



Lifespan Financial Planning Pty Ltd

POLICY DOCUMENT

COMPLAINTS MANAGEMENT

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Responsibility:

1. Chief Executive Officer (CEO)
2. Compliance Manager
3. Executive Chair (EC) / Responsible Manager (RM)

Reporting:

1. On receipt of a Complaint
2. During the settlement process
3. On settlement

Preamble

Lifespan Financial Planning Pty Ltd ('Lifespan') is required to be a member of the Australian Financial Complaints Authority (AFCA), AFCA is the operator of the AFCA scheme, which is the external dispute resolution scheme. We must also have in place Internal Dispute Resolution (IDR) procedures to ensure that complaints, in respect of the financial services we and our representatives provide to clients, are managed fairly, effectively and efficiently.

The Board, chief executives and senior management are actively interested in and support effective complaints management by:

- (a) having board and/or senior management oversight of the IDR process;
- (b) providing adequate resources, including training and support to staff managing complaints;
- (c) establishing and promoting a complaints management policy and procedure;
- (d) implementing information technology (IT) systems and reporting procedures to ensure timely and effective complaints management and monitoring; and
- (e) establishing clear roles and responsibilities for the management of complaints.

The Board has set clear accountabilities for complaints handling functions, including the management of systemic issues identified through consumer complaints. We recognise that everyone has a right to complain and we are open to receiving complaints and we demonstrate a commitment to resolving complaints through action.

Consumer access to fair, timely and effective dispute resolution is an essential part of the financial services consumer protection framework. We encourage all representatives to cultivate an organisational culture that welcomes feedback and values complaints. A positive complaint management culture can produce beneficial outcomes for both consumers and firms, including:

- (a) the opportunity to resolve complaints quickly and directly;
- (b) the promotion of trusted relationships between the parties;
- (c) improved levels of consumer confidence and satisfaction;
- (d) greater understanding of the key drivers of complaints;
- (e) the ability to identify emerging issues and inform product and service delivery improvements; and
- (f) reduced AFCA and future remediation costs.

To ensure that our representatives meet their compliance obligations and to ensure that complaints are managed in a fair, effective and efficient manner, our complaints management framework has been developed in accordance with our legislative and regulatory requirements. Lifespan amongst other references, has referred to ASIC Regulatory Guides (RG) 271 Internal dispute resolution and 267 Oversight of the Australian Financial Complaints Authority. For a comprehensive list of references, see; Laws, Regulations, and Industry Standards Relevant To This Policy below.

All representatives must comply with the Lifespan IDR procedure which is made available to all representatives.

A Responsible Manager must be notified of any complaint received by a representative and a summary of any complaint will be presented to an executive Board member.

A Responsible Manager is the only person, other than the Board, to authorise any settlement of a complaint.

The Responsible Manager will decide if this is a circumstance that could lead to a claim and if so will ensure that our PI insurers are notified.

Definitions

AFCA Australian Financial Complaints Authority—AFCA is the operator of the AFCA scheme, which is the external dispute resolution scheme for which an authorisation under Pt 7.10A of the Corporations Act is in force.

A Complainant has the right to take their complaint directly to AFCA.

Contact details for AFCA are:

Phone: 1800 931 678 (free call)

Online: www.afca.org.au

Email: info@afca.org.au

'Complainant': a retail client who lodges a complaint.

'Complaint': An expression of dissatisfaction made to or about an organisation, related to its products or services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.¹ This includes posts on a social media channel or account owned or controlled by the financial firm that is the subject of the post, where the author is both identifiable and contactable;

¹ RG 271.27 and AS/NZS 10002-2014

'Complaints Officer'	<p>A Complaints Officer will be appointed to manage the implementation and the ongoing maintenance of the procedures and report to the Responsible Manager. This role does not have to be that representative's full-time role but the person must have the following attribute:</p> <ul style="list-style-type: none"> • Availability to review or handle a complaint within the required timeframe; • An understanding attitude to clients; • A broad knowledge of the company's products and services; • Good written and oral communication skills; and • Management skills to ensure complaints are dealt with in accordance with the dealing with complaints procedure.
'Dispute':	a complaint that is not resolved to the satisfaction of the complainant.
'Systemic issues':	a matter that affects, or has the potential to affect, more than one consumer.
'Representative'	any employee of, or Authorised Representative of Lifespan

