



STATE SUPER
SAS Trustee Corporation

Complaint and Dispute Resolution Policy

Version 4.1

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4.1	Terri Webb	MSC	<p>To reflect changes in the <i>Superannuation Administration Act 1996</i> s.88 Appeals</p> <p>(1) A person aggrieved by a determination of STC or an STC disputes committee under section 67 (relating to determination of disputes) may appeal against the determination to the Industrial Relations Commission in Court Session (the <i>Commission</i>) (this was previously the Supreme Court of NSW)</p> <p>Typos, formatting and cross-references corrected in version 4.1 (March 2025)</p>	The Board Date: 3 October 2024
3.0	Terri Webb	MSC	To reflect changes in the regulations. RG 165 withdrawn and replaced with RG 271, which is effective from 5 October 2021	The Board Date: 26 August 2021
2.0	Terri Webb 26/04/2018	MSC	Update to separate the Policy from the procedure	The Board Date: 26 April 2018
1.0	Brian Matthews 9/12/2010			The Board Date: 9 December 2010

1 INTRODUCTION

1.1 Background

The SAS Trustee Corporation (**STC or State Super**) is required to establish and maintain appropriate internal and external arrangements for consideration, in a timely fashion, of complaints and disputes made by members and beneficiaries of its schemes.

This policy describes/sets out STC's dispute resolution system with respect to members, former members and beneficiaries of the STC schemes. The policy complies with the requirements of:

- a) the legislation governing STC, the SA Act,
- b) the legislation governing each of the STC schemes:

And also incorporates the following as guiding principles:

- (a) the New South Wales Government Model Litigant Policy; and
- (b) ASIC Regulatory Guide 271 (**RG 271**).

1.2 Commencement of Policy

This Policy commenced on 26 April 2018.

1.3 Objectives

In implementing the Policy, STC aims to ensure that:

- (a) Members, former members and beneficiaries of the STC schemes are treated fairly and, consistently;
- (b) Complaints and disputes are managed in a transparent, efficient, timely, and effective manner;
- (c) Relevant service providers (the Administrators) are monitored to ensure that they can handle inquiries, complaints and disputes in an efficient, timely and effective manner for and on behalf of STC;
- (d) A member-focused approach is applied to resolving complaints and disputes; and
- (e) it is open to feedback, and demonstrates its commitment to the efficient, timely and effective resolution of complaints and disputes by its actions.

STC considers its internal complaint handling procedure(s) (summarised in section 5 of this Policy) to be an integral component of its dispute resolution system as it provides:

- I. STC and the Administrators the opportunity to hear member concerns and expressions of dissatisfaction and to address them fairly, efficiently and effectively;
- II. Members, former members and beneficiaries with the opportunity to have their complaints resolved quickly and directly;
- III. Assists STC in identifying and addressing recurring or systemic problems (which can then lead to improvements in STC's business systems and products/services); and
- IV. improved level of member confidence and satisfaction.

2 REGULATORY OBLIGATIONS

2.1 STC's legislative and regulatory environment

STC is, as provided by section 48 of the SA Act, a statutory body representing the Crown (in the State of New South Wales).

STC is governed by the SA Act which makes specific reference to a "dispute" concerning an STC scheme, the determination of a "dispute" and the appeal rights relating to a "dispute". Therefore for STC's purposes a dispute is a specific type of complaint (refer to section 4 of the Policy) and does not refer to the general financial services meaning of the term which is generally synonymous with "complaint".

Under subsections 912A(1)(g) and (2) of the *Corporations Act 2001* (Cth), an Australian Financial Services (**AFS**) licensee must have:

- internal dispute resolution procedures that complies with standards and requirements made or approved by ASIC;
- membership of one or more external dispute resolution schemes approved by ASIC.

RG 271 explains what AFS licensees must do to have a dispute resolution system in place that meets ASIC's requirements.

STC is exempt from the AFS licensing regime because the STC schemes are "exempt public sector superannuation schemes" within the meaning of the SIS Act and are not financial products as defined under the *Corporations Act 2001* (Cth)¹.

STC is required to have regard to the Heads of Government Agreement commencing 1 July 1996 in relation to the operation of the SIS Act and the Government's retirement incomes policy (**HOGA**). Relevantly, under HOGA, STC is required to establish and maintain appropriate internal and external arrangements for the consideration in a timely manner of complaints made by members, former members and beneficiaries of the STC schemes.

STC aims to comply, on a best endeavours basis, with RG 271 as if it were the trustee of a regulated superannuation fund, but taking into account the provisions of the SA Act and the legislation governing the STC schemes.

