

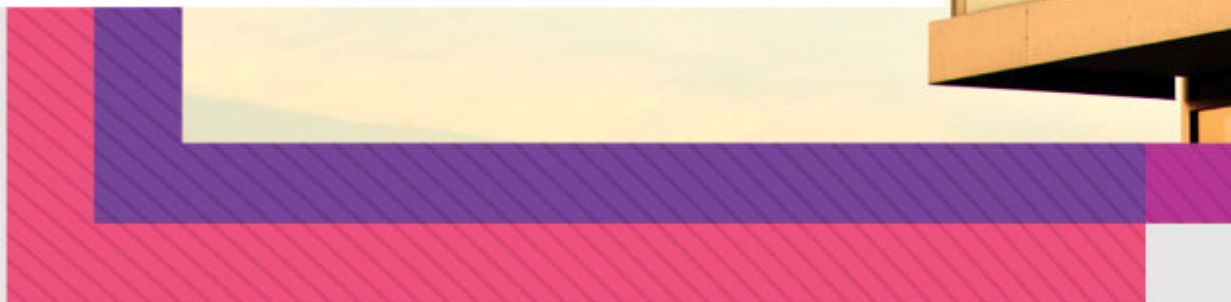


**WTW Insurance and Reinsurance Brokers  
Philippines, Inc.**

# Complaints Handling Policies and Procedures

**December 2023**

[wtwco.com](http://wtwco.com)



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## Section 1: Policy Statement

WTW Insurance and Reinsurance Brokers Philippines, Inc. (WTWIRBPI) herein referred to as “Company” values its customers by providing avenue to log their feedback as well as concerns to the services provided. This policy establishes guidelines to institutionalize client protection as an integral component of corporate governance and risk management as a insurance and reinsurance broker. This policy aims to:

- Ensure adequate client protection against unfair business practices;
- Achieve fair and beneficial client outcomes;
- Empower clients by providing complaints handling mechanisms.

## Section 2: Scope and Coverage

These policies and procedures cover only the services and products offered by WTW Insurance and Reinsurance Brokers Philippines, Inc. (WTWIRBPI). This does not apply to complaints against products and services offered by insurance companies. More importantly this does not cover claims filed against insurance companies or carriers.

## Section 3: Terms for Reference

Term	Description
<b>Financial Consumer/Client</b>	refers to a person or entity, or their duly appointed representative, who is a purchaser, recipient, or prospective purchaser or recipient of financial products or services regulated by the Insurance Commission. It shall also refer to any person, natural, or juridical, who had or has a current or prospective financial transaction pertaining to financial products or services regulated by the Insurance Commission.
<b>Financial Service</b>	refers to services regulated by the Insurance Commission including but not limited to insurance, reinsurance, and HMO. This also includes digital products or services which pertain to the broad range of financial services accessed and delivered through digital channels.
<b>Complaints</b>	refers to an expression of dissatisfaction submitted by a financial consumer relative to a financial service rendered by WTWIRBPI.
<b>Marketing</b>	refers to the act of communicating, offering, promoting, advertising, or delivering financial services by WTWIRBPI.
<b>Market Conduct</b>	refers to the manner by which WTWIRBPI designs and delivers its services and manages its relationships with the client and the public.

## Section 4: Fair and Equitable Treatment of Clients

WTWIRBPI Employees shall ensure that the right of every financial consumer be treated fairly, honestly, and professionally, at all stages of the transaction. Employees shall be guided and governed by the values as well as the measures enshrined in our Code of Conduct.

## Section 5: Disclosure and Transparency

WTWIRBPI Employees shall ensure that the financial consumers are fully informed about the services and products to be provided by the insurance companies/carriers for the latter to have an informed decision. All information relating to the products and services shall be disclosed to the Client by providing the Client with a ready access information that accurately represents the totality of the products and services.

## Section 6: Data Privacy and Protection

WTWIRBPI seeks to comply with Data Privacy Act of 2012 and is committed to safeguarding the privacy and confidentiality of personal information. All queries and concerns relating to privacy issues or breaches are dealt with promptly and transparently by the Data Protection Officer of WTWIRBPI.

## Section 7: Sources of Complaints

Complaints as herein defined may originate from any of the following:

- Email
- Postal Mail
- Website
  
- Net Promoter Score Survey
- Social Media (if applicable)
- Online Video/Chat

Once a complaint is received from the channels above, the Complaints Handler shall log the same and escalate the same to the concerned Line of Business.

## Section 8: Roles and Responsibilities

Role	Responsibilities
<b>Board of Directors</b>	<ul style="list-style-type: none"> <li>a. Approval of the policies and procedures.</li> <li>b. Ensuring adequate provision of resources and effective implementation of training and competency requirements for officers and personnel.</li> <li>c. Periodically reviewing the implementation of the complaints handling policies and procedures including how findings are reported and whether the audit mechanisms in place provide adequate oversight to the complaints received by WTWIRBPI.</li> </ul>
<b>Senior Management/LoB Leaders</b>	<ul style="list-style-type: none"> <li>a. Ensure that adequate systems and controls are in place to promptly identify issues that affect the Client across all phases of the relationship with the Client.</li> </ul>

