## **Internal Dispute Resolution Procedure**



At Bernie Lewis Home Loans we acknowledge that, though the highest standard of work is expected of our people, things don't always go to plan. When they don't it's important to know where you stand, and what we'll do to resolve the problem, so in the following paragraph's we've outlined our approach to complaint management.

We adopt the definition of a complaint prescribed by the regulatory body as; 'an expression of dissatisfaction made to or about an organisation, in relation to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required'. In order to comply with our obligations in this regard, the following procedure details the steps, actions and owners within the Bernie Lewis Home Loans Internal Dispute Resolution process.

In addition to the steps outlined in the following table, it is business practice that any and all concerns surrounding a potential complaint should be raised and acknowledged immediately, with precedence given over any existing business procedure.

Through this process, all business procedures can be reviewed and updated to ensure the potential for a compromised Client experience is mitigated. Adherence to our complaints policy and the behaviors that surround it is an integral step in generating opportunity for our business to develop and grow.

In the first instance, complaints will be managed by the Complaints Manager, with responsibility passing to their deputy in times of absence. All notes recorded concerning complaints will be updated in the Complaints Log by one of these individuals, including attachments of all relevant correspondence. The Complaints Log is monitored on a quarterly basis, or as complaints are received – whichever is more frequent.

Any complaint received will be acknowledged, verbally or in writing (via email, post, or social media channels) within 24 hours of receipt. The Client will be regularly informed during the complaints process, and written acknowledgement will be provided to summarise the complaint detail, as well as outlining the action/s that Bernie Lewis Home Loans proposes to take or has already taken to resolve the issue.

The Complaints Manager is empowered to make binding decisions on the company and has discretionary power to investigate the waiver of fees or consider compensation should it be deemed appropriate.

A written copy of our IDR Policy is available to all Clients on request, and the policy can also be accessed via our website located at www.bernielewis.com.au.

As a further commitment to our customer service experience, Bernie Lewis Home Loans and each accredited Broker are corporate members of the Australian Financial Complaints Authority (AFCA). As part of our External Resolution Process, AFCA provides its members and customers with an alternative method for resolving their disputes efficiently and independently of the legal system, and this service can be employed if we are unable to resolve a complaint internally. AFCA's service is approved by the industry regulatory body ASIC, and is available free of charge to the consumer.

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Step	Action	By Whom	Timeframe
Receive Complaint	Inform the Client of the name and direct telephone contact details of the Chief Operations Officer.  In some circumstances, the receiver of the call may be able to resolve the Client's concern. (e.g. If a correction is required to be made to our records or a simple apology is sufficient. In these instances, escalation to the Chief Operations Officer may not be required).  Complaints may be presented by any reasonable means. (e.g. By letter, telephone, in person, via email or social media). However, written confirmation of the details surrounding the complaint may be requested to assist with full investigation.	Staff Member who receives the complaint.	Immediately.
Acknowledge Complaint	Acknowledge the complaint (typically via the same means it was received), advising what is being done about it and requesting further information if necessary.  Record the details in the Complaints Log.  Provide a communication outlining the details of the complaint and our next actions to the Client.	Chief Operations Officer (or Deputy).	Promptly, even if the complaint has already been resolved). Written correspondence will be provided within 24 hours when required.
Investigate Complaint	The Chief Operations Officer (or Deputy) will investigate the complaint and establish a proposed solution.	Chief Operations Officer (or Deputy).	Within 48 hours where all required information is immediately available.
Respond to Complaint	Provide a substantive response in writing and give reasons for the decision. These must adequately address the issues raised in the complaint and, where practicable, refer to applicable provisions in legislation, codes, standards or procedures.  A complaint will be considered to have been 'substantively responded to' if we have:  accepted the complaint and, if appropriate, offered redress offered redress without accepting the complaint, or rejected the complaint.  If this is not possible within 14 days, we will advise the Client of the reasons for the delay.	Chief Operations Officer (or Deputy).	As soon as possible. Within 14 days of receipt (unless otherwise communicated), up to a maximum of 30 days.
Notify Professional Indemnity Insurer	Consideration will be given as to whether the matter could give rise to a claim, and if so notification will be given to the professional indemnity insurer, and/or legal advice sought.	Chief Operations Officer (or Deputy).	Within 48 hours where a determination of potential risk is established.
Client Not Satisfied	Inform the Client of the dispute resolution process available to them free of charge under the provisions of AFCA. Support the Client in the required steps to lodge their complaint and facilitate the process if the Client elects to follow this path.	Chief Operations Officer (or Deputy).	Within 48 hours of the Client's advice that they are not satisfied with the proposed resolution and would like to seek further mediation.