



Inquiries & Complaints Policy

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1 Introduction

This Policy sets the requirements for dealing with both Inquiries and Complaints in accordance with various regulatory obligations including the *Superannuation Industry (Supervision) Act 1993*, *Corporations Act 2001*, *Privacy Act 1988*, relevant regulatory / legal bodies and industry standards and legally binding provisions contained in ASIC's Regulatory Guide 271 Internal Dispute Resolution, enforceable under the *ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98*.

2 Objectives

The objective of this Policy is to ensure clear instructions are in place and are implemented through documented procedures to ensure compliance with the law and regulatory / legal bodies and industry standards.

Inquiries and Complaints handling are governed by a number of regulatory / legal bodies that add a layer of complexity to the process, requiring a clear and definitive approach to achieving compliance. The Inquiries and Complaints Handling Process is predominantly managed by First Super's Administrator (material outsourced service provider), Super Benefits Administration Pty Ltd, who provides administration services to the Fund.

3 Legislative / Regulatory Obligations

Section 101 of the *Superannuation Industry (Supervision) Act 1993* (**SIS Act**) requires approved trustees to have a formal system for dealing with disputes internally. The SIS Act further requires that an approved trustee must take all reasonable steps to ensure that:

- Beneficiaries (including former beneficiaries), executors or administrators of the estate of a former member, have the right to make inquiries into, or complaints about the operation and management of the Fund in relation to that person (or the former member).
- Complaints will be properly considered and dealt with within the 'Maximum Internal Dispute Resolution Response Timeframe', being:
 - for superannuation trustee Complaints (except for complaints about death benefit distributions), no later than 45 calendar days after receiving the complaint; and
 - for Complaints about superannuation death benefit distributions, no later than 90 calendar days after the expiry of the 28-calendar day period for objecting to a proposed death benefit distribution referred to in section 1056(2)(a) of the *Corporations Act 2001*.

Section 912A of the *Corporations Act 2001* (**CA**) requires that a financial services licensee must:

- Do all things necessary to ensure financial services covered by the license are provided efficiently, honestly and fairly, and
- If those financial services are provided to persons as retail clients, have a dispute resolution system.

Schedule 1 of the *Privacy Act 1988* requires all Australian Privacy Principles (APP) entities to:

- Take reasonable steps to implement a procedure that allows First Super to deal with inquiries or complaints from individuals regarding First Super's compliance with the APP as defined in the Act.
- Detail how an individual may access their personal information held by First Super and seek the correction of any such information.

This policy operates in accordance with Australian and International Industry standards AS/NZS 10002: 2014.

The Australian Financial Complaints Authority (**AFCA**) was established in November 2018 and replaces three previous complaints handling bodies being the Financial Ombudsman Service, the Credit and Investments Ombudsman, and the Superannuation Complaints Tribunal.

AFCA is the primary complaints resolution scheme for financial services covering credit finance and loans, insurance, banking products and payments, investments and financial advice, and superannuation.

Privacy complaints continue to be considered by the Office of the Australian Information Commissioner.

4 Application & Scope

This policy applies to all management and staff within First Super and Super Benefits Administration Pty Ltd (**SBA**) and any outsourced service provider to which First Super has outsourced all or part of its IDR process.

The Policy's scope covers all interactions between First Super and SBA with employers, members (and former members), beneficiaries, and legal personal representatives of a member or former member, including matters relating to outsourced service providers.

5 Related Policies and Documentation

This policy is to be read in conjunction with the following related policies and documentation:

Document	Relevance
Incident and Breach Reporting Policy	To distinguish between what is an inquiry versus what is a complaint, versus what is an incident, versus what is a breach To apply the appropriate policies and procedures depending on the nature of the interaction or circumstance
SBA Complaints Handling Procedures	To describe how this Inquiry and Complaints policy is to be implemented and operated for the Fund
Complaints Register	Document record of all complaints in progress for reporting to the relevant board

	committee and board. From September 2021, this will be via the Member Relationship Management System (CRM)
Delegations Policy	To determine if any authority under delegation applies to complaints that are settled with redress
Privacy Framework and Privacy Policy	To determine if a complaint relates to a potential or actual breach of privacy

6 Roles and Responsibilities

The Board has overall ownership of and accountability for this Inquiries and Complaints policy delegating the responsibility for identifying, recording, dealing with, and resolving inquiries and complaints to the Trustee in accordance with this policy and in compliance with relevant law.

