

Complaint Handling Policy

Ceylinco Life Insurance Ltd

Table of Contents

- 1. What is a Complaint Handling Policy.....3
- 2. The Complaint Management Function
 - 2.1 What is a Complaint.....4
 - 2.1.1 Who should understand this and how.....4
 - 2.1.2 Why is it essential.....5
 - 2.1.3 Methods of an incoming complaint.....5
 - 2.1.4 Which parties can make a complaint.....5
 - 2.1.5 What are the most common complaints from customers.....6
 - 2.2 Complaint Handling Procedure
 - 2.2.1 Who is responsible for handling a complaint.....6
 - 2.2.2 Lodging a complaint from incoming complaint methods.....7
 - 2.2.3 Acknowledging a customer’s complaint.....7
 - 2.2.4 How a complaint should be investigated.....8
 - 2.2.5 How to respond to a complaint.....8
 - 2.2.6 If a response is delayed, what is the next step.....9
 - 2.2.7 How to handle an appeal.....9
 - 2.2.8 Instances where the complaint can be considered closed.....9

1. What is a Complaint Handling Policy

In accordance with the RII act, Section 3 states that the objective and responsibility of the Insurance Regulatory Commission of Sri Lanka (IRCSL) and its members shall be to ensure that the Insurance business in Sri Lanka is conducted with integrity and in a professional and prudent manner with a view of safeguarding the interest of the policyholder.

Under Insurance Core Principles (ICP) 19 on the conduct of business, insurance supervisors should require insurers and intermediaries to have a policy and a process in place to handle complaints in a timely and fair manner, protecting the efficiency of the service.

Further, along with the guidelines provided by IRCSL, this Complaint Handling Policy has been developed within the company's view, which is to be defined and approved by the board of directors who shall be responsible for the implementation and monitoring, in compliance with the policy.

Objective

The policy guidelines are formulated with the objective of facilitating a Complaint Handling Policy where the processes are in line for timely, equal and fair handling of customers. This will maintain trust in the profession by adequately protecting the policyholders, beneficiaries and the company.

2. The Complaint Management function

2.1 What is a complaint?

A complaint in its simplest form is defined as “A verbal or written statement identifying where the company has fallen short of their contractual obligations or internal processes related to service level agreements that can be considered as unsatisfactory or unacceptable”.

Simply it's a statement of addressing dissatisfaction over an element related to the service.

2.1.1 Who should understand this and how?

The handling of a complaint will depend on how the complaint is made, to whom it is made to and what it actually is about. However, the initial stage of a complaint has to be handled by the officer who has direct contact with the complainant in regards to the particular complaint.

All staff directly or indirectly in charge of handling complaints should understand the complaints process and their role in it. Not every complaint needs to be dealt with through a formal process: if a practice receives a complaint about a failure to return a phone call, for example, this may be resolved by the recipient promptly calling back with an apology for the delay.

However, if the complaint is in the form of a formal letter to the partner responsible for handling complaints, then a response should follow in accordance with the formal complaint handling policy.

Staff should be aware of when they should handle a complaint, and when it should be dealt with. They should also be made aware of the importance of resolving complaints where it is appropriate for them to do so, rather than passing on the complaint.

Research by Consumer Focus has shown that it is important for clients to feel that a named individual has taken ownership of their complaint and that proper records of the complaint exist so that they do not have to repeat their story.

2.1.2 Why is it essential?

A complaint is more likely an asset to the company and proper handling of the complaint will establish an investment to the company. Therefore treating all complaints with equal importance will help the company to retain existing customers and also new ones by word of mouth.

2.1.3 Methods of an incoming complaint

Any complaint can be received by the following methods:

- Via telephone.
- Via visits.
- Via email.
- Via WhatsApp/Viber.
- Via fax.
- Via post.
- Via the website (online customer inquiries).

2.1.4 Which parties can make a complaint?

Most complaints are forwarded by the policyholders. However, others including, beneficiaries, professional bodies are also on the list of parties who can make complaints. Further, when handling complaints from different parties it should be in accordance with the party the receiver has obtained.