	<ul style="list-style-type: none"> <li>b. Ascertain that weaknesses in the client protection practices or client protection emerging risks are addressed and/or corrective actions are taken in a timely manner.</li> <li>c. Ensuring that the complaints received are addressed and resolved within the timeframe provided.</li> </ul>
<b>Complaints Handler</b>	<ul style="list-style-type: none"> <li>a. Logging and managing the complaints in the Complaints register.</li> <li>b. Ensure that the principles enshrined on the policies and procedures are complied with.</li> <li>c. Ensure proper escalation to the Sr. Management and the Lines of Business Leaders.</li> </ul>
<b>Marketing</b>	Ensure that the communication materials are free from false, misleading, or does not contain deceptive statements or omit key information that may materially and/or adversely affect the decision of the Client to avail of a service.
<b>Legal</b>	If a complaint was identified as an Errors and Omissions (E&O) incident, Legal will take control of the matter and advise the procedure to follow including documentation to be sent, etc.
<b>Compliance</b>	<ul style="list-style-type: none"> <li>a. Provide guidance and assistance in updating the policies and procedures.</li> <li>b. Ensuring that all employees are aware of the measures enshrined in the local policies and procedures.</li> <li>c. Investigating the complaints and helping the business in reporting the complaints incidents to the Board and the Insurance Commission (if applicable).</li> </ul>

## Section 9: Handling Process

### Section 9.1: Complaints Register

Complaints Handler are responsible for entering accurate complaint details on the Register; all complaints must be logged as soon as possible and no later than 48 hrs. from receipt or notice from the Clients. Copies of the correspondences, documents, transcripts or any relevant files and letters sent by the Client must be attached to the Register as a record.

### Section 9.2: Turn Around Time (TAT)

Pursuant to the requirements of Insurance Memorandum Circular Letter No. 2023-01, the following shall be the turnaround time for the following concerns:

Type	Turn Around Time (TAT)
<b>For Complaints or requests</b>	

<b>Logging of the complaints</b>	Simple	Within 2 working days from the receipt of complaint.
	Complex	Within 2 working days from receipt of complaint
<b>Processing and resolution (assessment, investigation, and resolution)</b>	Simple	Within 7 working days from receipt of complaint
	Complex	Within 45 working days from receipt of complaint
<b>Communication of resolution to requesting Client</b>	Simple	Within 9 working days from receipt of complaint
	Complex	Within 47 working days from receipt of the complaint
<b>For other inquiries</b>	Next Business Day (unless there is a fortuitous event experienced by WTWRBPI)	

### Section 9.3: Investigation

When a complaint is not resolved with the period provided in preceding section, the Compliance Officer shall conduct a full investigation of the complaint and determine whether there are regulatory exposures.

### Section 9.4: Complaint Logging and Management

When an employee received a complaint, the Complaints Handler shall acknowledge the receipt of the complaint in writing and immediately inform the concerned business unit.

After receiving and acknowledging the complaint, the Complaints Handler shall log the complaint in the **ServiceHub** and provide the necessary information needed.

Complaints Handler shall observe the minimum turnaround time provided under sec. 9.2 of these policies and procedures.

Complaint Handler shall inform the Client within five (5) business days on the progress of the complaint filed. In cases where the complaints cannot be resolved in the period provided, then, the Complaint Handler shall inform the Client in writing.

### Section 9.5: Complaint Forwarding

If the complaint is about or relates to a third-party e.g., the insurance company, it must be referred to the insurance company concerned. The Complaint Handler shall inform the Business Leader of the referral and shall inform the Client in writing that the complaint filed was referred to other party which can properly address or resolve the complaint.



## **Section 9.6: Complaint Resolution**

All complaints received shall be communicated to the business unit concerned and informing the local management of such.

The head of the business unit concerned is responsible for informing the Client of the outcome of the complaint filed. The decision of the business unit shall be made in writing, informing the Client whether it accepts, rejects, or offers redress for the complaint.

## **Section 10: Complaints Data Base and Root Cause Assessment**

All complaints, including those resolved informally, are required to be logged on the Complaints Database. The purpose of this is to keep a central log of all complaints received by WTWIRBPI, as well as to allow trends to be analysed and to facilitate WTWBPI's regulatory reporting requirements to the Insurance Commission. The format of reporting can be found in **Annex A** of this document.

### **Section 10.1: Complaint Database**

The Business and the Complaints Handler are responsible for entering the complaints details in the Service Hub or in the dedicated database for complaints. All complaints must be logged as soon as practicable and without delay. Subject to confidentiality or data protection requirements, copies of key correspondence related to a complaint must be attached to the database record. This includes the original complaint, any relevant file notes, and any letters sent to the complainant by WTWIRBPI. Once the complaint has been concluded the Complaints Handler will close the complaint in the database.

### **Section 10.2: Root Cause Assessment**

The Complaints Handler must investigate complaints, identify the root cause, and recommend corrective action as well as looking into systematic problems.

## **Section 11: Errors and Omissions**

An Errors or Omissions (E&O) situation is something which results in: (a) a claim against WTWIRBPI; (b) a notice given to WTWIRBPI; or (c) circumstances that may give rise to a claim against WTWIRBPI. Where the matter complained about has the potential to fit this E&O definition, or where there is any reference to taking legal action against WTWIRBPI, the Compliance Officer must contact their legal representative as soon as possible, preferably in email or by phone. Where a complaint is also logged as a potential E&O, Legal should be involved at all stages and no admission of liability should be made without their agreement. Where a complaint is referred to the Legal Department as an E&O incident, Legal will take control of the matter and advise the procedure to follow, including documentation to be sent etc.

## **Section 12: Document Review**

These policies and procedures shall be reviewed annually or whenever there are new regulatory requirements from the Insurance Commission.