

**Comments Template on EIOPA-CP 11/010a and EIOPA-CP 11/010b
 Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance
 Undertakings and Draft Report on Best Practices by Insurance Undertakings in handling
 complaints**

**Deadline
 31 January 2012
 12:00 CET**

Company name:	The Financial Services Authority	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. <i>Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.</i>	Public

Please follow the instructions for filling in the template:

- ⇒ Do **not** change the numbering in column "Reference", or any other formatting in the file.
- ⇒ Please fill in your comment in the relevant row. If you have **no comment** on a paragraph, keep the row **empty**. Please do not delete rows in the table.
- ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below.
 - If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies.
 - If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment relating to the corresponding paragraph.

Please send the completed template to CP-010@eiopa.europa.eu, in MS Word Format, (our IT tool does not allow processing of any other formats).

The paragraph numbers and questions below correspond to document no. EIOPA-CP-11/010a.

There is an additional section at the end of the table for general comments on the draft Best Practices Report (document no. EIOPA-CP-11/010b).

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Reference	Comment	
General Comment		
3.1.		
3.2.		
3.3.		
3.4.		
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3.11.		
3.12.		
3.13.		
3.14.		
3.15.	<p>With reference to paragraph 3.15, third bullet, sub paras (i) and (ii). Sub para (i) sets out the information to be given about how to complain. Sub para (ii) sets out the information to be given about the process that will be followed when handling the complaint. Sub para (i) sets a specific requirement for the information that must be given; sub para (ii) only give examples of the kind of information that might be given. We feel that sub para (i) is overly prescriptive. We do not believe that there are compelling consumer protection reasons to require that firms provide specific information about how to complain, providing it is appropriate. We would suggest that sub para (i) be worded similarly to sub para (ii), so that it reads: "details of how to complain and, in particular: (e.g. the type of information to be provided by the complainant, the identity and the contact details of the person or department to whom the complaint should be directed);</p>	

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3.16.		
3.17.	Comments are not being sought on this paragraph at this stage	
3.18.	Comments are not being sought on this paragraph at this stage	
3.19.		
Q1. – on Impact Assessment		
Q2.– on Impact Assessment		
Q3.– on Impact Assessment		
Q4.– on Impact Assessment		
Best Practices Report Comments (EIOPA-CP-11/010b)		