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Complaint Handling Policy

V1.3

December 2021



Effective complaint handling guideline

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1.0 Version control

Version	Date	Comment
1.0	24 December 2020	Draft
1.2	30 January 2021	Final
1.3	3 December 2021	Updated to include outsourcing in periods of high volume

The official version of this document is maintained on-line. Before referring to any printed copies please ensure that they are current. Once printed, this document is considered an uncontrolled version.

2.0 Review

This Policy will be reviewed by the Customer Advocate every two years or earlier if required by a change in circumstances.

Date of Next Review	December 2023
Approved By	Diego Ascani – Chief Executive Officer, Australia

3.0 Purpose

This Policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- enable us to respond to issues raised by customers, clients, suppliers and key stakeholders making complaints in a timely and cost-effective way
- boost confidence in Sedgwick, and
- provide information that can be used by us to deliver quality improvements in our services, professional development and complaint handling.

This Policy provides guidance to our colleagues and people who wish to make a complaint on the key principles and concepts of our complaint management system.

4.0 Scope

This Policy applies to all colleagues and contractors receiving or managing complaints to or about us, regarding our services, staff and complaint handling.

Colleague grievances, code of conduct complaints and conflict of interest disclosures are dealt with through separate mechanisms.

This Policy should be read in conjunction with:

- General Insurance Code of Practice 2020
- Complaints Handling Guideline
- Complaint Handling SOP

5.0 Organisational commitment

Sedgwick expects colleagues at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from colleagues and the way that commitment should be implemented.

Who	Commitment	How
CEO and NLT	Promote a culture that values Complaints and their effective resolution	<ul style="list-style-type: none"> • Review report on Sedgwick’s complaint handling work. • Provide adequate support and direction to key colleagues responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all colleagues to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage colleagues to make recommendations for system improvements. • Recognise and reward good complaint handling by colleagues. • Support recommendations for product (where relevant), service, colleague and complaint handling improvements arising from the analysis of complaint data.
Quality Assurance Manager	Establish and manage the Complaint management system.	<ul style="list-style-type: none"> • Provide regular reports to NLT on issues arising from complaint handling work. • Ensure recommendations arising out of complaint data analysis are canvassed

		<p>with the NLT and implemented where appropriate.</p> <ul style="list-style-type: none"> • Empower colleagues to resolve complaints promptly and in accordance with Sedgwick’s policies and procedures. • Encourage colleagues managing complaints to provide suggestions on ways to improve the complaint management system. • Encourage all colleagues to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Recognise and reward good complaint handling by colleagues.
<p>People Leaders</p>	<p>Demonstrate exemplary complaint handling practices focusing on timely, transparent and respectful resolution.</p>	<ul style="list-style-type: none"> • Treat all people with respect, including people who make complaints. • Respond in a timely and appropriate manner, listen without being defensive • Assist people make a complaint, if needed. • Comply with this framework and its associated procedures. • Keep informed about best practice in complaint handling. • Provide feedback to colleagues on issues arising from complaints. • Provide suggestions to management on ways to improve the complaints management system. • Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.

		<ul style="list-style-type: none"> • Address colleague performance issues where the handling of a complaint identifies behaviour or performance in consistent with our policies and procedures.
All Colleagues	Understand and comply with Sedgwick complaint handling practices.	<ul style="list-style-type: none"> • Treat all people with respect, including people who make complaints. • Be aware of the Sedgwick's complaint handling policies and procedures. • Assist people who wish to make complaints to access the complaints process. • Be alert to complaints and assist colleagues handling complaints to resolve matters promptly. • Provide feedback to management on issues arising from complaints. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

6.0 Terms and Definitions

Complaint

Expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances
- code of conduct complaints
- responses to requests for feedback about the standard of our service provision
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response
- service requests [see definition of 'service request' below], and
- requests for information.

Complaint management system

All policies, procedures, practices, colleagues, hardware and software used by us in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of our organisation.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

Service request

Service requests include:

- requests for approval
- requests for action
- routine inquiries about our business
- requests for the provision of services and assistance
- reports of failure to comply with laws regulated by the organisation
- requests for explanation of policies, procedures and decisions.

