



PRESTIGE ASSURANCE PLC

COMPLAINTS MANAGEMENT POLICY

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This management complaints policy establishes procedures for Prestige Assurance Plc to effectively manage and resolve complaints from clients and members of the public.

1. INTRODUCTION

This complaints policy establishes procedures for Prestige Assurance Plc to effectively manage and resolve complaints from clients and members of the public.

Our management and staff respect the right of all our clients on the standard of services that we provide or any other matters. Our commitment to fair, equitable and timely resolution of complaints is described in this Policy and related documents.

2. PURPOSE

The purpose of our Complaints Handling Policy is to:

- Recognize, and protect clients' rights, including the right to comment and complain.
- Provide an efficient, fair and accessible mechanism for resolving customer's; complaints.
- Provide information to Clients 'on the Company's complaints handling process.
- Demonstrate the company's commitment to continual improvement to the quality of its products and services
- To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- To make sure everyone at Prestige Assurance Plc knows what to do if a complaint is received.
- To make sure all complaints are investigated fairly and in a timely way.
- To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- To gather information which helps us to improve what we do.

3. DEFINITIONS

Claimant means a person who has a claim with the Prestige Assurance Plc.

Complaint means a genuine expression of dissatisfaction or concern regarding the Prestige Assurance Plc services, or the complaints handling process itself, made to the Prestige Assurance Plc by, or on behalf of:

- a claimant;
- an individual client - including government agencies;
- a group or member of the public.

Complaint does not mean a dispute with a decision or policy of the Prestige Assurance Plc. In particular, a complaint does not mean a dispute with:

- The Prestige Assurance Plc's assessment of liability (i.e. fault) with respect to a claim;
- The Prestige Assurance Plc's settlement offer on a claim;
- The Prestige Assurance Plc's assessment of, and payments for;
 - Special Damages, being reasonable expenses related to the treatment of injuries received in a crash, together with compensation for any loss of earning capacity sustained.
 - General Damages (Non Pecuniary Loss), being damages awarded for pain, suffering and inconvenience experienced as a result of injuries, together with any disability.

A complaint may be made in person, by phone, email, in writing and via the Prestige Assurance Plc's Internet. Verbal complaints should be documented immediately by the employee who receives the complaint.

Complainant means the person or organisation making the complaint.

Client/Customer means a person or organisation receiving advice, a service, using the facilities, or engaged in a business relationship, or any other person or organisation having an interest in the functions or activities of the Prestige Assurance Plc.

Dispute means a customer's formal disagreement with the products and services of the Prestige Assurance Plc which leads to some type of internal or external review or determination.

Organisation means a company, firm, enterprise or association, or part thereof, whether incorporated or not, public or private, that has its own function(s) and administration.

4. **COMMITMENT**

We are committed to efficient and effective complaints management. Our commitment involves:

- all levels of the Prestige Assurance Plc, particularly the organisation's Management cadre;
- encouraging an organisational culture that welcomes complaints as an opportunity to improve services
- the development and maintenance of a computerized Complaints System to manage complaints;

5. **FAIRNESS**

We recognise the need to be fair to both the complainant and the Prestige Assurance Plc or employee against whom the complaint is made.

If a customer complains, we will:

- treat the complainant with tact, courtesy and fairness at all times;
- maintain appropriate confidentiality of the complaint at all times;
- not victimise or harass the complainant as a result of any complaint he/she makes against us;
- not discriminate against the complainant because of any disability, his/her colour, race, religion, age, sex or sexual orientation.

The complainant can request all relevant material to support the complaint .

We will provide a response to the complainant and inform the complainant of our decision and the reasons for that decision.

6. COMPLAINTS ABOUT EMPLOYEES

Complaints about employees should be referred directly to the relevant Manager and a determination will be made whether the complaint is an alleged breach of our Code of Conduct.

7. RESOURCES

We have resources committed to the handling of complaints by way of a customized computerized Complaints System that is available to all employees for the recording of, and management of, complaints.

In addition, training is available on our Complaints Policy, Complaints System in the skills of listening, problem solving, and conflict resolution. This is to ensure that our employees are skilled, motivated and empowered to be sensitive to and welcome complaints and feedback. Our customer Complaint Policy is covered during the induction program for all new employees and example of the form to be filled is as follows:

CUSTOMER COMPLAINT RECORD - FORM EXAMPLE

Client:			
Address:			
Phone	(Home):	Email:	
Phone (work):			
Date complaint received ___/___/20__			
Person receiving the complaint			
How was the complaint received?	Phone	In person	In writing
Describe the goods or service			
Describe the problem/complaint			
What does the customer want done?			
What is the business policy for this complaint?			
What is the agreed solution?			
Action required:			
Date action completed:			
Record of action taken:			
Date complaint resolved:			
Signature			

Employees who demonstrate our core Values in the resolution of customer complaints are recognized and rewarded through our Recognition and Reward Program.

8. ACCESS TO THE COMPLAINTS PROCESS

A person wishing to make a complaint may do so in person, by telephone, by letter, by email.

All complaints made with us will be lodged via a 'Complaint Form', and recorded on to our Complaints System as follows:

A person may lodge a complaint by filling out and completing a 'Complaint Form' on our website. For complaints made in person or by telephone, letter, fax, or email, one of our staff members will complete a Complaint Form on behalf of the complainant and attach any associated correspondence that has been received (e.g letter, fax, email).