The Trustee reports on all Complaints received including progress of resolution to the Audit and Compliance Committee of the Board and the Board itself.

Specific roles and responsibilities are described in the table below:

Position Title	Role	Responsibility	Further comment
Trustee Board	Ultimate ownership and accountability for the Inquiries and Complaints Policy	Responsible for reviewing and approving policy and oversight of Trustee's application of policy through procedures and / or contract management and training.	Authority given under the SIS Act and CA and Privacy Act.
Audit and Compliance Committee	Delegated authority from the Board to review and consider changes to policy and oversee the Trustees' management of the Inquiries and Complaints Handling Process	Responsible for reviewing policy and requesting any further information deemed necessary from the Trustee to form considered conclusions and recommend policy approval to the Board.	Authority given under Committee Charter approved by the Board and this Policy.
CEO	Accountable for the effective implementation of policy and oversight of Trustee	Feedback and instruction on policy development and implementation.	Delegated authority from the Board.

Position Title	Role	Responsibility	Further comment
	implementation, monitoring, and reporting.	<p>Policy review prior to tabling at Audit and Compliance Committee</p> <p>Review of complaints register and authority to make further inquiries with Administrator.</p> <p>Receive and consider complaints from Trustee and Administrator submitted in accordance with policy and provide instruction.</p>	
Executive Manager Governance	Manage relationship with Administrator regarding effective implementation of policy through documented procedures	<p>Review of complaints register and authority to make further inquiries with Administrator.</p> <p>Receive and consider complaints from Trustee and Administrator submitted in accordance with policy and provide instruction.</p>	Delegated authority from the CEO
Risk Manager	<p>Update policy as required for review by Trustee Executive prior to tabling with Audit and Compliance committee</p> <p>Monitor compliance through control testing (including monitoring the outsourced IDR provider's services)</p>	<p>Review of complaints register and authority to make further inquiries with Administrator.</p> <p>Receive and consider complaints from Trustee and Administrator submitted in accordance with policy and provide instruction.</p>	Delegated authority from the CEO

Position Title	Role	Responsibility	Further comment
		Oversee training.	
SBA Administrator	Through contract management, owns the Inquiries and Complaints Handling Process	Responsible for development and implementation of procedures in accordance with policy and responsible for staff training to maintain required skill set and capability.	Authority given per Administration Agreement and Policy approved by the Trustee Board.
Complaints Officer	Under delegation from the Administrator, implements and operationalises the Complaints Handling Process in accordance with policy. Receives, considers, evaluates, records, and resolves complaints according to policy, and refers complicated items to the Trustee.	Applies the Complaints Handling Process daily. Maintains complaints register. Oversees or manages complaint resolution in accordance with policy. Reports complaints status and resolution progress to the Trustee.	Delegated authority from SBA's CEO in accordance with Policy.

The Trustee Office:

- must be notified if information cannot be provided in response to an inquiry within 10 days; and
- must include as an agenda item for the First Super / SBA contract management meetings, the status of complaints and proposed resolution and timeframes.

Outsourced service providers

Any outsourcing of the IDR process, whether to SBA or any other outsourced service provider, will be deemed as an outsourcing of a material business activity within the meaning of SPS 231. In accordance with both SPS 231 and ASIC RG 271, the Trustee must:

- have measures in place to ensure that due skill and care is taken in choosing suitable service providers;
- monitor the ongoing performance of service providers; and
- appropriately deal with any actions by service providers that breach service level agreements or fall short of their obligations under law.

