

RETIREMENT INVESTMENTS AND SAVINGS FOR EVERYONE



**Complaints Management
Framework**

RISE

RETIREMENT INVESTMENTS AND SAVINGS
FOR EVERYONE

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 COMPLAINTS ACTIVITY DESCRIPTION

Name of policy/procedure:	Complaints Management Framework
Originating department:	Compliance
Departments affected:	ALL
Compiled by:	Compliance
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Approved by:	Executive Management
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A Instruction

In terms of Section 17 (1) (a) of the General Code of Conduct “a provider must establish, maintain and operate an adequate and effective complaints management framework to ensure the effective resolution of complaints and the fair treatment of complainants”.

- All employees must read and confirm via the ISIBANI portal that they understand the contents of this procedure.
- The policy must be accessible for public inspection purpose
- Refer to the policy whenever a client lodges a query or complaint relating to a financial service rendered by RISE
- This policy must be read and understood in conjunction with the FAIS act.
- This Policy must be reviewed annually.

B Definitions

Complaint means an expression of dissatisfaction by a person to a provider or, to the knowledge of the provider, to the provider's service supplier relating to a financial product or financial service provided or offered by that provider which indicates or alleges, regardless of whether such an expression of dissatisfaction is submitted together with or in relation to a client query, that-

- (a) the provider or its service supplier has contravened or failed to comply with an agreement, a law, a rule, or a code of conduct which is binding on the provider or to which it subscribes;
- (b) the provider or its service supplier's maladministration or willful or negligent action or failure to act, has caused the person harm, prejudice, distress or substantial inconvenience; or
- (c) the provider or its service supplier's has treated the person unfairly;

Complainant means any person who has submitted a complaint to the provider and includes a;

- (a) any client of the provider;
- (b) person nominated as the person in respect of whom a product supplier should meet financial product benefits or that persons' successor in title;
- (c) retirement fund
- (d) any person who is, or who claims to be
 - i. a member, former member or prospective member of a retirement fund administered or previously administered by the provider and/or administrator
 - ii. a beneficiary or former beneficiary of a retirement fund administered or previously administered by the administrator
 - iii. nominee or dependent of a member or former member of a retirement fund administered or previously administered by the administrator
 - iv. an employer who participated in a retirement fund administered or previously administered by the administrator
 - v. a spouse or a former spouse of a member or former member of a retirement fund administered or previously administered by the administrator
 - vi. a policyholder and his/her beneficiaries for any policy administered by the provider
- (e) any group of persons referred to in paragraph (b)(i), (ii), (iii), (iv), (v) or (vi)
- (f) a board of a retirement fund administered or previously administered by the administrator or member thereof;
- (g) person whose dissatisfaction relates to the approach, solicitation marketing or advertising material or an advertisement in respect of a financial product, financial service or related service of the provider, or
- (h) any person who has a direct interest in the agreement, financial product or financial service to which the complaint relates;

Compensation payment means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant to compensate the complainant for a proven or estimated financial loss incurred as a result of the provider's contravention, non-compliance, action, failure to act, or unfair treatment forming the basis of the complaint, where the provider accepts liability for having caused the loss concerned, but excludes any-

- (a) goodwill payment;
- (b) payment contractually due to the complainant in terms of the financial product or financial service concerned; or
- (c) refund of an amount paid by or on behalf of the complainant to the provider where such payment was not contractually due;

and includes any interest on late payment of any amount referred to in (b) or (c);

FAIS Act means Financial Advisory and Intermediary Services Act;

Goodwill payment means a payment, whether in monetary form or in the form of a benefit or service, by or on behalf of a provider to a complainant as an expression of goodwill aimed at resolving a complaint, where the provider does not accept liability for any financial loss to the complainant as a result of the matter complained about;

Internal complaint and queries resolution system and procedures means the system and procedures established and maintained by the FSP in accordance with the General Code of Conduct for the resolution of complaints by clients;

Member in relation to a complainant means a member of a-

- (a) pension fund as defined in section 1(1) of the Pension Funds Act, 1956 (Act 52 of 1956);
- (b) friendly society as defined in section 1(1) of the Friendly Societies Act, 1956 (Act 25 of 1956);
- (c) medical scheme as defined in section 1(1) of the Medical Schemes Act, 1998 (Act 131 of 1998); or
- (d) group scheme as contemplated in the Policyholder Protection Rules made under section 62 of the Long-term Insurance Act, 1998, and section 55 of the Short-term Insurance Act, 1998;

