

**CCC FINANCIAL SOLUTIONS PTY LTD**

# **COMPLAINTS HANDLING PROCEDURE**

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## Purpose

The purpose of this document is to outline the CCC Financial Solution Group procedure in relation to the process of resolving complaints. This document is to be used as a guideline for employees and management when handling problems, grievances, and disputes.

In doing this CCC Financial Solutions Group will:

- Achieve increased satisfaction in the delivery of CCC Financial Solutions Group products and services.
- Recognise, promote and protect a customer, client, agent, provider or any other third party and their rights including the right to comment and complain;
- Ensure that our framework for resolving complaints is efficient, fair and easily accessible both internally and externally;
- Provide relevant, timely and accurate information on CCC Financial Solutions Group's complaint handling process;
- Monitor and report on all complaints with the intention of improving the quality of our products and services.

In using this procedure CCC Financial Solutions Group will act in accordance with:

- Trade Practices Act 1974 (Cth)
- Australian Privacy Principles (APPs).
- International Standard AS ISO 10002-2006 Customer Satisfaction – Guidelines for Complaints Handling in Organisations.
- Code of Conduct.
- ACCC.
- Any other applicable statutory and regulatory requirements.

## Scope

The procedure has application to all employees working with CCC Financial Solutions Group including senior management and the board of directors.

The procedure has application to all problems, grievances, and disputes received from a customer, client, agent, provider or any other third party.

## Responsibilities

Senior Management Group (SMG)

- The SMG has the responsibility and authority for implementing and maintaining all requirements of this procedure.

Supervisor/Coordinator

- Ensuring the requirements of this procedure are implemented at the local level.

Employees

- Complying with this procedure and related advice in the undertaking of Customer Service/Debt collection related business activities in the workplace.

## Procedure

### Definitions

Complainant – a customer, client, agent, provider or any other third party who comments, makes a complaint or provides feedback.

Complaint - any expression of dissatisfaction with a product or service that is offered or provided. A complaint will be classified into Level 1, 2 or 3 as noted below for recording and reporting purposes.

Complaint - Level 1 (Grievance) - complainant contacts CCC Financial Solutions Group and expresses concern about any aspect of their dealings with CCC Financial Solutions Group, however no specific action

is required as the fund policy/procedure has been applied correctly. The complainant is advised of CCC Financial Solutions Group policy/procedure and is accepting of the explanation.

Complaint - Level 2 (Problem) – complainant contacts CCC Financial Solutions Group and expresses concern about any aspect of their dealings with CCC Financial Solutions Group and is not satisfied with the explanation by an employee and that requires further action to rectify or requires referral to a Supervisor/Manager. Usually a resolution to the issue will be identified and acted upon.

Complaint - Level 3 (Dispute) – complainant contacts CCC Financial Solutions Group and expresses concern about any aspect of their dealings with CCC Financial Solutions Group and is not satisfied with the explanation by an employee or Supervisor/Manager and requires referral to the Chief Executive Officer (CEO).

## Guiding Principles

### Our Commitment

CCC Financial Solutions is committed to the efficient and fair resolution of all complaints. All levels of employees within the business will acknowledge a complainant's right to comment and complain. Complaints provide CCC Financial Solutions Group with an opportunity to improve the quality of our products, services and processes. With this in mind all levels of employees will actively seek feedback during interactions with a customer, client, agent, provider or any other third party.

### Visibility

The CCC Financial Solutions Group procedure for the resolution of complaints will be publicised in such a way that people are encouraged to provide feedback to the business. This procedure will be promoted internally for employees and also externally via our web site.

### Accessibility

Individuals or groups wanting to make a complaint will have access to all levels of employees. In the first instance a complainant will have contact with a Customer Service Officer by telephone, online via our website, by post, fax or in some instances face-to-face interactions. The Customer Service Officer will attempt to resolve the complaint immediately. If the complaint cannot be resolved at this point the Customer Service Officer will refer the complaint to a Customer Service Manager and the escalation process will continue (if required) to the General Manager and finally, the Chief Executive Officer (CEO). If the complaint is still unresolved at this point, the complainant shall be made aware of their right to access the relevant Ombudsman or other relevant authority dependent on the circumstances, however all contact should first be made with CCC Financial Solutions Group with the intention to seek resolution promptly and satisfactorily.

Complaints may be submitted in the format that is most appropriate and comfortable for the complainant (ie: letter, fax, email, by telephone or via the internet). CCC Financial Solutions Group recognises the diversity of the complainant and endeavours to resolve complaints by appropriately addressing each individual's particular needs. CCC Financial Solutions Group will engage specialised services appropriate to the individual to achieve a satisfactory resolution for all parties (ie: language or interpreting services).

### Responsiveness

CCC Financial Solutions Group will respond to complaints in a timely manner following the guidelines below:

- The complainant will be contacted within 24 hours to acknowledge receipt of the complaint and outline the complaints handling process.
- Following this initial interaction, the complainant will be contacted within 7 days (or at an alternative time agreed to by both parties) and provided with information as to the progress of the complaint.
- Contact will be made with the complainant not less than each 7 days thereafter (or at an alternative time agreed to by both parties) until the complaint is satisfactorily resolved.
- Where the complaint is referred or escalated during the process of resolution, the complainant will be informed.

