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Complaint Handling Procedures and Complaints Log

Background

COLEMONT AD Insurance Brokers LLC (COLEMONT) recognizes that there may be occasions when a client or insurer or third party feels that the level of service or treatment that they have received from COLEMONT has fallen short of what might reasonably be expected.

This Complaints Handling Procedure reflects COLEMONT's commitment to dealing with such complaints as timely, effectively and fairly as possible. Our aim is to resolve issues of dissatisfaction as close as possible to the level at which they arise and to conduct thorough and fair investigations of complaints so that, where appropriate, we can make evidence-based decisions based on the facts of each individual case.

Concentrating on achieving an early resolution of a complaint as close to the point of contact as possible frees up the time of our staff and ultimately contribute to the continued positive experience of clients or insurers dealing with COLEMONT.

Complaints procedures will be openly and actively publicized in COLEMONT documentation, website, sales literature and offices, as appropriate.

Complaints cannot be handled by the person about whom the complaint is made nor by a department which is the subject of the complaint.

This procedure is compliant with the guidelines published by Dubai Health Authority, as part of Standards Notice Number 2 of 2015 (SN 02/2015) pursuant to the Health Insurance Law (No 11 of 2013) of the Emirate of Dubai.

1. Objectives

Objectives of COLEMONT's complaints handling procedures are -

- To allow clients, insurers and others to report instances on non-compliance with the laws and regulations
- Provide a clear escalation process regarding complaints received both internally and externally
- Use complaints to enhance procedures and correct procedural or policy deficiencies

2. What is a complaint?

2.1. Any expression of dissatisfaction by a customer, potential customer or an insurer or other business partner or any regulatory body made to COLEMONT either directly or indirectly which is related to –

- a. An insurance product or service provided by COLEMONT or;
- b. An employee of COLEMONT or;

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- c. The standard of service, action or lack of action by or on behalf of the COLEMONT
- 2.2.** A complaint may therefore relate to:
- a. The quality and standard of service;
 - b. Failure to provide a service;
 - c. Inappropriate behavior or attitude of COLEMONT staff member or its related contractor;
 - d. The failure of COLEMONT staff to follow applicable local / international laws, regulations, Code of Conduct, policies or procedures
 - e. Dissatisfaction with COLEMONT's policy
- 2.3.** Special attention will be given to identifying complaints considered high risk /high profile, as these may require particular action or may raise critical issues requiring direct input from senior management. Potential high risk /high profile complaints may:
- a. Involve serious service failure, for example major delays in service provision or repeated failures to provide a service;
 - b. Generate significant and on-going press interest;
 - c. Pose a serious operational risk to COLEMONT;
 - d. Present issues of a highly sensitive nature

3. Categories of complaint

- 3.1. All complaints must be categorized in the complaints log as relating to one of the following:
- a. Advice provided or service suitability
 - b. Accuracy of documentation provided
 - c. Delays in process (issue of quotations, response to correspondence etc.)
 - d. Administrative or operational process or procedures (i.e. a complaint about the process itself rather than the implementation of it)
 - e. Service provided by advisers, staff or departments (efficiency, attitudinal, behavioral, knowledge)
 - f. Others such as fraud or misconduct

4. What is not a complaint?

- 4.1. Not every concern raised with the COLEMONT can be categorized as a complaint. For example, the following **are not complaints** eligible for pursuing under this Procedure:
- a. A request for information or an explanation of policy or practice;
 - b. An insurance claim;
 - c. An issue which is being, or has been, considered by a court;
 - d. An attempt to have a complaint reconsidered where the COLEMONT's procedure has been completed and the COLEMONT's decision has been issued;
 - e. A grievance by a member of staff which is eligible for handling through the appropriate Human Resources grievance procedure;



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Such issues should be raised and considered under the appropriate alternative COLEMONT procedures cited in this document.

5. Identifying a complaint

- 5.1. Below are a few examples of statements that indicate the existence of a complaint.
 - a. An explicit comment or statement such as "I want to make a complaint" or "Who do I complain to about this?" indicates the existence of a complaint.
 - b. An expression of dissatisfaction such as "I am not happy with..." or "I am not satisfied with what you are saying..." or "This policy that I was sold does not meet my needs" indicates the existence of a complaint.
 - c. A statement that expectations were not met such as "I was told that....but this has not happened" or "You promised to... but..." or "I asked for...but did not receive..." indicates the existence of a complaint.
- 5.2. Complaints from multiple members of the same group scheme relating to the same subject will be logged as a single complaint.