Ombud means the Ombud of Financial Services Providers referred to in section 20(2) of the FAIS Act;

Pension Funds Act means the Act that governs pension funds and retirement funds;

Pension Funds Adjudicator is the Adjudicator who, in terms of Section 30(D) of the Pension Funds Act, shall be able to dispose of complaints lodged by members of the Fund

Query means a request to the provider or the provider's service supplier by or on behalf of a client, for information regarding the provider's financial products, financial services or related processes, or to carry out a transaction or action in relation to any such product or service. It is a question aimed at getting a resolution based on an enquiry raised by the client with the service provider and/or service provider's service supplier;

Rejected in relation to a complaint means that a complaint has not been upheld and the provider regards the complaint as finalised after advising the complainant that it does not intend to take any further action to resolve the complaint and includes complaints regarded by the provider as unjustified or invalid, or where the complainant does not accept or respond to the provider's proposals to resolve the complaint;

Reportable complaint means any complaint other than a complaint that has been-

- (a) upheld immediately by the person who initially received the complaint;
- (b) upheld within the provider's ordinary processes for handling client queries in relation to the type of financial product or financial service complained about, provided that such process does not take more than five business days from the date the complaint is received; or

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(c) submitted to or brought to the attention of the provider in such a manner that the provider does not have a reasonable opportunity to record such details of the complaint as may be prescribed in relation to reportable complaints;

Resolution or Internal Resolution in relation to a complaint and a provider, means the process of the resolving of a complaints through and in accordance with the internal complaint resolution system and procedure of the provider;

Rules means the Rules on Proceedings of the Office of the Ombud for Financial Services Providers, as published in the Gazette;

Upheld means that a complaint has been finalised wholly or partially in favour of the complainant and that-

- (a) the complainant has explicitly accepted that the matter is fully resolved; or
- (b) it is reasonable for the provider to assume that the complainant has so accepted; and
- (c) all undertakings made by the provider to resolve the complaint have been met or the complainant has explicitly indicated its satisfaction with any arrangements to ensure such undertakings will be met by the provider within a time acceptable to the complainant.

1. INTRODUCTION

In terms of the Financial Advisory and Intermediary Services Act (FAIS, Act 37 of 2002) every Financial Services Provider (FSP) who is authorized to provide financial advice and/or intermediary services to clients, have the duty to offer clients a formal process to resolve complaints. The complaint resolution process must offer the client the opportunity to lodge a complaint and have the complaint resolved within 6 weeks (for FAIS complaints) and/or 30 days (for Pension Funds complaints). In the event of the complaint not being resolved within the prescribed period, the client can escalate the complaint to the FAIS Ombud and/or Pension Fund Adjudicator for a final ruling. Such complaint must be lodged within six (6) months after the determination that the complaint could not be resolved by the FSP.

2. COMPLAINTS MANAGEMENT MISSION

RISE is committed to providing our clients with quality service and undertake to manage the affairs of our clients in such a way that it would not be necessary to have a complaint about our service, integrity and commitment. However should it happen that a client does have a query or complaint, we undertake to:

- ensure the effective resolution of complaints and the fair treatment of complainants that;
 - i) is proportionate to the nature, scale and complexity of RISE business and risks;
- (ii) is appropriate for the business model, policies, services, and RISE clients;
- (iii) enables complaints to be considered after taking reasonable steps to gather and investigate all relevant and appropriate information and circumstances, with due regard to the fair treatment of complainants; and
- (iv) does not impose unreasonable barriers to complainants;
 - to inform all our clients of the procedures established for the internal resolution of their queries and/or complaints, details of which will be given to them in writing;
 - to ensure easy access to our complaints resolution process at our offices, or by way of post, website, e-mail or telephone;
 - Empower and properly train the people at RISE to deal with queries and/or complaints, as well as with escalation of non-routine serious complaints;
 - Deal with queries and/or complaints in a timely and fair manner, with every query and/or complaint receiving proper consideration in a process that is managed appropriately and effectively by the responsible staff member;
 - Offer appropriate remedy in all cases where a query and/or complaint is resolved in favour of a client;

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- Inform clients of their right to refer their complaints to the FAIS Ombud and/or Pension Fund Adjudicator, should a complaint not be resolved to their satisfaction within six (6) weeks and/or 30 days (depending on the applicable law) from the date on which the complaint is received;
- Maintain records of all queries and/or complaints received for a period of 5 years, which will specify the outcome of all the complaints lodged;
- **Implement corrective action for non-compliance with the policy by RISE employees and representatives;** and
- Implement follow up procedures to
 - ✓ Implement remedial actions to prevent similar queries and/or complaints from occurring; and
 - ✓ Improve services and procedures where necessary within RISE.

