



Complaints management framework



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Purpose

We use the group complaints management framework to treat Alexforbes clients and customers fairly.

We ensure that we make it easy for clients and customers to complain by not creating any after-sale barriers. We created this framework in line with the conduct of business reform and, in particular, the revised Policyholder Protection Rules. This ensures that Alexforbes acts with due skill, care and diligence when dealing with its policyholders, members, corporate clients and individual customers..

Alexforbes is committed to its Customer First value by supporting the complaints management framework and complaints handling procedure. Please read the complaints management framework in conjunction with the complaints handling procedure. The voice of the customer provides invaluable customer insights and we value the feedback received from clients and customers through complaints to improve our customer experience, service, processes and product offering.

Application

This framework applies to all Alexforbes employees as well as the following entities in the Alexforbes group of companies:

Alexander Forbes Limited and its subsidiaries:

- Alexander Forbes Botswana Group
- Alexander Forbes Financial Services
- Alexander Forbes Group Holdings
- Alexander Forbes Health
- Alexander Forbes Life
- Alexander Forbes Namibia
- Alexander Forbes Offshore
- Alexander Forbes Retail Holdings
 - Alexander Forbes Financial Planning Consultants
 - Alexander Forbes Individual Client Administration Services
 - Alexander Forbes Fiduciary Services
- Alexander Forbes Investments Holdings
- Alexander Forbes Investments Limited
- Alexander Forbes Investments Unit Trusts

Definitions

'Compensation payment' means a payment by **Alexforbes** to a complainant to pay the complainant for a proven or estimated financial loss acquired as a result of Alexforbes's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where Alexforbes accepts liability for having caused the loss concerned. However, it excludes any:

- a) goodwill payment
- b) payment contractually due to the complainant in terms of a policy contract or fund rules
- c) refund of an amount paid by or on behalf of the complainant to the insurer where such payment was not contractually due.

Note: The above includes any interest on late payment of any amount referred to in b) or c).

'Complainant' means a person who submits a complaint and includes a:

- a) financial customer or the financial customer's successor in title
- b) a beneficiary or the beneficiary's successor in title
- c) a person whose life is insured under an insurance policy
- d) a person who pays any premium, contribution or money for a financial product or financial service
- e) a member or member spouse of a pension fund, insurance group scheme (or other type of member-based product or scheme) or
- f) a potential financial customer or potential member of a pension fund, insurance group scheme (or other type of member-based product or scheme), whose dissatisfaction relates to the relevant application, approach, solicitation or advertising or marketing material referred to in the definition of 'potential financial customer'.

'Complaint' means any expression of dissatisfaction by a person to Alexforbes or, to the knowledge of Alexforbes, to our service provider relating to a financial product or financial service provided or offered by that provider. Regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, it alleges or indicates that:

- a) Alexforbes or its service provider has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on or to which we subscribe
- b) Alexforbes or our service provider's maladministration, or wilful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience or
- c) Alexforbes or its service providers have treated the person unfairly.

'Goodwill payment' means a payment by Alexforbes to a complainant as an expression of goodwill. This is aimed at resolving a complaint where Alexforbes does not accept liability for any financial loss to the complainant as a result of the matter complained about.

'Member' in relation to a complainant means a member of a:

- a) pension fund as defined in section 1(1) of the Pension Funds Act 52 of 1956
- b) medical scheme as defined in section 1(1) of the Medical Schemes Act 131 of 1998, or
- c) group scheme as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act of 1998, and section 55 of the Short-term Insurance Act of 1998.

Applies to South African entities only.

Definitions

'Potential financial customer' means a person who has:

- a) applied to, or otherwise approached, Alexforbes or a related party or representative of Alexforbes to become a financial customer
- b) been solicited by Alexforbes to become a financial customer or
- c) received advertising in relation to any financial product or financial service.

'Rejected' in relation to a complaint that has not been upheld and Alexforbes regards the complaint as finalised after advising the complainant that it doesn't intend to take any further action to resolve the complaint. It includes complaints regarded by Alexforbes as unjustified or invalid, or where the complainant does not accept or respond to Alexforbes's proposals to resolve the complaint.