Complaints data reports

The Executive Manager Governance must provide reports about complaints data regularly to the Board, containing the following:

- The number of Complaints received
- The number of Complaints closed
- The circumstances giving rise to Complaints (e.g. products, services, and issues and reasons)
- The time taken to acknowledge Complaints
- The time taken to resolve or finalise Complaints
- Complaint outcomes, including the number of Complaints resolved and unresolved, the number of Complaints that were abandoned or withdrawn, and details of amounts paid to Complainants to resolve Complaints
- Possible systemic issues identified
- The underlying causes of Complaints
- Complaint trends
- The number of Complaints escalated to AFCA
- Recommendations for improving products or services

Internal Audit

Upon instruction and as agreed with the Trustee, Internal Audit will be engaged periodically to perform a review of the Complaints Handling Process. This review may include in its scope the following areas:

- Compliance with relevant law
- Policy currency, relevance, and fit for purpose criteria
- Procedural compliance with policy
- Accuracy, completeness, validity of Complaints raised, and
- Timeliness of Complaint resolution (in accordance with policy)
- Performance of SBA or any other outsourced service provider assisting with IDR
- Whether the IDR process is adequately resourced.

Systemic issues

All reports to the Board and/or board committees must include metrics and analysis of consumer complaints including about systemic issues identified through those complaints.

All First Super staff and those of SBA, our Administrator, must be encouraged to escalate possible systemic issues that they identify from complaints;

First Super must:

- regularly analyse complaint data sets to identify systemic issues;
- ensure these are promptly escalated to appropriate areas within the Trustee for investigation and action; and
- report internally on the outcome of investigations, including actions taken, in a timely manner.

7 Policy Statements

7.1 Overriding Principles

The Fund's Inquiry and Complaints Handling Process will be deemed to be efficient, honest, and fair if it features the following overriding principles:

- It is easy for members, including those with a disability or language difficulties, to understand and use;
- It helps members to clarify the subject matter of a complaint where necessary;
- It expresses empathy without admitting liability;
- It regards complaints objectively;
- It ensures internal decisions are subject to review;
- A staff member mentioned or implicated in a Complaint as a subject of the Complaint must not investigate the Complaint;
- A proposed remedy must consider whether compensation is appropriate and, if so, what might constitute fair compensation based on loss recovery (and subject to the requirements of this policy);
- Impact upon other parties must be considered;
- It helps members to know their rights; and
- It places member's best financial interests above all other interests, subject to law.

7.2 Inquiry definition and capture

An Inquiry is a request for information that is not prefaced or combined with any expression of dissatisfaction about a product or service or matter relevant to the Inquiry regardless of whether it is within the control of the Fund or not.

An Inquiry may be in written form or verbal, and must be captured and addressed in accordance with the following criteria:

- It must be recorded on the member's file and must be confirmed as an accurate representation of the member's communication (that the nature and purport of the Inquiry is agreed with the member to ensure the response / information supplied is consistent with expectations);
- The contact remains an Inquiry if it is resolved on first contact, or alternatively if it is resolved on second contact where that second contact consists of providing further factual information;
- The response must be clear and concise and satisfactorily address the nature of the Inquiry;
- If information is required in writing it must be supplied within 10 working days of an Inquiry being received;
- If information cannot be provided within 10 working days of the Inquiry being received, or if the Inquiry becomes protracted, then the matter must be drawn to the attention of the Trustee for consideration as a possible systemic flaw (in the process);
- Inquiries may turn into Complaints where information originally provided in response to the inquiry may be insufficient, factually incorrect, or results in protracted communication that frustrates the member. In this case, policy statements relating to Complaints must be applied.

In all circumstances, the individual receiving the Inquiry must be satisfied that the member requesting information regarding their account or correction of personal information regarding their account is indeed the person to which the information and account refers.

