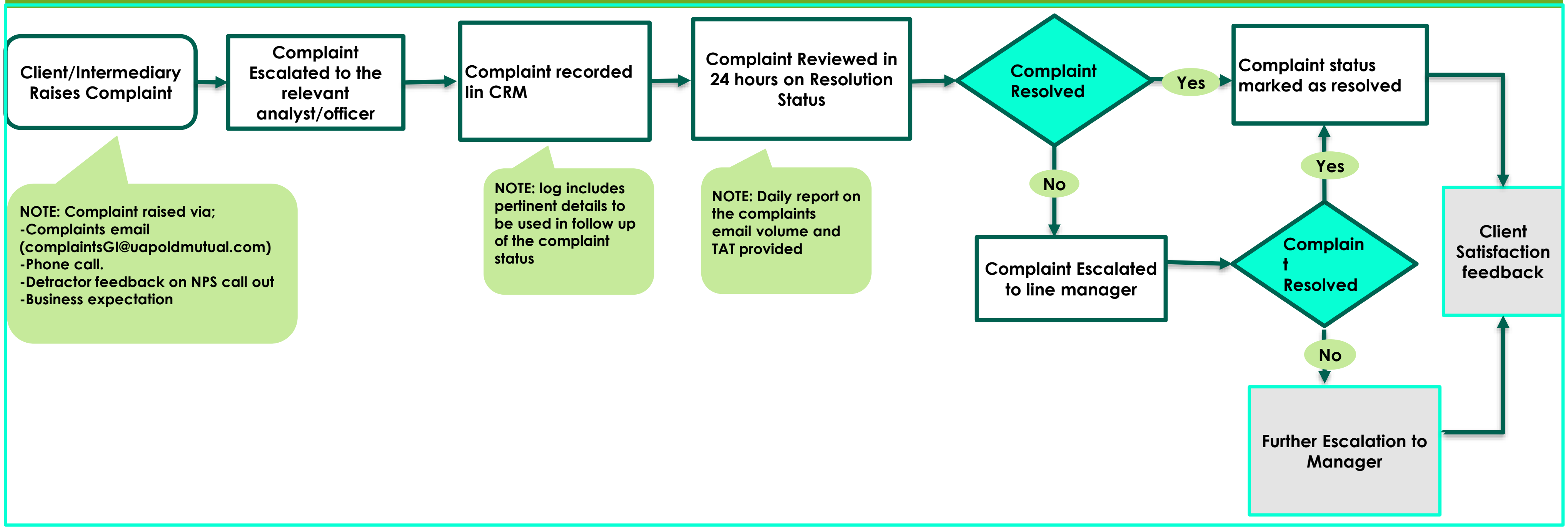
KENYA GI/Health Complaints Management Standard Operating Procedure (SOP)
ALL Customers (Direct, regulator, Advisor, etc.)

