



Complaints Handling & Disputes Resolution Policy

(Effective 1 November 2018)

Introduction

At Doctors' Choice, we really value client feedback, both positive and negative. Feedback provides the opportunity for Doctors' Choice to improve its processes to enhance service and strengthen our reputation.

When a matter goes beyond negative feedback to become a complaint, we treat this very seriously. This Complaints Handling and Disputes Resolution Policy aims to provide a structured and fair approach to resolving complaints and disputes which will lead to acceptable solutions for all parties.

Purpose

The purpose of this Policy is to effectively and fairly handle client complaints and resolve disputes in a professional and timely manner.

This Policy:

- defines complaints and disputes
- outlines our values in managing complaints and disputes
- establishes processes to:
 - record, action and resolve complaints and disputes
 - refer dissatisfied complainants to an external process for resolution of their complaint and
 - review and monitor Doctors' Choice performance in relation to complaints handling and dispute resolution.

Our approach to complaints-handling is aligned with industry best practice as described in the Australian Standard AS ISO 10002-2006 and the requirements of the Australian Securities and Investments Commission's (ASIC) complaints handling guidelines (RG 165 'Licensing: Internal and External Dispute Resolution' and RG 139 'Approval and Oversight of External Dispute Resolution Schemes').

Definitions

We use the following definitions:

- **Complaint**

A complaint is an expression of dissatisfaction made to us related to our activities, operations, policies or employees or our complaints handling and disputes resolution process itself, where a response or resolution is explicitly or implicitly expected.

It is easy to identify a complaint when the complainant expressly requests a response or resolution. If the complainant does not do so, we must consider whether they implicitly expect a response or resolution in order to determine if the matter is a complaint.

The expression of dissatisfaction does not have to be in writing to be a complaint; it can be received in person or via telephone.

- **Complainant**

A person who makes a complaint, for example: a potential client, a client, an employee, a contractor.

- **Dispute**

A dispute is an unresolved complaint. In other words, it is a matter that has been dealt with as a complaint under this Policy, but where the complainant is still not satisfied with the outcome.

Our values in handling complaints and disputes

We apply the Doctors' Choice core values of Integrity, Care and Excellence to all we do.

- **Integrity**

When handling complaints and disputes we:

- act in good faith
- investigate the complaint fully by seeking all relevant information from all parties
- review the complaint on its merits
- are objective
- ensure confidentiality.

- **Care**

When handling complaints and disputes we treat each complainant with sensitivity and empathy.

- **Excellence**

We operate in a framework of excellence. This means we:

- communicate this policy to employees, clients and prospective clients including having it available on the Doctors' Choice website
- ensure we have adequate resources to implement this Policy effectively
- ensure our staff and officers are adequately trained in relation to this Policy
- review this policy, at least annually
- have management systems and reporting in place to ensure timely and effective complaints handling and disputes resolution and monitoring
- always review the root causes of complaints and disputes in order to continuously improve our processes.

Responsibilities

The Board of Directors is responsible for:

- Establishing this Policy
- Appointing the Complaints Officer/s and reviewing their performance
- Appointing the External Dispute Resolution provider and reviewing their performance
- Promoting a client-focus culture in the organisation.

Executive Management is responsible for:

- Promoting a client-focus culture in the organisation.

The Complaints Officer is responsible for:

- Managing and coordinating the implementation of this Policy including staff training
- Ensuring this Policy is easily accessible by clients, prospective clients and staff
- Receiving complaints and handling them in accordance with the procedures in this Policy
- Directing complaints involving the Complaints Officer to the Assistant Complaints Officer
- Ensuring all complaints are recorded in the Doctors' Choice Customer Relationship Management System (CRM)
- Reporting on actions taken to resolve complaints and preventing them in future
- Providing complaints-handling data to Executive Management for review
- Reviewing this Policy to ensure it is continually improved.

Staff are responsible for complying with the procedures in this Policy particularly recording and reporting complaints.

Overview of process

The Doctors' Choice complaints handling and disputes resolution process operates in two stages:

1. **internal disputes resolution** under which we use our best efforts to resolve a complaint or dispute; and
2. failing resolution, **external dispute resolution** under which the complainant can refer the complaint to our external dispute resolution scheme.

This is illustrated in Figure 1 below:

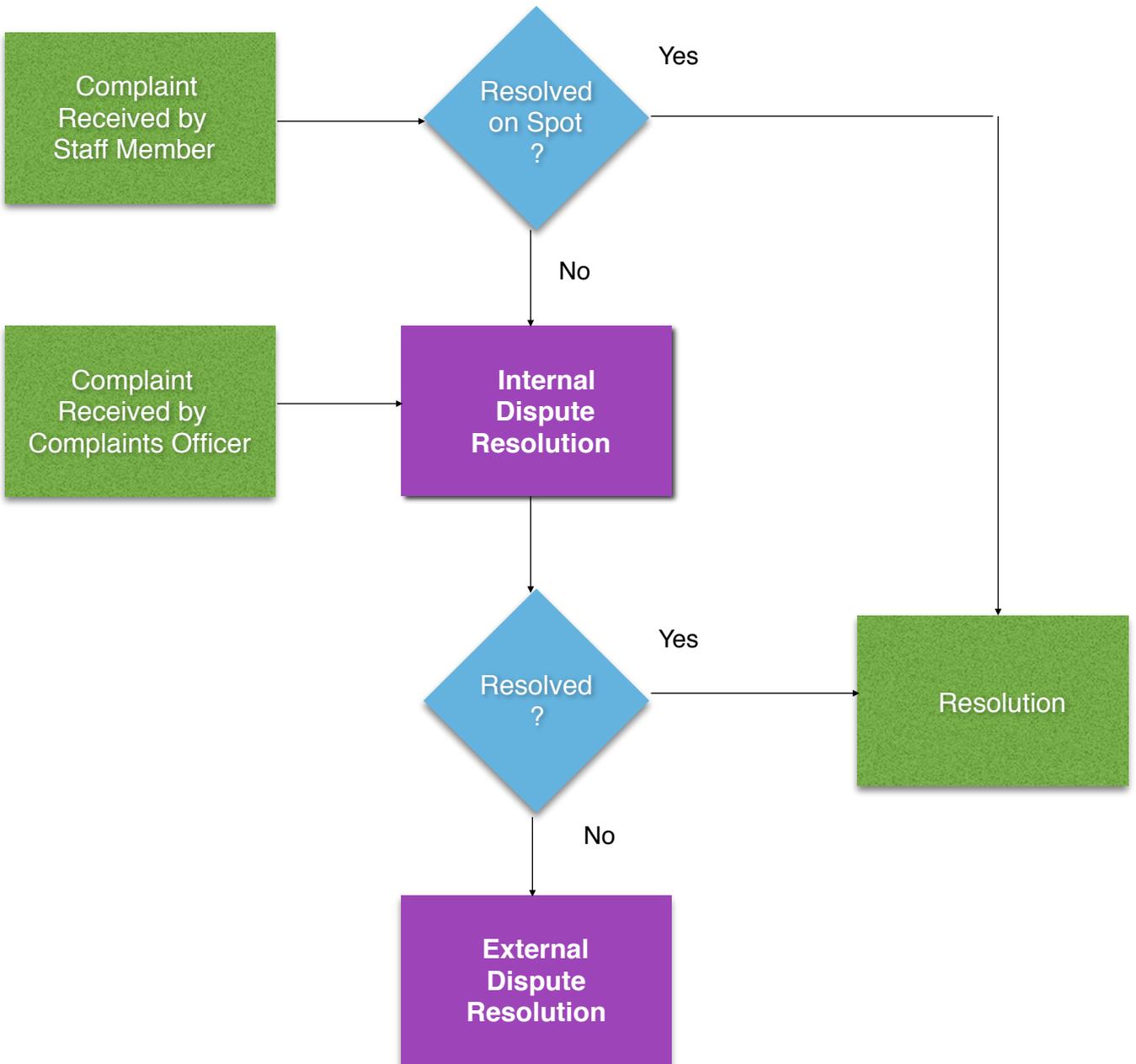


Figure 1: The Doctors' Choice Complaints Handling and Disputes Resolution Process

Details of the steps we follow in this process are outlined in Appendix A.

Public Statement

As an Australian Financial Services licensee, Doctors' Choice is required to inform its policyholders of its complaint resolution process. We do this by including the following statement in our Financial Services Guide and our website:

We are committed to resolving your complaints

In the unlikely event you have a complaint against us, please contact our Complaints Officer by any of the following means:

*Email: complaints@drschoice.com.au
Phone: 1800 DRS CHOICE (1800 377 246)
Mail: Suite 19/23 Mill Point Rd, SOUTH PERTH WA 6151*

We are committed to dealing with complaints fairly and efficiently and will respond to you with a decision within 10 business days. If you are not satisfied with our response and wish to pursue the matter further, you may wish to refer your complaint for external dispute resolution as outlined below.

We are members of an external dispute resolution scheme

As we are a member of the Australian Financial Complaints Authority (AFCA), if you are not satisfied with our handling of your complaint you can lodge a dispute with AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

AFCA will only review complaints if they have first gone through our internal complaints and dispute resolution process.

For more information about AFCA and for online dispute forms, visit their website at www.afca.org.au. You can also contact AFCA by:

*Email: info@afca.org.au
Phone: 1800 931 678 (free call)
Mail: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001*

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

Appendix A - Process

1. Receive Complaint

A. Written Complaints

Create a complaint record in the Doctors' Choice CRM.

B. Verbal Complaints

If the complaint is received verbally while at the Doctors' Choice office, create a complaint record in the Doctors' Choice CRM. Otherwise complete a Complaint Form and then, within one business day, create a complaint record in the Doctors' Choice CRM.

2. Refer Complaint to Complaints Officer

Immediately refer the complaint to the Complaints Officer or, if the Complaints Officer is the subject of the complaint, to the Assistant Complaints Officer. They will handle the matter from hereon.

3. Acknowledge Complaint

Within 3 business days of receiving the complaint:

A. Resolved Complaints

Acknowledge receipt of the complaint including thanking the complainant and confirming the resolution.

B. Unresolved Complaints

Acknowledge receipt of the complaint including thanking the complainant and, if required, requesting further details. Include in the acknowledgement the date by which a response will be given (which will be no more than seven business days).

Update the complaint record.

4. Investigate Complaint

The investigation required, and any appropriate remedy, will depend on the details of the complaint. Examples of remedies are information and explanation regarding the circumstances giving rise to the complaint and/or an apology.

5. Communicate Outcome

Within 10 business days of receiving the complaint, advise the complainant of:

- the determination in relation to the complaint
- the remedies (if any) available to the complainant.

This will also include a request to contact Doctors' Choice if the complainant is not satisfied with the outcome.

Communicate outcome to the original recipient of the complaint.

Update the complaint record to indicate resolution.

6. External Disputes Resolution Information

If the complainant advises that they are not satisfied with the outcome of the internal disputes resolution process, provide the complainant, in writing, with information regarding external dispute resolution.

Update the complaint record.