STC believes that its dispute resolution system, as set out in this Policy and the Procedures, is such that it satisfies, as far as practicable, ASIC's requirements for internal dispute resolution procedures. Although STC is not a member of an external dispute resolution scheme, there are external dispute rights for members, former members and beneficiaries of the STC schemes provided by NSW legislation. The SA Act provides that any person aggrieved by a determination of STC or an STC disputes committee in relation to a dispute lodged under the relevant scheme legislation can appeal against that determination to the Industrial Relations Commission in Court Session (the **Commission**). The PRS Act provides that a person aggrieved by a decision made by STC (or its delegate PSAC) on a matter that arises under the PRS Act by reason of a member or former member of the Police Force being hurt on duty can appeal against the decision to the District Court of NSW.

¹ Section 765A(1)(q) of the *Corporations Act*, together with *Corporations Regulation 7.1.05*, contain the exemption for exempt public sector superannuation schemes.

2.2 Model Litigant

As an agency of the Crown, STC is governed by the New South Wales Government Model Litigant Policy. The Model Litigant Policy requires that the State and its agencies act with complete propriety, fairly and in accordance with the highest professional standards. As a model litigant STC is committed to:

- a. deal with claims properly and without unnecessary delay;
- b. not take advantage of a claimant who lacks the resources to litigate a legitimate claim;
- c. pay legitimate claims without litigation;
- d. using best endeavours to avoid litigation;
- e. keep costs to a minimum; and
- f. apologise where STC has acted inappropriately.

These commitments are reflected in this Policy and the Procedures.

3 WHAT IS A COMPLAINT AND WHAT IS A DISPUTE?

3.1 Definition of complaint

For the purposes of the Policy and Procedures, a complaint is:

An expression of dissatisfaction, verbal or written, made to STC or an Administrator, related to its products or services, or the complaint handling procedures themselves, where a response or resolution is explicitly or implicitly expected or legally required.

For these purposes, a complaint includes a dispute but does not include an inquiry.

STC's internal complaint handling procedures, which are an integral part of its dispute resolution system, are summarised in section 5 of this Policy.

3.2 Definition of a dispute

A dispute is a specific type of complaint. For the purposes of the Policy and Procedures, a dispute is:

A written notice expressing that the complainant wants to dispute a decision made by STC or a delegate of STC relating to an entitlement or claimed entitlement under the governing legislation of an STC scheme.

A dispute will most likely arise from a decision by a delegate of STC about an entitlement or claimed entitlement to a benefit payable or claimed to be payable from an STC scheme. STC's internal dispute resolution procedures, which involve the determination of a dispute by the MSC, are summarised in section 6 of this Policy.

3.3 An inquiry is not a complaint

An inquiry made by a member, former member or beneficiary of the STC schemes is not a complaint unless the person in question expresses dissatisfaction with the outcome of the inquiry.

4 STC'S COMMITMENT TO RESOLVING COMPLAINTS

STC is committed to fair, objective, impartial and timely consideration of complaints and disputes. STC focuses on member satisfaction and aims, to the best of its ability, to handle and resolve all complaints fairly, effectively and efficiently.

STC's commitment to the fair, effective and efficient handling and resolution of complaints and disputes is demonstrated by the following.

4.1 The Policy

The principles and framework for complaint and dispute resolution outlined in this Policy are evidence of the Board's commitment. Performance in relation to complaint resolution is a key performance indicator for each Administrator.

4.2 Management and reporting systems

STC has in place adequate and appropriate management and reporting systems with regard to complaints and disputes to enable effective monitoring of the handling of complaints and disputes. STC collects relevant data and information relating to all complaints and disputes received, including regular reporting from its Administrators. STC management provide regular reporting to the Board and Committees regarding STC's compliance and the compliance of its Administrators with the Policy.

4.3 The provision of adequate resources

STC will ensure that adequate resources are allocated to complaint and dispute handling at all times. This includes ensuring that its Administrators allocate adequate numbers of experienced staff and robust systems to handle complaints in an efficient, timely and effective manner, with the staff having access to and appropriate documentation, specialist support, materials and equipment and computer hardware and software. STC requires that staff allocated to complaint and dispute handling will have the authority to settle complaints or disputes (as applicable) or ready access to someone who has the necessary authority.

4.4 Training of specialist staff at STC and its Administrators

STC requires that its staff and those of its Administrators who are allocated to complaint or dispute handling are properly trained for their roles, have been provided with a copy of the Policy and are therefore capable of competently handling complaints or disputes (as applicable). STC employs specialist staff trained in complaint handling and in the governing legislation and rules of the STC schemes and requires the same of its Administrators, so as to ensure that appropriate responses are provided to inquiries and complaints. All staff who deal with members, former members or beneficiaries, not just the complaints team, are expected to have an understanding of the Policies and Procedures.