### Objectivity

This procedure recognises the need to be fair to the individual or group raising the complaint, the business and also the person against whom the complaint is raised. Each complaint will be addressed in an equitable and unbiased manner through the complaints handling process.

The complainant has the right to:

- Be heard.

- Know whether CCC Financial Solutions Group's relevant product and service guidelines have been followed.
- Provide and request all relevant material to support the complaint where this does not breach privacy regulations.
- Be informed of the response to their complaint.
- Be informed of CCC Financial Solutions Group's decision and the reason for this decision.
- Know that their complaint is being reviewed independently where appropriate.

CCC Financial Solutions Group or the person about whom the complaint is made has the right to:

- Provide sufficient detail about the complaint to enable a thorough investigation of the complaint.
- Be informed of the decision and the reason for this decision.

In summary, all parties involved in the transaction will remain informed as the complaint progresses and will also be informed of the outcome of the complaint and the reason for this outcome.

#### Charges

Any individual or group may register a complaint with CCC Financial Solutions Group free of charge.

#### Confidentiality

Personally identifiable information concerning a complainant will be used for the purposes of addressing and resolving the complaint only.

#### Customer-Focused Approach and Continual Improvement

CCC Financial Solutions Group will foster a customer-focussed approach, recognising that complaints and feedback provide the business with an opportunity for improvement.

#### Accountability

Each CCC Financial Solutions Group employee accepts responsibility for effective complaints handling. The employee with whom a complainant first has contact with has the authority to resolve a complaint and to remedy the situation within the company delegations and will keep the complainant informed during the process. Each employee will follow the guidelines set in this policy when handling complaints.

#### Complaints and Handling Framework

##### Responsibility and Authority

All CCC Financial Solutions employees will:

- Be trained in complaints handling.
- Comply with any complaints handling reporting requirements determined by CCC Financial Solutions Group.
- Treat customers in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual to handle their complaint.
- Show good interpersonal and good communication skills.
- Be aware of their roles, responsibilities and authorities in respect of complaints.
- Be aware of what procedures to follow and what information to give to complainants.
- Notify management of any significant complaints by immediately referring complaints to a manager.
- Report complaints which have a significant impact on CCC Financial Solutions Group immediately to a Customer Service Manager (who will report to the CEO).

## Planning and Design

### Objectives

CCC Financial Solutions Group has established the following complaints handling objectives:

- Complaints are resolved by Collection Officers at the first point of contact in the majority of cases where appropriate.
- The need for the escalation of complaints is kept to a minimum and done on an as needed basis (ie: Manager Referrals and CEO Referrals are kept to a minimum).
- Where a complainant requests consideration by a management representative this will be a mandatory requirement.
- Complainants are responded to in a timely manner in accordance with the Complaints Handling section of this procedure.
- A target of zero complaints relating to a staff member.

### Resources

CCC Financial Solutions Group recognises that employees are the most important resource in the complaints handling process. CCC Financial Solutions Group will ensure that employees are adequately trained and provided with sufficient support to handle complaints appropriately. Training will be provided at the induction stage for all employees and will be updated and reinforced as necessary.

Employees will have authority relevant to their knowledge, experience and capabilities to make decisions in the complaints handling process. Employees will take ownership of the complaint when it is received by CCC Financial Solutions Group. CCC Financial Solutions Group will maintain a comprehensive system that will allow for the efficient recording, tracking, monitoring and reporting of all complaints. Employees will also use this procedure as a resource to follow when handling complaints. CCC Financial Solutions Group will assess the need for other resources such as computer hardware and software, specialist support and finances as required.

## Operation of Complaints Handling Process

### Communication

Information relating to the complaints handling process at CCC Financial Solutions Group will be made available to all complainants in plain language and, as much as possible, in formats accessible to all.

The information will include:

- Where and how complaints can be made (ie: by letter, fax, email, phone or via the internet).
- The information required from the complainant (ie: details of the complaint).
- The process for handling complaints as stated in this policy.
- Time periods associated with various stages of the complaint.
- Acknowledge complaints within 24 hours and then respond every 7 days until resolved.

The complainant's options for remedy such as:

- Adjustment – complainant has an adjustment made to a claim that was previously processed in error or an adjustment to a contribution payment.
- Apology - complainant is tendered an apology due to an error or lack of service, however no compensation/adjustment is required. The apology may be oral or in writing. If an adjustment or other action is taken this will take precedence in coding the action step.
- Compensation – complainant is offered compensation for a wrong doing by CCC Financial Solutions Group (ie: a settlement for breach of privacy/accident on premises).
- Other assistance - complainant is offered nonfinancial assistance (ie: extended payment arrangement).
- Information - complainant is provided with information that satisfies the request.
- Waiver of fees - complainant is provided with a waiver of fees applied to their account.
- Referral - complainant is referred to another agency (ie: Ombudsman, AFSA).
- Other - any other remedy that is not covered above.
- How the complainant can obtain feedback on the status of the complaint (ie: the complainant may contact our office any time by any method for information about the status of their complaint).