6. How to make a complaint

- 6.1. A person (or their authorized representative) can make a complaint in writing (preferred), in person or by telephone. Where it is clear that a complaint will be immediately considered at the investigations
- 6.2. tag, or is subsequently referred to the investigation stage, the complainant may be required to complete the appropriate complaint form to provide full details of the complaint including any relevant documentation.
- 6.3. Readers should note that at present complaints can be made in English only. If required, a staff member will be available to assist a complainant in completing the complaint form in Arabic.
- 6.4. Complaints can be made by:
 - a. Email: complaints@colemontuae.com
 - b. Telephone: 00971 (0) 6279222
 - c. Address: Colemont Abu Dhabi insurance Broker , P. O Box 108488 Abu Dhabi UAE

7. Unacceptable behavior of Complainants

- 7.1. It is recognized that people may behave differently in times of trouble or distress. The circumstances leading to a complaint may result in the complainant acting in an unacceptable way.



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- 7.2.** The actions of complainants who are angry, demanding or persistent may result in unreasonable demands on time and resources or unacceptable behaviour towards COLEMONT staff. Unacceptable behaviour includes (but is not limited to):
- a. Aggressive or abusive behaviour, including inflammatory statements and unsubstantiated allegations.
 - b. Unreasonable demands, the result of which is that the complainant takes up an excessive amount of staff time and in so doing disadvantages other complainants.
 - c. Unreasonable use of the complaints process - when the effect of repeated complaints is to harass or to prevent COLEMONT pursuing a legitimate aim or implementing a legitimate decision.
- 7.3.** The threat or use of physical violence, verbal abuse or harassment towards COLEMONT staff is likely to result in the termination of all direct contact with the complainant. COLEMONT may report such behaviour to the police (this will always be the case if physical violence is used or threatened) and disciplinary proceedings may be initiated. Where a complainant has exhibited such behaviour, COLEMONT reserves the right to refuse to consider the complaint or future complaints from such individuals.

8. What COLEMONT will do when it receives a complaint for investigations?

- 8.1.** The COLEMONT will allocate the complaint to an appropriate staff for review. It is important that both the complainant and the COLEMONT are clear from the start of the investigation stage exactly what is being investigated, and to ensure that both the complainant and the complaints investigator understand the scope of the investigation.
- 8.2.** In discussion with the complainant, therefore, three key questions will be considered:
- a. What specifically is the complaint (or complaints)?
 - b. What does the complainant want to achieve by complaining?
 - c. Do the complainant's expectations appear to be reasonable and achievable?
- 8.3.** If the complainant's expectations appear to exceed what the COLEMONT can reasonably provide or are not within the COLEMONT's power to provide, the complainant will be advised of this as soon as possible in order to manage expectations about possible outcomes.
- 8.4.** Details of the complaint will be recorded on the COLEMONT's system for recording complaints. Where the complaint has been through the frontline resolution stage, this will be shown in the complaints log. At the conclusion of the investigation stage, the log will be updated to reflect the final outcome and any action taken in response to the complaint.
- 8.5.** Complainants are strongly encouraged to have all supporting documentary evidence available prior to escalating their complaint from the frontline stage. Once the complaint has progressed to the investigation stage the timelines and extension criteria stated herein will apply.

9. Complaints logging

- 9.1.** Various types of complaints mentioned in this document will be logged in the computer. As a minimum, the complaints log must detail the following:
- a. Name of complainant
 - b. Date of complaint
 - c. Detail of the complaint
 - d. Name of staff member receiving and registering the complaint
 - e. Name of staff member to whom the complaint has been directed
 - f. Identification of a repeat complaint (that is a repeat of an earlier complaint made by the same complainant)
 - g. Policy detail (if an existing insured member) including Policy Number, Member Number, Company name (if a corporate scheme)
 - h. Category of complaint
 - i. Source of complaint (telephone, email, personal visit, online facility, via a third party, etc)
 - j. Action taken and outcome at frontline resolution stage
 - k. Date the complaint was closed at the frontline resolution stage
 - l. Date the investigation stage was initiated (if applicable)
 - m. Action taken and outcome at investigation stage (if applicable)
 - n. Date the complaint was closed at the investigation stage (if applicable)
 - o. Underlying cause and remedial action taken (if applicable)

10. Anonymous Complaints

10.1. Complaints submitted anonymously will only be considered if there is enough information provided in the complaint submission to enable COLEMONT to make further meaningful enquiries. If, however, an anonymous complaint does not provide sufficient information to enable further action, the COLEMONT may decide not to pursue the complaint further. However, the COLEMONT may give consideration to the issues raised, and if appropriate the complaint will be recorded in order for corrective action to be taken where appropriate.