Laws, Regulations, and Industry Standards Relevant To This Policy

This Policy has been written to ensure that Lifespan and its representatives comply with relevant laws, regulations, codes, policies, and industry standards, including but not limited to:

- the National Consumer Credit Protection Act 2009 (Cth) (the NCCP), National Consumer Credit Protection Regulations 2009 (Cth) and the National Credit Code (Schedule 1 the NCCP)
- Australian Securities and Investments Commission (ASIC) Act 2001 (Cth)
- Privacy Act 1988 (Cth) and the Australian Privacy Principles 2014
- ASIC Regulatory Guide 271 – Internal dispute resolution
- The Australian Financial Complaints Authority (AFCA) Complaint Resolution Scheme Rules
- AFCA Operational Guidelines to the Rules
- ASIC Regulatory Guide 267 - Oversight of the Australian Financial Complaints Authority
- AS 8000–2003 – Corporate Governance: Good Governance Principles
- AS/NZS ISO 10002-2014 Quality Management – Customer Satisfaction: Guidelines for Complaints
- Management in Organisations

Introduction

All representatives may encounter a complainant and you must be aware of the procedures to be followed and the person responsible for dealing with complaints. All representatives will have ready access to and must adhere to the complaints procedures set out in this document.

The most effective method of dealing with a complaint is to convert a dissatisfied client into a satisfied client by dealing with the complaint quickly and offering effective remedies at the first point of contact.

It is important to note that regardless of whether a complaint is made in writing or verbally, a complaint must be dealt with in accordance with these procedures.

INTERNAL DISPUTE RESOLUTION (IDR) PROCEDURE

GENERAL NOTIFICATION

Clients must be notified of the existence of the procedure to deal with complaints. This is achieved by including details in the Financial Services Guide and on the Lifespan and the Authorised Representatives website. The information must include;

- a) That the client has a right to complain;
- b) That the service is free;
- c) The title of the person to contact;
- d) The methods of contact available;
- e) The time frame in which a resolution can be expected; and
- f) The next step if the complaint is not resolved to the complainant's satisfaction.

ACCESSIBILITY

It is important that people with disability or language difficulties are able to understand the IDR process. Complaints may be lodged by telephone, email, letter, social media, in person, or online. Complaints do not need to be in writing.

It is acceptable for representatives to lodge complaints on behalf of complainants. Such representatives might include financial counsellors, legal representatives, family, friends and members of parliament.

The authority of the representative to act for the complainant must come from the complainant which can be written or verbal. If verbal then it should be documented in writing and a written acknowledgement should be sent to the client.

Once notified that a complainant has authorised a representative, the complainant should not be contacted directly unless:

1. the complainant specifically requests direct communication with the firm;

2. It is reasonable to believe that the representative is acting against the complainant's best interests;
3. It is reasonable to believe that the representative is acting in a deceptive or misleading manner with the complainant and/or the firm;
4. It is reasonable to believe that the representative is not authorised to represent the complainant; or
5. At the time of dealing with the complaint, the representative has been excluded by AFCA from representing complainants in relation to any complaint lodged with AFCA.

RECORDING OF COMPLAINTS

1. The Complaints Officer and/or the Responsible Manager must be informed of the complaint.
2. All complaints must be recorded immediately upon receipt.
3. The complaint must be recorded in the complaints register.

ACKNOWLEDGEMENT OF COMPLAINT

1. The complaint must be acknowledged within 24 hours (or one business day) of receiving it, or as soon as practicable;
2. It is preferred to acknowledge a complaint in writing via email however, if appropriate the acknowledgement can be verbal or in another form of writing (e.g. post or social media channels) with a detailed file note made. When determining the appropriate method of communication, the method used by the complainant to lodge their complaint and any preferences they may have expressed about communication methods should be taken into account;
3. The acknowledgement should detail the process, including timeframes and the availability of the external dispute resolution body (AFCA) if the complaint is not resolved to their satisfaction.
4. When a complaint is received, complaint management staff should assess and prioritise complaints according to the urgency and severity of the issues raised. Example of matters that should be prioritised include where:
 - (a) the complainant is experiencing domestic or financial abuse;
 - (b) the complainant has a serious or terminal illness; or
 - (c) a delay in addressing the complaint could adversely affect the complainant's basic living conditions.