DO GREAT THINGS | OLDMUTUAL

COMPLAINTS PROCESS-GENERAL GI



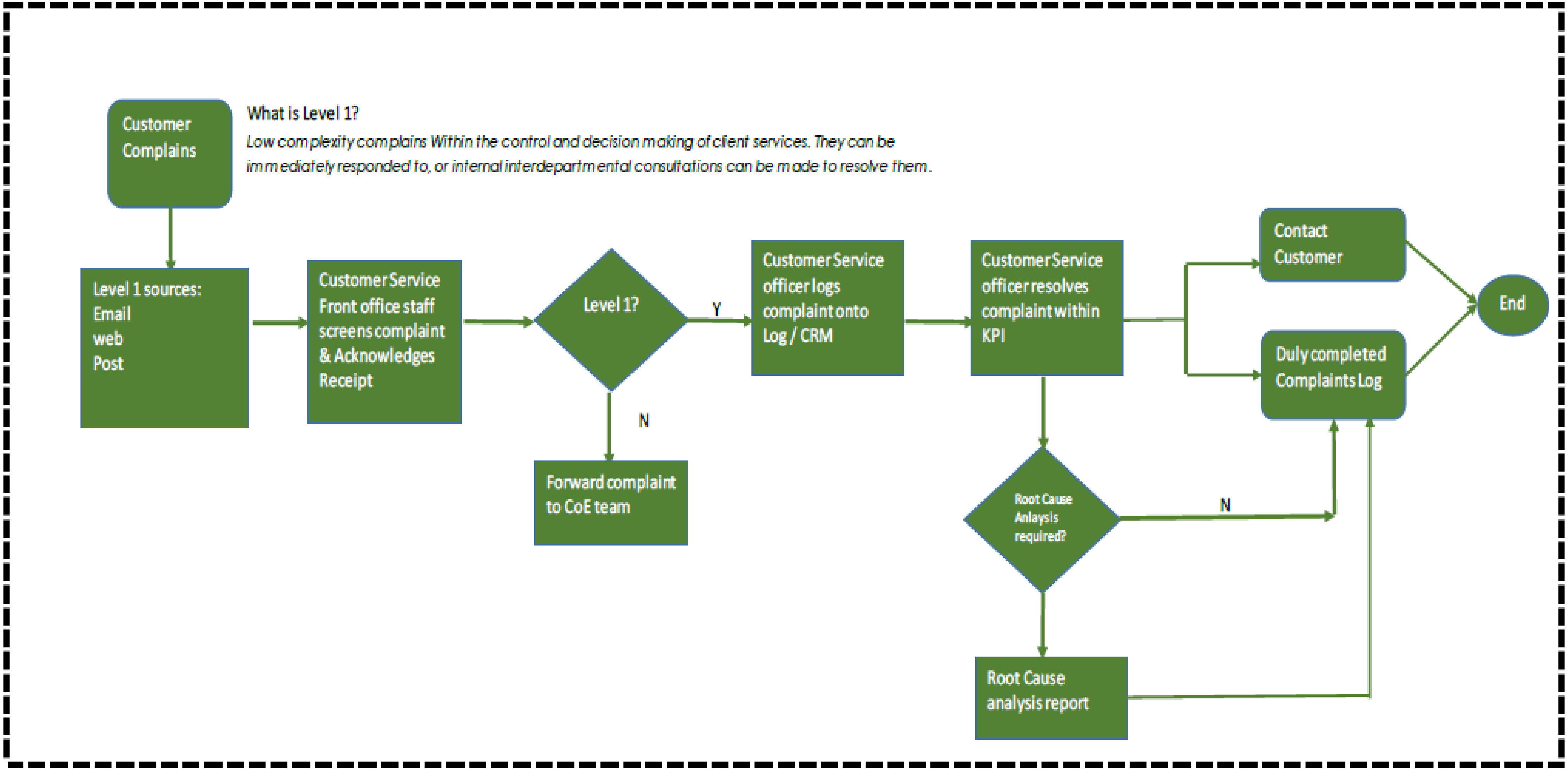
Note:

•Client satisfaction feedback call back after complaint resolution will commence in Q2. Previous practice was call back on any contact with UAPOM.

•The complaints are captured in CRM.

