

Complaints Handling Policy

15 December 2022

Document Control & Version History

Policy	Complaint Handling Policy
Document Number	9
Document Owner	Chief Risk Officer
Effective Date	15 December 2022
Review Period	Every 2nd year or as needed
Scheduled Review Date	December 2024

Record of Amendments, Authorisations & Issues

Version	Revision Date	Drafted by	Nature of Amendment	Approval Required
2	15 December 2022	GRC	Updated Policy Template Version Update for withdrawal of RG 165	BRCC / CLRCC / CLN BRCC

1. Purpose

The purpose of the Complaint Handling Policy (Policy) is to embed a fair, timely and effective complaints management process within ClearView, which is aligned with:

- ASIC Regulatory Guide 271: Internal Dispute Resolution;
- Life Insurance Code of Practice and any other relevant code or guidance notes (**the Codes**); and
- ClearView's business values, vision and strategic objectives.

The Policy sets out the requirements to support compliance with ClearView's regulatory obligations and its commitment to the highest possible standards of customer service and regulatory obligations including the Design and Distribution Obligations and Breach Reporting. ClearView also recognises the important of adhering to our system of internal dispute resolution (IDR) in accordance with s912A(1)(g) and s912A(2)(a)(i) of the Corporations Act.

The Policy provides guidance for ClearView in its approach to receiving and handling complaints to ensure customer concerns and complaints are handled in a manner which is timely, fair and transparent manner.

2. Key Principles

- ClearView's complaints handling process is guided by the following principles:

Commitment: ClearView is committed to a holistic, customer-centric complaints handling process to resolve any grievances raised in a fair, timely and professional manner;

Fairness: ClearView's complaints handling process recognises the need to be fair to both the Customer and any employee who may have had a complaint made against them. To ensure objectivity, the investigation of a complaint against a ClearView business unit or an employee will be conducted by the Complaints Officer where the person investigating is not directly involved in, or is the subject of, the complaint. Each complaint will be addressed in an equitable and unbiased manner;

Resources: ClearView is committed to providing adequate training, technology, and resources to ensure the complaints handling process operates effectively and efficiently;

Visibility: ClearView provides avenues for Customers to make complaints, including verbal and written complaints. The information about ClearView's Internal Dispute Resolution (IDR) process is included in the Financial Services Guides, Product Disclosure Statements, and periodic statements. It is also readily available online and in hard copy on request;

Accessibility: ClearView's complaint handling process is available free to the general public and is easy to understand and use, including by Vulnerable Customers;

Responsiveness: ClearView is committed to dealing with complaints promptly and courteously;

Reviews: ClearView regularly reviews its complaints data to identify systemic issues, promptly escalate possible systemic issues to its business units for investigation and action;

Report: ClearView reports the investigation outcome, including actions taken to resolve the complaint.

A Customer or their representative is entitled to make a complaint about any aspect of a product, service or experience provided by ClearView or in relation to our Advisers or Independent Service Providers.

If the Customer is not satisfied with ClearView's response after the initial contact, or it cannot be resolved at first point of contact, it can be escalated as a dispute for resolution within the IDR process.

Complaints are viewed as an opportunity to improve from the feedback that customers provide. This process results in a positive impact on our business in the long term and maintains our customers' confidence in our ability to provide our products and services. ClearView is committed to achieving the best outcome for its customers.

3. Scope of the Policy

- This Policy has been adopted by:
 - ClearView Wealth Limited (CWL);
 - ClearView Financial Management Limited (CFML);
 - ClearView Life Assurance Limited (CLAL);
 - ClearView Life Nominees Pty Limited (CLN); and
 - ClearView Administration Services Pty Limited (CAS).

In this document, 'ClearView' refers to CWL and its operating subsidiaries as set out above.

ClearView sold its advice business to Centrepont Alliance effective Oct 2021. Whilst complaints will generally be managed by Centrepont, ClearView may be required to support complaint management, particularly if there is a claim which may impact our public indemnity insurance. Where this is the case, the Centrepont Alliance legal team will discuss this with the ClearView legal team. The arrangement to support ends in October 2023.

This Policy applies to all employees and contractors (Employees) working for or on behalf of ClearView. Employees are required to read and understand the Policy and must adhere to the policy at all times. Clearview's culture supports the recognition of feedback gathered through complaints as an opportunity to learn and improve how we do business.

Roles and responsibilities relating to complaints handling are outlined in **Annexure A**. This also includes Dealer Group related Complaints where these responsibilities are to be undertaken by the Centrepont Alliance Complaint Manager and managed under the Centrepont Alliance complaint policy.

