



COMMUNITY
BROKER
NETWORK

t 1300 905 577
e info@cbn.au
w cbn.au

Complaints & Disputes Procedure

March 2025

Contents

Background	3
Purpose	3
Commitment and culture	3
Roles and Responsibilities	4
People Focus	4
Recent Legislation update - Regulatory Guide 271	5
What is a Complaint	5
Receiving Complaints	5
Receiving a Complaint Verbally	6
Receiving a Written Complaint	6
What Happens Next	8
Reviewing Complaints with the Authorised Representatives	8
Acknowledgment of a complaint	9
Replying to a Complainant	9
Replying to a Complaint in Favor of the Broker	9
Unresolved Complaints	10
AUSTRALIAN FINANCIAL COMPLAINTS AUTHORITY (AFCA)	10
Recording Complaint Data	11
Escalating Systemic or Repetitive Issues	11
Remedies and Rectifying a Complaint	11
Our Charges	12
Confidentiality	12
Document History and Version Control Record	13

Background

Community Broker Network (CBN) is committed to being open and responsive to any complaints about our organisation, our staff, our partners, our contracted service providers or anyone else acting on our behalf.

This procedure details the approach adopted by CBN to ensure the identification, recording, monitoring and rectification of complaints.

Complaints will be addressed professionally, competently and in a timely manner applying principles of natural justice and confidentiality.

It's important and indeed, a requirement of our AFSL, that we have in place a functional and ongoing internal and external complaint handling procedures.

CBN are a principal member of NIBA and as such we have adopted the Insurance Brokers Code of Practice.

Having robust processes and systems in place for dealing with complaints and disputes is an essential part of good business practice.

We are committed to meeting if not exceeding the expectations of our clients whenever possible. As much as we dislike receiving complaints, we recognise that dissatisfied clients have a right to complain and to have their complaint handled professionally and competently. Clients who take the time to complain may well still have confidence in us and want to continue dealing with us.

Complaints should not be seen as a nuisance or a cost, but as an opportunity to obtain feedback from clients about a product or service experience. We should use them as a way to assist us continuously improve service and relationships with our clients.

CBN is a member of the Australian Financial Complaints Authority (AFCA). If a complaint cannot be resolved satisfactorily a client has the right to refer the matter to AFCA.

Purpose

The purpose of this procedure is to:

- Ensure the existence of a process through which complaints can be made regarding CBN's services, functioning or operations;
- Enable CBN and our Authorised Brokers to benefit from all complaints through ensuring that they are recorded, considered, resolved and monitored;
- Establish the principles that are to govern CBN's response to complaints; and
- Ensure awareness of the content of this policy and relevant procedure

Commitment and culture

CBN has a positive complaint management culture that welcomes and values complaints.

The CBN Executive Leadership Team are actively interested in and support effective complaint management by:

- (a) having oversight of the IDR process via D.O.C.K;
- (b) providing adequate support to the Head of Compliance for staff managing complaints;
- (c) establishing and promoting the Group Complaint Dispute Procedure and the Internal Complaints Dispute Procedure (this procedure);
- (d) ensuring there is effective and timely complaint management, monitoring and reporting through the Responsible Managers forum; and
- (e) establishing clear roles and responsibilities for the management of complaints as prescribed in the Group Complaint Dispute Procedure and the Internal Complaints Dispute Procedure (this procedure).

Roles and Responsibilities

Chief Executive Officer –

Overview of the complaints process and procedures
Provide detailed updates to the Board

Executive Leadership Team (ELT) / Responsible Managers –

Assist with systemic issues
Liaising with all below parties, as well as ASIC
Provide oversight to CEO of the complaints process and procedures from the Compliance Team

Head of Legal and Governance

Review and provide resolutions to the Head of Compliance. Assisting with their understanding of legal obligations.

Head of Compliance –

Review and approve resolutions, liaise with Head of Legal and Governance as well as The Compliance Officer.
Provide monthly reporting and systematic issues to the ELT.
Providing an update to the business of new and existing changes to legislation.
Liaise with ASIC regarding changes

Compliance Officer –

Review, Investigate and complete a complaint resolution.
Understand trends and assist with remediation.
Liaise with AFCA and complainants when required.

Authorised Representative –

Providing support and assistance to the Compliance Officer to find a resolution for the complaint.

People Focus

Identifying and managing complaints in the organisation is an essential part of CBN's compliance culture and everyone is responsible for ensuring that the appropriate action is taken. We recognise that everyone has the right to complain. We are open to receiving complaints and demonstrate an utmost commitment to resolving the

complaints. We encourage our staff and Authorised Representatives to resolve complaints, wherever possible, at the first point of contact.