## Receipt of Complaints

Complaints will be immediately recorded on the clients account.

The record will include the following information:

- Description of the complaint.
- Requested remedy.
- The product, service, policy, procedure or process complained about.
- Due date for a response (if a due date is not recorded, a response will be required every 7 days until the complaint is resolved, refer to the Complaints Handling section of this procedure).
- Additional Information relating to the complaint.
- Any immediate action that has been taken.

## Tracking Complaints

The complaint is recorded on the clients account (file notes in Collect!) from the initial receipt of the complaint to the final resolution. Any documents or other information with regard to the complaint are also attached the clients account file in Collect!. The complainant may contact CCC Financial Solutions Group at any time to obtain an update as to the status of the complaint.

## Acknowledgement and Initial Assessment of Complaints

Complaints will be acknowledged within 24 hours of receipt. At this point an initial assessment of the complaint will be made to determine its severity taking into account factors such as the impact on the business, safety implications or the need for immediate action.

The employee will:

- Identify themselves.
- Actively listen.
- Record the details of the complaint on the clients account.
- Determine what the complainant wants.
- Show empathy and be courteous without laying blame on any individual, group or the business.
- Explain the proposed course of action and seek agreement.

## Investigation of Complaints

All complaints are taken seriously and will be investigated thoroughly.

## Response to Complaints

Following the investigation of the complaint, CCC Financial Solutions Group will provide the complainant with a response and remedy as outlined in this procedure. The employee is responsible for providing a response within the agreed timeframe between themselves and the complainant.

## Communication the Decision

Once a decision has been made, the complainant will be contacted immediately by the most appropriate means for their complaint (ie: letter, fax, email or telephone).

## Closing the Complaint

If the complainant accepts CCC Financial Solutions Group's decision, the agreed action will be carried out in the account and the file notes updated. If the complainant does not accept CCC Financial Solutions Group's decision, the complaint will remain open and the complainant will be made aware of other internal or external forms of recourse available to them.

## Maintenance and Improvement

### Collection of Information

CCC Financial Solutions Group uses a comprehensive and integrated communication system for the collection of data. The communication system records information about each and every interaction with customers/clients including complaints.

### Analysis and Evaluation of Complaints

CCC Financial Solutions Group uses the data recorded for regular monitoring and reporting. The system tracks these interactions and reports are extracted for review on a regular basis and to assist in the identification of improvement initiatives.



This data is incorporated into the standard monthly reporting scorecard and is regularly reviewed by management and the board of directors.

#### Monitoring the Complaints Handling Process

The CCC Financial Solutions Group Complaints Handling Procedure will be reviewed on an annual basis.

#### Auditing of the Complaints Handling Process

CCC Financial Solutions Group will regularly perform audits in relation to the complaints handling process and provide information about conformity with the guidelines set out in this policy and the ability of CCC Financial Solutions Group to achieve its objectives.

#### Management Review of the Complaints Handling Process

The CCC Financial Solutions Group management team will review the complaints handling process on a regular basis to:

- Ensure its continuing suitability, adequacy, effectiveness and efficiency.
- Identify and address instances of non-conformity with health, safety, environmental, customer, and applicable statutory and regulatory requirements.
- Identify and correct product, process and service deficiencies.
- Assess opportunities for improvement and the need for changes to the complaints handling process.
- Evaluate potential changes to the Complaints Handling Procedure and objectives.

The input to management review should include information on:

- Internal factors such as changes in the policy, objectives, organisational structure.
- Resources available, and products offered or provided.
- External factors such as changes in legislation, competitive practices or technological innovations.
- The overall performance of the complaints handling process and the results of the continual monitoring of the process.
- The results of audits.
- The status of corrective and preventive actions.
- Follow up actions from previous management reviews.
- Recommendations for improvement.

The output from the management review should include:

- Decisions and actions related to improvement of the effectiveness and efficiency of the complaints handling process.
- Proposals on product improvement.
- Decisions and actions related to identified resource needs (ie: training).
- Records from management review should be maintained and used to identify opportunities for improvement and resource requirements.

#### Continual Improvement

CCC Financial Solutions Group will continually improve the effectiveness and efficiency of the complaints handling process. In doing so the business will:

- Explore, identify and apply best practices in complaints handling.
- Foster a customer-focused approach within the business.
- Encourage innovation in Complaints Handling development.
- Recognise exemplary Complaints Handling behaviour.

#### Related Documents

N/A

## Complaints Handling Process Flow Chart

**Collections Officer (CSO)** resolves complaint immediately and a records of details are entered in the Consumer file.



If the complaint cannot be resolved the CSO refers the complaint to their **Manager/Supervisor** and a records of details are entered in the Consumer file.



If the Manager/Supervisor cannot resolve the complaint it is referred to the **Genral Manager/CEO** and a records of details are entered in the Consumer file.



If the complaint is still not resolved the Consumer has the option of contacting the Australian Financial Complaints Authority (AFCA)  
<https://www.afca.org.au/>