that the outcome you want is *[include specific outcome the complainant wants]*.

[My/ the] review

[Set out a description of:

- 1. A summary or timeline of what happened*
- 2. The steps you have taken when considering the complaint*
- 3. The key information, including the provisions of the contact/ statement of advice etc, which relate to the complaint and that you relied on to make your decision*
- 4. How you arrived at your decision on the complaint.]*

The decision

After taking all the information into account, I confirm [my/our/ company's] view is that *[summarise your position]*. As a result, [I/we/the company] do/do not agree with your complaint.

If this does not resolve your complaint, please respond to this letter so that I/we can advise you of the next steps in the process.

Yours sincerely

Dear [client]

If the client provides no new information or issues when responding to the review letter.

I confirm [my/ the company's] position is that [I/we] do not agree with your complaint.

If the client provides new information or issues when responding the review letter, then you can write another review letter or include the review comments in this letter as suggested here.

I have reviewed the additional information you have provided relating to your complaint and I confirm [my/ the company's] position is that [I/we] do not agree with your complaint. [Then complete the review letter format– “your complaint; the review; the decision”]

Next steps

I confirm that we have been through our internal complaints resolution process and have now reached “deadlock”.

You can now take your complaint to the Financial Services Complaints Ltd Scheme. (“FSCL Scheme”), as we are a Participant of the FSCL Scheme.

[If you believe the FSCL Scheme does not have jurisdiction to consider the complaint add this] As [brief of the reason, eg it is over the monetary limit], we believe this complaint falls outside of the FSCL Scheme’s jurisdiction. However, we have issued this notice of “deadlock” so that you can take your complaint to the FSCL Scheme and the FSCL Scheme can determine whether or not it has jurisdiction to consider it.

The FSCL Scheme has been approved by the Minister of Consumer Affairs to provide an external disputes resolution service for consumers with complaints about their financial service providers. It offers a free and independent complaints service to customers of its Participants and can be contacted as follows:

Email: info@fscl.org.nz
Website: www.fscl.org.nz
Freephone: 0800 347 257
Address: P O Box 5967
Lambton Quay
WELLINGTON 6145

If you wish to complain to the FSCL Scheme, you must do so within **3 months** of the date of this letter.

Yours sincerely

[signature]

Approval and Version Control

Version	Date	Author	Description
1.0	11/05/2020	Alana Collinson	Development of Complaints policy and procedures
1.1	26/05/2021	Alana Collinson	Review and update
1.2	30/03/2023	Alana Collinson	Updated DSR
1.3	31/10/2023	Alana Collinson	Complete review and change to be more aligned with 'real life'.

Authorised by:	Matthew Beattie
Date:	11/05/2020
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Document Name:	Complaints Process

Resources:

<https://www.legislation.govt.nz/regulation/public/2014/0326/latest/LMS467226.html>