Employees should consider this Policy in relation to the general corporate governance of ClearView and its core business activities as a:

- Non-Operating Holding Company (NOHC as defined by APRA);
- AUSTRAC regulated entity;
- Registered Life Insurance Company;
- Australian Financial Services Licensee (AFSL Holder);
- Responsible Entity (RE);
- Registrable Superannuation Entity (RSE); and

- Operator of an Investor Directed Portfolio Service (IDPS).

This Policy outlines a framework for receiving, managing and resolving complaints across ClearView.

Failure to comply with the Policy may give rise to regulatory risk and may result in both civil and criminal penalties as well as reputational and other damage.

Any instances of non-compliance with this Policy must be treated in accordance with the ClearView Incident Management Policy.

Where ClearView Employees have a concern that a serious breach of this Policy has occurred or will occur they should report this to their people leader or through the ClearView Whistleblowing channel.

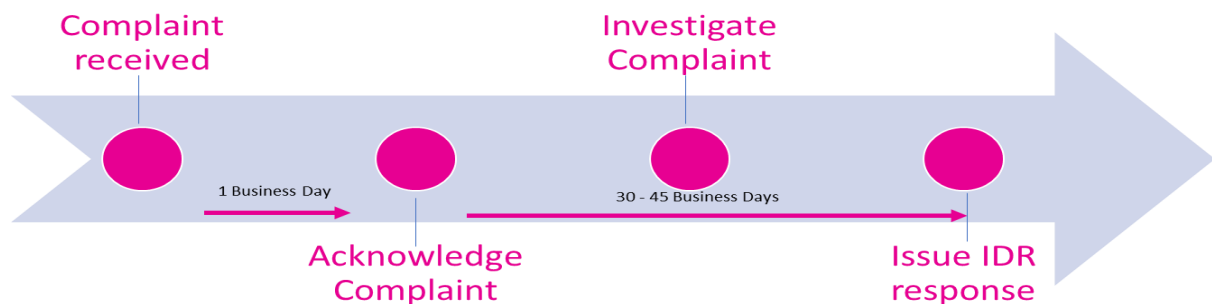
A breach of this Policy may be considered as misconduct and may result in disciplinary action.

4. Policy

Complaints management function

- ClearView maintains an appointed Complaints Officer at all times.

ClearView's [Complaint Process Manual](#) sets out the detailed process for complaint handling and this must be followed by all staff when involved in the handling of a complaint. The high level process flow for handling complaints is outlined in **Annexure B**.



Register

- 4.2 The Complaint Register is maintained in Intelligence Bank (IB). All staff have access to lodge a complaint in the register. A complaint can be notified by a customer, representative, adviser or ClearView Employee. The relevant Employee receiving the complaint must record the details in the Complaints Register. All records relating to complaint handling will be maintained in accordance with the required timeframes.

Systemic issues

Complaints handling data are extracted from ClearView's Complaints Management System and analysed regularly to ensure that any recurring or systemic problems are identified and addressed. This is carried out by:

- Encouraging employees to escalate possible systemic issues they identify from individual reported complaints;

- Undertaking root cause analysis to identify common types of complaints;
- Assessing impacts from root causes on other processes, services or products; and
- Appropriately responding to address the root cause issues.

Reporting

- 4.4 A report of complaints received, and systemic issues identified will be provided to the relevant Executive Leadership Team (ELT) through either the leadership or risk forum on a periodic basis. Reporting will also be provided to the RMCC, BRCC, CLN BRCC (for CLN related complaints) and CLRCC on a six monthly basis. The reporting will include but not be limited to the total number of complaints received and settled, complaints escalated to EDR, information on adherence to regulatory timeframes, the types of complaints received during a given reporting period and any relevant trends or observations.

5. Definitions

What is a complaint?

A complaint is “an expression of dissatisfaction made to or about ClearView relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required”.

A complaint may be expressed explicitly where a response is requested or implicitly where an expression of dissatisfaction expects ClearView to reasonably respond or take action.

Whether the complaint is made orally or in writing, all complaints must be treated in the same manner; that is, ClearView must use reasonable endeavours to resolve the Customer’s dissatisfaction.

A complaint does not include employment related complaints raised by staff at ClearView or comments made about ClearView where a response is not expected.

Any person, organisation or representative (the ‘Customer’) who is dissatisfied with a product or service provided by ClearView, for any reason, may contact ClearView to lodge a complaint.

Who is considered a representative?