Where a complaint is made in person at the Prestige Assurance Plc, we will respect that the customer may wish to make the complaint in a private area where he/she may feel more comfortable.

Complaints are best made to the member of staff with whom the customer has been dealing. They can, however, be directed to the Commission Secretary or a Supervisor or Manager.

9. ASSISTANCE WITH LODGING COMPLAINTS

Our staff will assist people who may have difficulty making a complaint. For example, interpreters can be provided to assist people with limited English who would prefer an interpreter.

In addition, staff will complete a Complaints Form on behalf of anyone making a complaint over the phone or in person. They will also assist those with limited literacy skills by confirming the details of the complaint verbally.

10. COMPLAINTS MADE ON BEHALF OF ANOTHER PERSON

If it is difficult for a customer to personally make a complaint, a complaint may be made on his/her behalf by another person.

11. RESPONDING TO COMPLAINTS

If a customer complains, we will:

- attempt to resolve the complaint at the first point of contact, where possible;
- acknowledge receipt of the complaint no later than five working days;
- where a complaint is not fully understood, telephone the person who lodged the complaint to ensure we understand the issues correctly; and
- for complaints not resolved "on the spot", aim to resolve the complaint and issue a response within 15 working days.

If these time frames cannot be met, we will tell the complainant why and give some idea of when we will reply in full.

We may, at any time after receiving a complaint, decide not to deal with the complaint, or to stop dealing with the complaint, because:

- a) it does not relate to a matter we have power to deal with;
- b) it is frivolous, vexatious, misconceived or lacking in substance; or
- c) having regard to all the circumstances of the case, the enquiries into, or the continuance of the enquiries into the matter raised in the complaint, is unnecessary or not justified.

The Commission Secretary, in consultation with other relevant senior staff, will make decisions of this nature where appropriate. If we decide not to deal with a complaint, or to stop dealing with a complaint, we will inform the complainant of the decision and the reason(s) for the decision.

12. CHARGES

We will not apply any fee or charge for the lodgment of a complaint.

13. COMPLAINTS SYSTEM

We have a specialized Complaints System for recording, management and reporting of complaints. This system enables complaints to be managed at various stages.

First stage: Recording and acknowledgment of the complaint and attempted resolution by front line staff.

Second stage: If the complainant is still not satisfied, a more senior staff member such as a Supervisor or Manager will review the person's complaint and the results of the review will be reported to the complainant.

If the complainant remains dissatisfied, we will consider other options that may be available to achieve a resolution.

Third stage: If the complaint cannot be resolved by the Prestige Assurance Plc, the complainant will be referred to an outside agency, such as the Ombudsman.

14. REMEDIES

We will endeavour to resolve all complaints received as fairly as possible and in a timely manner. Some of the remedies that we may use to help resolve complaints include:

Rectify mistakes

Where we have made a mistake, taken too long to follow up a matter, or simply overlooked a matter, we will take immediate action to rectify the mistake or situation.

Information

We have an Information Statement that clearly explains the documents we hold, how to make a Freedom of Information (FOI) application and rights of review.

Employee training and counseling

Where a complaint is made about an employee, whether it is about the employee's general manner or about the employee providing wrong information, and after investigation if we consider the complaint is justified, the employee will be provided with training and/or counseling as follows:

GUIDANCE FOR HANDLING VERBAL AND WRITTEN COMPLAINTS

- Remain calm and respectful throughout the conversation

- Listen - allow the person to talk about the complaint in their own words. Sometimes a person just wants to "let off steam"
- Don't debate the facts in the first instance, especially if the person is angry
- Show an interest in what is being said
- Obtain details about the complaint before any personal details
- Ask for clarification wherever necessary
- Show that you have understood the complaint by reflecting back what you have noted down
- Acknowledge the person's feelings (even if you feel that they are being unreasonable) - you can do this without making a comment on the complaint itself or making any admission of fault on behalf of the organisation
e.g. "I understand that this situation is frustrating for you"
- If you feel that an apology is deserved for something that was the responsibility of your organisation, then apologise
- Ask the person what they would like done to resolve the issue
- Be clear about what you can do, how long it will take and what it will involve.
- Don't promise things you can't deliver
- Give clear and valid reasons why requests cannot be met
- Make sure that the person understands what they have been told
- Wherever appropriate, inform the person about the available avenues of review or appeal

Referral

As outlined in this Complaints Policy, if a complaint cannot be resolved by us, the complainant may be referred to the National Insurance Commission/National Insurance Association.

15. COLLECTING AND RECORDING INFORMATION ABOUT COMPLAINTS

Complaint data will be recorded using the Complaint Form. Complaint data will be collected, analyzed and reported using our Complaints System. Complaint data, enquiry outcomes and service improvements will be reported regularly to our Executive Committee and Board of Commissioners.

16. STORAGE OF COMPLAINT RECORDS

Records of all complaints will be retained in our Complaints System, for confidentiality, monitoring and evaluation purposes. Access to the complaints records will be restricted to authorized staff.

17. CATEGORISING COMPLAINTS

Complaint data is collected, collated and reported in categories to enable us to identify policies, practices, facilities, etc. that are in need of review and that also contribute to improved customer focus and business outcomes.

18. REVIEW

The Complaints Policy will be reviewed at regular intervals to ensure it meets the needs of the Prestige Assurance Plc and its clients.