7.3 Complaint definition, capture, and handling

A complaint is any expression of dissatisfaction made to or about the Fund, 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. This extends to:

- Posts (that meet the definition of a “complaint”) on a social media channel or account owned or controlled by the firm that is the subject of the post, where the author is both identifiable and contactable;
- An objection to a proposed decision about how and to whom to pay a superannuation death benefit distribution;
- An act / omission of the Trustee, Administrator, and / or Adviser;
- A product feature or advice or information whether it is supplied by the Fund or not;
- A failure to deliver on a promise / obligation to a member / beneficiary;
- The conduct of a Fund representative or third party acting for or on behalf of the Trustee;
- Dissatisfaction with the law or interpretation and application of the law, or employment conditions, or Government policy, or any other such thing that may impact a member’s entitlements or dealings with the Fund;
- A legal obligation that the Trustee must comply with; and
- Any dissatisfaction with the Complaints Handling Process itself (as specified by AS / NZS 10002 – 2014).

In handling Complaints, the Trustee must be able to demonstrate that the Fund will act in the best interests of the member / beneficiary even if it is to the detriment of the Trustee and Fund’s objectives. For example, an expression of dissatisfaction regarding a failed hardship claim by a member due to not meeting the criteria required for acceptance, will be identified and processed as a Complaint even though the Trustee / Fund has no legal alternative other than to reject the claim. In this instance, the member must be informed of his or her rights and means of recourse by reference to the ATO (that considers hardship claim disputes).

Whereby a member or beneficiary does not, or will not, put a Complaint in writing, the complaint can be made by telephone to our Contact Centre where it will be recorded. The Complaint will be deemed to be received when it is understood in a clear and actionable way and to the extent practicable confirmed by the complainant as accurate. If written, a complaint will be deemed received on the day it arrives at the Fund, whether that be by email or post.

Requirements for capturing and handling and reporting Complaints

General

- Any communication that potentially meets the definition of Complaint under this policy must be referred to an individual’s line manager for consultation, and evidence of such referral consultation must be entered on the member’s file;
- Once identified as a Complaint, the communication must be clarified, confirmed, and entered as a note on the member’s file, and raised as a case within Case 360;

- The Complaints Officer must be notified, and the complaint must be recorded in the complaints register;
- The person designated to manage the complaint takes responsibility for tracking progress towards resolution. Where no person is specifically designated responsibility defaults to the Complaints Officer;
- The Trustee must acknowledge receipt of a complaint within 24 hours (or one business day) of receiving it, or as soon as practicable.
- The Trustee may acknowledge a complaint verbally or in writing via the post, email or social media channels. When determining the most appropriate method of communication, the trustee will take into consideration the method used by the complainant to lodge their complaint and any preferences they may have expressed about methods of communication.
- The letter must contain;
 - The current understanding of the complaint (and for any Privacy related complaints include the relevant Australian Privacy Principles Issues allegedly impacted);
 - A statement that the Trustee is conducting an investigation;
 - An estimated date of completion for the investigation process (within 45 days)
 - Contact details for the relevant complaints resolution body being either the Office of the Australian Information Commissioner (OAIC) for privacy complaints, or the Australian Taxation Office (ATO) for hardship complaints, or the Australian Financial Complaints Authority (AFCA) for all other complaints.

Requirement for all IDR responses

In addition to any other requirement contained in this Policy, all IDR responses must be in writing and must inform the complainant of:

- the final outcome of their complaint at IDR (either confirmation of actions taken by the firm to fully resolve the complaint or reasons for rejection or partial rejection of the complaint);
- their right to take the complaint to AFCA if they are not satisfied with the IDR response; and
- the contact details for AFCA.

Rejecting a Complaint

Prior to rejecting a Complaint, a separate and independent review must be undertaken which includes an examination of all documents and evidence relevant to the Complaint. This review must be performed by:

- The Complaints Officer where the value of the subject matter is less than \$5,000 and the complaint affects 5 people or less, and where the original complaint handling was not performed by the Complaints Officer; OR
- The Trustee Office comprising of the CEO, or Executive Manager Governance, or Risk Manager in all other instances.