4.5 Policy to be publicly available

To assist members, former members and beneficiaries to understand how to make an inquiry or complaint or to notify of a dispute, as well as how a complaint or dispute will be dealt with, the Policy will be made publicly available on the State Super website.

5 SUMMARY OF STC'S INTERNAL COMPLAINT HANDLING PROCEDURES

5.1 Outsourcing of complaints handling to Administrators

STC outsources the first stage of its internal complaint handling process to its Administrators who are contracted by STC to provide administration and related services for STC in relation to the STC schemes. These services include the requirement for the Administrators to handle complaints made to them in their role as administrator. Each Administrator has staff who are specifically responsible for receiving, investigating and responding to complaints.

The handling of complaints by the Administrators forms part of the service standards in each of their respective service contracts.

STC oversees and monitors the performance of the Administrators in handling and resolving complaints and requires that they comply with this Policy and the Procedures.

5.2 Complaints made to the Administrator

Complaints that are made to an Administrator (or complaints made directly to STC that relate to the administration of an STC scheme) are generally to be dealt with by that Administrator in the first instance.

Complaints that should be made or directed to an Administrator in the first instance include complaints about the standard or quality of service provided by an Administrator in administering the STC schemes; for example, a complaint that claims:

- a delay in the processing by an Administrator of a benefit or other administrative task applied for or requested by a member or former member of an STC scheme;
- an error in the processing by an Administrator of a benefit or other administrative task applied for or requested by a member or former member of an STC scheme;
- the provision of incorrect information about the STC schemes or a particular membership or former membership of a STC scheme by an Administrator to a member or former member or beneficiary;
- an incorrect or unfair application or interpretation of the governing legislation or rules of an STC scheme in relation to the circumstances of a member or former member or beneficiary of an STC scheme by an Administrator; or
- a problem with the way a complaint has been handled by an Administrator.

A complaint may be written or verbal (eg over the phone), but as part of the investigation process an Administrator may request that a complainant clarify the details of the complaint in writing, or provide further information about the complaint in writing.

However, a "complaint" about a decision of Mercer or PSAC as delegate of STC about an entitlement to a benefit payable or claimed to be payable under the governing legislation of an STC scheme is a dispute, and has to be made in writing to STC (see sections 3.2 and 6 of this Policy).

5.3 Complaints escalated to STC

There may be occasions where a complaint made to an Administrator cannot be resolved without the assistance of STC. In such cases, the complaint will be escalated to STC for investigation and/or resolution. This may occur in situations where the complaint is:

- of a type which is beyond the authority of the Administrator to resolve;
- about the management, policy or rules of the scheme;
- concerning investment strategy or asset allocation of the STC Pooled Fund;
- the nature of the complaint requires escalation; or

where the complainant is not satisfied with resolution of the complaint by the Administrator.

5.4 Timeframes for acknowledging and responding to complaints

Acknowledgement of receipt of a complaint should be made within 24 to 48 hours or 1 – 2 working days upon receipt by an Administrator.

An Administrator is required to provide a final response to a complaint within 20 business days of receipt of all information². However, if a response cannot be made within this time frame, the reasons should be recorded in the Administrator's complaints register and consideration given to whether the matter requires escalation to STC. In any case, a final response must be made within 45 days, depending on the subject matter of the complaint. For complaints which are directed to or escalated to STC, STC will comply with the same timeframes as are required of an Administrator.

At the conclusion of the investigations of STC or an administrator, a response will be given outlining the reasons for the decision made. If a decision is unable to be reached within 45 days, written notice will be sent to acknowledge that more time is necessary until completion.

6 INTERNAL RESOLUTION OF DISPUTES BY STC

6.1 Decisions by delegates of STC

The Board delegates the responsibility for making decisions in relation to an entitlement or claimed entitlement under the governing legislation of an STC scheme. The decisions made by STC's delegates are treated as decisions of STC and are subject to the Policy. The delegates are:

- (a) **Mercer**; in respect of a decision in relation to an entitlement or claimed entitlement under the governing legislation of SSS, SASS or SANCS and in respect of an entitlement or claimed entitlement under the governing legislation of PSS but excepting the types of decisions specified below;
- (b) **PSAC**; in respect of a decision under the PRS Act with respect to an application for :
 - (i) a certificate of incapacity to personally exercise the functions of a

² These time frames are in the Administrators' respective dispute resolution policies.