3. THE DIFFERENCE BETWEEN A COMPLAINT AND A QUERY

It is important not to get a query confused with a complaint. A client may say that they are not happy about something but this does not mean that they want to make an official complaint. The complaint must not be about the financial performance of the product unless the financial performance was guaranteed or the financial performance was so deficient that it creates the presumption that there has been misrepresentation, negligence or mal-administration.

When does a query become a complaint and how do you handle a query to make sure it does not become a complaint?

A query escalates into a complaint when the client expresses their continued dissatisfaction with the situation. They will tell you that they are still not happy, or that the resolution that you put to them is not good enough.

Once a client communicates that they are not satisfied with the resolution of the query, then they should be referred to the Complaints Procedure.

4. CONDITIONS APPLICABLE TO QUERIES AND INTERNAL PROCESS

When a client raises a query about any product or services they have received from RISE, the query must be sent to the senior person responsible for the relevant fund and/or product and the Divisional Head must be copied.

The senior person is defined as Team Leader, Manager and Divisional Manager responsible for the relevant fund and/or product. The senior person must take the client's concerns seriously and provide feedback to the "Member Experience Office" ("MEO") within 24 hours. The MEO must ensure they acknowledge receipt of the query on the day of receipt and provide feedback to the client within 2 days.

Where it is not possible for the senior person to provide feedback within the stipulated time, it should be resolved within a time frame that has been communicated to the client in writing. The timeframe must include good reasons and must be agreed on by the senior person and his/her Divisional Head. The time frame should not exceed 5 days. If a client's concerns are not dealt with accurately and within the required timeline their query will quickly turn into a complaint.

The client's concerns are always important. Ensure that you understand the requirements upfront. This will lead to the resolution of the query within the stipulated timeline.

Engage with the client such that he/she knows you understand his/her concerns. If you do not feel that you can resolve the matter alone, or you think that a colleague or manager is best to deal with the client, you must refer them on the date of receipt of the query to help ensure that the client does not escalate their concerns into a complaint. Ensure that your manager is fully informed of the whole situation, including the possible resolution that you have discussed with the client.

5. CONDITIONS APPLICABLE TO COMPLAINTS

- For a complaint to be valid, the following conditions have to be met;
 - The act or omission complained of must have been done on or after 30 September 2004.
 - The complaint must be received by the Ombud/Pension Fund Adjudicator within 3 years of the act or omission that resulted in the complaint – if the complainant was not aware of the act or omission, the 3 years starts running from the date on which the complainant became aware, or from the date on which a reasonable person in this circumstance would have become aware, whichever date is the earliest.
 - If the complainant already instituted action in a court of law relating to the matter forming the subject of the complaint submitted to the Ombud/Pension Fund Adjudicator, the Ombud/Pension Fund Adjudicator will not consider the complaint.
 - RISE must have been given the opportunity to resolve the complaint first. Only if RISE failed to resolve the complaint to the satisfaction of the complainant within 6 weeks and/or 30 days (whichever is applicable) of receipt, may the complainant take the matter to the Ombud/Pension Fund Adjudicator.
 - The complainant has six (6) months after he received a final response from the provider, to go to the Ombud/Pension Fund Adjudicator.
 - Complaints must be in writing and must be accompanied by relevant documentation
 - The Ombud/Pension Fund Adjudicator may refuse to consider a complaint if he believes that the complaint should be dealt with in court

6. COMPLAINTS PROCEDURE

To ensure a quick and appropriate response to complaints, the following process should be used at all times by all relevant staff;