10.2. A decision not to pursue an anonymous complaint will be authorized by Operations Manager. If an anonymous complaint contains allegations that are serious in nature, it will be referred to the Managing Director immediately.

11. Time limit for making complaints

11.1. This Procedure sets a time limit of six months to raise a complaint with COLEMONT, starting from when the complainant first became aware of the problem, unless there are special circumstances for requesting consideration of a complaint beyond this time.

11.2. Beyond the six-month time limit, the COLEMONT will exercise discretion in the way that the time limit is applied.



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12. The Complaints Escalation Process

12.1. This Procedure is intended to provide a quick, simple and streamlined process with a strong focus on early resolution of complaints by well-trained staff.

12.2. The procedure involves up to three stages:

- a. **Frontline resolution** seeks to resolve straightforward complaints swiftly and effectively at the point at which the complaint is made, or as close to that point as possible.
- b. **Investigation** is appropriate where a complainant is dissatisfied with the outcome of frontline resolution, or where frontline resolution is not possible or appropriate due to the complexity or seriousness of the case
- c. **External Review** will be considered by the Managing Director if the complainant is not satisfied with frontline resolution as well as investigation.

13. Stage One: frontline resolution – to be completed within 5 working days

13.1. Anyone who has a complaint is encouraged to raise it initially at the point of, or as close to the point of, becoming aware of it as possible and to raise it with the supervisor or the Operations Manager or HR Official, as appropriate.

13.2. Complaints at this stage may be made face-to-face, by phone, in writing or by email to the appropriate person.

13.3. The purpose of frontline resolution is to attempt to resolve as quickly as possible complaints which require little or no investigation. Complaints at this stage of the process may be addressed by any relevant member of the COLEMONT's staff and may be handled by way of a face-to-face discussion with the complainant, or by asking an appropriate member of staff to deal with the complaint.

13.4. Members of staff to whom complaints are made will consider the following key questions:

- a. Is this a complaint under this Policy?
- b. What specifically is the complaint (or complaints) about and which area(s) of the business is/are involved?
- c. What outcome is the complainant hoping for and can it be achieved?
- d. Is this complaint straightforward and likely to be resolved with little or no investigation?
- e. Can the complaint be resolved on the spot by providing an apology/explanation /alternative solution?
- f. Can another member of staff assist in seeking a frontline resolution?
- g. What assistance can be provided to the complainant in taking this forward?

13.5. Resolution may be achieved by providing an on-the-spot explanation of why the issue occurred and/or an apology and, where possible, what will be done to stop this happening in the future.



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- 13.6.** If responsibility for the issue being complained about lies in the staff member's area of work, every attempt will be made to resolve the problem at source. If responsibility lies elsewhere, the staff member receiving the complaint will liaise with the relevant area in an attempt to resolve the issue promptly.
- 13.7.** Frontline resolution will normally be completed within 5 working days, though a resolution may be achieved more quickly. In exceptional circumstances a short extension of time may be necessary to increase the possibility of resolving the complaint at the frontline resolution stage (for example, by obtaining information from other areas of COLEMONT where no single individual is responsible for the issue(s) being complained about).
- 13.8.** The complainant will be told of the reasons for extending the deadline and advised of the new timescale for resolution. The maximum extension which can be granted is 5 working days (i.e. not more than 10 working days in total from the date of receipt of the complaint).
- 13.9.** For the purpose of this Procedure, Sunday to Thursday are counted as working days except when COLEMONT is closed for a Public Holiday. Fridays and Saturdays are not counted as working days.
- 13.10.** The outcome of the frontline resolution will be communicated to the complainant. This may be face-to-face, by phone, in writing or by email. The response to the complainant will address all the topics for which COLEMONT is responsible, explaining therein the reasons for COLEMONT's decision. There is no requirement for COLEMONT to send out further written communication to the complainant following the issuing of such a response. Once a decision has been issued, the record of the complaint will be updated on the recording system, detailing therein the decision reached. The complaint will then be closed.

14. Stage two: Investigation – to be completed within 20 working days

- 14.1.** These complaints may already have been considered at the frontline resolution stage, or they may be complaints identified upon receipt as appropriate for immediate investigation. The purpose of conducting an investigation is to establish all of the facts relevant to the points made in the complaint and to provide a full, objective and proportionate response to the complainant.
- 14.2.** A complaint will be moved to the investigation stage when:
- a. Frontline resolution was attempted, but the complainant remains dissatisfied. This may be after the case has been closed following the frontline resolution stage;
 - b. The complainant refuses to recognize or engage with the frontline resolution process and is insistent that the issue be addressed by a more senior officer;
 - c. The issues raised are complex and will require detailed investigation;
 - d. The complaint relates to issues that have been identified by the COLEMONT as high risk or high profile.