'Service provider' means any person (whether or not that person is the representative or other agent of Alexforbes) with whom Alexforbes has an arrangement relating to the marketing, distribution, administration or provision of financial products or related services.

'Service request' means a request to Alexforbes by or on behalf of a customer or client to carry out a transaction or action or administer a change in relation to any product or service, without any expression of dissatisfaction with Alexforbes or its products or service or its service providers.

'Upheld' means that a complaint has been finalised wholly or partially in favour of the **complainant and that:**

- a) the complainant has explicitly accepted that the matter is fully resolved, or
- b) it's reasonable for Alexforbes to assume that the complainant has accepted that the matter is fully resolved, or

all undertakings made by Alexforbes to resolve the complaint have been met or the complainant has explicitly indicated their satisfaction with any arrangements to ensure such undertakings will be met by Alexforbes within a time acceptable to the complainant.

Allocation of responsibilities

Who deals with complaints

Business unit
initial complaints

Complaints handling team
escalated complaints

Alexforbes board of directors

Complaints handling team

Deal with escalated complaints only when the client bypasses the business unit or the business unit fails to resolve client queries

Centre-led and not part of any business unit

Employees

Must log any complaint they receive

Managers

Must ensure that their employees log complaints

Employees

- Ensure that we treat customers fairly
- Log and resolve initial complaints using complaints management system (CMS) tools
- Provide facts, failures, timelines, documentation, and root cause analysis

Alexforbes board of directors (Social, ethics and transformation committee)

- Mandates and minutes of the committee meetings ensure that there are no conflict of interest
- Responsible for effective complaints management
- Approves and oversees the complaints management framework

Complaints handling team

- Ensure that we treat customers fairly
- Set standards, conduct quality assurance and provide training and awareness of complaints management and the complaints management system
- Monitor trends, conduct root cause analysis and provide management reporting
- Make fair, impartial and objective recommendations on how to resolve complaints
- Are experienced, knowledgeable, skilled and trained to resolve complaints received according to current laws and regulations
- Provide governance, oversight and assurance that the framework is being adhered to
- Don't have any conflicts of interest

Managers

- Drive client-first culture and behaviours
- Hold teams accountable to framework
- Share operational stats and trends as a lead indicator to pain points
- Monitor and report service provider complaints, if relevant

The table below illustrates the above responsibilities and accountabilities:

Who	What	Where	
		Intranet complaints form	Complaints management system (employees with CRM licence)
All employees	Log complaints	●	●
The person responsible for resolving the complaint	Logs and resolves complaints received in any business unit and updates the complaints management system (CMS)	●	●
Complaints handling team	Log and resolve escalated complaints and update CMS		●
Complaints handling team	Perform quality assurance on CMS to ensure data is complete and accurate		●

For the complaints handling team, quality assurance is conducted on inbound and outbound calls, and data capturing on the complaints management system (CMS). Coaching and mentoring are given based on quality assurance findings.

Performance standards

The effectiveness of complaints handling employees is monitored on an ongoing basis and is reported on monthly to maintain Alexforbes's service commitments, complaints standards and targets. Performance standards are aligned to customer service standards, complaints acknowledgement and resolution targets.

Service providers

A process is in place for managing complaints relating to service providers who provide Alexforbes with policy or related services

Alexforbes ensures that:

- service providers have adequate complaints management processes in place to ensure fair treatment of complainants
- it monitors and analyses aggregated complaints data in relation to complaints received by the service provider and their outcomes
- there are effective referral processes between Alexforbes and the service provider for handling and monitoring complaints that are submitted directly to either of them and require referral to the other for resolution
- complainants are appropriately informed of the process being followed and the outcome of the complaint

Alexforbes confirms its commitment to managing complaints relating to binder agreements.

Internal complaints handling procedure

Information about how and where to complain is well publicised to customers, employees and other interested parties.

The complaints handling procedure is available on the following platforms:

- our website
- policyholder and member documentation
- our regional offices

Front-line employees are aware of the complaints handling procedure and the contact details of complaints handling employees.