- The complaint must be received in writing
- If a complaint is not in writing, ask the complainant to lodge the complaint in writing or call to provide details of the complaint, including the following details of the client/member; Name, ID number, product the complaint relates to and Company that he or she worked for
- Refer the client to the website for the external complaints policy (www.RISE.co.za)
- The MEO must log the date and contents of the complaint in the Complaints Register
- Once the complaint has been logged, the complaint will be redirected to the senior person and Divisional Head responsible for the Fund/client
- The central mailbox of the relevant fund must be copied. All correspondence must be copied to the Funds' administration central mail box
- The senior person must acknowledge receipt of the complaint in writing within 2 days of receipt
- **The senior person will investigate the complaint and provide feedback to the complainant within 5 days**
- If the complaint cannot be resolved within 5 days, request supporting documentation (if any) from the client that may be necessary to resolve the matter and indicate the expected date of resolution (which should not be more than a further 5 days)
- If unable to resolve the complaint within the further 5 days, communicate to the complainant, providing valid reason why it cannot be resolved within the stipulated time frame, and advise the complainant that it will be resolved within 30 days of logging the complaint in the Complaints Register
- Once the complaint has been resolved, send the resolution to the client stating clear reasons for the outcome
- Where a complaint is upheld, any commitment to make a compensation payment, goodwill payment or to take any other action must be carried out without undue delay and within any agreed timeframes
- Where a complaint is rejected, the complainant must be provided with clear and adequate reasons for the decision and must be informed of any applicable escalation or review processes
- Update the Complaints Register with all developments/activities as you are actioning the complaint
- The senior person must close the case on the Complaints Register or via the link sent to him/her once it has been finalised
- If the client is not happy with the outcome;
 - Advise the client of his/her right to:
 - ✓ escalate the complaint to the Division Head and/or Legal Division and provide details for where such escalation may be sent to, including any relevant time frames
 - ✓ refer the complaint to the Office of the Ombud/Pension Fund Adjudicator if the complainant wishes to pursue the matter; and
 - ✓ the complainant should do so within six (6) months of receipt of such notification; or
 - ✓ seek legal redress in another forum
- If a legal complaint is referred to a Consultant, the Consultant must log a call on the BPM System, which will be allocated by the MEO to the relevant Legal Advisor.

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- **NB Complaints must not be sent directly to a Legal Advisor, as they need to be registered on the BPM system first for audit trail purposes.**

7. RISE'S RIGHT AND DUTIES

In terms of the Rules on Proceedings of the Office of the Ombud for Financial Services Providers, 2002, the Provider has the following rights and duties:

- a) RISE must be informed of the complaint submitted to the Office of the Ombud/Pension Fund Adjudicator to the extent necessary to respond thereto fully
- b) RISE is entitled to submit any fact, information or documentation in relation to the complaint and must disclose relevant information or documentation to the Ombud/Pension Fund Adjudicator
- c) If deemed necessary by the Ombud/Pension Fund Adjudicator, RISE must discuss the complaint with the Ombud and furnish such further relevant information as the Ombud/Pension Fund Adjudicator may require
- d) RISE is required to act professionally and reasonably and to cooperate with a view to ensuring the efficient resolution of the complaint

8. DETERMINATIONS BY THE OMBUD AND ITS LEGAL STATUS

- The Ombud may, when accepting a complaint in terms of section 27(5) of the FAIS Act, require the FSP to pay a case fee to the office not exceeding R1000.00
- If the complaint was not resolved through a conciliated settlement, the Ombud will make a determination which has the legal status of a civil judgment of court
- The determination can be a monetary award (not exceeding R800 000, unless the person complained against agrees to it), or any other order that can be made by a court
- An award of costs may be made against the person complained against
- An award of cost may be made against a complainant if the conduct of the complainant was improper or unreasonable, or if the complainant caused an unreasonable delay in the finalisation of the investigation

9. DETERMINATION BY THE PENSION FUND ADJUDICATOR AND ITS LEGAL STATUS

- Any determination of the Adjudicator shall be deemed to be a civil judgement of any court of law had the matter in question been heard by such court, and shall be so noted by the clerk or the registrar of the court, as the case may be
- An award of costs may be made against the person complained against
- An award of costs may be made against a complainant if the conduct of complainant was improper or unreasonable, or if the complainant caused an unreasonable delay in the finalisation of the investigation