DEALING WITH COMPLAINTS

Each complaint should be managed fairly, objectively and without actual or perceived bias and wherever possible, the complaint should be considered by staff not involved in the subject matter of the complaint.

Other persons who may request an information return (e.g. beneficiaries), and who may reasonably have an interest in the outcome of a traditional services complaint, to be identified, notified and their views considered, where relevant to the efficient and fair handling of the complaint.

When dealing with complaints, follow our privacy policy and processes to ensure compliance with obligations under privacy laws.

Each complaint should be managed in an equitable manner, including those lodged by complainants who display unreasonable or challenging behaviour. If you believe the complainant to be exhibiting unreasonable conduct then you should escalate the complaint to the complaints officer.

Where appropriate, actions that could adversely affect the complainant until the complaint has been finalised and an IDR response has been provided will be postponed, this could include legal proceedings or other enforcement action while considering a hardship notice or request to postpone enforcement proceedings.

1. Treat complainants with respect
2. Allow adequate opportunity for complainants to make their case
3. Be helpful
4. Keep an open mind;
5. Investigate the complaint objectively;
6. Gather information from the complainant and any representatives or other parties involved;
7. Keep the complainant informed of the situation and delays that may prevent a resolution within the quoted timeframe;
8. Enter or ensure that details have been entered into the complaints register at each stage of the process;
9. Keep accurate records of conversations with the complainant and any other party involved in the complaint;

DEALING WITH ORAL COMPLAINTS

1. Identify yourself, listen carefully and record details including the resolution that the complainant requires.
2. Repeat the details back to the complainant to ensure you have recorded them correctly.
3. Empathise with the complainant in a courteous manner.

4. Do not attempt to lay blame or be defensive or argue with the complainant.
5. If possible, resolve the complaint then and there. If you cannot resolve the complaint, commit to doing something immediately in response to the complaint and advise the complainant of the next step in the process.
6. Do not create false expectations.
7. Tell the complainant the name and contact details of the person who will be formally dealing with the complaint.
8. Acknowledge the complaint – refer to ACKNOWLEDGEMENT OF COMPLAINT above.
9. Enter the details including the complaint outcome, complaint remedy and financial compensation amount (if any) into the complaint register and inform the Responsible Manager / Complaints Officer.

DEALING WITH WRITTEN COMPLAINTS

1. Acknowledge the complaint – refer to ACKNOWLEDGEMENT OF COMPLAINT above.
2. Inform the complainant of the name of the person who will be attending to the complaint and the time frame in which a response will be forthcoming.
3. Request clarification of any point or issue that is unclear (this may be more effectively dealt with by telephoning the complainant). If you do telephone the complainant ensure that you are not intruding on their time. In either case, you must point out to the complainant that delays in providing the required information may extend the time frame required to resolve the complaint.
4. If you telephone the complainant, follow the steps outlined in the “Dealing with Oral Complaints”.
5. Enter the details including the complaint outcome, complaint remedy and financial compensation amount (if any) into the complaint register and inform the Responsible Manager / Complaints Officer.

DEALING WITH COMPLAINTS – AUTHORISED REPRESENTATIVES

Authorised Representatives must follow the IDR procedures and any internal complaints policy and/or procedure they may have must state this. Any internal complaints policy and/or procedure must be approved by Lifespan. The authorised representative may attempt to resolve the complaint but must do so within 3 days.

When dealing with a complainant you must follow the IDR process and you should:

1. Ascertain what it is that the client is complaining about;
2. Explain the internal process for complaint handling and the options available to the complainant;

3. Explain to the complainant that their complaint will be given fair and due consideration, it is a free service;
4. Inform the complainant of the options available if the resolution is not to their satisfaction or the complaint is not resolved within 30 days;
5. Record exactly what the client is complaining about and repeat back to the client to ensure your record of the complaint is accurate;
6. If possible, try to arrange an appointment with the client to discuss the complaint;
7. Not admit liability;
8. Not place blame, be condescending, arrogant or argumentative when receiving the complaint;
9. Let your employer know about the complaint (if applicable);
10. Inform us within 24 hours, giving details, even if you are confident of resolving the complaint;

The Complaints Officer must approve any resolution that you propose to make to a client prior to making the offer. Also, you must inform us when you resolve any complaint.