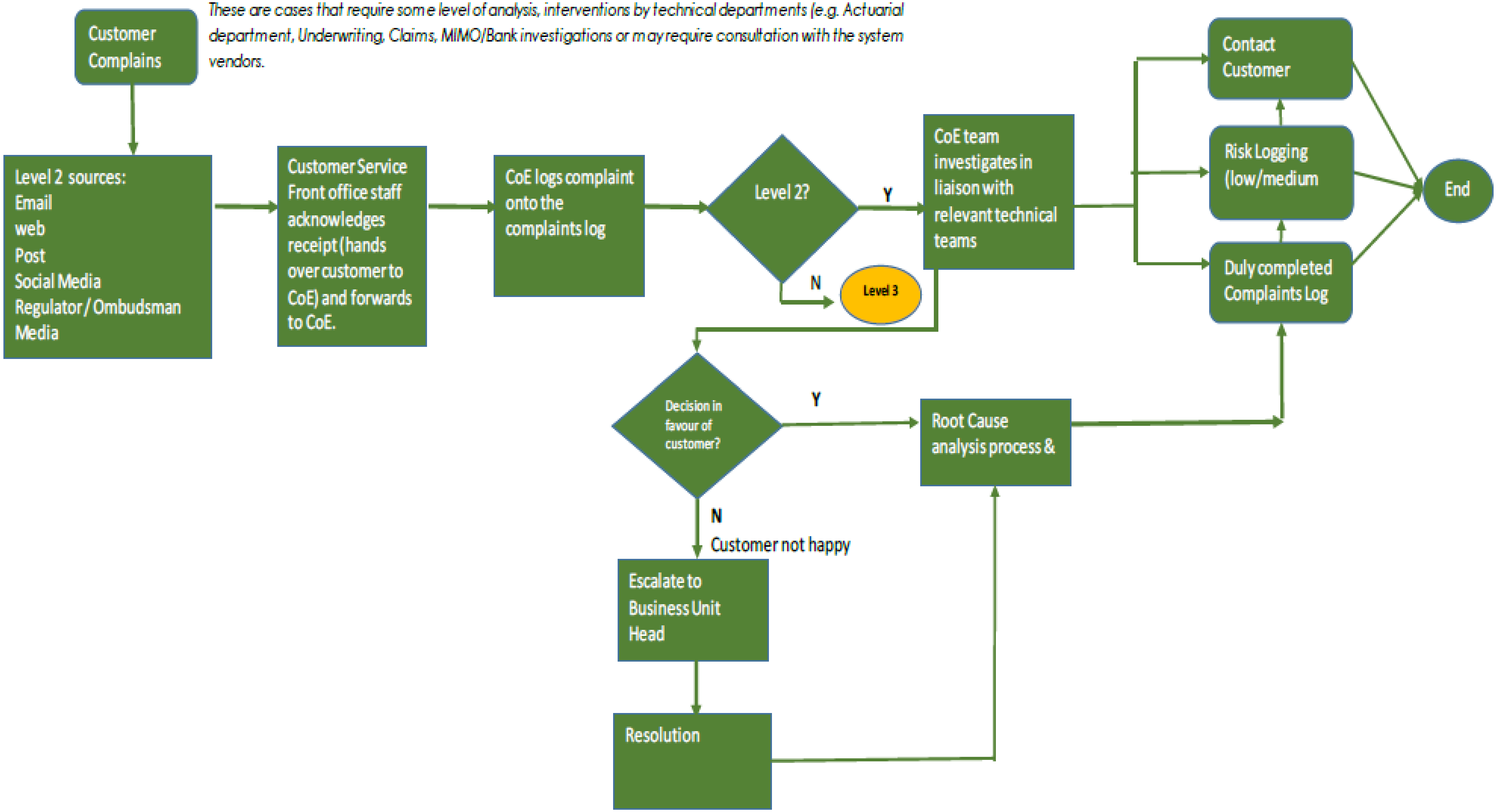
•Detractor feedback also serve as areas of improvement.

•Provided an Email address for ease of complaints


Customer Complains
What is Level 1?
Low complexity complains Within the control and decision making of client services. They can be immediately responded to, or internal interdepartmental consultations can be made to resolve them.
Level 1 sources: Email web Post
Customer Service Front office staff screens complaint & Acknowledges Receipt
Level 1?
Y
N
Forward complaint to CoE team
Customer Service officer logs complaint onto Log / CRM
Customer Service officer resolves complaint within KPI
Contact Customer
Duly completed Complaints Log
End
Root Cause Anlaysis required?
N
Root Cause analysis report