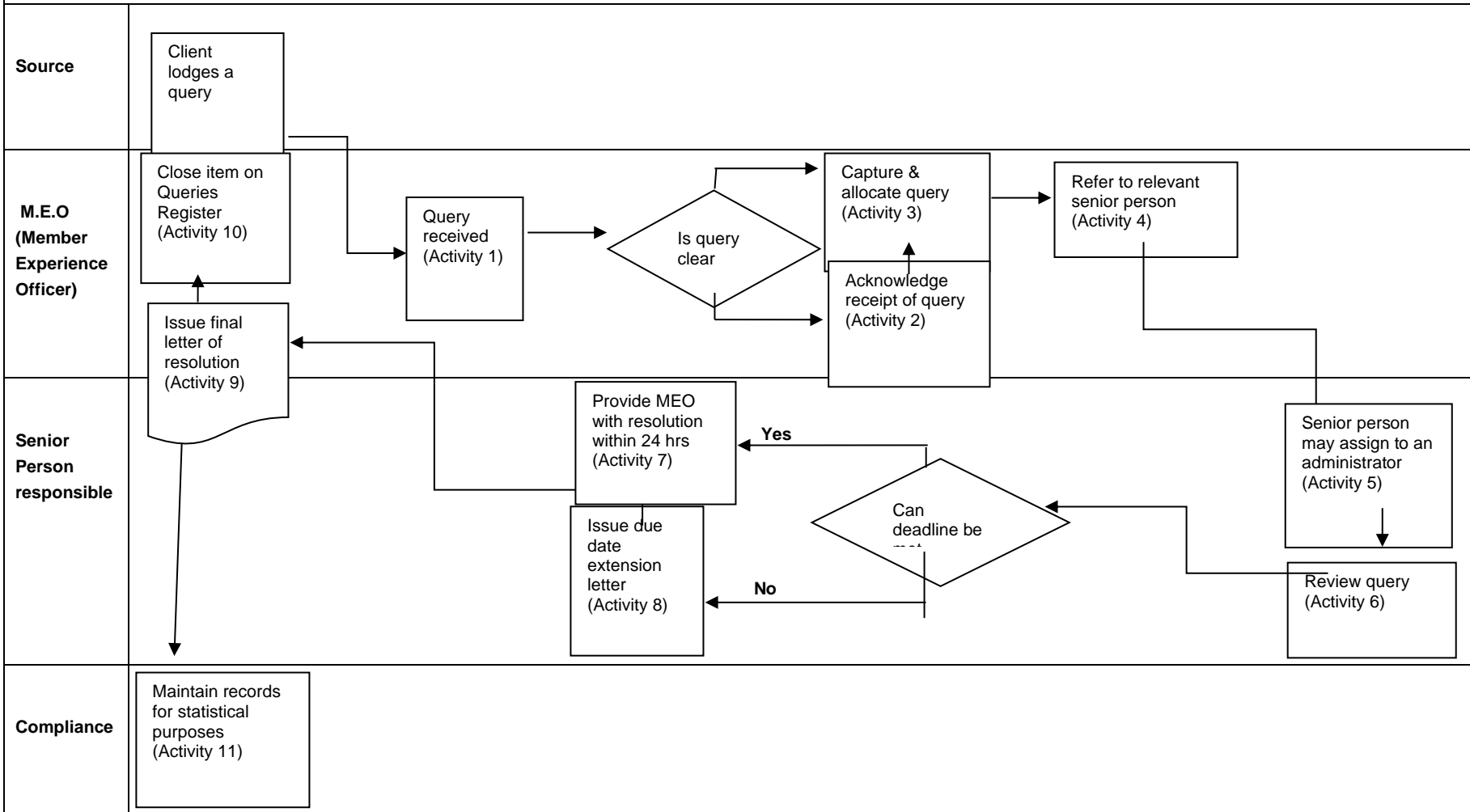
10. APPEALS OF OMBUD CASES TO BOARD OF APPEAL

- It is possible to appeal to the Board of Appeal, provided the Ombud grants leave to appeal. Application for leave to appeal must be made to the Ombud within one (1) month of the Ombud's determination. If the Ombud refuses to grant leave to appeal, an application may be made to the Chairperson of the Board of Appeal, within one (1) month of the Ombud's refusal – the applicant must inform the Ombud of his application. A determination by the Board of Appeal has the same status as a judgement of a civil court.