2.1.5 What are the most common complaints from customers?

For an insurance company, several complaint patterns can be identified.

- Complaints with regards to claims (death claims, medical claims, critical illness claims, injury claims).
- Complaints with regards to delays in the process of several servicing functions offered by the company (changes to a policyholder's details, changes to other party's details, delays in delivering policy-related documents, delays in sending receipts etc).
- Delays in policy cancellations.

While there can be various other complaints, the above listed are some of the most common complaints received.

2.2 Complaint Handling Procedure

2.2.1 Who is responsible for handling a complaint?

The officer initially in charge of the complaint will be the one responsible to handle it.

However, anyone and everyone directly or indirectly involved in handling complaints will be responsible to ensure the efficiency of the service is maintained.

2.2.2 Lodging a complaint from incoming complaint methods

Any complaints that come through telephone, fax, post, the online website, visits and emails must be entered into the system with all the correct and relevant details;

- Policyholder's name.
- Language.
- Contact details.
- If the complaint comes through a third party, their name and relevant details.
- The issue in brief, in an understandable manner.
- Scans of the required documents uploaded to the system for reference.

2.2.3 Acknowledging a customer's complaint

It is strictly required to acknowledge a customer's complaint with a response within 03 working days. The following points must be included in the acknowledgement letter.

- The letter should be sent in line with the language the complaint was made in. If the complaint is made in Sinhala, Tamil or English, the acknowledgement, feedback or reply letter should be produced in the same language. Further, simple language shall be used in communicating with the complainant.
- The name, designation and contact details of the officer who will be in charge of the particular complaint must be included.
- When lodging a complaint into the system, there will be a reference number originated individually and that number must be included in the letter.
- The indicated timelines for the complaint must be clearly mentioned in the letter in line with the developed timelines of the company.
- The signature of the complaint handling officer shall be included as well.

If the given complaint can be resolved within 03 working days, the resolution should be communicated to the complainant along with the acknowledgement letter.

2.2.4 How a complaint should be investigated

If possible, the person investigating a complaint should be independent. This does not mean that the complaint handling officer cannot seek other's assistance. While they can seek the assistance of others, they must not be forced to close or resolve the complaint, a fair resolution must be obtained.

In any event, the complaint handling officer should approach any complaint with an open mind. Treat each complainant as an individual and each complaint on its own merits.

Further, everything found on the process related to the complaint should be recorded in the system and should be given a proper follow-up on a daily basis.

2.2.5 How to respond to a complaint

The response should be given after considering following points;

- Resolution of the complaint – if the complaint cannot be resolved within 03 working days, then the complaint must be handled within a minimum of 7 days and a maximum of 14 days from the date the complaint was received.

Further, the resolution letter must;

- Include the reference number, issue description along with the proper feedback.
- Include the No. of days taken to resolve.
- Be written in simple language understandable to the client.

2.2.6 If a response is delayed, what is the next step

If a resolution cannot be provided within the expected timeline as indicated in the acknowledgement letter (due to an unavoidable reason only), the complainant shall be kept informed that the matter will be sorted during an indicated time period by apologizing for the inconvenience caused.

Further, the delay should be indicated in the letter which is prepared with the intention of informing the delay to the complainant.

2.2.7 How to handle an appeal

When communicating the resolution or the response to an appeal, the complainant shall be informed with a letter that the particular matter will be closed in the absence of a reply within 04 weeks from the date of receiving the resolution or response.

2.2.8 Instances where the complaint can be considered closed

- When a complaint is fully resolved. (When the customer request has been fulfilled).
- When the complainant has confirmed the acceptance of the resolution in writing (in favour of the company when the complainant confirms that their need is fully resolved).
- When the complainant has not responded within 04 weeks to an initial letter that was sent to the complainant indicating any pending material to proceed further.
- When the complainant has not responded within 04 weeks of receiving a written resolution of response. (i.e. if the complainant fails to appeal).
- The officer in charge of the complaint management function has certified that the company has discharged its contractual, statutory and regulatory obligations and therefore concludes the matter.