

APSS Complaints Policy - Internal Dispute Resolution (IDR)

Legislative requirements

PostSuper Pty Ltd (the **Trustee**) in its capacity as Trustee of the Australia Post Superannuation Scheme (APSS), is required to comply with the internal dispute resolution (**IDR**) requirements set out in section 101 of the Superannuation Industry (Supervision) Act 1993 (the **SIS Act**), the **Corporations Act 2001** (the Corporations Act), and the standards and requirements which are enforceable as set out in Regulatory Guide 271: Internal Dispute Resolution issued by the Australian Securities & Investments Commission (**ASIC**).

Complaint management documentation is a key component of the Trustee's IDR process. The Trustee must have a publicly available, readily accessible complaints policy and an internal complaint management process.

In administering a person's complaint, the Trustee has regard to the Privacy Act 1988. The APSS's Privacy Policy and Privacy Collection Statement can be found at the apss.com.au website.

About this Policy

This Policy is referred to as the Complaints Policy and will apply on and from 5 October 2021.

This Complaints Policy provides eligible persons who may have a complaint with information about:

- the options available to assist persons who need additional support to lodge a complaint;
- how to lodge a complaint;
- the key steps and timing of the complaints process; and
- how to contact Australian Financial Complaints Authority (**AFCA**) if a complaint is not resolved to their satisfaction.

The Trustee may modify or update its Complaints Policy from time to time by publishing it on the apss.com.au website. A hard copy of this Complaints Policy is available on request.

The Trustee's philosophy on complaints

The Trustee is of the view that matters raised with the APSS should be dealt with to the satisfaction of the person(s) who raised them, wherever possible. If a matter raised can be defined as a complaint, it will be handled fairly, objectively and without actual or perceived bias. The Trustee encourages persons to first contact the APSS contact centre on 1300 360 373 to discuss their concerns as this may help to resolve their issue efficiently.

Who can make a complaint?

Complaints may be made by:

- current and former members;
- death benefit beneficiaries;
- parties (and intending parties) to an agreement under the Family Law Act 1975 or order affecting superannuation, including a member's or beneficiary's spouse or former spouse who is party to an agreement, or subject to an order about that person's superannuation interest; and
- someone eligible to request information about that superannuation interest.

Complaints may also be made by an authorised representative of any of the persons detailed above.

Definition of a complaint

All interactions with the APSS that fall within the following categories will be treated as a complaint, and dealt with by the APSS as a complaint under this Complaints Policy:

- an interaction or communication that identifies itself as a complaint, that is, a person uses language that states that the person has made or wishes to make a complaint;
- an objection to a proposed decision about how and to whom to pay a superannuation death benefit distribution;
- complaints about the handling or declinature of an insurance claim; and
- an expression of dissatisfaction made to or about the APSS related to its products, services, staff, or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

How to lodge a complaint

A person who requires assistance to lodge their complaint should contact the APSS by phone or email. There are multiple ways to contact the APSS as listed below:

By phone: Please call **1300 360 373** to lodge a verbal complaint. Verbal complaints will be handled in the same way as a complaint made in writing.

By email: Please email your complaint to **sr@apss.com.au** and remember to include your member number (if applicable).

Contact Us: Via the **apss.com.au** website's 'contact us' web page.

By Mail to: **Inquiry and Complaints Officer**
APSS
Locked Bag A5005
Sydney South NSW 1235

How to get help in another language

If a person who has a complaint needs help in a language other than English, the Trustee encourages the use of language translation services provided by TIS National – the Translating and Interpreting Service provided by the Australian Government. Please refer to www.tisnational.gov.au for further details.

APSS complaints handling steps and timeframes

All responses to complaints, except those noted on the following page, will be responded to within:

- 45 calendar days of the date of receipt where the complaint does not relate to a death benefit distribution; and
- 90 calendar days after the expiry of the 28 calendar day period for objecting to a proposed death benefit distribution for complaints that relate to death benefit distributions.

APSS complaints handling steps and timeframes (continued)

Timing following receipt of complaint	Description
Within 3 business days	A written acknowledgement will be issued to the person who made the complaint.
Within 30 calendar days	The details of the complaint will be assessed and investigated, and a full response provided wherever possible. Persons making a complaint may receive requests for additional information during this time from the APSS. If the complaint cannot be resolved within 30 days, an update letter will be provided, giving reasons why the complaint cannot be resolved and an estimated resolution date. Details about how a person may contact AFCA about the complaint will also be provided.
Within 45 calendar days	Either a full IDR response will be provided if not provided earlier OR if a response cannot be provided within the 45 calendar day timeframe, an IDR Delay Notification will be issued to explain the reasons for the delay. Details about how a person may contact AFCA about the complaint will also be provided.
For death benefit distribution complaints only	
Within 90 days after the 28-day objection period expires	A full IDR response will be issued OR an IDR Delay Notification will be issued if the complaint cannot be resolved within this time.

Exceptions to response timeframes - 'IDR Delay Notification'

A full IDR response may not be provided to a person who made a complaint within the required timeframe in the following circumstances:

1. the resolution of the complaint is particularly complex and/or there are circumstances beyond APSS's control that are causing a delay in responding to the complaint; and
2. the person who made the complaint has received an IDR Delay Notification which explains the reasons for the delay.

How to contact the Australian Financial Complaints Authority (AFCA)

If a complaint has not been resolved to a person's satisfaction under this Complaints Policy, the person may have a right to lodge a complaint about the decision with AFCA. AFCA is an independent body established by the Federal Government to review, consider and resolve decisions relating to complaints, including decisions made by the Trustee. Please contact AFCA using the below contact details:

AFCA
GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au
Web: www.afca.org.au

Ongoing review

This Complaints Policy will be reviewed at least every three years by the Trustee, or as necessary, having regard to any required legal or regulatory changes. Any changes to the Policy will be published on the APSS website at apss.com.au and is available in hard copy upon request.