Grievance

A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

Policy

A statement of instruction that sets out how we should fulfill our vision, mission and goals.

Standard Operating Procedure (SOP)

A statement or instruction that sets out how our policies will be implemented and by whom.

7.0. Guiding principles for effective complaint management

The AS/NZS Complaint Management Standard sets out the following guiding principles for complaint management:

1. Enabling complaints

- People focus
- Ensuring no detriment to complainant
- Visibility and transparency
- Accessibility
- No charges

2. Managing complaints

- Responsiveness
- Objectivity and fairness
- Equity
- Privacy and disclosure
- Communication

3. Managing the parties

- Conduct of parties
- Work health and safety
- Complaint involving multiple parties
- Empowerment of staff

4. Accountability, learning and prevention

- Accountability
- Continuous improvement
- Prevention of ongoing disputes

The content covered by these guidelines is congruent with the AS/NZS Complaint Management Standard.



7.1 Facilitate complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiples and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

No charge

Making a complaint or providing feedback is free.

7.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with Sedgwick Australia.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any colleague whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. Internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Our colleagues are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by Sedgwick Australia as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

7.3 Manage the parties to a complaint

Complaints involving multiple organisations

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

Empowerment of colleagues

All colleagues managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Colleagues are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Adequate resourcing

If Sedgwick experiences a sudden increase in complaint volume we are committed to ensuring that adequate resource is available to addressing the complaints in a timely manner. This may include the engagement of a third party. If a third party is engaged to manage a complaint on our behalf, we will seek permission from the complainant prior to disclosing their information.

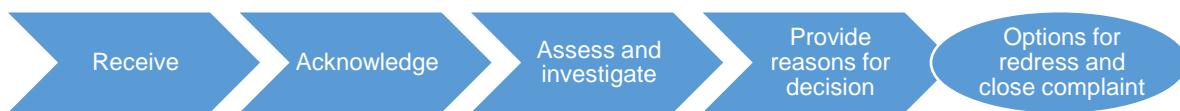
Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our colleagues, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our colleagues to do the same in accordance with this Policy.

8.0 Complaint management system



8.1 Introduction

When responding to complaints, colleagues should act in accordance with our complaint handling SOP as well as any other internal documents providing guidance on the management of complaints. Colleagues should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

8.2 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant and
- any additional support the person making a complaint requires.

8.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 2 business hours.

Consideration will be given to the most appropriate medium (e.g. email, letter, phone) for communicating with the person making a complaint.

8.4 Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed. When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

8.5 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

8.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

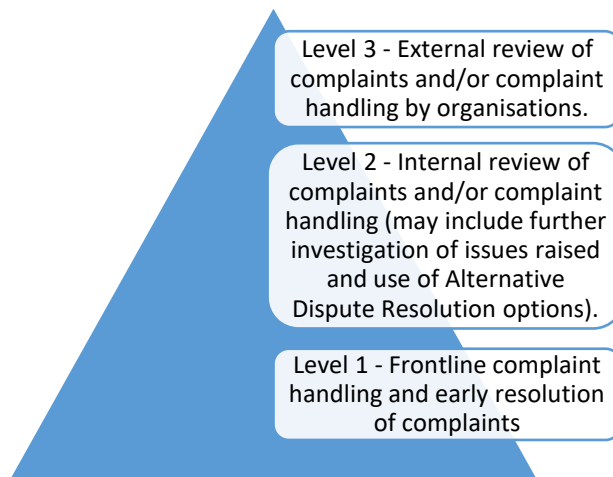
- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated), any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

8.7 Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them.

8.8 The three levels of complaint handling



We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint to a more senior colleague within Sedgwick Australia. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of Sedgwick Australia's review of their complaint, they may seek an external review of our decision for example by their Insurer or AFCA.

9.0 Accountability and learning

9.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis. Regular reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to Sedgwick Australia's CEO and senior management for review.

9.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

9.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.