In the event the separate and independent review confirms that the original rejection decision is fair and reasonable in the circumstances, a polite letter will be sent to the complainant that contains:

- Advice that the complaint has been rejected;
- Reasons for the rejection;
- An invitation to comment on the decision;
- Contact details for the Complaints Officer to provide the comment; and
- Contact details for the relevant external complaint resolution service being either the OIAC, ATO, or AFCA (as the case may be).

First Super must also ensure that the letter

- identifies and addresses the issues raised;
- sets out its findings on material questions of fact and referring them to information supporting those findings; and
- provides enough detail for the complainant to understand the basis of the decision and to be fully informed when deciding whether to escalate the matter to AFCA or another forum.

In the event the separate and independent review determines that the original rejection decision is not fair and reasonable, then the Complaint is returned to the relevant staff member to continue resolution in terms of this Policy.

Accepting a Complaint that was immediately and satisfactorily resolved

It is a requirement to record any Complaint even though it may immediately and satisfactorily be resolved on first contact or on second contact where additional information is supplied. Evidence of the Complaint must be recorded on the member's file, and the Complaint must be recorded in the Complaints register in accordance with this policy.

Recognising and recording Complaints that have been satisfactorily and immediately resolved is necessary to ensure sufficient trustee review is available to identify potential systemic weaknesses in process.

A letter must be sent to the complainant that contains:

- The current understanding of the Complaint (and for any Privacy related complaints include the relevant Australian Privacy Principles Issues allegedly impacted);
- A statement that confirms the Complaint has been satisfactorily resolved;
- An offer to provide any further assistance or answer any further queries in future; and In the event the Complaint remains unresolved or re-emerges or a new Complaint is made that is not satisfactorily addressed, contact details for the relevant external complaint resolution service being either the OIAC, ATO, or AFCA (as the case may be) must be supplied.

Accepting a Complaint with redress

If it is determined that the Complaint is valid and a conclusion to accept the Complaint with redress is fair and reasonable, the following action must be taken:

- For matters under \$5,000 and affecting under five people, the Complaints Officer is authorised to issue a letter to the complainant that contains;
 - An adequate response to all issues raised in the Complaint without making an admission of liability;

- An offer of redress;
 - An invitation for the person to comment on the decision;
 - Contact details of the Complaints Officer for providing comment; and
 - Contact information for the relevant external complaint resolution service being either the OIAC, ATO, or AFCA (as the case may be).
- In all other cases the letter must be approved by the Trustee's CEO, Executive Manager Governance, or Risk Manager before being sent. In reviewing the letter, the Trustee's CEO, Executive Manager Governance, or Risk Manager must consider whether the offer of redress requires board approval, approval by a Co-Chair, or whether it falls within any delegated authority.

Accepting a complaint without redress

If it is determined that the complaint is valid and a conclusion to accept the Complaint without redress is fair and reasonable, a letter must be sent to the complainant by the Complaints Officer after being reviewed by the Trustee's CEO, Executive Manager Governance, or Risk Manager. The letter must contain:

- Comment on all issues raised in the complaint without making an admission of liability;
- An invitation for the person to comment on the decision;
- Contact details of the Complaints Officer for providing comment; and
- Contact information for the relevant external complaint resolution service being either the OIAC, ATO, or AFCA (as the case may be).

Protracted and Complex Complaints

Additional requirements exist for Complaints that are or become protracted and / or are complex in nature.

If no resolution is achieved by the date advised in the original acknowledgment letter, a second follow up letter must be sent by the Complaints Officer that proposes a new resolution date, and contains the following information:

- Reasons why the complaint was not resolved in the time frame;
- Contact details of the person handling the complaint and the Complaints Officer; and
- An invitation for the complainant to provide comment.