If an Authorised Representative does not resolve the complaint within 3 days:

1. the complaint must be escalated to the complaints officer
2. Forward to the complaints officer a copy of the complaint file including any file notes and other material that is relevant to the complaint.

WHAT THE IDR RESPONSE MUST CONTAIN

1. An 'IDR response' is a written communication to the complainant, informing them of:
 - (a) the final outcome of their complaint at IDR (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
 - (b) their right to take the complaint to AFCA if they are not satisfied with the IDR response; and
 - (c) the contact details for AFCA.
2. If the complaint is rejected or partially rejected, the IDR response must clearly set out the reasons for the decision by:
 - (a) identifying and addressing the issues raised in the complaint;
 - (b) setting out the findings on material questions of fact and referring to the information that supports those findings; and

- (c) providing enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.
- 3. The level of detail in an IDR response should reflect the complexity of the complaint and the nature and extent of any investigation conducted.

MAXIMUM TIMEFRAMES FOR AN IDR RESPONSE

The obligation to deal with a matter according to IDR requirements is triggered when the complainant's expression of dissatisfaction meets the definition of 'complaint'. It is not triggered by the referral of a complaint to a specialist complaints or IDR team.

1. An IDR response must be provided to a complainant no later than 30 calendar days after receiving the complaint.
2. An IDR response does not need to be provided to a complainant if the complaint is closed by the end of the fifth business day after receipt because we have:
 - (a) resolved the complaint to the complainant's satisfaction; or
 - (b) given the complainant an explanation and/or apology when we can take no further action to reasonably address the complaint.
3. A written IDR response must be provided, even where the complaint is closed by the end of the fifth business day, if:
 - (a) the complainant requests a written response; or
 - (b) the complaint is about hardship.
4. When determining whether a complaint has been resolved to a complainant's satisfaction, consider whether:
 - (a) the complainant has confirmed (verbally or in writing) that they are satisfied with the action(s) taken in response to the complaint and do not wish to take the matter further; or
 - (b) other circumstances exist that make it reasonable to form the view that the complaint has been resolved to the complainant's satisfaction.

COMPLAINT MANAGEMENT DELAYS

There are many variables that can affect complaint response times. This includes the complexity of the issues raised and the availability of information, including from third parties. However, we consider that the pursuit of best practice should result in regularly meeting or outperforming the maximum IDR timeframes.

1. An IDR response is not required to be provided within the relevant maximum IDR timeframe if:

- (a) there is no reasonable opportunity to provide the IDR response within the relevant maximum IDR timeframe because:
 - i. resolution of the individual complaint is particularly complex such as;
 - (i) an individual complaint is about a transaction or event that occurred more than six years ago and requires reconstruction of account information and/or
 - ii. circumstances beyond our control are causing complaint management delays such as:
 - (i) the complainant is unable to respond to the financial firm due to illness or absence;
 - (ii) information must be obtained from third parties to a complaint (excluding an authorised representative who is a party to the complaint)
- (b) before the relevant maximum IDR timeframe expires, the complainant must be given an 'IDR delay notification' that informs the complainant about:
 - i. the reasons for the delay;
 - ii. their right to complain to AFCA if they are dissatisfied; and
 - iii. the contact details for AFCA.

Example of 'complexity' include when:

- (a) an individual complaint is about a transaction or event that occurred more than six years ago and requires reconstruction of account information.

Examples of circumstances that may be beyond a financial firm's control include when:

- (a) the complainant is waiting on a medical appointment that the firm reasonably requires the complainant to attend;
- (b) the complainant is unable to respond to the financial firm due to illness or absence; and
- (c) information must be obtained from third parties to a complaint (excluding an authorised representative who is a party to the complaint).