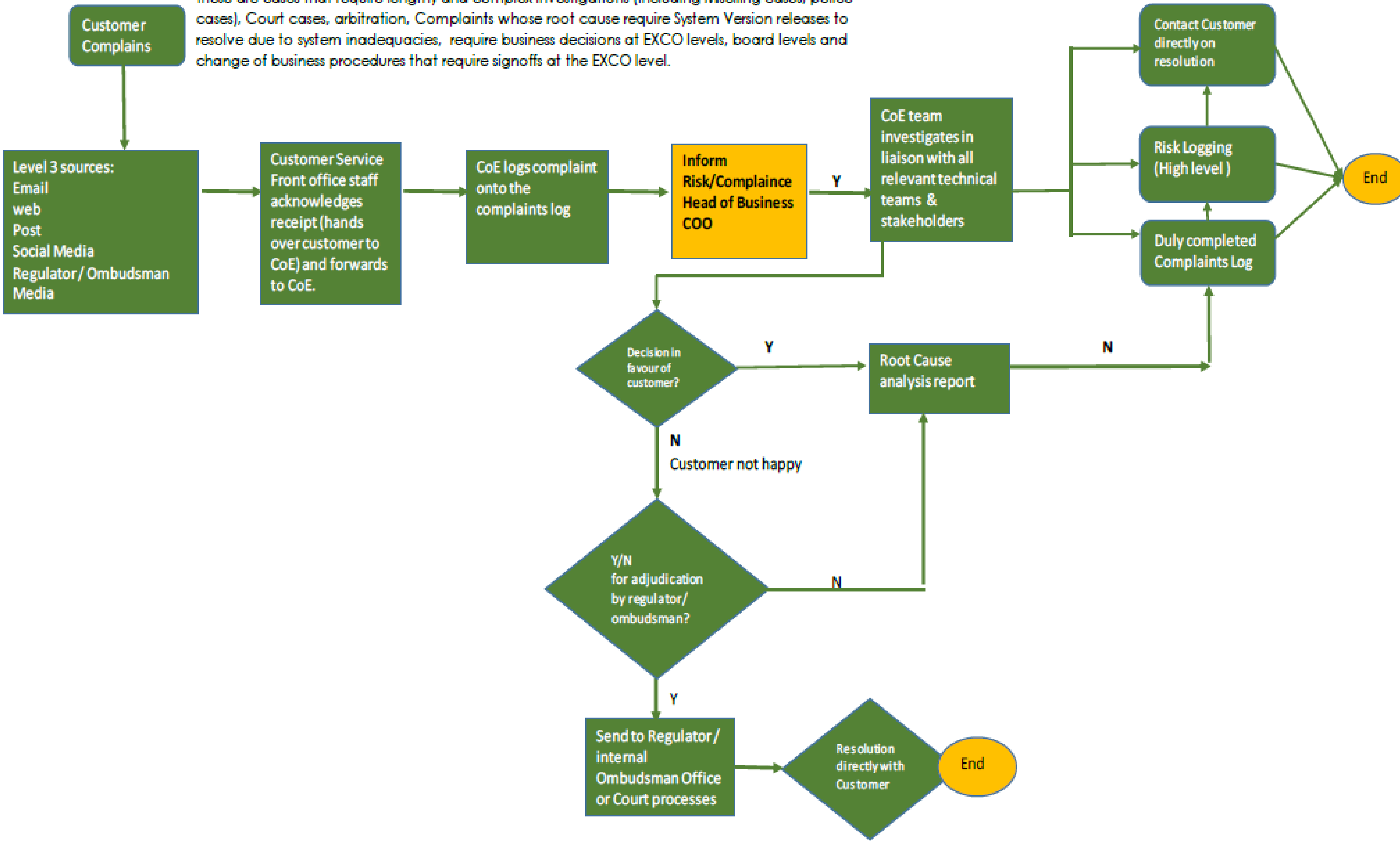
What is Level 2 ?

These are cases that require some level of analysis, interventions by technical departments (e.g. Actuarial department, Underwriting, Claims, MIMO/Bank investigations or may require consultation with the system vendors.



What is Level 3?

