

# **WOOLWORTHS** FINANCIAL SERVICES







## **EXTERNAL SUPPLIER CONTROL OBLIGATIONS**


CUSTOMER COMPLAINTS

Version 7.2 Dated May 2018















**Important Note:** For regulated suppliers, the supplier must adhere to any specific requirements set out by the regulator in their local jurisdiction which may include but are not limited to definition of a complaint, costs associated with contacting a firm, timescales on response, response content and referral rights to Alternative Dispute Resolution (ADR) organisations

Control Scope				CONTROL DESCRIPTION	WHY THIS IS IMPORTANT
CONTROL TITLE	Suppliers who handle complaints under WFS brand	Suppliers who manage complaints end to end under their own branding	Suppliers who receive and forward on complaints to WFS to handle		
1. Complaint Handling: Information on how to raise a complaint				Customers are provided with clear, consistent, readily available information on how to raise a Complaint.	Suppliers must ensure the complaints process is available so customers are aware if they wish to express dissatisfaction on any element of their relationship with us/the supplier.  Consideration must be given to customers in vulnerable circumstances and those who require alternative formats
2. Complaint Handling: Availability of Complaints Process				The process for raising a Complaint is accessible, transparent and straightforward.  Complaints must be readily accepted even if the customer does not use the words 'I want to complain' we should consider the words, language and tone used.	Suppliers must not prevent or put barriers up which deter customers from making a complaint. A complex process may deter customers from making a complaint  Where possible customers should be able to make a complaint via any channel through which a business operates.  Consideration must be given to customers in vulnerable circumstances and those who require alternative formats

3. Complaint Handling: Costs of raising complaints				Customers are not charged for raising a Complaint.	Suppliers must not charge customers to raise a complaint; this includes directing complainants to premium rate telephone numbers or other revenue generating telephone lines. Charging to raise a complaint could deter customers from raising issues which need addressing
4. Complaint handling: Feedback Mechanisms				Customer Feedback Mechanisms provide clear information on the appropriate process for raising a Complaint.  Unmonitored mailboxes should have an autoreply function to advise of the correct process to raise a complaint	Suppliers must ensure that customers are informed how they can raise complaints and through which channels (e.g. e-mail, phone, post, website, etc.). This ensures customers can choose the most appropriate and convenient  Customers should not be left with any doubt as to whether their complaint has been received  Customers should not be left with any doubt as to whether their complaint has been received
5. Complaint Handling: Acknowledging Complaints				Complaints are promptly acknowledged. For guidance WFS views this as 5 days	Suppliers ensure customers are aware that their complaint has been received and is being/will be reviewed.  For some jurisdictions an informal resolution period applies and the acknowledgement would be sent at the end of this period if the complaint was not resolved
6. Complaint  Complaint Handling: Recording requirements				Complaints are recorded in a manner appropriate to the nature, scale and complexity of the Business and type of Complainant.  Consider: For data retention consideration should be given to any requirements of the Data Privacy External Supplier Control Obligations and local privacy regulator requirements	Suppliers to log and record details of all complaints received and keep records of the complaint in line with Data retention policies (as a minimum) as long as required so if the customer, auditor, regulator or Alternative Dispute Resolution (ADR) provider needs details of the issue they can be easily retrieved.

7. Complaint Handling: Investigation requirements	✓	✓	✗	Complaints are fairly and thoroughly investigated, documented and resolved in a timely manner appropriate to the nature, scale and complexity of the Business and type of Complainant.	Suppliers must ensure complaints are investigated timely, thoroughly and fairly addressing the customer dissatisfaction and provide an appropriate resolution so as the customer understands the complaint outcome and rationale for this. Complaint resolution should be communicated to customers using the correct customer letter
8. Complaint Handling: Complaint handler competency	✓	✓	✗	Complaints Investigations are conducted by individuals who: <ul style="list-style-type: none"> <li>• Are empowered to recognise and investigate Complaints effectively; and</li> <li>• Have the relevant skills, knowledge and expertise in the relevant aspect of the Business to which the Complaint relates.</li> </ul>	Suppliers must ensure complaints are investigated by trained and competent individuals, who have relevant skills and experience to complete a thorough investigation and provide an appropriate response to customers even if on complex issues. This will ensure customers feel valued and know we have carefully considered their issues.  Suppliers should ensure there is an annual or ongoing training provided to their colleagues
9. Complaint Handling: Avoiding conflict of interest	✓	✓	✗	If there is a Conflict of Interest between the individual conducting the Complaints Investigation and the subject of the Complaint, it is escalated to a Business Senior Manager who is responsible for determining an appropriate course of action. This could be as simple as asking another colleague or team to handle the complaint.	Suppliers must deal with any conflicts of interest appropriately (e.g. not have the advisor/salesman who advised on/sold the product, also investigate the complaint and/or determine the outcome of the complaint). This is so the investigation is deemed impartial and does not present a conduct risk to either the supplier or WFS.
10. Complaint Handling: Keeping customers updated	✓	✓	✗	Customers are kept informed of the progress of the Complaints Investigation	Suppliers ensure customers receive timely and appropriate updates on the progress of their complaint resolution
11. Complaint Handling: Communication of complaint outcome	✓	✓	✗	Customers are provided with a timely, clear, fair, unbiased and robust response to Complaints, addressing all material elements raised by the Complainant.	Suppliers ensure customers are provided with a response informing them whether their complaint is being upheld/rejected and the reasons for this decision; always addressing the main issues of the complaint. This ensures the customer is clear on the steps we have taken to investigate and the rationale behind the decision made

12. Complaint Handling: Providing appropriate redress				When a Complaints Investigation has been concluded, appropriate remedial action and/or appropriate redress are offered to Customers.	Suppliers ensure customers are put back in the appropriate offers of redress are made in relation position they would have been had the issue complained about not taken place and to costs incurred and any distress or inconvenience experienced
13. Complaint Handling: Consistent redress approach				All decisions related to redress are based on consistent principles, articulated in a Business Standard or Business Procedure applied to the specific facts and circumstances appropriate to the nature, scale and complexity of the Business.	Suppliers ensure the decisions and outcomes of customer complaints are consistent (e.g. this could be achieved by having a quality assurance (QA) process in place). This supports fair customer outcomes and will aid coaching and training of complaint handling staff
14. Complaint Handling: Provision of escalation processes				If the outcome of a Complaints Investigation is not satisfactory to the Customer, clear information is provided on any relevant internal and external escalation process.	Suppliers ensure customers are provided with details of any escalation process (e.g. free and independent complaints review bodies).
15. Complaint Handling: Root Cause Analysis				A regular review of management information is undertaken including appropriate escalation of issues identified relating to Complaints and Complaints Investigations designed to: <ul style="list-style-type: none"> <li>• Identify emerging risks;</li> <li>• Perform root-cause analysis; and</li> <li>• Identify and resolve any recurring or systemic issues;</li> </ul>	Suppliers track management information to ensure root causes of complaints about recurring issues are addressed and regulatory reporting is completed
16. Complaint Handling: Supplier Contracts	WFS's Responsibility			WFS undertakes annual checks to ensure that the WFS External Supplier Requirements for Complaints is incorporated in any supplier contracts and is in line with requirements	To ensure our contracts are inclusive of any specific requirements where appropriate for complaints