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Internal Dispute Resolution Policy and Procedure

R & K Partners Pty Ltd

ACN: **651 962 579**

Australian Credit Licence: **389328**

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1. Introduction

All Australian Financial Services (AFS) licensees must maintain a dispute resolution system that ensures client complaints are managed fairly, promptly, and transparently. This system must include:

- Internal Dispute Resolution (IDR): A documented procedure that complies with the standards and requirements set by ASIC in Regulatory Guide 271 Internal Dispute Resolution. This applies to all complaints made by retail clients about the financial services provided
- External Dispute Resolution (EDR): Membership with the Australian Financial Complaints Authority (AFCA), the approved external dispute resolution scheme

AFS licensees are also required to follow and comply with their IDR procedures in practice, not just in documentation.

R & K Partners Pty Ltd maintains Internal Dispute Resolution (IDR) procedures that comply with **ASIC Regulatory Guide 271: Internal Dispute Resolution (RG 271)**. These procedures incorporate and build upon the principles of **AS ISO 10002:2018 – Quality management, customer satisfaction, guidelines for complaints handling in organizations**.

This IDR framework ensures all complaints from clients are addressed fairly, promptly, transparently, and consistently, with our legal and regulatory obligations.

External Dispute Resolution (EDR)

R & K Partners Pty Ltd is a member of the **Australian Financial Complaints Authority (AFCA)**, the approved external dispute resolution scheme. AFCA provides free, fair, and independent services to consumers who are unable to resolve their complaints directly with us. **AFCA** membership number: **89677**.

2. Purpose

The purpose of this policy is to ensure that R & K Partners Pty Ltd manages complaints from retail clients in a fair, timely, and transparent manner. This document provides guidance for both internal staff and clients on how complaints are handled and supports compliance with regulatory obligations under **ASIC Regulatory Guide 271 (RG 271): Internal Dispute Resolution (RG 271)**. These procedures incorporate and build upon the principles of **AS ISO 10002:2018 – Quality management, customer satisfaction, guidelines for complaints handling in organisations**.

3. Scope

This Internal Dispute Resolution Policy and Procedure applies to:

1. **Clients:** All retail clients, including individuals and small businesses, receiving financial services or products
2. **Complaints Covered:** Complaints relating to financial services or products, including advice, accounts, fees, charges, service delivery, and staff conduct. Excludes complaints subject to legal proceedings or outside the organisation's control
3. **Personnel:** All staff, representatives, and authorised third parties involved in providing financial services or handling complaints
4. **Processes:** Steps for receiving, recording, assessing, resolving, and responding to complaints, including escalation and reporting
5. **Regulatory Compliance:** Ensures compliance with RG 271, incorporates principles from AS ISO 10002:2018, and aligns with AFCA membership
6. **Purpose:** Protect clients' rights, manage complaints effectively, and identify opportunities for service and process improvements

4. Definitions

AFCA	Australian Financial Complaints Authority – the external dispute resolution body approved by ASIC to handle complaints that cannot be resolved internally.
Complaint	An expression of dissatisfaction made by a client relating to a financial service or product provided by R & K Partners Pty Ltd.
Client	A retail client of R & K Partners Pty Ltd, including individuals or small businesses, who receive financial services or products.
IDR (Internal Dispute Resolution)	The internal process used by R & K Partners Pty Ltd to receive, investigate, and resolve complaints from clients.
EDR (External Dispute Resolution)	The process by which complaints that cannot be resolved internally are referred to AFCA for independent review.
Staff / Representatives	All employees, contractors, and authorised third parties providing financial services on behalf of R & K Partners Pty Ltd.
Retail Client	As defined under the Corporations Act 2001, typically an individual or small business receiving financial services not considered wholesale or sophisticated clients.

5. Commitment

R & K Partners Pty Ltd is committed to:

- Handling all complaints fairly, promptly, and confidentially
- Ensuring that complaints are resolved in line with **ASIC RG 271** requirements and best practice standards
- Using complaints as an opportunity to improve our services, processes, and client experience
- Providing clear information to clients about how to make a complaint and their rights, including access to **AFCA** if the matter cannot be resolved internally

6. Internal Dispute Resolution (IDR)

Step 1: Receipt of Complaint

- Complaints can be received in writing (email, form, letter) or verbally (documented by staff)
- Complaints must be logged in the [complaints register](#) with date, client details, and nature of complaint

Step 2: Assessment and Acknowledgement

- Confirm complaint is within scope
- Acknowledge receipt within **1 - 5 business days**

Step 3: Investigation

- Investigate thoroughly, gathering relevant facts and documents
- Ensure impartiality and transparency throughout

Step 4: Response

- Provide a written response within **30 calendar days**, including findings and proposed resolution
- Advise client of their right to escalate to AFCA if dissatisfied

Step 5: Escalation to **AFCA**

- Facilitate referral to AFCA if the complaint is unresolved
- Provide all relevant documentation to AFCA as required

Step 6: Record-Keeping and Review

- Record all complaints, actions, and outcomes in the complaints register
- Review complaints periodically to identify trends and systemic issues

7. External Dispute Resolution (EDR)

R & K Partners Pty Ltd is a member of the **Australian Financial Complaints Authority (AFCA)**. AFCA provides an **independent, free, and fair** mechanism for resolving complaints that cannot be resolved internally.

Clients can contact AFCA directly:

Website: www.afca.org.au

Phone: 1800 931 678

8. Responsibilities

The Directors of R & K Partners Pty Ltd are responsible for ensuring that the *Internal Dispute Resolution (IDR)* procedures are fully implemented, actively monitored, and regularly reviewed to ensure ongoing compliance and effectiveness.

Staff members are expected to follow the IDR procedures carefully and to report any complaints promptly, ensuring that all client concerns are captured and addressed in a timely manner.

The Compliance Officer is responsible for maintaining the complaints register, monitoring adherence to regulatory timeframes, and reporting any systemic issues or trends to management to support continuous improvement in the organisation's complaint handling processes.

9. Monitoring

R & K Partners Pty Ltd will regularly review this policy and procedure to ensure it remains effective, compliant, and relevant. Oversight will be managed by the company directors or a delegated officer.

Authorised by:

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Director

Luke Radford

Director

Date:

17/09/15

Version	Date	Author	Changes	Review
1.0	2023	Annette Krapkat	Issued	
2.0	10/09/2025	Jill Keen	Rewritten and updated to current template for consistency	2026