

## INTERNAL DISPUTE RESOLUTION PROCEDURES

We aim to provide the very best service for our clients. In the event that you are unhappy regarding any part of our service, our internal dispute resolution process provides that your complaint will be handled efficiently, honestly and fairly.

Karen Bashford is authorised as a credit representative (Credit Representative number 398914) to engage in credit activities on behalf of BLSSA Pty Ltd (ACN 117 651 760) (Australian Credit Licence number 391237) who may assist us in the investigation and resolution of your complaint.

Should you have a complaint about our services, please contact:

<b>Karen Bashfords Complaints Officer:</b>	<b>BLSSA Pty Ltd Complaints Officers:</b>
Joanne Menzies	
Manager	Complaints Officers
ADDRESS: PO Box 272 Ulladulla NSW 2539	ADDRESS: PO Box 626, Collins Street West, VIC 8007
PHONE: (02) 4454 4502	PHONE: 03 8616 1443
FAX: (02) 4454 3322	FAX: 03 8616 1918
EMAIL: joanne@everylender.com.au	EMAIL: resolutions@BLSSA.com.au

The Complaints Officers are senior personnel in our organisation and in BLSSA Pty Ltd and have the necessary experience and authority to handle your complaint and make relevant decisions on outcomes.

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

If you are not satisfied with the response to your complaint, you may contact the Australian Financial Complaints Authority (AFCA) (of which we and BLSSA Pty Ltd are members) on:

Online: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Phone: 1800 931 678

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 staff and consultants who deal with (or are likely to deal with) clients, are aware of the names, titles and telephone numbers of our and BLSSA Pty Ltd's Complaints Officers.

Each staff member and consultant is also instructed in how to transfer a client who has a complaint to our Complaints Officer or BLSSA Pty Ltd's Complaints Officer; and what client details to record if the Complaints Officers 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). We and BLSSA Pty Ltd do not charge any fee in respect to any complaint.

## TIMELINESS

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

We will ensure that a final response is given to you as soon as possible, but within twenty one (21), thirty (30) or forty five (45) days of receipt of the complaint.

If we or BLSSA Pty Ltd are unable to deal with the complaint as it relates to a third party (for example, a lender), we or BLSSA Pty Ltd 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 you within relevant timeframes, we will inform you of the reasons for the delay and of your right to refer the complaint to the Australian Financial Complaints Authority (AFCA) or, in the case of privacy complaints, to the Australian Information Commissioner.

We will have provided 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.

## **WRITTEN RESPONSE TO A CLIENT**

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.

Where practicable, our response will refer to applicable provisions in Legislation, Codes, Standards or Procedures.

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 the 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 will 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 Internal Dispute Resolution Procedures at least every three (3) years to ensure that our complaints systems are operating effectively. *This document was reviewed on 1 October 2018*