

# COMPLAINTS & FEEDBACK POLICY AND PROCEDURES

## OVERVIEW

This policy relates to complaints made in respect to the products and services offered by The Insurance Company of the West Indies Limited (ICWI). Whilst the term complaint is used primarily throughout the policy, this also relates to feedback received about ICWI and its operations.

This policy provides guidance for responding to complaints about ICWI and is to be applied to the handling of complaints lodged by clients; it is also to ensure the proper management of complaints and facilitate quality management and control.

## COMPLAINTS COVERED BY THIS POLICY

- Complaints about communication, or miscommunication, between clients and staff of ICWI that has caused conflict
- Complaints about the performance of duties; services that have not been provided at the professional standard required.
- Complaints about conduct; the alleged wrongdoing, or inappropriate behaviour by staff of ICWI
- Complaints about unacceptable delay in, or inappropriate carrying out of any function related to serving clients and or potential clients of ICWI
- Complaints about a policy, a service or product offered by ICWI

## HOW COMPLAINTS ARE RECEIVED

Complaints and feedback about ICWI can be provided in various forms- in person, by telephone, facsimile, email, in writing or via the media i.e. newspaper. Clients may make a complaint either written or verbal form to:

- A Supervisor of ICWI
- Using the ICWI Complaints Register located in each Branch
- Using the ICWI Customer Service Questionnaire
- A Manager (Branch/Sub-Branch) of ICWI
- A member of the Executive Management Team
- The President or Chairman of ICWI
- The Financial Services Commission

Complainants are to be asked to document their complaint in the Complaints Register located in each Branch.

Where a **verbal complaint** has been lodged to a Supervisor or Manager, the complainant must be advised that the capacity to resolve the issue may be limited to a general response to their concerns raised. In some cases, depending on the complexity of the complaint, escalation to a member of the Executive Management, including the President may become necessary.

The recipient of a **written complaint** must ensure that acknowledgment is sent to the client within five (5) business days of receipt, and provide the name of the individual assigned to be the point of contact for the complaint. It is the duty of the recipient to follow through with the complaint handling process until such complaint is amicably resolved.

If the Customer Service Questionnaire is used by a client to lodge a complaint, the Marketing Department, which reviews the completed surveys, has responsibility for responding to the complainant (if pertinent contact information is given).

Where a complaint is received by the Company through **written correspondence from the Financial Services Commission**, it is the duty of the Branch Manager for the specific location where the client complaint pertains, to log the complaint in the branches complaints register.

## PROCESS FOR RESPONDING TO COMPLAINTS

Since the complaints received by ICWI vary in nature, it is difficult to assign a set standard for the way in which they are to be handled. The purpose of this policy is to offer guidance.

- Complaints about the performance of duties; services have not been provided at the professional standard required:

Complaints of this nature can usually be handled at the Branch Manager level, and in almost cases are logged in the Complaints register by the client. Where a matter can be resolved informally by direct communication with the complainant (either verbally, or in writing) that meets the desired outcome of the complainant, escalation to the Executive level may not be required. Once the issue has been resolved, the Branch Manager will sign off in the register to close the issue.

- Complaints about conduct; the alleged wrongdoing, or inappropriate behaviour by staff of ICWI:

Complaints of this nature can usually be handled at the Branch Manager level unless the complaint relates to the behaviour of that Manager. In cases such as this, the complaint is to be escalated to the Senior Management of ICWI for handling.

In all cases of inappropriate behaviour, ICWI Human Resources Department is to be notified so that if necessary appropriate disciplinary action, in accordance with the Employee Handbook, can be taken.

- Complaints about unacceptable delay in, or inappropriate carrying out of any function related to serving client and or potential clients of ICWI

Branch Managers/Supervisors have ultimate control over the quality of service. Complaints relating to poor service within a branch or by a particular employee should be handled at the Branch Manager level unless the complainant wishes to escalate the matter to Senior Management. Complaints of this nature are to be logged in the Branch Complaints register for tracking.

- Complaint about a policy, a service or product offered:

Dissatisfaction with a benefit or product is to be referred to the Insurance Operations department for review and action.

## COMPLAINTS SPECIFICALLY RELATED TO CLAIMS SERVICE

Complaints related to claims service are received in the various forms listed above including written letters from the Financial Services Commission. All claims complaints are dealt with directly by the Claims Manager at Head Office, and are logged in the Claims Complaints Register which indicates action taken, by whom, and dates.

The recipient of a **written complaint** must ensure that acknowledgment is sent to the client within five (5) business days of receipt, and provide the name of the individual who will be the point of contact. Written updates on the progress of investigations into a complaint must be provided at intervals of not greater than every 20 days. Once the investigation of the complaint is complete, the complainant is to be advised within five (5) business days of the outcome. All complaints received through the **Financial Services Commission** are also logged and responded to within the set timeframe.

The complaints related to claims matters specifically must be resolved within forty (40) business days; this is inclusive of the investigation and resolution of the complaint. Where 40 days have elapsed without a resolution ICWI must advise the complainant of the time frame within which resolution can be expected. All complaints are to be dealt with:

- Seriously
- Quickly
- and must be documented

Monitoring of the Complaints register is to be conducted by the Branch Manager of each Branch monthly, and a quarterly report submitted to the Marketing Department indicating the nature of the complaints. This is to ensure reliable identification of trends in the number, regularity and subject matter of complaints and feedback. Quarterly reports are to include; date complaint was received, complainants name and contact information, nature of the complaint (summary), action taken, date complaint was closed.

If a resolution is not found between the Company and the complainant, the client has a right to take their complaint to the Financial Services Commission (FSC). In this case the Branch Manager is to prepare a letter on Company letterhead to the FSC stating the Company's final position regarding the complaint – all letters to the FSC are to be approved by a member of the Executive Management team prior to delivery.