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An investigation will normally be completed within 20 working days, though a resolution may be achieved more quickly. In exceptional circumstances a short extension of time, not exceeding 10 days, will be allowed subject to the approval of Operations Manager.

15. Stage Three: Independent External Review - to be completed within 45 working days

15.1. Once the investigation stage has been completed, the complainant may write to the Managing Director of COLEMONT to have an external party look at their complaint. COLEMONT's Managing Director will consider complaints from people who remain dissatisfied at the conclusion of the COLEMONT's internal complaints handling procedure. The Managing Director would review issues such as service failure and maladministration (administrative fault) as well as the way the COLEMONT has handled the complaint and based on which, he may decide to have an external party investigate the complaint.

16. Feedback to the Complainant

16.1. The following timelines will be used for providing feedback to the complainants:

- a. Complaints will be acknowledged in writing within 3 working days;
- b. COLEMONT will provide a full response to the complaint as soon as possible but not later than 20 working days from the time that the complaint was received for investigation.

16.2. Not all investigations will be able to meet this deadline; for example some complaints are so complex that they will require careful consideration and detailed investigation beyond the 20 working days timeline. Where there are clear and justifiable reasons for extending the timescale, senior management will exercise judgment and will set time limits on any extended investigation. If the complainant does not agree to an extension but it is unavoidable and reasonable, then senior management will consider and confirm the extension. In such circumstances, the complainant will be kept updated on the reason for the delay and given a revised timescale for bringing the investigation to a conclusion. It is expected, however, that this will be the exception and that the COLEMONT will always strive to deliver a definitive response to the complaint within 20 working days.

16.3. Where an extension has been agreed, this will be recorded appropriately, including the reason given for the delay, and the proportion of complaints that exceed the 20 working day-limit will be evident from reported statistics.

16.4. The outcome of the investigation will be communicated to the complainant in writing. The decision, and details of how and when it was communicated to the complainant, will be recorded on the COLEMONT's system for recording complaints.

17. Complaints process flowchart



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17.1. Readers are encouraged to refer the attached two flowcharts identifying the complaints procedure from end to end. The flowchart is available to both customers and prospective customers.

17.2. As a minimum it will be published on the company website.

18. Reporting

18.1. COLEMONT has a system for the internal reporting of complaints information. Regularly reporting the analysis of complaints information helps to inform management of where improvements are required.

18.2. A weekly report of all complaints received and the status of ongoing complaints will be submitted to the Operations Manager.

18.3. An annual report (see KPI's below for report content) covering the calendar year will be submitted to Dubai Health Authority, Health Funding Department no later than 7 January each year.

19. Key Performance Indicators (KPI's)

19.1. COLEMONT will produce an annual report to include the key performance indicators as detailed below:

- a. Complaints actual TATs by number of days to resolution or point of referral to third party deliberation
- b. Number of complaints outstanding at end of each calendar month
- c. Number of complaints unresolved after 15, 30, and 90 days at the end of each calendar month
- d. Number of complaints escalated for outside deliberation or arbitration.
- e. Complainant satisfaction with outcome of internal dealing with the complaint (as a minimum a scoring system with 1= fully satisfied, 2= largely satisfied, 3= largely unsatisfied, 4= completely dissatisfied)
- f. Number of complaints by category
- g. Number of complaints fully upheld
- h. Number of complaints partially upheld
- i. Number of complaints denied (prior to any external escalation)

20. Staff training

20.1. COLEMONT will have an induction program to train new staff and an annual refresher training staff for other staff in –

- a. COLEMONT's Complaints Handling Procedure;
- b. How to handle and record complaints at the frontline resolution stage;
- c. Who they can refer a complaint to if they are unable to handle it;
- d. Their clear authority to attempt to resolve any complaints they may be called upon to deal with.



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COLEMONT maintains a Training Log to record which staff have received such training and when.

21. Confidentiality

21.1. Confidentiality is an important factor in conducting complaints investigations. COLEMONT will always have regard to any legislative requirements, and also internal policies on confidentiality and the use of complainant information. Complaints will be handled with an appropriate level of confidentiality and information released only to those who need it for the purposes of investigating or responding to the complaint. No third party will be told any more about the investigation than is strictly necessary in order to obtain the information required from them.

21.2. In making a complaint, complainants should accept that limited disclosure of all or part of their submission will be required to enable investigation of their complaint to proceed. Complainants have the right to expect that everyone who responds to or investigates a complaint will do so impartially. No individual will be permitted to act in any manner in a case in which they have a material interest or in which any actual or potential conflict of interest may arise.

