



Complaints Handling Procedures

Background

Emirates International Insurance Brokers LLC (EIIB) recognizes that there may be occasions when a client, insurer, or third party feels that the level of service or treatment that they have received from EIIB has fallen short of what might reasonably be expected. This Complaints Handling Procedure reflects EIIB's commitment to dealing with such complaints as timely, effectively, and fairly as possible.

Objectives

The objectives of EIIB's complaints handling procedures are:

- To allow clients, and insurers to report instances of non-compliance with laws and regulations.
- Provide a clear escalation process regarding complaints received both internally and externally.
- Use complaints to enhance procedures and correct procedural or policy deficiencies.

What is a Complaint?

Any expression of dissatisfaction by a customer, potential customer, or an insurer or other business partner, or any regulatory body made to EIIB either directly or indirectly.

A complaint may relate to:

- a. The quality and standard of service.
- b. Failure to provide a service.
- c. Inappropriate behavior or attitude of EIIB staff member or its related contractor.
- d. The failure of EIIB staff to follow applicable local/international laws, regulations, Code of Conduct, policies, or procedures.
- e. Dissatisfaction with EIIB's policy.

Categories of Complaint

All complaints must be categorized in the complaints log as relating to one of the following:

- a. Advice provided or service suitability.
- b. Accuracy of documentation provided.
- c. Delays in the process (issue of quotations, response to correspondence, etc.).
- d. Administrative or operational processes or procedures.



- e. Service provided by advisers, staff, or departments (efficiency, attitudinal, behavioral, knowledge).
- f. Others such as fraud or misconduct.

What is not a Complaint?

Not every concern raised with EIIB can be categorized as a complaint. For example:

- a. A request for information or an explanation of policy or practice.
- b. An insurance claim.
- c. An issue that is being, or has been, considered by a court.
- d. An attempt to have a complaint reconsidered where the EIIB's procedure has been completed.

Identifying a Complaint

Examples of statements that indicate the existence of a complaint:

- a. An explicit comment or statement such as "I want to make a complaint" or "Who do I complain to about this?"
- b. An expression of dissatisfaction such as "I am not happy with..." or "I am not satisfied with what you are saying..." or "This policy that I was sold does not meet my needs."
- c. A statement that expectations were not met such as "I was told that....but this has not happened."

How to Make a Complaint

A person (or their authorized representative) can make a complaint in writing (preferred), in person, or by telephone.

Email: info@eiib.ae / healthinsurance@eiib.ae

Telephone: 04-3967777

Address: Emirates International Insurance Brokers LLC. Aspin Commercial Tower, Office No 4004/4002, Dubai, UAE P.O. Box 88888.



Unacceptable Behavior of Complainants

It is acknowledged that individuals may react differently during challenging or distressing situations, and the circumstances leading to a complaint can sometimes result in inappropriate behavior by the complainant. The actions of complainants who express anger, make unreasonable demands, or persistently engage in unacceptable behavior may place undue demands on time and resources or create a challenging environment for EIIB staff. In response to such situations, the following actions will be implemented:

- The use or threat of physical violence, verbal abuse, or harassment directed towards EIIB staff is strictly prohibited and will not be tolerated under any circumstances.
- Any incident involving physical violence, verbal abuse, or harassment will lead to the immediate termination of all direct contact with the complainant.
- EIIB retains the right to report such behavior to the police. This will be standard procedure in cases where physical violence is used or threatened.
- Disciplinary proceedings may be initiated against individuals who exhibit such behavior, with consequences per EIIB's internal policies.
- In instances where a complainant has demonstrated threats, violence, verbal abuse, or harassment, EIIB reserves the right to decline consideration of the complaint or any future complaints from that individual.

What EIIB Will Do When it Receives a Complaint for Investigation?

The EIIB will allocate the complaint to the appropriate staff for review. In discussion with the complainant, three key questions will be considered:

- a. What specifically is the complaint (or complaints)?
- b. What does the complainant want to achieve by complaining?
- c. Do the complainant's expectations appear to be reasonable and achievable?

Details of the complaint will be recorded on the EIIB's system for recording complaints.

Complaint Logging

Various types of complaints mentioned in this document will be logged on the computer. As a minimum, the complaints log must detail the following:

- Name of complainant
- Date of complaint
- Detail of the complaint
- Name of the staff member receiving and registering the complaint
- Name of staff member to whom the complaint has been directed



- Identification of a repeat complaint
- Policy detail (if an existing insured member)
- Category of complaint
- Source of complaint (telephone, email, personal visit, online facility, via a third party, etc.)
- Action that was taken and the outcome at the frontline resolution stage
- Date the complaint was closed at the frontline resolution stage
- Date the investigation stage was initiated (if applicable)
- Action taken and outcome at the investigation stage (if applicable)
- Date the complaint was closed at the investigation stage (if applicable)
- Underlying cause and remedial action taken (if applicable)

Anonymous Complaints

Complaints submitted anonymously will only be considered if there is enough information provided in the complaint submission to enable EIIB to make further meaningful inquiries. A decision not to pursue an anonymous complaint will be authorized by the Operations Manager. If an anonymous complaint contains allegations that are serious in nature, it will be referred to the Managing Director immediately.

Time Limit for Making Complaints

This Procedure sets a time limit of six months to raise a complaint with EIIB, starting from when the complainant first became aware of the problem unless there are special circumstances for requesting consideration of a complaint beyond this time. Beyond the six-month time limit, the EIIB will exercise discretion in the way that the time limit is applied.

