

# Market Bulletin

Ref: Y5154

**Title** International Complaints Handling: Australia, Canada, New Zealand and Singapore and other territories

---

**Purpose** To advise that Australia, Canada, New Zealand, Singapore and all other remaining territories are now in-scope for Lloyd's international complaints handling arrangements from 31 March 2018.

---

**Type** Event

---

**From** Paul Brady, Head of Policyholder & Third Party Oversight  
Performance Management

---

**Date** 16 January 2018

---

**Deadline** From 31 March 2018 - on renewal of the placement or binding authority  
From 31 March 2019 - all placements and binding authorities

---

**Related links** [www.lloyds.com/complaintshandling/international](http://www.lloyds.com/complaintshandling/international)

---

In January 2016, Lloyd's notified details of its arrangements for the reporting of international complaints - see [Market Bulletin Y4961](#). As noted in that bulletin, the implementation of the new arrangements would be rolled out on a territory specific basis. To-date arrangements have already been rolled out for a number of territories including EEA countries and for the US.

Managing agents are advised that all remaining territories are now in scope.

Managing agents are also asked to note that a two stage complaints handling process will apply in Australia, Canada, New Zealand and Singapore. Details of the processes to be followed for these territories are set out in Appendix 1. It is important to note that there are differences between each of the processes and therefore careful attention must also be paid to the guidance notes available at [www.lloyds.com/complaintshandling/international](http://www.lloyds.com/complaintshandling/international) which explain each process in more detail.

---

## Timetable for implementation

All in scope binding authorities and in scope open market placements (including line slip programmes and master or group policies) placed or renewed from the 31 March 2018 are required to adopt the new arrangements. All in scope binding authorities or other placements renewing before 31 March 2018 must adopt the new arrangements on renewal and by no later than 31 March 2019. "In scope" placements mean those where the policyholder is an eligible complainant according to the local definition.

The market should note the following additional points:

### Australia

The complaint process for Australia is to remain unchanged from the arrangements that are currently in place for Australian business. Therefore, notwithstanding the process detailed in [Market Bulletin Y4961](#) there is no requirement to provide a copy to Lloyd's of each original complaint and stage one response. Instead complaints must be notified to Lloyd's upon resolution of the complaint at stage one. Full details of the process to be followed are contained within the guidance notes for Australia at [www.loyds.com/complaintshandling/international](http://www.loyds.com/complaintshandling/international).

### Canada

To support the implementation of the changes by coverholders and TPAs in Canada, Lloyd's has produced the following documents, available to download at [www.loyds.com/complaintshandling/international](http://www.loyds.com/complaintshandling/international):

- A guidance note and FAQs prepared for coverholders and TPAs dealing with Canadian business.
- Model complaints handling clauses for endorsing to binding authority agreements writing Canadian business - these are currently being drafted by the LMA and will be published shortly. That clause must be used and should not be amended.

A letter from the Head of Policyholder & Third Party Oversight has been produced which Lloyd's brokers will be asked to send to all Canadian coverholders explaining the changes. This letter has been produced because it is important that coverholders are given consistent instructions by all managing agents for the successful implementation of the new arrangements. Variations of approach between managing agents, while understandable, can cause confusion for coverholders. This is particularly the case for coverholders who have binding authorities with more than one managing agent.

Managing agents are also asked to use the guidance note prepared for coverholders and TPAs as the basis for any briefing of coverholders/TPAs writing Canadian business.

## New Zealand

The complaint process is to remain unchanged from the arrangements that are currently in place for New Zealand business with the exception that Lloyd's Australia will now conduct the stage two review rather than the Lloyd's Complaints team in the UK. In line with the Australian process there is no requirement to provide a copy of each original complaint and stage one response to Lloyd's. Instead complaints must be notified to Lloyd's upon resolution of the complaint at stage one. Full details are contained with the guidance notes at [www.lloyds.com/complaintshandling/international](http://www.lloyds.com/complaintshandling/international).

## Singapore

The complaint process for Singapore will follow the UK definitions and timescales, and stage two escalations will be carried out by Lloyd's Asia. Full details of the process to be followed are contained within the guidance notes for Singapore at [www.lloyds.com/complaintshandling/international](http://www.lloyds.com/complaintshandling/international).

## Remaining Territories

There are no further territory specific arrangements being implemented. Instead for all other territories [Market Bulletin Y4961](#) applies and complaints should be handled in accordance with local requirements and timeframes and reported to Lloyd's using the standard template, with copies of the complaint and response provided in the usual manner. For internal monitoring purposes, Lloyd's will utilise an eight week deadline for these territories.

## Further information

Model complaints handling clauses for all territories for endorsing to binding authority agreements are currently being drafted in conjunction with the LMA and these will be published shortly.

Copies of all relevant material, including full details of all in-scope territories, can be found at [www.lloyds.com/complaintshandling/international](http://www.lloyds.com/complaintshandling/international) including summary pages for each in-scope territory and country specific guidance notes for each of the territories following a two stage process.

Any questions regarding the arrangements for complaints handling at Lloyd's can be sent to the Complaints team by email at: [complaints-enquiries@lloyds.com](mailto:complaints-enquiries@lloyds.com). Alternatively, managing agents can contact the Complaint Handling Helpline on 020 7327 5696.