

## Complaints: External Dispute Resolution Procedures

PLAN Australia is committed to the effective handling of complaints and resolution of disputes and sees this as a key means of ensuring that the services offered by PLAN Australia and its finance brokers are provided efficiently, honestly and fairly.

This document outlines the dispute resolution procedures in relation to a complaint against PLAN Australia or a PLAN Australia finance broker.

PLAN Australia provides aggregation services to finance brokers across the Australian market. Professional Lenders Association Network of Australia Pty Limited (PLAN Australia) ACN 086 490 833, as trustee for the Plan Australia Unit Trust trading as PLAN Australia. PLAN Australia is a Credit Representative (No. 392535) of BLSSA Pty Ltd ACN 117 651 760, Australian Credit License 391237. BLSSA may assist us in the investigation and resolution of your complaint. Each is a member of the National Australia Bank Limited Group

### Complaints against PLAN Australia

If you have a complaint about our services, staff or the manner in which we have handled personal information about you, please contact:

1 <sup>st</sup> point of contact at PLAN Australia:	2 <sup>nd</sup> point of contact at PLAN Australia:
Complaints Officer:	Deputy Complaints Officer:
Name: Consultant, Aggregation Operations	Name: Manager, Operations and Sales Support
Phone: 1300 78 78 14	Phone: 1300 78 78 14
Email: <a href="mailto:planaustralia@planaustralia.com.au">planaustralia@planaustralia.com.au</a>	Email: <a href="mailto:planaustralia@planaustralia.com.au">planaustralia@planaustralia.com.au</a>
Mail: PLAN Australia Complaints Officer: Level 10, 700 Bourke Street, Melbourne VIC 3008	

### Complaints about PLAN Australia Finance Brokers

For complaints about one of PLAN Australia's finance broker members, who is also a credit representative of BLSSA Pty Ltd. please contact:

1 <sup>st</sup> point of contact at BLSSA:	2 <sup>nd</sup> point of contact at BLSSA:
Complaints Officer	Deputy Complaints Officer
Phone: (03) 8616 1443	Phone: (03) 8616 1443
Fax: (03) 8616 1918	Fax: (03) 8616 1918
Email: <a href="mailto:resolutions@BLSSA.com.au">resolutions@BLSSA.com.au</a>	Email: <a href="mailto:resolutions@BLSSA.com.au">resolutions@BLSSA.com.au</a>
Mail: BLSSA Advice Complaints, PO Box 626, Collins Street West VIC 8007	

For complaints against one of PLAN Australia's finance broker members who is a Credit Representative of another Australian Credit License (ACL) holder, you may make a complaint directly to the ACL holder, these details can be obtained from the finance broker or documentation supplied.

You can also contact PLAN Australia directly on the details above if you feel your complaint is not adequately addressed by the ACL Holder or finance broker.

The Complaints Officers are senior personnel in our organisation and have the necessary experience and authority to handle complaints and make relevant decisions on outcomes.

The complaint need not be in writing and may be presented to us by any reasonable means, for example letter, e-mail, telephone or in person. Please ensure you give us full particulars of your complaint.

If you are not satisfied with our response to your complaint, you may contact the complaints Authority (of which PLAN Australia and BLSSA Pty Ltd. are members) to consider the complaint on:

Australian Financial Complaints Authority (AFCA)
Online: <a href="http://www.afca.org.au">www.afca.org.au</a>
Phone: 1800 931 678 (free call)1
Email: <a href="mailto:info@afca.org.au">info@afca.org.au</a>
Mail: GPO Box 3, Melbourne VIC 3001

If the complaint is about privacy and you are not satisfied with the outcome of our investigations, you may ask the Office of the Australian Information Commissioner to consider the complaint. The Information Commissioner can be contacted online at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or on 1300 363 992.

## **Awareness**

All PLAN Australia staff who deal with (or are likely to deal with) customers, are aware of the names, titles and telephone numbers of our Complaints Officer and Deputy Complaints Officer.

Each staff member is also instructed in how to transfer a customer who has a complaint to our Complaints Officer or Deputy Complaints Officer; and what customer details to record if the Complaints Officer and Deputy Complaints Officer are for any reason unavailable (this information will include a minimum of the name, telephone number, and description of the product or transaction to which the complaint relates). PLAN Australia does not charge a fee in respect to any complaint.

## **Timelines for resolving your complaint**

We will provide a written acknowledgement of receipt of your complaint as soon as possible, unless the complaint is otherwise resolved in the meantime.

We will ensure that a final response is given to your complaint as soon as possible, but within twenty one (21), thirty (30) or forty five (45) days of receipt of your complaint. See below for further information on time frames.

If PLAN Australia or BLSSA is unable to deal with the complaint as it relates to a third party (for example, a lender), we may ask you to contact the relevant third party.

For certain types of complaints, involving “default notices” or urgent disputes such as “applications for hardship”, a final response must be provided within twenty one (21) days.

For privacy complaints, we are required to give you a final response within thirty (30) days.

Final responses to complaints not involving financial hardship or privacy issues should be received by you within forty five (45) days.

If we cannot respond to your complaint within the relevant timeframes, PLAN Australia will inform you of the reasons for the delay and of your right to refer the complaint to your EDR or, in the case of privacy complaints, to the Australian Information Commissioner.

We will provide a final response to you if we:

- (a) Accept the complaint and, if appropriate, offer redress, or
- (b) Offer redress without accepting the complaint; or
- (c) Reject the complaint.

If you make a complaint directly to your finance broker they will provide you with their expected response time frames.

### **Written Response to Your Complaint**

We will give you a written response to your complaint and the reasons for reaching a particular decision on the complaint. We will adequately address the issues that are raised in the complaint.

We will inform you of the contact particulars of our EDR Scheme and, for privacy complaints, the Australian Information Commissioner if you are not satisfied with the outcome of our investigating the complaint.

### **Remedies**

If we accept the complaint and are of the view that it is appropriate to offer redress to you, that redress may be non-financial as well as, or instead of, financial. If we consider that a financial remedy is appropriate then we will provide compensation for any direct loss or damage caused.

We will, when determining an appropriate remedy, take into consideration the extent of loss or damage suffered by you, relevant legal principles, EDR Scheme Rules, the MFAA Code of Practice and other relevant codes of conduct and concepts of fairness and relevant industry best practice.

### **Data Collection**

We will keep data concerning the complaint in such form and manner as we think fit and will enable analysis according to:

- a. Type of complaint;

- b. Subject of complaint;
- c. Outcome of complaint;
- d. Timeliness of response;

So that we can identify any systematically recurring problems, we will classify complaints accordingly.

Subject to legal constraints including our privacy obligations, we may make available data collected in respect of the complaint upon request to the EDR Scheme, of which we are a member, and the Australian Securities and Investments Commission.

### **Review**

We will review our Dispute Resolution Procedures at least every three (3) years to ensure that our complaints systems are operating effectively. This policy adheres to *RG165* which is ASIC's guide to internal and external dispute resolutions.

*This document was reviewed and updated November 2018.*