LINKS BETWEEN THE IDR PROCESS AND AFCA

1. A complaint may go through the IDR process but remain unresolved, or may not be resolved within the relevant maximum IDR timeframe. In this instance we will:
 - (a) inform the complainant that they have a right to pursue their complaint with AFCA; and

- (b) provide details about how to access AFCA.
- 2. Other documents and broader communications that contain these details include:
 - (a) IDR responses
 - (b) IDR delay notifications
 - (c) Financial Services Guide
 - (d) website
- 3. We may wish to directly refer a complaint to AFCA for resolution. This may occur where an IDR response has been given to the complainant, but the complaint remains unresolved and the complainant has not escalated it to AFCA. In these cases, the consent of the complainant needs to be obtained first.
- 4. When complaints involve hardship notices or requests for postponement of enforcement proceedings, interest and other default charges may continue to accrue. This may lead to directly refer complaints to AFCA. The complainant's consent to the referral also needs to be obtained in these circumstances.

SYSTEMIC ISSUES

A systemic issue is a matter that affects, or has the potential to affect, more than one consumer. An example:

- (a) a disclosure document that is inadequate or misleading
- 1. Consumer complaints are a key risk indicator for systemic issues and the early identification and resolution of systemic issues should prevent these matters being escalated to AFCA. To help identify any potential systemic issues we:
 - (a) encourage and enable staff to escalate possible systemic issues they identify from individual complaints;
 - (b) regularly analyse complaint data sets to identify systemic issues;
 - (c) promptly escalate possible systemic issues to appropriate areas for investigation and action; and
 - (d) report internally on the outcome of investigations, including actions taken, in a timely manner.
- 2. If an investigation confirms that a systemic issue exists, we will take prompt action to identify affected consumers and provide fair remediation.

RECORD KEEPING MONITORING, REPORTING AND REVIEW

All complaints must be recorded on the Complaint Register which is maintained on the ComposaDoc Register data base.

Each Complaint will have its own folder and all files stored within the folder on the Lifespan intranet. The folder and files within it will be located on Lifedocs drive (H:). The files to be stored may include but are not limited to:

1. File notes
2. Email correspondence
3. Audio recordings
4. Voice recordings
5. Documentation

The Complaints Officer must ensure that complaints are dealt with in accordance with the procedures and within the required timeframe. This will require:

1. Checking the complaint register each week and referring any complaint unresolved after 15 working days to the person nominated in the complaint register as dealing with the complaint;
2. The Complaints officer will also analyse complaint data regularly so that they can:
 - (a) monitor the performance of the IDR process;
 - (b) identify possible systemic issues and areas where product or service delivery improvements are required; and
 - (c) identify matters that are likely to need to be reported to ASIC under s912D of the Corporations Act.
3. To monitor the performance of the IDR process, the following items of data (at a minimum) will be collect and analysed annually:
 - (a) number of complaints received;
 - (b) number of complaints closed;
 - (c) nature of complaints (e.g. product and problem);
 - (d) time taken to acknowledge complaints;
 - (e) time taken to resolve or finalise complaints;
 - (f) complaint outcomes, including:
 - i. number of complaints resolved;

- ii. number of complaints unresolved;
 - iii. number of complaints abandoned/withdrawn; and
 - iv. details of amounts paid to complainants to resolve complaints;
 - (g) possible systemic issues identified; and
 - (h) number of complaints escalated to AFCA.
4. Preparing reports for management each month. The reports should detail:
- (a) the number of complaints received;
 - (b) the number of complaints closed;
 - (c) the circumstances giving rise to complaints (e.g. products, services, and issues and reasons);
 - (d) the time taken to acknowledge complaints;
 - (e) the time taken to resolve or finalise complaints;
 - (f) complaint outcomes, including:
 - i. the number of complaints resolved;
 - ii. the number of complaints unresolved;
 - iii. the number of complaints that were abandoned or withdrawn; and
 - iv. details of amounts paid to complainants to resolve complaints;
 - (g) possible systemic issues identified;
 - (h) the underlying causes of complaints;
 - (i) complaint trends;
 - (j) the number of complaints escalated to AFCA; and
 - (k) any recommendations for improving products or services.