In the event a Complaint remains unresolved after 30 days, it will be determined to be problematic and must be reviewed by the Trustee's CEO, Executive Manager Governance, or Risk Manager. Upon review, if it is determined that there is no reasonable opportunity to resolve the complaint within the 45-day maximum timeframe for an IDR response, or 90-day maximum timeframe for a death benefit distribution IDR response, the Complaints Officer must write to the complainant and provide an IDR delay notification that informs the Complainant about the following information:

- Reasons why the complaint will not, or is not likely to, be resolved within the Maximum IDR Response Timeframe;
- A description of what is being, or can be, done to eventually resolve the Complaint;

- An explanation of what steps (if any) to resolution are beyond the control of the Trustee;
- An invitation for the Complainant to comment;
- That the Complainant has a right to complain to AFCA;
- Contact details of the Complaint Officer; and
- Contact information for the relevant external complaint resolution service being either the OIAC, ATO, or AFCA (as the case may be).

A Complaint that is not, or appears unlikely to be resolved within 45 days or within 90 days for death benefit distribution, because there is no reasonable opportunity for resolution must be reported to the Audit and Compliance Committee plus any other relevant Board Committee at the next scheduled meetings. Furthermore, it must be reported to both of the Trustee Co-Chairs by the CEO.

7.4 Distinction between a Complaint and an Incident / Breach

The Incident and Breach Reporting Policy defines the following terms:

- *Incident* – A failure in any standard process or procedure that may or may not incorporate a breach and may have a negative impact or connotation that appears not inconsequential. Includes near risk events.
- *Breach* – A failure to comply with the relevant law, trust deed, or a requirement of a risk management or compliance plan. A notifiable breach is a breach or likely breach that must be reported to a regulator within a specified time.

An 'event' is defined under the Incident and Breach Reporting Policy as '... an occurrence or omission that seems more likely than not to involve either a breach or incident.'

Complaints as defined by this Policy must be evaluated to determine whether they meet the definition and criteria of an Incident or Breach. In the event such definition or criteria is satisfied, then the Incident and Breach Reporting Policy must also be applied. It is a requirement that the Trustee be notified and consulted as part of this evaluation process.

7.5 Letters and Communication

The Administrator is authorised under this policy to develop and maintain letters and communication that provide the required content and information prescribed within these policy statements. All letters and correspondence must be reviewed and approved by the Trustee prior to being used. A summary of the letters previously referred to within these policy statements are given below:

- Inquiry response letter must be issued within 10 days of receiving the inquiry;
- Complaint acknowledgment letter – issued within 1 day or 24 hours of receipt of the Complaint, or as soon as practicable;
- Complaint rejection letter;
- Complaint acceptance letter for Complaints that have been immediately and satisfactorily resolved;
- Complaint acceptance letter for Complaints with redress;
- Complaint acceptance letter for Complaints without redress;

- Complaint proposed new resolution date letter for Complaints that are protracted and / or complex;
- Complaint letter to the complainant for unresolved problematic complaints, where resolution is not expected within the Maximum IDR Response Timeframe.

8 Definitions

Term	Definition
AFCA	Australian Financial Complaints Authority
APPs	Australian Privacy Principles
ASIC RG 271	ASIC's Regulatory Guide 271 Internal Dispute Resolution
Complaint	The meaning provided by section 7.3 of this Policy
Complaints Handling Process	The process for handling complaints set out in section 7.3 of this Policy
Corporations Act 2001	<i>Corporations Act 2001</i> (Cth) and Regulations
Fund	First Super
IDR	Internal Dispute Resolution
Inquiry	The meaning provided by section 7.2 of this Policy
Maximum IDR Response Timeframe	The meaning provided by section 3 of this Policy
OAIC	Office of the Australian Information Commissioner
Privacy Act 1988	Privacy Act 1988 (Cth)
SBA	Super Benefits Administration Pty Ltd
SIS	Superannuation Industry (Supervision Act) 1993 (Cth) and Regulations
SPS 231	Prudential Standard SPS 231 Outsourcing
Systemic Flaw	A persistent defect in policy or procedure that has or is likely to result in multiple complaints
Trustee	First Super Pty Limited
Trustee Approval	Means approval from either the CEO, Executive Manager Governance, or Risk Manager

9 Review, Update, and Approval

This Policy should be reviewed and updated every two years, and no later than 30 months since its last review.

The Board has overall responsibility for the approval of this Policy.