Recent Legislation update - Regulatory Guide 271

RG 271 – INTERNAL DISPUTE RESOLUTION

On 30 July 2020 ASIC released updated internal dispute resolution guidance for financial firms in the form of Regulatory Guide 271 Internal Dispute Resolution (RG 271). The new guidance and ASIC Instrument provide updated requirements for how Australian financial services (AFS) licensees (and other financial firms) should deal with consumer and small business complaints under their internal dispute resolution (IDR) procedures. This policy is aligned with the requirements of RG271

What is a Complaint?

A complaint is defined as an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

A complaint can be received verbally (including by phone) or in writing.

Complaints are a valuable and important part of ongoing business relationships. They provide a flag to potential problems and difficulties, and a repetition of complaints can indicate a systemic problem that needs attention.

If the complainant is not satisfied with the action taken in response to the complaint, it may then become a dispute. Disputes that are not resolved need to be referred to an external dispute resolution scheme.

Receiving Complaints

A complaint can be received verbally, by phone, by email or in writing. Complaints, where possible, are to be resolved closest to the source of the complaint.

CBN will ensure that the complaint investigation process is impartial. No assumptions will be made, nor any action taken until all relevant information has been collected and considered.

We recognise that effective complaints handling is an essential component of quality management. Accordingly, we acknowledge the complainant's right to complain and will ensure that:

- necessary assistance is provided to the claimant to lodge the complaint;
- all complaints and internal failures receive prompt responses;
- all complaints are handled fairly to both the complainant and the company;
- corrective action is taken to rectify the immediate problem;

- incidents are reviewed to detect underlying trends; and
- appropriate changes are made to our systems and procedures to prevent recurrence.

CBN will try and resolve the complaint quickly and fairly and will always liaise with the Authorised Broker.

Receiving a Complaint Verbally

When a client makes a complaint, it is an opportunity to ensure that they feel important and appreciated and to demonstrate our commitment to excellent service and respect for our clients. Our aim is to turn any client's frustration into satisfaction. Also, depending on the complaint, non-action may result in an errors and omissions claim at a later date.

However, if the complainant still wants to further the complaint as they believe it to be unresolved, complete the Complaint Notification Form (located in The D.O.C.K.) provide all documentation the complainant has provided, as well as their contact details (i.e. phone number and email address).

Receiving a Written Complaint

If you receive a written complaint, complete the Complaint Notification Form (located in The D.O.C.K.) providing all documentation the complainant has provided, as well as their contact details (i.e. phone number and email address).

WHEN DEALING WITH A DISSATISFIED CLIENT, ALWAYS:

- Listen to what the client says – this is the first step in reducing tension;
- Acknowledge the complainant's feelings – denying that the complainant is, or has the right to be upset may antagonise them;
- Record details and determine what they want – ask the necessary questions in a polite and even-handed manner to obtain the most detailed response
- Confirm the information you have received to ensure that your understanding is correct;
- Empathise with the complainant in a courteous manner, without making any admission;
- Do not offer excuses or argue with the complainant;
- Do not attempt to lay blame or be defensive;
- Attempt to resolve the problem with an explanation or information;

- Ask the client if they are satisfied;
- If the client is still not satisfied, tell them that we have a team who are dedicated to resolving client problems and that you would like to refer the matter to them to see if they can assist further. Seek to obtain the client's agreement to this. Inform them of the Compliance Team's details and advise them that the Complaints Officer will contact them within 24 hours; and
- Immediately complete a Complaint Notification Form (located in the D.O.C.K).

It may be appropriate to apologise to the client, but you need to take care in the way that you do this. This is because most insurance policies contain a condition prohibiting the insured from making any admissions of liability, and an apology that can be viewed as an admission may mean we are not covered by our Professional Indemnity policy.

There is a way to safely apologise to customers without compromising our insurance cover. The key is to empathise and/or apologise for the emotional impact experienced by the customer (e.g. "I'm so sorry you feel ..."; I'm sorry for the inconvenience/frustration/annoyance/anger, etc.") – rather than the action that caused the problem (e.g. "I'm sorry, I should have explained the exclusions to you ..."; or "I'm sorry, I forgot to renew your policy"). Ensure you are mindful of this when offering apologies.

WHEN A CLIENT COMPLAINS YOU SHOULD:

- Try to remain calm even in the most demanding situations. Help the client maintain their control, no matter how angry they are;
- Always treat the client courteously and fairly;
- Be convincing in your expressions and actions to earn client trust;
- Listen to the client – while they are not always right, a dissatisfied client is an asset, not a liability;
- Be patient if your client communicates poorly. Help them to get their meaning across; and
- Understand when to say "no" and be firm without antagonising the client.

