

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 (Trinidad) Limited (ICWI). Whilst the term complaint is used primarily throughout the policy, this also relates to feedback received about ICWI and its operations.

Complaints are indicators of consumers dissatisfaction with a service or product, and these should be handled promptly. This policy provides guidance on how the Company should monitor, manage and control complaints that it receives from various channels/ sources.

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 behavior by staff of ICWI or complaints made against an intermediary
- 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, email, social media or any other form. Clients may make a complaint either in 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 staff member of ICWI
- A member of the Management Team
- The President or Chairman of ICWI
- The Office of the Financial Services Ombudsman (OFSO)

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 Management Team, including the General Manager, may become necessary.

The recipient of a **written complaint** must ensure that acknowledgment is sent to the client within ten (10) 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 Senior Underwriting Manager, 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 Office of the Financial Services Ombudsman**, it is the duty of the General Manager, to log the complaint in the 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 Senior Underwriting Manager level, and in most 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 General Manager may not be required. Once the issue has been resolved, the Senior Underwriting Manager will sign off in the register to close the issue.

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

Complaints of this nature can usually be handled by the Senior Underwriting Manager unless the complaint relates to the behavior of that Manager. In cases such as this, the complaint is to be escalated to the General Manager of ICWI for handling.

In all cases of inappropriate behavior, 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 delays, errors, or inappropriate carrying out of any function related to serving client and or potential clients of ICWI

The Senior Underwriting Manager has direct control over the quality of service. Complaints relating to poor service within a branch or by a particular employee should be handled at the Senior Underwriting Manager level unless the complainant wishes to escalate the matter to the General Manager. 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 Senior Underwriting Manager who in turn will refer to the Group 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 Central Bank. All claim complaints are dealt with by the Claims Officer and the General Manager, 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 ten (10) 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.

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 forty (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 General Manager monthly, and a quarterly report prepared 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 TO THE COMPLAINT IS NOT FOUND

If a resolution is not found between the Company and the complainant, the client has a right to take their complaint to Alternative Dispute Resolution Schemes (ADRS) registered with the Central Bank such as, the Office of the Financial Services Ombudsman (OFOS) which is a licensed ADRS.

Depending on the reason for the complaint, those received from the OFOS are typically resolved within ten (10) business days. If a resolution with the complainant is not achieved within ten (10) business days, ICWI will communicate with the OFOS explaining the reason for the lack of resolution of the complaint along with any relevant information pertaining to the matter.

Consumers may also make their complaint to the Inspector of Financial Institutions where the complaint falls outside the remit of the OFSO, or other registered ADRS ; or seek redress in the Courts of Trinidad & Tobago.