11. APPEALS OF PENSION FUND ADJUDICATOR DETERMINATION

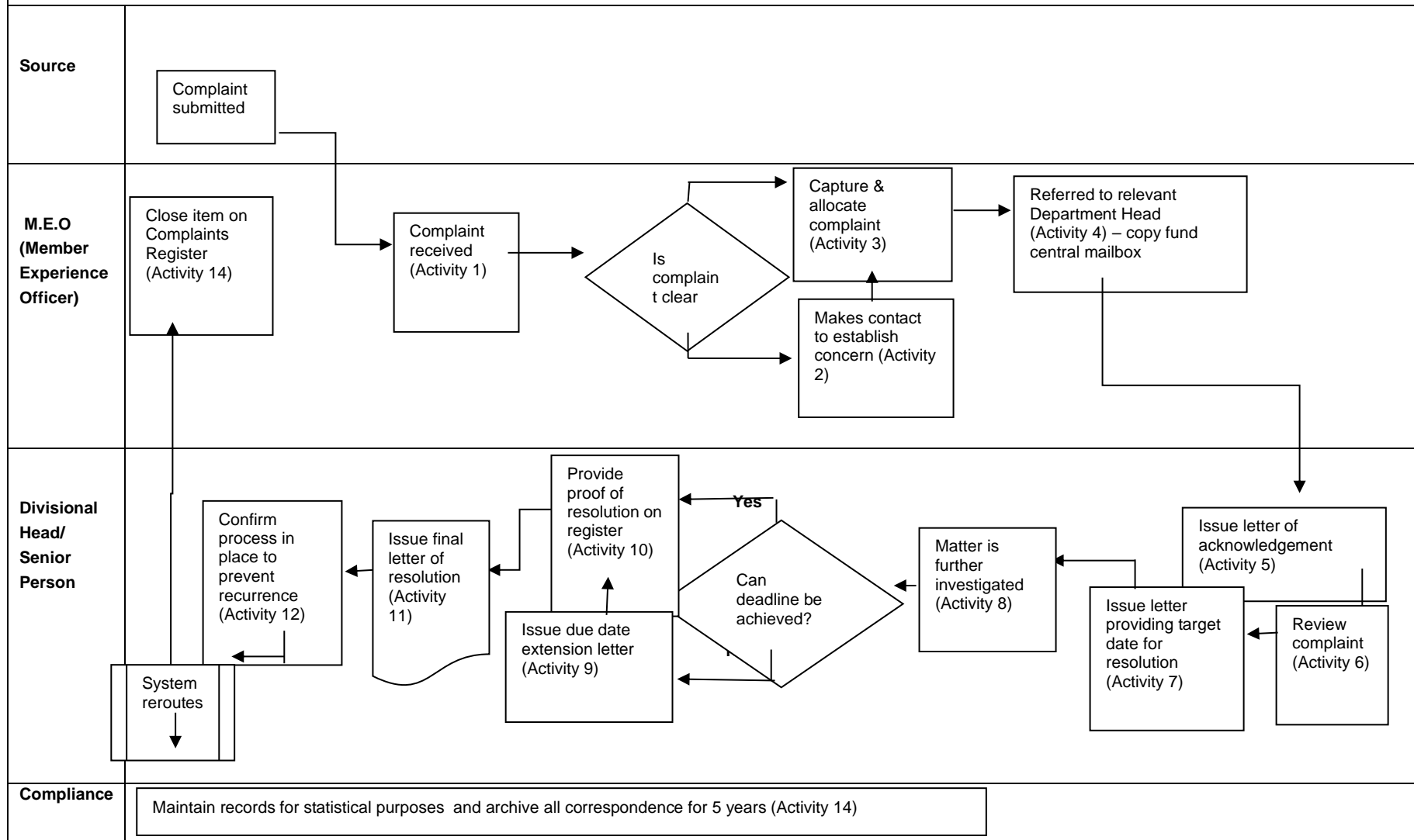
- Any party who feels aggrieved by a determination of the Adjudicator may, within six (6) weeks after the date of the determination, apply to the division of the High Court which has jurisdiction, for relief, and shall at the same time give written notice of his or her intention to apply to the other parties to the complaint
- The division of the High Court may consider the merits of the complaint made to the Adjudicator under section 30A (3) of the Pension Funds Act and on which the Adjudicator's determination was based, and may make any order it deems fit