Skilful communication skills are vital. For example, a client may complain that a telephone call had not been responded to for two weeks, but the client could be actually inferring that they may be considering going to a competitor when the contract of insurance comes up for renewal.

It is important that you differentiate between these two messages. Most people do not like to hear complaints and put up enormous psychological blocks. If you only listen to the surface message, it will result in a mismanaged complaint and possibly,

the loss of the client. If we can listen to clients with open minds and flexible points of view, complaints may then be considered as opportunities to rectify client problems and cement our relationship.

CBN will ensure that the complainant is informed of his or her right to have a support person or advocate present to assist or represent them during any formal complaint's procedure. Formal complaints can be written or verbal. If verbal, the assisting staff member will document the complaint and either the complainant, Authorised Representative or assisting staff member must sign the document and refer it to the Compliance Team.

Any admission may set a precedent for the whole organisation and, as such any offer of settlement must be approved by CBN as the Licensee.

What Happens Next

After the complaint is submitted by the Authorised Representative to the Compliance Team via the D.O.C.K, they will assist to help you with a reviewed outcome.

Our Compliance Officer is responsible for:

- dealing with and attempting to resolve all client complaints which cannot be resolved by the provision of clarification or information;
- advising clients of their rights to lodge complaints with AFCA;
- managing all disputes with clients and Authorised Representatives; and
- liaising with AFCA.

When a complaint is received, the Compliance Officer will assess and prioritise complaints according to the urgency and severity of the issues raised. Examples of matters to be prioritised are:

- a) the complainant is experiencing domestic or financial abuse;
- b) the complainant has a serious or terminal illness;
- c) a delay in addressing the complaint could adversely affect the complainant's basic living conditions.

The Compliance Officer will take over the management of the complaint and will attempt to resolve the complaint swiftly. You will be asked to provide additional information if this becomes necessary.

Reviewing Complaints with the Authorised Representatives

On receiving a complaint, the Compliance Officer will contact the relevant Authorised Representative (AR) advising them of the complaint, requesting their assistance with the case and obtaining:

- Relevant documentation from the Authorised Representative including the needs analysis, any paperwork involved in constructing the solution, the advice given to the client and any promotional material shown or given to the client that may have influenced the client's decision to purchase the product;

- The original proposal and any subsequent documentation such as invoice, general advice warning, Financial Services Guide, Product Disclosure Statement, proposal form and risk review form;
- The client's history;
- The client's version of events; and
- The complainant's phone number and email address, to assist with resolving this complaint.

Acknowledgment of a complaint

Upon receipt of the D.O.C.K case, the Compliance Officer will acknowledge the complaint in writing within 1 business day (24 hours), confirming:

- the matter is being investigated and that the complainant will be kept informed as to the progress of their complaint, any proposed actions and expected timeframes;
- that our aim is to resolve complaints in a timely manner, and we will generally resolve a matter within 30 calendar days; and
- their right to refer the matter to the AFCA if the dispute is not resolved satisfactorily.

Complex complaints may take longer than 30 calendar days to resolve. In these cases, we will regularly update the complainant on the progress and likely timeframe for resolution.

Replying to a Complainant

The Compliance Officer will provide a written response to the complainant within 10 days of the complaint being finalised and sent to the complainant as of 21 days. Where appropriate Compliance Officer will acknowledge and respond to any documentation obtained during the investigation.

Also, the complainant's right to take the complaint to AFCA if they are not satisfied with the IDR response and the contact details for AFCA.

In the case of the complaint being referred to the AFCA, all relevant information the Authorised Broker holds will be made available to the external complaint body if requested.

Replying to a Complaint in Favor of the Broker

If CBN rejects or partially rejects the complaint, the IDR response must clearly set out the reasons for the decision by:

- (a) identifying and addressing the issues raised in the complaint,
- (b) setting out CBN's findings on material questions of fact and referring to the information that supports those findings; and

- (c) providing enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

Unresolved Complaints

If a complaint is complex or remains unresolved, or may not be resolved within the relevant IDR timeframe (30 Days);

- (a) The Compliance Officer will inform the complainant that they have a right to pursue their complaint with AFCA and provide details about how to access AFCA.

This may also occur when a response is provided to the complainant, who is dissatisfied with the outcome of the case, you must advise them of AFCA's details.

AUSTRALIAN FINANCIAL COMPLAINTS AUTHORITY (AFCA)

All retail and business clients who are unhappy with their broker's services can complain to the Australian Financial Complaints Authority (AFCA). Although the numbers of AFCA complaints against insurance brokers are relatively low, brokers need to proactively minimise the risk that they might occur.

