

Enclosure 5: Complaints procedure, N.V. Verzekeringsbedrijf Groot Amsterdam

- Aim** : Adequate handling of complaints, orally / by telephone, in writing / email.
: To register, handle and evaluate all complaints received by all departments of VGA, the Municipal Ombudsman or the KIFID (the Dutch Institute for Financial Disputes).
- Definition of complaint** : An expression of dissatisfaction towards VGA from which it appears that the expectation has not been met. If a claim for loss or damage is rightly not allowed and this leads to dissatisfaction, such dissatisfaction shall not be regarded as a complaint, but nevertheless it will be handled. A written complaint and complaints of the Ombudsman and KIFID are formal expressions of dissatisfaction with VGA and are being dealt with by these authorities. An oral complaint is an informal complaint and is also registered.

Procedural steps		Person in charge
1a	Everyone has the right to file a complaint with VGA about the way in which VGA behaved in a particular matter towards him/her.	Complainant
1b	VGA takes care of a proper handling of oral and written complaints about its conduct. The complainant shall have access to the minimum prescribed data of the complaint file at all times	Complaints coordinator and Supervisor
1c	The written complaint must at least contain: a. the name and address of the complainant; b. the date c. a description of the behaviour against which the complaint has been directed	Complainant
1d	As soon as VGA has met the complaint to the satisfaction of the complainant, the obligation to apply this procedure further shall lapse.	Complaints coordinator and supervisor
2a	The complaint is handled by a person who has not been involved in the conduct to which the complaint relates. The handling of a complaint related to a tendering procedure or a market consultation takes place by the management.	Manager of the relevant department Management
2b	To the person to whose conduct the complaint relates a copy of the written complaint is provided, as well as the accompanying documents	Supervisor
2c	VGA is not obliged to handle the complaint if it concerns a behaviour: a. about which a complaint has already been submitted and handled b. which occurred more than a year before the complaint was submitted	Complaints coordinator

Procedural steps		Manager
2d	If a complaint is not being dealt with the complainant is notified of this in writing as soon as possible, but no later than four weeks after receipt of the complaint. With the notification reference is made to the ombudsman or the KIFID and within which period the complainant may subsequently submit a petition	Supervisor
3a	The supervisor analyses the complaint, determines the cause, takes appropriate action in the light of correction, satisfaction and prevention and communicates about this in a timely manner but no later than within 1 week after receiving it with the ultimately responsible MT member (4 eyes principle)	Supervisor
3b	The supervisor informs the complainant as soon as possible, but within 2 weeks, in writing and justified, of the findings of the investigation and any conclusions and consequences	Supervisor
3c	If the complaint may not be handled within 6 weeks (for simple complaints) and 3 months (for complex complaints), the complainant will be informed of this, stating a new period. This notice mentions any other complaints procedures such as the ombudsman and the KiFiD.	Supervisor
3d	If the complainant does not agree with the handling of the complaint it is pointed out that a complaint may be lodged with the ombudsman or KIFID (within 3 months).	Supervisor
3e	If the complaint is justified, depending on the situation, flowers are sent to the complainant.	Supervisor
4a	VGA gives the complainant and the person to whose conduct the complaint refers, if desired, the opportunity to be heard.	Supervisor
4b	Hearing the complainant may be abandoned if the complaint is apparently unfounded or if the complainant has stated not wanting to exercise the right to be heard.	Supervisor, member of the MT with ultimate responsibility
4c	A report is made of the hearing.	Complaints coordinator
5a	VGA takes care of the registration of the written complaints submitted.	Complaints coordinator
	The reporting of the registered complaints is published annually	Head Claims / JZ

Procedural steps		Manager
5b	Measures for removing root causes may be initiated with the help of an improvement proposal.	All employees
5c	Evaluation of the complaints takes place annually in an MT meeting for the purpose of structural and preventive measures.	Complaints coordinator
5d	Once a year an overview of the complaints is submitted to the managing director	Complaints coordinator
5e	The complaint will be saved at least 1 year after the complaint has been settled.	Complaints coordinator