Policy statement

Alexforbes is committed to effective complaints handling and values feedback from complainants

We adhere to the following Alexforbes service commitment:

We never let the sun set on a complaint and we take ownership of the complaint.

We aim to resolve 80% of complaints within four working days.

We manage expectations by providing regular feedback until resolution.

We aim to acknowledge 100% of our complaints within one working day.

We conduct root cause analysis and hold our colleagues accountable for actions and feedback.

We make it easy for customers to complain

Complaints are dealt with free of charge.

Customers can log a complaint using the following channels:

- website
- social media
- telephone
- email
- regulator, ombud or pension fund adjudicator
- fax
- walk-in
- letter
- through any Alexforbes employee

We have a dedicated complaints contact centre from Monday to Friday, 08:00 to 17:00, excluding weekends and public holidays.

Our contact details are: contactus@alexforbes.com and **011 669 7026** or **0860 000 279**

Any Alexforbes employee can log and resolve a client complaint using our complaints intranet functionality.

A unique reference number is allocated to each complaint. The complainant can use this to track the progress of their complaint at all times. Complaints that require investigation are referred to complaints handling employees for investigation, resolution, root cause analysis and implementation of management action plans in collaboration with business.

Complaints are acknowledged and investigated timeously and the complainant is kept informed throughout the process

Communication

Communication with complainants is in simple, plain language. We communicate throughout the complaints process.

The complaints handling team conduct communication and engagement regularly with the business to create complaint awareness, provide training, highlight trends and continuously look at improvements. The communication will include trends and outcomes from the pension funds adjudicator, ombud and client and customer complaints.

The complaints handling procedure advises complainants of the turnaround times for resolving complaints, the internal complaints escalation and review process if the complainant is not satisfied with the outcome, if the complainant feels that they have been treated unfairly or the manner in which the complaint was dealt with, and the details of the pension funds adjudicator and relevant ombud.

If a complaint is upheld, Alexforbes will provide a remedy.

Alexforbes undertakes to provide fair, reasonable and appropriate levels of redress to complainants without delay and within agreed turnaround times. Remedies may take the form of either or a combination of the following:

- Explanation: this form of resolution entails providing information on the decision-making process or relevant policies or legislation and providing reasons for a decision
- Apology in writing
- Changing a policy, practice or process to prevent similar incidents in future
- Compensation payment for any financial loss suffered by a complainant
- Premium refunds
- Fee refunds for services or advice not provided
- Goodwill payment as an expression of goodwill aimed at resolving a complaint for services or advice not provided

If a complaint is rejected, Alexforbes will provide the complainant in writing with:

- adequate reasons for the decision made
- the internal complaints escalation and review process and timelines
- relevant details of the ombud or pension funds

adjudicator

Personal information related to complaints is kept confidential.

Alexforbes takes data protection seriously. We comply with legislation that protects data and personal information like the Protection of Personal Information Act.

We will keep clients' and customers' personal information to resolve their complaints and if we need to comply with any law that requires it. Once we no longer have a need or legal basis to keep clients' and customers' personal information we will delete it, or remove the personal information.

Internal escalation of complaints and review process

The internal complaints escalation and review process takes into account the interests of all parties involved, including the fair treatment of complainants.

Complainants may escalate their complaint to the complaints manager or head of customer insights at complaintescalation@alexforbes.com if they feel they've been treated unfairly or if they are not satisfied with the resolution of their complaint.

The complaints manager and head of customer insights will manage the escalation and review process. If the complaint is rejected, the complainant will be advised of the decision within 10 working days and referred to the relevant ombud or pension funds adjudicator's office.

If the complaint is upheld, a recommendation will be made to the business unit head for a final decision. A full and final redress will be made within 10 working days and the complainant will be informed accordingly.

Decisions made are reported monthly to business and group executive committees, and quarterly to the board.