These are cases that require lengthy and complex investigations (including Miselling cases, police cases), Court cases, arbitration, Complaints whose root cause require System Version releases to resolve due to system inadequacies, require business decisions at EXCO levels, board levels and change of business procedures that require signoffs at the EXCO level.



Process description:

This Process Document outlines the process to follow when receiving complaints directly from a customer/intermediary (hereon referred to as Customer) into the UAP Old Mutual Complaints Management team mailbox (**complaintsgi@uap-oldmutual.com)** or General enquiries mailbox.
Customer complaints received at branches and all front facing touch points, will be sorted for complexity levels (low – level 1, medium – level 2, or high – level 3) by the Customer service officer and captured in CRM.
All level 2 and 3 complaints will be escalated to the respective line managers upon the customer service officer finding do adequate resolution criteria.
All complaints will be acknowledged as received within 5 hours of receipt into the client services mail box.
All complaints originating from the Regulator and any ombudsman office, will be deemed as level 3 complaints and must take on the level 3 process described herein.

Mail Boxes;

customerservice@uap-group.com
complaintsgi@uap-oldmutual.com

TATs;

- Acknowledgment: 2 hours upon receipt.
- Level 1 – Resolution 48hrs after receipt
- Level 2 - Resolve within 7 working days or as agreed with stakeholders
    - Follow-up's – done daily – depending on urgency can result in the case having to be walked to get it resolved or actioned.
- Level 3 – resolve within 30 working days upon receipt. Depending on complexity, e.g. court cases, or investigations, the process may take longer durations and this must be communicated to the customer and frequent updates given, as and when received.
    - Follow-up's – done weekly – as and when appropriate feedback is made.

Process steps:

1	Customer Contact	Customer contacts customer service with a complaint at the particular touchpoint; claims, underwriting etc Please note that all complaints must be in writing/converted to writing – Email, Letter, Social Media, Website, etc.
2	Logging Complaints	All complaints will be logged onto a CRM
3	Complaint Definition	A customer complaint is any indication that the service or product provided does not meet the customer's expectations, and can be expressed in the following manner: • Action that contravenes regulation - Contravened or failed to comply with a provision of a specific legislation (i.e. Laws of Kenya - The Insurance Act – Chapter 487) and that, as a result, the client has suffered or is likely to suffer financial prejudice or damage. • Customer Disgruntled / Irate • Reminders from customers – irritated/ frustrated - A second request or query on the same issue, not addressed within the agreed service time, is a complaint. • Expression of Criticism • Expression of dissatisfaction • Customer Grievances • Customer Protests • Customer Objection or concerns about process /procedure/advice • Customer Unfairly treated • Customer Unprofessionally treated • Negative Sentiments • Breaches of Customer Privacy, Confidentiality and Loss of Data • Claims - Non-Disclosure / Voiding • Alleged Fraud or a transaction where the customer alleges fraudulent activity involved. • Not Meeting Service Levels (SLAs) • Negative Sentiments towards Staff Behavior - No feedback to customers, not returning phone calls or e-mails, no consistency in dealing professionally with customers, rudeness, general attitude problems.

Process steps:

4	Quality Assurance	The Customer Experience team champions/ manager will do proper screening of all complaints logged to ensure that the complaint is correctly classified and referred to the correct level. Business line manager will review the log to ensure that all pertinent data is duly filled out and proper actioning of items is happening
5	Complaints Levels 1	**Level 1** – Low complexity complaints. • **Level 1 definition:** Within the control and decision making of client services. They can be immediately responded to, or internal interdepartmental consultations can be made to resolve them. • Complaints that **qualify as Level 1:** ✓ Statements non-receipt. ✓ Letters / notification non-receipt. ✓ Enquiries with negative sentiments connotation. ✓ Reminders ✓ Expressions of Criticism – require immediate action and apologies and can be resolved at point of contact. ✓ Expressions of dissatisfaction – require immediate action and apologies and can be resolved at point of contact. • **Resolution KPI:** These cases have a resolution KPI of 48hrs from date received. • **Level 1 complaints Decentralized** – These will be decentralized to front office staff vis. Customer service officers, branch support officers, call center agents. • **Who deals with Level 1 complaints** ✓ Customer Service managers - Owners ✓ Customer Service team leaders – Leads ✓ Customer service officers ✓ Branch support officers • **Root Cause Analysis**: In cases where a complaint is persistent, i.e. has been resolved two times, **ROOT CAUSE** analysis must be carried out for permanent resolution. • All level 1 complaints will be resolved and communicated to customers by front office staff. • All complaints must be responded to and closed via written mode – letter, or email.

