



# OUTsurance Complaints Resolution Policy

## Table of Contents

1.	Overview	2
2.	Complaints Policy	2
3.	Complaints Procedure	3
4.	Conclusion	5
5.	Regulatory Framework	5
6.	Document Control Summary	6



# 1. Overview

OUTsurance Insurance Co Ltd and OUTsurance Life Insurance Co Ltd are authorised financial services providers in terms of the Financial Advisory and Intermediary Services Act and we therefore have a responsibility to treat all clients fairly with honesty and integrity. This Complaint Resolution Policy serves to provide guidance around the recording and handling of complaints with a view to continuously improve our awesome service to clients. The procedure should be used by all employees in dealing with complaints.

**OUTsurance's complaints resolution procedures have been designed to:**

Show our commitment to the prompt handling of complaints in an effective fair and prompt manner and for the resolution of complaints by clients in accordance with Part XI of the General Code of Conduct for Authorised Financial Services Providers and Representatives as published in Board Notice 80 of 2003 and published in the Government Gazette dated 8 August 2003 and any other applicable legislation.

**Our Value of Awesome Service:**

OUTsurance has a company value of providing Awesome Service. How we deal with complaints is an integral part of providing Awesome Service.

Awesome service is unique and exceptional; it influences the way we treat our clients and ensures that they become our best marketing tools by recommending the company to family, friends and colleagues.

# 2. Complaints Policy

**OUTsurance is committed to an internal complaint resolution procedure based on the following principles:**

- We offer transparency by ensuring that clients have full knowledge of the procedures for resolution of their complaints and we keep clients continually updated on progress;
- We promise fairness to clients, at all times and even more so when dealing with a complaint; and
- We provide adequate training of all relevant staff ensuring full knowledge with regard to the resolution of complaints.

## 3. Complaints Procedure

### 3.1 Your responsibilities:

- Inform us immediately of any complaint.
- You can complain telephonically to your initial contact person since all conversations are recorded.
- If you prefer, you can put your complaint in writing to your initial contact person.
- If your complaint is related to the outcome of a claim the complaint can be send to [dispute@out.co.za](mailto:dispute@out.co.za).
- For any compliance/non-compliance matter relating to FAIS or the Policyholder Protection Rules you may contact us via email at [compliance@out.co.za](mailto:compliance@out.co.za).
- Remember if it is FAIS related, the complaint MUST be in writing. Provide us with all relevant information to enable us to assist you efficiently. Your complaint should contain sufficient details including sufficient facts, dates and supporting documentation. You should also include your Policy number, Identity number and contact details.

### 3.2 Our responsibilities:

The person dealing with your complaint will follow the following process:

- Acknowledge receipt of complaint as soon as possible, but not later than 24 business hours.
- Confirm their contact details to you;
- Identify all issues by considering and listing all concerns or points raised and asking additional questions if necessary;
- Do comprehensive research into causes of all the issues raised;
- Handle complaints in a fair, transparent and timely manner.
- Resolve the complaint within 15 working days, provided we have all required information;
- Provide feedback at least every 10 days;
- If we require further information we will agree with you on a new reasonable timeframe;
- In the unlikely event that the person handling the complaint finds it impossible to reach agreement, the matter will be escalated internally for a dispute resolution process. Please refer to point 3.3 below for the dispute resolution guidelines.
- All complaint records will be kept for a minimum of 5 years.

## If your complaint relates to a rejected claim we will:

- a. Provide reasons for the decision in writing if the same was not already provided in the rejection letter sent to you;
  - b. Inform you of the external complaints procedure avenues available;
  - c. The time limitation provision for the institution of legal action and the implication thereof;
  - d. Provide you with copies of all available documents and information from third parties that influenced the decision on request, that are not subject to legal privilege;
  - e. If you object to a rejected claim and we abide by our initial decision we will follow the procedure in (a) to (d) above in writing again and include the facts on which the decision was based. You also have the right to request an internal dispute resolution as per paragraph 3.3 below.
- If you challenge a rejected claim and make representations in this regard as part of your complaint and we decide to confirm the decision to reject the claim after consideration, the dispute resolution process as described in paragraph 3.3 is applicable.

## 3.3 Internal dispute resolution process

If you wish to have a decision regarding a complaint reviewed, we will treat it as a dispute:

- a. You are advised of your right to request an internal dispute resolution process;
- b. We will notify you of the name and contact details of the person assigned to liaise with you;
- c. The internal dispute resolution process will follow the standards stipulated as part of the normal complaints handling procedure;
- d. When we have made a decision in terms of the internal dispute resolution procedure, we will respond to you in writing confirming:
  - i. Reasons for the decision;
  - ii. Facts on which the decision was based
  - iii. Information about how to access the external dispute resolution or policyholder recourse mechanisms. Should you not be satisfied with the internal resolution, we will inform that you have recourse with certain external parties like the Ombudsman for Short-term Insurance, Ombudsman for Long-Term Insurance or the FAIS Ombud as the case may be. You may also approach the South African Insurance Association (SAIA) if you feel that a breach of their code of conduct has occurred.
  - iv. Notify you of the timeframe in which an external dispute should be lodged.

## 4. Conclusion

The complaints policy is intended to provide guidance pertaining to the handling of complaints. We are committed to abide by this document and to provide AWESOME SERVICE in all our dealings with you.

## 5. Regulatory Framework

If you want to know more about the applicable legislation, regulations or codes read about it in the section below or contact our compliance department.

**The Financial Advisory & Intermediary Services Act 37 of 2002 (FAIS) – How does FAIS define complaints?**

### 5.1 In terms of the FAIS Act, a complaint is defined as follows:

*5.1.1 "Complaint" means, subject to section 26(1)(a)(iii), a specific complaint relating to a financial service rendered by a financial services provider or representative to the complainant on or after the date of commencement of this Act, and in which complaint it is alleged that the provider or representative -*

*(a) has contravened or failed to comply with a provision of this Act and that as a result thereof the complainant has suffered or is likely to suffer financial prejudice or damage;*

*(b) has wilfully or negligently rendered a financial service to the complainant which has caused prejudice or damage to the complainant or which is likely to result in such prejudice or damage;*  
*or*

*(c) has treated the complainant unfairly.*

## 6. Document Control Summary

Document Status	Version 1.2
Process Owner	Risk & Compliance Department
Approved by (1)	Internal Risk Committee - 19 October 2017
Approved by (2)	Audit, Risk and Compliance Committee - 8 November 2017
Document Location	Risk & Compliance - SharePoint site
Review Document	October 2018

Document Status	Version 2
Process Owner	Risk & Compliance Department
Approved by (1)	Internal Risk Committee - 29 October 2018
Approved by (2)	Audit, Risk and Compliance Committee - Notified on 5 November 2018
Document Location	Risk & Compliance - SharePoint site
Review Document	November 2019