AFCA addresses these complaints from the perspective that insurance brokers enter into a professional relationship with consumers and have a duty of care to them. Bear in mind that in determining whether the duty has been met, AFCA will consider if you have:

- established the terms of agreement with the client (i.e.: what services you will provide and whether your advice will be general, or tailored to the client's needs);
- fully investigated and recorded the client's insurance needs;
- undertaken reasonable efforts to arrange a policy that is suitable to the client's needs;
- appropriately informed the client of any ability to arrange the cover sought, or of a relevant exclusion that impacts their requirements; and
- provided sufficient advice to enable the client to make an informed decision.

Recording Complaint Data

The Compliance Team will keep records of the complaint resolution process and outcomes through the D.O.C.K, noting any regulatory requirements and actions. Complaint records will be filed and stored appropriately.

The Compliance Officer must record all details, documents, email correspondence and dates of the complaint through the D.O.C.K. The related Authorised Representative may review the complaint at any point during the investigation, through the D.O.C.K's case number.

Escalating Systemic or Repetitive Issues

A systemic issue is a matter that affects, or has the potential to affect, more than one consumer.

Some examples include:

- a) a disclosure document that is inadequate or misleading.
- b) a documented procedure that does not comply with legal requirements.
- c) Communication break down between broker and insured.
- d) Lack of time placed into reviewing insured's policy's, consequently providing the incorrect cover.

The Compliance Officer will review all complaints and identify and escalate any issues believed to be system related and/or could assist with changing the mindset of how brokers in the network communicate with their clients;

- (a) encourage and enable staff to escalate possible systemic issues they identify from individual complaints;
- (b) regularly analyse complaint data sets to identify issues;
- (c) promptly escalate possible systemic issues or behaviour issues to the Head of Compliance to review and escalate within the business for investigation and action.

This will be reviewed monthly, quarterly and annually through the D.O.C.K, with communications sent to the brokers through training or newsletter articles to try and keep the network updated with how Compliance is dealing with complaints and provide oversight of issues that may be rectified through basic trainings.

Remedies and Rectifying a Complaint

The Compliance Officer will consider a broad range of possible remedies when trying to rectify and resolve complaints.

Remedies may include:

- a) an explanation of the circumstances giving rise to the complaint;
- b) provision of assistance and support;
- c) a refund or waiver of a fee or charge;
- d) a payment of compensation;
- e) correcting incorrect or out-of-date records;

- f) changing the terms of a contract;
- g) ceasing legal or other action that may cause detriment; and
- h) undertaking to set in place improvements to systems, procedures or products.

When coming to a conclusion for a complaint, the above remedies will be taken into consideration with the broker before sent to the complainant.

Our Charges

CBN do not charge our clients for handling complaints or disputes, however if a complaint is submitted through AFCA the fee is payable by the broker.

Confidentiality

To maintain CBN's confidentiality, all participants in the process should restrict the information about the complaint to those who need to know of the complaint in order to:

- refer the complaint;
- manage the complaint;
- provide advice and support in the process;
- review and decide upon appropriate complaint mechanisms;
- manage the workplace; and
- apply the process.

CBN will address all complaints in a confidential manner. Only the people directly involved in making, investigating or resolving a complaint will have access to information about it. CBN respects the privacy of the complainant under the CBN privacy policy.

Complaint Review, Learnings and Training

After a complaint has been resolved and the complainant is satisfied with the outcome of the complaint. The Compliance Team will review the case to understand how we can mitigate the issue from recurrence. The following will take place;

- Issues discovered during the complaint
- How the issue was resolved
- What form of training is required
- Observations and learnings sent to broker

- Sign to say “Acknowledged and will comply”

DOCUMENT HISTORY AND VERSION CONTROL RECORD

Name of Document: Complaints & Disputes Procedure
Assigned review period: 12 months
Date of next review: February 2026

Version Number	Version Date	Reviewed by	Amendment Details
V2	Nov 19	Emma Cansell	Rebranded and minor language updates
	Dec 20	Amy Dobo	Updated document to reflect RG 271 changes
V3	Jan 21	Amy Dobo	Review and submission of document to the wider network
V4	Oct 21	Owen Mulhall	Adding AFCA cost tables
V5	Nov 22	Owen Mulhall	Removing AFCA cost table following AFCA cost changes, minor language updates and alignment with new IBCOP 2022
V6	Apr 2023	Amy Dobo	Changes to mitigation
V07	Feb 2024	Jessica Nieuwoudt	Amendments to spelling & grammar
V08	March 2025	Morgan Moroney	Amendments to spelling and grammar Amendments to CBN Staff Titles and website