



## COMPLAINTS PROTOCOL

**September 23, 2023**

CCRIF SPC recognizes the need for transparency and fairness in its operations. This document sets out and establishes a protocol to be followed when a complaint is received from any party other than a policyholder<sup>1</sup>. In this Protocol, “complaint” refers to an expression of dissatisfaction with CCRIF, specifically,

- the Board or Directors, staff or service providers
- Operations
- Disputes
- any matter not related to Payouts or Claims Administration

This Complaints Protocol provides a process for receiving, recording, tracking and dealing with complaints which may arise if CCRIF has allegedly acted or omitted to act unfairly resulting in

- i. mistakes or a lack of care
- ii. unreasonable delays
- iii. unprofessional behaviour
- iv. bias and
- v. a lack of integrity

Concerns or questions received verbally would be classified a query until received in writing.

All complaints should identify the affected party making the complaint (the person/party writing must have a direct interest or be instructed by a person/party who has a direct interest in the subject matter of the complaint).

*CCRIF will accept anonymous complaints and will carry out an investigation if enough information is provided.*

The complaint should provide all relevant particulars on the substance of the matter, together with relevant documents. CCRIF will seek to resolve complaints as soon as reasonably possible.

The Complaints Protocol gives CCRIF an opportunity to remedy shortcomings or resolve potential disputes.

### **CCRIF Complaints Policy Statement**

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<sup>1</sup> CCRIF has a separate Protocol for Complaints for policyholders related to Payouts and Claims administration.

1. In accordance with CIMA's Rule and Statement of Guidance on Internal Controls for Regulated Entities (April 2023) CCIRF will maintain adequate procedures for receiving, recording, investigating, monitoring, and resolving complaints from customers. The Complaints Protocol shall be reviewed every two years.
2. CCRIF's Policy is to respond in a timely manner and to deal with complaints fairly, efficiently, effectively and consistently where a response is expected or legally required.
3. CCRIF will ensure that complaints are handled fairly, consistently, and timely and that necessary action is taken to sufficiently remediate the control deficiencies highlighted by the complaints. As an organization dedicated to the public good and benefit, CCRIF is a learning organization and uses feedback, including complaints, to constructively inform and improve its services and to maintain public confidence in CCRIF's institutions and mission.
4. Senior Management will report Complaints to the Board each quarter should complaints be received.
5. In accordance with CIMA's Rule on Corporate Governance for Regulated Entities (April 2023) each Director must make enquiries where complaints are raised and satisfy him or herself that an appropriate and timely course of action is taken to address the concern. Concerns raised and related corrective action must be appropriately documented.

## **Procedure**

- 1 The CCRIF website will include a section on *How to Make a Complaint*. Complaints should be sent by email to the attention of the CCRIF CEO to the email address [complaints@ccrif.org](mailto:complaints@ccrif.org). The subject line should state the topic of the complaint and include the country name/affected party. The complaint must be written down with reasonable detail regarding the facts giving rise to the complaint together with any time or other details of the incident that would help CCRIF investigate and address the complaint.
- 2 The CCRIF Corporate Communications Manager will assign an identification number to the complaint and record details such as receipt date, information about the sender of the complaint (country, organization etc), type of complaint, issues to be addressed and status.
- 3 The complaint will be acknowledged within 24 hours of receipt via email by the CCRIF Corporate Communications Manager. The Corporate Communications Manager will send the complainant details explaining how the complaints procedure works. In each case, the complainant will be advised that the fact that a complaint on alleged matters is accepted or being investigated, does not constitute admission of any fault, wrongdoing or legal liability on behalf of CCRIF.

- 4 CCRIF may contact the complainant for clarifications and to inform of the process that will be undertaken to investigate and formulate a response and action plan, if required, to address the complaint.
- 5 The response to the complaint will be drafted by the COO and shared internally with the CCRIF CEO and Corporate Communications Manager for review. The CCRIF CEO will approve all responses which include the approved response document and any supporting documents. The response for complaints will be issued by the CCRIF CEO within 10 days.

If the complaint relates to the CEO, the Chairman will review and approve all responses. Further, for complaints about a particular individual working in or with CCRIF, CCRIF will ensure that the person handling the complaint is different from the person about whom the complaint is made.

- 6 If a complaint is deemed to be well-founded, the response would advise the complainant in writing of what CCRIF proposes to do to remedy the matter, subject to its responsibilities and obligations as well as the governing law. If CCRIF concludes that a complaint is not well-founded, the response will explain the reasons in writing.
- 7 The complainant should confirm receipt of each response from CCRIF by email sent to [complaints@ccrif.org](mailto:complaints@ccrif.org) and indicate if there are further issues or if all matters have been addressed.
- 8 The Corporate Communications Manager will maintain a complaints log to record incoming complaints and track the client requests. It will include the
  - Date of complaint
  - Source of complaint (name and contact information of member country representative)
  - Nature of the complaint,
  - Specific details of the complaint,
  - How and when the complaint was resolved,
  - Any changes implemented as a result of the complaint and procedures to implement the changes required

The complaints log will be continually updated until all matters are resolved and signed off by the CCRIF CEO.

On a quarterly basis, the CEO would report on complaints submitted and the results of the findings. The report may include information on trends in complaints, lessons learned or any prospective legal action from complainants.

## **CCRIF's Pledge**

CCRIF pledges to:

- (1) Treat all people with respect, including those who make complaints.
- (2) Comply with this policy and its procedures.
- (3) Keep informed about best practice in complaint handling.
- (4) Provide feedback to its Board regarding issues arising from complaints.
- (5) Implement applicable changes arising from complaints, if necessary, to properly address the matter giving rise to the complaint in future.
- (6) CCRIF operates consistently with good international practices regarding individual privacy; its complaint's procedures are subject to privacy and confidentiality considerations and to legal consideration as may be advised by CCRIF legal counsel.

### **General Provisions**

- This Policy pertains to the public and its interactions with CCRIF as a public-service institution. Any staff grievances are dealt with through separate mechanisms.
- CCRIF distinguishes “complaints” from general feedback that may be sent to CCRIF including opinions, comments or expressions of interest about CCRIF’s programs and services where a response is not reasonably expected or legally required.
- CCRIF will take reasonable steps to ensure that the complainant is not adversely affected because a complaint has been made by or on their behalf.

CCRIF is committed to improving its management systems and for that reason will periodically review its processes for answering and resolving complaints and implement changes as required to help CCRIF deliver its on its mission.