Queries Workflow Process



Activity Number	Queries Activity Description
	The source notifies RISE of query via www.RISE.co.za or via direct correspondence. Should the query be submitted to any other source within RISE, this must be routed to the person responsible for monitoring the complaints register , MEO
Activity 1	Query is received by the Member Experience Officer
Activity 2	The MEO must send acknowledgement of receipt of the query to the client and advise the response will be provided within 2 days of receipt.
Activity 3	The query and complaint must be recorded on the Complaints register. The information is collated on the database and is based on information obtainable from the source or senior person responsible.
Activity 4	The MEO and the Divisional Head send query to senior person responsible for the fund/client (Team Leader, Manager, and Divisional Manager working/responsible for the relevant fund), and central mailbox of the fund relevant must be copied. All correspondence must be copied to the Funds' administration central mail box
Activity 5	The senior person may assign the query
Activity 6	The issue is investigated and the resolution must be returned to the senior person.
Activity 7	The query must be resolved within 24 hours and communicated to the MEO by the senior person.
Activity 8	Where it is not possible, it should be resolved within a period that has been communicated to the MEO in writing. The period cannot exceed 5 days.
Activity 9	The resolution must be communicated to the client by the senior person responsible within 2 days.
Activity 10	The Queries register must be updated with comments and effective dates and the query must be closed by the MEO on the system
Activity 11	The MEO must maintain accurate records.

Complaints Workflow Process



Activity Number	Activity Description
	The source notifies RISE of dissatisfaction via www.rise.co.za or via direct correspondence. Should the complaint be submitted to any other source within RISE, this must be routed to the person responsible for monitoring the complaints register , MEO
Activity 1	Complaint is received by person responsible for the complaints register
Activity 2	Contact is made with complainant to establish the nature of complaint/ concern.
Activity 3	The escalation/ complaint must be recorded on the Complaints register. The information is collated on the database and is based on information obtainable from the source or complaints mailbox. This mailbox must be copied on all escalation/ complaint correspondence.
Activity 4	Complaint is logged and is systematically routed to the relevant Senior Person/Divisional Head, copied to fund central mail box. All correspondence must be copied to the Funds' administration central mail box
Activity 5	A letter of acknowledgement/ holding letter must be issued by the Senior person/Divisional Head. Ensure that all correct information is detailed on correspondence (System generated letter) The Holding Letter is •To be issued within 2 days of receipt of the escalation/ complaint •Line Manager and Complaints Mailbox to be copied on all communication Target date must be provided on this letter (which is 5 working days from the day the complaint was received)
Activity 6	The issue is investigated within timeframes.
Activity 7	A resolution letter is issued. Depending on the nature of the complaint, the matter is either resolved within 5 days or a target date for resolution must be agreed upon, if this cannot be resolved within the 5 days The resolution date must specify a target date, taking cognizance on possible dependencies on other support areas (which should not be more than a further 5 days).
Activity 8	Complaint is investigated in its entirety with all pertinent information collated.
Activity 9	If the resolution of the escalation is still in progress, an "Extension of Target Date Letter" must be issued, prior to initial target date (should not be more than 30 days from receipt of complaint).
Activity 10	Provide proof of resolution. This resolution must be documented and discussed so as to prevent the issue arising again. Depending on the severity of the breach or if there is a breach, a letter of apology or resolution letter must be issued to ensure and maintain good business relations. Complaints Mailbox to be copied on all communication. Divisional Head to make courtesy call to respondent to enhance relations and to ensure that the matter has been resolved according to their expectations.
Activity 11	Management to ensure that processes are put in place to ensure that service failure does not recur. The following steps must be followed for the different scenarios: 1. If failure is a result of a system error, log a call via RISE Portal 2. If training need is identified, matter needs to be referred to the direct Line Manager who will then provide on-the-job training and refer to the training department if required. 3. If the escalation/ complaint occurred due to a staff member's lack of performance, the matter will be dealt with accordingly and the staff member penalized 4. Should it be established that there is a gap in the process, this gap will be closed. All steps taken must be documented and disclosed to all the department heads to prevent error from recurring. 5. Should repetitive escalations/ complaints be received for a particular staff member, performance discussions will be held.
Activity 12	The Complaints register must be updated with comments and effective dates. Root cause analysis must be conducted. Once the information is captured on register, the closed item will systematically reroute to the person responsible for the complaints register
Activity 13	Accurate records must be maintained by the Compliance department for onward transmission to the FSCA. Compliance to ensure that resolved items are categorized according to the TCF Principles. Compliance will also monitor the adherence to Policy
Activity 14	MEO will be informed of closed items on register to ensure that accurate feedback can be provided in the event this is requested.