Claims committee

Complaints relating to rejected or disputed long-term insurance claims are to be escalated to the Alexander Forbes Life Claims Committee for a decision. If a complaint is rejected, the details of the ombud will be provided to the complainant. Where the claims committee upholds a complaint, Alexander Forbes Life must act accordingly on the committee's decision. The claims committee may only act in accordance with the terms of reference of this committee.

Record keeping, monitoring and analysis

The Alexforbes complaints management system (CMS) has been developed to ensure efficient and secure recording of complaints. CMS is reviewed yearly to ensure it is easy to use, improves reporting and meets regulatory reporting requirements.

The following complaint details are to be recorded in CMS for each complaint:

- a) all details of the complainant and the complaint
- b) copies of all relevant evidence, correspondence and decisions
- c) the complaint categorisation
- d) progress and status of the complaint

Alexforbes categorises complaints in the following complaints categories:

- a) the design of a policy or service
- b) information provided to policyholders
- c) advice
- d) policy performance
- e) customer service (including withdrawal benefit payments from pension or provident funds)
- f) policy accessibility, changes or switches
- g) complaints handling
- h) insurance risk claims
- i) Protection of Personal Information Act (POPIA) and Promotion of Access to Information Act (PAIA) complaints
- j) fraud
- k) medical aid complaints
- l) withdrawal benefit payments

CMS allows Alexforbes to provide the following complaints data:

- a) complaints received
- b) complaints upheld
- c) rejected complaints and reasons for the rejection
- d) complaints escalated by complainants to the internal complaints escalation process
- e) complaints referred to an ombud or pension funds adjudicator and their outcome
- f) number and value of compensation payments

made

- g) number and value of fee refunds
- h) number and value of goodwill payments made
- i) complaints outstanding

Complaints data is analysed on an ongoing basis to identify, manage and report on:

- conduct risks and compliance breaches
- improving outcomes and processes for its customers
- preventing recurrences of poor outcomes and errors

Trends and management action plans are provided in reporting.

Complaints records are to be kept for a minimum of five years from the date that the complaint has been resolved by Alexforbes, an ombud, pension funds adjudicator or regulatory office.



Prescription

A complaint will not be considered if three or more years have passed from the date on which the complainant became aware, or should reasonably have become aware, that they had cause to complain, excluding any time-barring period referred to in contractual documents.

Proactive complaints management

Proactive management includes monitoring business operational statistics and customer touchpoints to pre-empt customer impacts and to mitigate them.

Systemic issues are dealt with to proactively manage customer expectations and to avoid an increase of complaints. Affected customers are identified, internal business stakeholders agree to a management action plan with resolution and the resolution is communicated proactively to affected customers to avoid an influx of complaints. Root cause analysis is conducted to ensure that there is no recurrence of the systemic issue. These are reported monthly and quarterly.

Engagement with ombud schemes

Alexforbes is committed to building trusted relationships with regulatory bodies, for example the statutory and voluntary ombud schemes, industry bodies and the Financial Sector Conduct Authority. We undertake to have open and honest communication and to fully cooperate with any of these offices to resolve customer complaints. We try to resolve a complaint with the customer before a final determination or ruling is made by an ombud or pension funds adjudicator, or through our internal escalation process, without delaying a complainant's access to an ombud or pension funds adjudicator.

The details of the relevant ombuds or pension funds adjudicators are provided in the following platforms:

- complaints handling procedure on our website
- policy and member documentation
- on receipt of a complaint and when a complaint is rejected or a claim is repudiated

We'll monitor determinations, publications and guidance issued by any relevant ombud or pension funds adjudicator with a view to creating awareness and training and identifying failings or risks in our services, processes or products.

Reporting

Alexforbes reports on all customer and regulatory complaints.

Quarterly reporting is provided to the social, ethics and transformation board committee meeting. Monthly reporting is provided to the group, institutional and retail executive committees as well as management committees and the group risk committee respectively.

Review

The complaints management framework is reviewed regularly by the complaints handling management, and periodically by independent parties, to ensure optimal efficiency and effectiveness of the framework and the processes followed.

The board (social, ethics and transformation committee) must approve any amendments to the complaints management framework.