A representative can lodge complaints on behalf of Customers. A representative is not limited to a Customer’s legal representative. A representative includes a financial counsellor, family or a friend (this list is not intended to be exhaustive). Once ClearView is made aware a Customer has authorised a representative, the Customer should not be contacted, unless:

- The representative is not acting in the Customer’s best interests; or
 - Is acting in a misleading or deceptive manner with the Customer and/or ClearView
- The following additional definitions apply throughout this Policy:
 - Adviser:** A Financial Adviser, Planner or Broker who is an authorised representative (including Credit representative) or corporate authorised representative of ClearView Financial Advice Pty Limited (CFA) or Matrix Planning Solutions Limited and/or any Employee of ClearView who provides financial advice to retail customers. Adviser also includes Independent Financial Advisers (not affiliated with ClearView) that distribute ClearView products;
 - Customer:** A person, organisation or a representative of a person or organisation who has made a complaint;

Complaints Officer/Manager: The Complaints Officer or their delegate or Dealer Group Complaints Manager;

ClearView Life Claims Committee (CLCC): The committee that oversees the life claims management function of ClearView Life Assurance Limited;

Complaints Management System: The compliance portal on Intelligence Bank;

Dealer Group: means ClearView Financial Advice Pty Limited and Matrix Planning Solutions Limited (now referred to as Centrepoint Alliance);

Dealer Group Complaints Manager: The Dealer Group manager appointed to this position or their delegate;

Disputes: Unresolved complaints escalated internally or externally, or both;

EDR: External Dispute Resolution Process, being the process that ClearView must adhere to when complaints have been referred to an EDR Scheme such as the Australian Financial Complaints Authority (AFCA);

Independent Service Provider: Someone ClearView enters into an agreement with, to assist with administration or management of a claim by a Client on their Life Insurance Policy or Wealth Product This may include, but is not limited to, an independent medical assessor, a rehabilitation provider, an allied health professional, an accountant, an investigator, surveillance operative or claims management service. This excludes reinsurers;

IDR: Internal Dispute Resolution Process, being the complaint handling procedure outlined in this Policy;

Standard Complaint: a complaint other than a superannuation trustee complaint or complaints about superannuation death benefit distributions.

Vulnerable Customers takes its meaning in accordance with ClearView's Customers Experiencing Vulnerability Policy.

6. Customers Experiencing Vulnerability

- Complaints raised by Vulnerable Customers are to be managed in accordance with ClearView's Customers Experiencing Vulnerability Policy and provide assistance when reasonably appropriate.
- Indicators of Vulnerable Customers may include the following:
 - Low financial capability skills (this could also include low literacy and numeracy);
 - Physical, mental or emotional disability;
 - Physical, mental or emotional abuse;
 - Severe or long-term illness;
 - Age related;
 - Low income or high debt;
 - Remoteness;
 - Digital exclusion;
 - Language or cultural background including indigenous;
 - Sudden or significant changes to personal situation; and/or
 - Caring responsibilities.

7. Other Related Policies

- ClearView Complaints Handling Manual
- Privacy Policy
- Customers Experiencing Vulnerability
- Incident Management Policy

8. Australian Financial Complaints Authority (AFCA)

All ClearView entities are members of AFCA. The ClearView Complaints Manager and a Senior Compliance Manager are delegated by the Managing Director to receive and manage complaints referred to the AFCA. Complaints which are not resolved to the complainant's satisfaction may be accepted by the AFCA in line with the AFCA's terms of reference. The AFCA sets all time frames related to complaints they accept.

9. Training

- All Employees will receive training in respect of complaints handling on a periodic basis.
- Customer facing staff will receive additional tactical training on the process and the tools available to support complaints handling on a periodic basis.
- ClearView will ensure that the Complaints Officer and any other Employees who are involved or handle complaints are adequately trained and competent.

10. Key Contacts

ClearView's external website and relevant communications will include information about the following to enable visibility of Complaints Handling at Clearview and ensure the process is accessible to and useable by customers:

- The IDR and EDR contact details;
 - An online complaint form; and
 - How a customer can make a complaint
- Contact details for key IDR and EDR are listed below.

Internal Complaint Body	External Complaints Body
Group Complaints Officer Level 15 20 Bond St Sydney NSW 2000 Complaints@clearview.com.au	Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3000 1800 931 678 http://www.afca.org.au Info@afca.org.au

If you are in any doubt as to your obligations under this Policy or would like any advice or assistance in dealing with a complaint you should contact the Complaints Officer or another member of the Group Compliance Team.