Note: items (a) through to (j) can be achieved by providing the complaints register.

- 5. Ensuring that representatives have access to the appropriate resources to fulfil the requirements for dealing with complaints;
- 6. Ensure full cooperation with AFCA in respect of complaints forwarded to it;

TRAINING

The Complaints Officer will implement the initial training program and ensure that all representatives are kept up to date with changes in dealing with complaints procedures. In particular:

1. Complaints procedures must be included in the induction program for new representatives;
2. The Compliance manual will include an explanation of the procedures and remedies;
3. Continual review of the complaints procedure and amend the training, both ongoing and initial, to address any weaknesses identified

REMEDIES

Where possible the complainant and a Responsible Manager will meet to allow both parties to more openly discuss the matter. That meeting should be regarded as a settlement meeting and take place after a full investigation of the complaint.

Lifespan considers there could be a broad range of possible remedies when attempting to resolve complaints. Remedies may include:

1. an explanation of the circumstances giving rise to the complaint;
2. an apology;
3. provision of assistance and support;
4. a refund or waiver of a fee or charge;
5. a goodwill payment;
6. a payment of compensation;
7. a waiver of a debt;
8. replacing damaged or lost property;
9. correcting incorrect or out-of-date records;
10. repairing physical damage to property;
11. changing the terms of a contract;
12. ceasing legal or other action that may cause detriment; and
13. undertaking to set in place improvements to systems, procedures or products.

Complaints resolution and compensation arrangements must not be made by any Lifespan employee or authorised representative without prior approval from the Complaints Officer. In certain circumstance, Lifespan may request that the client sign a Deed of Release before settlement.

Complaint resolution outcomes (e.g. refunds, fee waivers, correction of records, compensation payments) must be implemented in a timely manner when a complaint is closed.

When closing a complaint, the complaint outcome, complaint remedy and financial compensation amount (if any) must be recorded on the complaints register.

PROCEDURE REVIEW

The complaint dealing procedure including the IDR process will be reviewed at least each twelve months or sooner if required to ensure it remains fair, effective, efficient and that the IDR process is adequately resourced.

The Complaints officer will:

1. carry out annual quality assurance of complaint management activity by frontline and any other staff member, including monitoring whether:
 - (a) complaints are being recorded in the firm's complaint management system;
 - (b) telephone contact and correspondence with complainants is clear and consumer focused;
 - (c) complaint outcomes are fair;
 - (d) complainants are being provided with their escalation options, including AFCA; and
 - (e) conduct annual compliance audits to identify and address issues of non-conformity with this regulatory guide and internal requirements. Where non-compliance with this regulatory guide is identified, appropriate action should be taken—such as
 - i. performance feedback,
 - ii. re-training and enhanced supervision for complaints management staff and,
 - iii. where appropriate, rectification for the complainants adversely affected by the non-compliance.

Senior management will conduct or arrange annual reviews of the IDR process to:

- (a) consider the suitability, effectiveness and efficiency of the IDR system;
- (b) assess whether systemic issues are being promptly identified and remedial action taken to address the issues;
- (c) assess whether the remedial action is prioritised and effective;
- (d) identify improvements that need to be made;
- (e) assess customer satisfaction; and
- (f) recommend any actions to improve the IDR process

The IDR process review could be undertaken by the internal compliance audit function or by an appropriately qualified independent consultant

ACTION REVIEW RECOMMENDATIONS

Any recommendations arising from the review process are to be generally implemented by the complaints officer however, other staff may be directed to do so.

Senior management will:

1. provide a brief which is to include:
 - a. the recommendation
 - b. the nominated person responsible to implement the recommendation
 - c. the timeframe in which the recommendation is to be implemented
 - d. progress report guidelines
2. provide the tools and resources for the brief to effectively implemented
3. track the progress of the recommended actions by reviewing the progress reports.

Senior management will also consider if deemed appropriate, other improvement activities including:

1. conducting benchmarking exercises;
2. establishing a feedback mechanism for staff to record improvement opportunities;
3. encouraging innovation in complaint management practices; and
4. recognising and rewarding exemplary management of complaints.

Signed:

Director Eugene Ardino

Date: 1/10/2020