The Complaints Escalation Process

This Procedure is intended to provide a quick, simple, and streamlined process with a strong focus on early resolution of complaints by well-trained staff. The procedure involves up to three stages:

1. Frontline resolution seeks to resolve straightforward complaints swiftly and effectively.
2. Investigation is appropriate where a complainant is dissatisfied with the outcome of the frontline resolution or where frontline resolution is not possible.
3. External Review will be considered by the Managing Director if the complainant is not satisfied with frontline resolution as well as investigation.

Stage One: Frontline Resolution – To be Completed Within 5 Working Days

- Anyone who has a complaint is encouraged to raise it initially at the point of, or as close to the point of, becoming aware of it as possible.



- Complaints at this stage may be made face-to-face, by phone, in writing, or by email to the appropriate person. The purpose of the frontline resolution is to attempt to resolve as quickly as possible complaints that require little or no investigation.
- Resolution may be achieved by providing an on-the-spot explanation or an apology and, where possible, what will be done to stop this happening in the future.

Frontline resolution will normally be completed within 5 working days, though a resolution may be achieved more quickly.

Stage Two: Investigation – To be Completed Within 20 Working Days

Complaints may be moved to the investigation stage when:

- Frontline resolution was attempted, but the complainant remains dissatisfied.
- The complainant refuses to recognize or engage with the frontline resolution process.
- The issues raised are complex and will require detailed investigation.
- An investigation will normally be completed within 20 working days, though a resolution may be achieved more quickly.

Stage Three: Independent External Review - To be Completed Within 45 Working Days

- The complainant may write to the Managing Director to have an external party look at their complaint.
- The Managing Director will consider complaints from people who remain dissatisfied after the EIIB's internal complaints handling procedure.

Feedback to the Complainant

The following timelines will be used for providing feedback to the complainants:

- Complaints will be acknowledged in writing within 3 working days.
- EIIB will provide a full response to the complaint as soon as possible but not later than 20 working days from the time that the complaint was received for investigation.
- Not all investigations will be able to meet this deadline; for example, some complaints are so complex that they will require careful consideration and detailed investigation beyond the 20 working days timeline.

Complaints Process Flowchart

Refer to the attached flowcharts identifying the complaints procedure from end to end. The flowchart is available on the company website.



Reporting

- EIIB has a system for the internal reporting of complaints information. Regular reporting of the analysis of complaints information helps to inform management of where improvements are required.
- A weekly report of all complaints received and the status of ongoing complaints will be submitted to the Operations Manager.
- An annual report covering the calendar year will be submitted to Dubai Health Authority, Health Funding Department no later than 7 January each year.

Key Performance Indicators (KPIs)

EIIB will produce an annual report to include the key performance indicators as detailed below:

- Complaints actual TATs by number of days to resolution or point of referral to third-party deliberation.
- Number of complaints outstanding at the end of each calendar month.
- Number of complaints unresolved after 15, 30, and 90 days at the end of each calendar month.
- Number of complaints escalated for outside deliberation or arbitration.
- Complainant satisfaction with the outcome of internal dealing with the complaint.

Staff Training

EIIB will have an induction program to train new staff and annual refresher training staff for other staff in:

- EIIB's Complaints Handling Procedure.
- How to handle and record complaints at the frontline resolution stage.
- Who they can refer a complaint to if they are unable to handle it.
- Their clear authority to attempt to resolve any complaints they may be called upon to deal with.

EIIB maintains a Training Log to record which staff have received such training and when.



Confidentiality

Confidentiality is an important factor in conducting complaint investigations. EIIB will always have regard to any legislative requirements and internal policies on confidentiality and the use of complainant information.

Complaints will be handled with an appropriate level of confidentiality and information released only to those who need it for investigating or responding to the complaint.

Review and Update of Complaints Handling Procedures

Valuable feedback is obtained through the receipt of complaints. One of the objectives of this Procedure is to identify opportunities to improve the provision of services across the EIIB.

If required, EIIB shall make necessary adjustments to its policies, services, products, processes, or procedures to avoid repetitions of upheld complaints.



The Complaints Handling Procedure

FRONTLINE RESOLUTION

For issues that are straightforward and easily resolved, requiring little or no investigation. 'on-the-spot' apology, explanation, or other action to resolve the complaint quickly, in five working days or less, unless there are exceptional circumstances.

Complaints addressed by any member of staff or alternatively referred to the appropriate point for frontline resolution.

Complaint details, outcome and action taken recorded and used

INVESTIGATION

For issues that have not been resolved at the frontline or that are complex, serious or 'high risk'.

A definitive response provided within 20 working days. A thorough investigation of the points raised.

Responses signed off by senior management. Senior management have an active interest in complaints and use information gathered to improve services.

INDEPENDENT EXTERNAL REVIEW (SPSO or other)

For issues that have not been resolved within the company.

Complainants who remain dissatisfied after an investigation has been completed internally have the right to ask the Managing Director to review their case.

The Managing Director will assess whether there is evidence of service failure or maladministration not identified internally.

Note: For clarity, the term 'frontline resolution' refers to the first stage of the complaints process. It is not intended to reflect any job description within the company; rather it refers to the process which seeks to resolve complaints as soon as possible.



Complaints Handling Procedure (Flowchart)