Process steps:

6	Complaints Level 2	• **Level 2** – Medium complexity complaints • **Level 2 definition:** These are cases that require some level of analysis, interventions by technical departments (e.g. Actuarial department, Underwriting, Claims, MIMO/Bank investigations or may require consultation with the system vendors. • Complaints that qualify as Level 2 complaints: ✓ Case that require investigative analysis with technical teams and ✓ System vendors. ✓ Social Media complaints ✓ Customer grievances and protests of any form of injustice, or unfairness or unprofessionalism. ✓ Contentions with policy status ✓ Staff Errors ✓ Delayed payments ✓ Contract Documents – Loss or misplacements ✓ Customer Objection or concerns about process /procedure/advice ✓ Breaches of Customer Privacy, Confidentiality and Loss of Data. ✓ Claims - Non-Disclosure / Voiding. ✓ Not Meeting Service Levels (SLA). ✓ Negative Sentiments towards Staff Behavior • Resolution KPIs - These cases have a KPI of up to 10 working days for resolution. • All Level 2 complaints will be forwarded to the Complaints Champions teams for follow-up, investigations, communication/updates and closure with customer. • All resolutions must be done in writing. • Who deals with Level 2 complaints ✓ Customer Experience manager/BU Champion – owner (as is applicable) ✓ Customer Service manager – Owner (as is applicable) ✓ COO/ Head of Operations – FYI unless escalated for intervention by Customer experience / service managers. • All complaints must be responded to via written mode – letter, or email. • Root Cause Analysis and LEAN problem solving techniques must be applied and completed for top three (3) level 2 issues.

Process steps:

7	Complaints Level 3	• **Level 3 –** Complex complaints
		• **Level 3 definition:** These are cases that require lengthy and complex investigations (including Miselling cases, police cases), Court cases, arbitration, Complaints whose root cause require System Version releases to resolve due to system inadequacies, require business decisions at EXCO levels, board levels and change of business procedures that require signoffs at the EXCO level.
		• Complaints that qualify as Level 3 complaints:
		    ❖ Category 3 (a)
		        ✓ Miselling/ misappropriation cases
		        ✓ Actions that contravene regulation
		    ❖ Category 3 (b)
		        ✓ Alleged Fraud or a transaction where the customer alleges fraudulent activity involved.
		        ✓ Breaches of Customer Privacy, Confidentiality and Loss of Data.
		        ✓ Legal Law Suits.
		• Resolution KPIs – Category 3(a) cases have a KPI of up to 30 working days for resolution, while Category 3 (b) will be advised as and when progress is made. Customer engagements must be kept as frequent as weekly.
		• All Level 3 complaints will be forwarded to the Complaints Management team for follow-up, investigations, communication/updates and closure with customer.
		• All level 3 customers must be handed over from customer service to the complaints management team and customer informed accordingly.
		• All resolutions must be done in writing.
		• Who deals with Level 3 complaints
		    ✓ Customer Experience manager /Champion– owner (as is applicable)
		    ✓ Customer Service manager – Owner (as is applicable)
		    ✓ Complaints Management Team
		    ✓ COO & Head of Operations – FYI unless escalated for intervention by Customer experience / service managers.
		    ✓ Risk & Compliance Managers.
		• Must be included in the Risk logs.
		• Must be escalated to Heads of businesses.
		• All level 3 complaints must have complete incidence reports.
		• All level 3 complaints must have a full root cause analysis and countermeasures implemented to eliminate or minimize repeatability.
		• All level 3 complaints must be responded to and closed in writing – vide letter, or email.