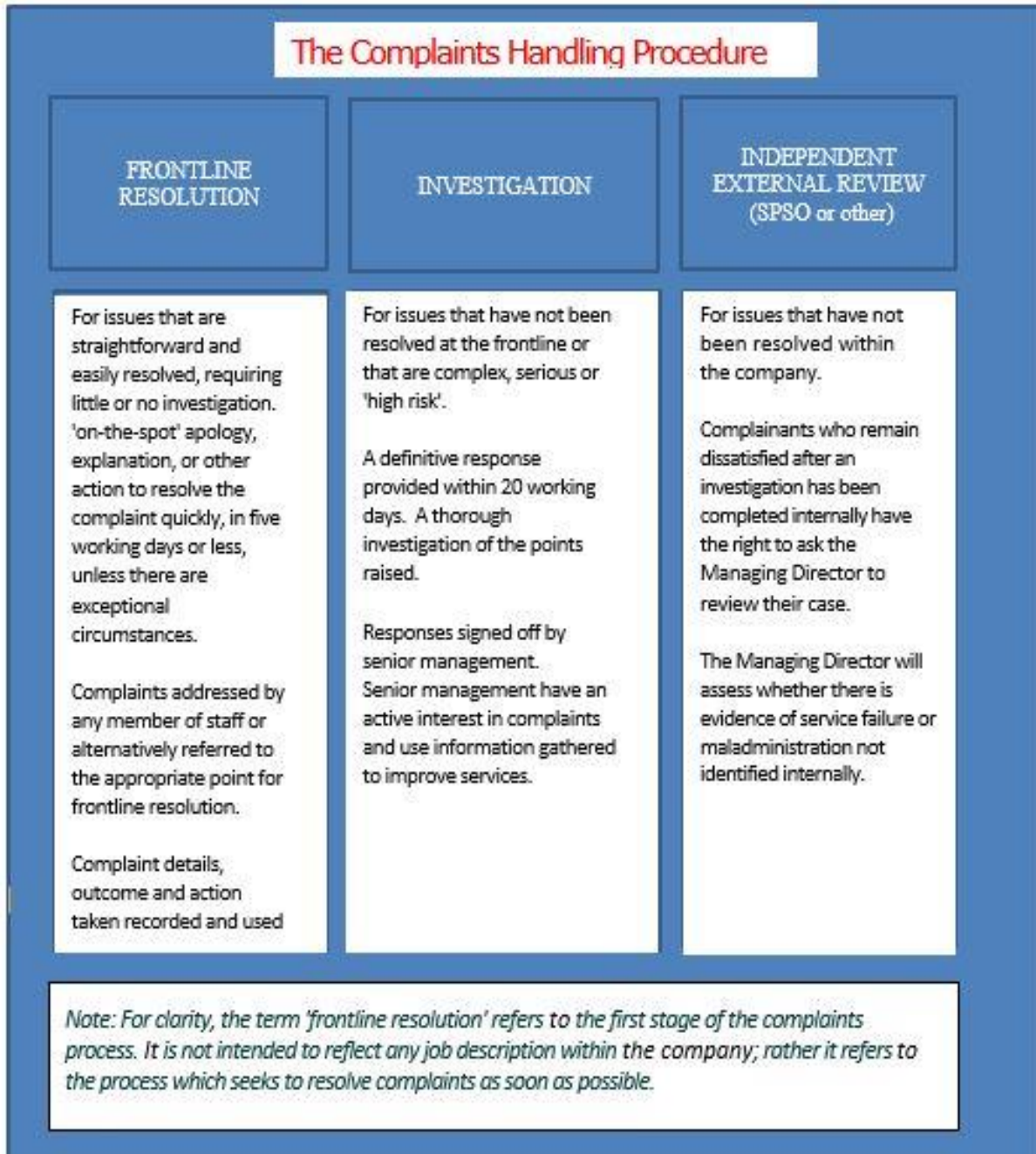
22. Review and update of Complaints Handling Procedures

22.1. Valuable feedback is obtained through the receipt of complaints. One of the objectives of this Procedure is to identify opportunities to improve provision of services across the COLEMONT. Staff will record all complaints so that COLEMONT can use the complaints data for analysis and management reporting. By recording and using complaints information in this way, the causes of complaints can be identified, addressed and, where appropriate, training opportunities can be identified and improvements introduced.

If required, COLEMONT shall make necessary adjustments to its policies, services, products, processes or procedures to avoid repetitions of upheld complaints.



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Complaints Handling Procedure (Flowchart)