Annexure A: Roles and Responsibilities

Line of Defence	Role	Responsibility
First Line of Defence	Frontline	<ul style="list-style-type: none"> • Understand the definition of a complaint • Collect all information possible to assist with the resolution of a complaint using the template • Raise/report any complaints to the Complaint Manager via Intelligence Bank or email • Ensure you complete/attend training • Assist customers to make a complaint • Attempt to resolve enquiries/issues raised by customers before they become a complaint • Provide the Senior Complaints Manager with any information required to investigate the complaint
	Team Leader/Manager	<ul style="list-style-type: none"> • Identify opportunities for your team to understand and identify complaints • Ensure teams are provided with training and/or coaching about complaints • Provide feedback to team member when they fail to identify complaints • Provide solutions to team members to help resolve enquiries before they escalate • Prioritise providing information as requested by the Senior Complaints Manager that is required to resolve complaints • Respond to and address or escalate feedback provided by customers including addressing failures or gaps in process, products, systems, collateral or any other area • Ensure you complete/attend training • Immediately escalate complaints which have not been recorded initially to the Senior Complaints Manager • Record an incident in Intelligence Bank if a complaint has been identified as not being logged when received • Encourage discussions to continuously enhance understanding within teams and a culture of proactively seeking solutions for customers

	Quality Assurance	<ul style="list-style-type: none"> • Ensure that complaints identified in quality assurance processes are logged • Provide feedback and recommendations to team leaders/team managers for team coaching if complaints are not identified during calls • Provide feedback and recommendations to team leaders/team managers on ways to help teams resolve queries before they escalate. • Ensure that any complaints which have not been logged are immediately escalated to the Senior Complaints Manager • Record an incident in Intelligence Bank if a complaint has been identified as not being logged when received • Ensure you complete/attend training
	Head of Department	<ul style="list-style-type: none"> • Approve or escalate solutions for customers with delegation of authority • Drive a culture of seeking proactive customer outcomes and thinking outside the box to achieve good customer outcomes • Respond to and address or escalate feedback provided by customers including addressing failures or gaps in process, products, systems, collateral or any other area • Respond to or attend Compensation and Good Will Committee requests for solutions
	Executive Leadership Team	<ul style="list-style-type: none"> • Provide tools for staff to be able to resolve issues and queries before they escalate to complaints • Approve or escalate solutions for customers within delegation of authority
	Marketing & Communications	<ul style="list-style-type: none"> • Ensure that social media channels are monitored, and any complaints are escalated to the Senior Complaints Manager immediately
	Product/Pricing	<ul style="list-style-type: none"> • Respond to and address or escalate feedback provided by customers including addressing failures or gaps in process, products, systems, collateral or any other area • Prioritise providing information as requested by the Senior Complaints Manager that is required to resolve complaints
	Learning & Development	<ul style="list-style-type: none"> • Support and/or deliver training delivery for new staff and ongoing training for all staff
	Group HR	<ul style="list-style-type: none"> • Consider suitability of new recruits to frontline teams including assessment of empathy and solution seeking skills

Second Line of Defence	Senior Complaints Manager	<ul style="list-style-type: none"> • Owner of the Complaints Policy and Complaint Handling Manual and their compliance with the relevant legal, legislative and Code related obligations. • Responsible for case managing IDR complaints (with support from relevant areas of the business), including compliance with relevant legal, Code or legislative obligations including time frames documented in Regulatory Guideline 271. • Deliver tactical training (with support from Learning and Development) for frontline teams on their role, responsibility, and processes. • Work with Legal and/or other specialist teams to case manage complaints referred to AFCA. • Provide reports to Senior Management via different Committees • Identify and escalate trends or potentially systemic issues to responsible owners Ensure recommendations arising out of complaint data analysis are canvassed with the senior management and presented at Committees (for example the Life Risk Forum). • Raise incidents or breaches in Intelligence Bank.
	Senior Compliance Manager	<ul style="list-style-type: none"> • Act as delegate or back up for Senior Complaints Manager as needed. • Support in day-to-day management and oversight of process.
	Chief Risk Officer	<ul style="list-style-type: none"> • Act as a reference for the Senior Complaints Manager in complex or risky complaints.
	Legal	<ul style="list-style-type: none"> • Provide legal advice in relation to complex complaints at the request of the Complaint Manager. • Provide support for complaints received from AFCA. • Support in the drafting of Deeds of Release.
Third Line of Defence	Internal Audit	<ul style="list-style-type: none"> • Undertake periodic assessments of the control environment
Board and Board Committees	Compensation and Good Will Committee (CGC)	<ul style="list-style-type: none"> • Respond to requests from the Senior Complaints Manager in relation to financial remedies above \$500
	BRCC CLN BRCC CLRCC LIRF WMRF RMCC	<ul style="list-style-type: none"> • Review submissions and reports received from the Senior Complaints Manager as required. • Critically assess for trends and systemic issues. • Provide support and resourcing to resolve systemic issues.

Annexure A: Flow chart