Process steps:

8	Reporting	All Complaints are consolidated by the Complaints Management team (level 1 – 3) and reported at Weekly team meetings, Monthly Manco Meetings, EXCO, Customer Sub Committees, Customer Committee affairs, Customer Forums.
9	Action At Level 1	• Acknowledge receipt to the customer within 2 hours of receipt. • Case to be placed with the correct Level team on the day of receipt of the complaint - Sort the complaints – level 2 and 3 need to be forwarded to complaints@uap-oldmutualkenya.com – the CM team. • Update complaints dashboards as required. Level 2 and 3 complaints will be updated onto the log by the CM team. • Complaints Assessor (at CMT) actions the complaint within stipulated KPIs. • The assessor will source the information • Understand the customer need and expectation • Update customer with relevant feedback. • Update all relevant MIS • Root Cause Analysis where applicable • In level 3 cases, ensure risk and compliance have line of sight every step of the way. This includes review of all communication to the customer.
10	Follow-up's	□ All level 2 and 3 cases should be touched at least every 3rd day. □ Delays refer to any time delay outside of the box SLA or promised dates to customers.
11	Telephonic resolution (if Regulator allows direct interaction with customer)	Use the recorded lines □ Assessor must ensure the customer is informed that the call is being recorded for quality purposes upfront □ Client to be authenticated □ Positioning of call □ Point of contact resolution (POCR) if possible □ Use professional telephony skills at all times
12	Stakeholders	Consult relevant stakeholders/clients to ensure appropriate understanding of complaint and resolution
13	Extensions	• You must inform the customer if you are not able to resolve the complaint within the SLA and then renegotiate a new date. Ensure that the customer is kept informed at all times. Send the client an e-mail after the conversation if this negotiation is done telephonically. • Extension should be requested before the end of the SLA or stipulated deadline by regulator by the legal and compliance units.

Process steps:

14	Case Completion	Check that all MIS fields in the log are updated and duly completed. Prepare response and attach all relevant annexures for audit purposes especially for all level 2 and 3 complaints. If the matter is resolved in favor of the customer (wholly or partially), or not in favor, the customer is informed both telephonically and in writing – email or letter, based on client's preference. If the matter is not resolved in the customer's favor, the matter can be escalated to the regulator or an arbitrator as advised by customer. The use of the internal arbitrator will be at the business's discretion.

FORMULATING YOUR RESPONSE:

1.Ensure that a comprehensive, factual response is sent to the client, the regulator as the case may be. In the case of use of the Internal Arbitrator's office (depending on the outcome, i.e. in favor of customer or Old Mutual), a copy is sent to the office.
2.Presentation of response is professional yet easy to read and understand by the customer. Ensure that the response is checked for Spelling and Grammar.
3.Reference appropriate legislation where applicable.
4.Make sure that all proof or supporting documentation is Annexed that is referred to in the response
5.Ensure to collect NPS / NES (where applicable) feedback from customer.
6.If you cannot get hold of customer telephonically, use the email address provided.
7.Consult relevant stakeholders/clients to ensure appropriate understanding of complaint and resolution

Systems & Process steps summary:

1. Access CRM tool – ensure case is assigned to you – when built is complete
Access Complaints log and ensure case is assigned to you.

2. The comments captured on Log or CRM tool should be an investigative report (applicable to level 3) on each complaint so that the reader or anybody taking over the complaint should not do a full investigation again.

3. Ensure all fields of the complaints log/CRM tool are completed and check if the root cause analysis has been duly done and completed as required.
Ensure that the Findings and Learnings to Business is completed especially for complex complaints.

COMPLAINTS MANAGEMENT TEAM

1. Departmental complaints handling champions
2. Departmental Managers & GMs
3. Managing Director

Co-ordination; Information Centre/OPEX Departments