- Police officer, by a member of the Police;
- (ii) a retrospective certificate of incapacity to personally exercise the functions of a Police officer or to discharge the duties of office, whichever is applicable in a particular circumstance, by a former member of the Police;
 - (iii) an increase to the rate of pension of a hurt on duty (HOD) pensioner and/or for a change to the commencement date of the pension; or
 - (iv) benefit or benefits payable upon the death of a member or former member of the Police Force whose death is determined to have been caused by his or her having been hurt on duty whilst in the Police Force; or
 - (v) lump sum (gratuity) benefit payable upon the death of a member of the Police Force whose death is not determined to have been caused by his or her having been hurt on duty whilst in the Police Force;
- (c) **Allianz**; in respect of a claim under the PRS Act by a member or former member of the Police Force who was hurt on duty for:
- (i) payment or reimbursement of medical expenses; or
 - (ii) a lump sum benefit for permanent impairment;
- (d) **the CEO of STC**; in respect of a decision in relation to an entitlement or claimed entitlement under the governing legislation of any of the STC schemes, and particularly with respect to any decision in relation to an entitlement or claimed entitlement under the governing legislation of any of the STC schemes which has been specifically delegated to the CEO by the Board, and also in any situation where PSAC or Mercer is unable or unwilling to exercise a function delegated to it because of a conflict or perceived conflict of interest or where the CEO decides the function should not be exercised by PSAC or Mercer.

A dispute is a specific type of complaint (see section 3.2 of this Policy) where the complainant expresses in writing that he or she wants to dispute a decision made by STC or a delegate of STC (usually Mercer or PSAC) relating to an entitlement or claimed entitlement under the governing legislation of an STC scheme. Note: Some decisions by STC or its delegate do not attract a right of dispute but can be appealed direct to the District Court (see below and section 7.1 of this Policy).

Whenever a decision which can be disputed is made by STC or a delegate of STC, the member or former member or beneficiary of an STC scheme to whom the decision relates has to be informed in writing of the decision and of the right under the governing legislation of the applicable STC scheme, to dispute the decision and to have the dispute determined by STC under the SA Act (see section 6.2 of this Policy). The person must also be informed of the statutory 2 year period in which a dispute must be notified to STC.

Disputes can be notified to STC by writing to:

Disputes Officer
SAS Trustee Corporation
PO Box N259
Grosvenor Place NSW 1220

A decision of STC or a delegate of STC cannot be appealed to a NSW court without a dispute first being determined by STC (ie by the MSC), except for a decision made by STC or its delegate (the CEO, PSAC or Allianz) in a matter that arises under the PRS Act by reason of a member or former member of the Police Force being hurt on duty. (see section 8.1 of this Policy).

6.2 Determination of disputes

The SA Act requires a dispute concerning an STC scheme to be determined by STC or an STC disputes committee. The MSC is STC's disputes committee. The Board has delegated to the MSC the authority to:

- a) investigate disputes involving members or beneficiaries/potential beneficiaries of the STC schemes with respect to STC scheme matters in accordance with s.67 of the SA Act;
- b) consider and determine disputes in accordance with s.67 of the SA Act and either;
 - confirm the delegate's decision;
 - amend the delegate's decision;
 - reverse the delegate's decision; or
 - defer the matter and seek further information.

Written notice of a dispute must be served on STC (or its delegate) within 2 years after the aggrieved person (the member or former member or beneficiary who is dissatisfied with the applicable decision of the delegate of STC) is notified in writing of the right to dispute the decision. If a dispute is notified to STC outside of that 2 year period and the aggrieved person had been properly informed of the right to dispute the decision within the 2 year period, the MSC does not have to determine the dispute. However if the aggrieved person had not been properly informed, the MSC should proceed to determine the dispute.

The STC Member Engagement team are responsible for acknowledging the receipt of disputes and corresponding with the person who made the dispute (the disputant) to request clarification if applicable, concerning the details of the dispute and further information or supporting evidence as appropriate. The Member Engagement team are responsible for making a recommendation to the MSC for consideration of a dispute at a regular MSC meeting. The MSC will make determinations about disputes at its regular meetings and the Member Engagement team are responsible for writing to a disputant to inform them of the determination of their dispute by the MSC and of the applicable statutory right of appeal.

If at any stage while a dispute is being considered by the MSC, the disputant does not respond to requests from the Member Engagement team to provide information or further information with respect to the dispute, or otherwise refuses to assist or co-operate with the investigation of the dispute, the Member Engagement team should take reasonable steps to contact the disputant to obtain the required information. If no co-operation or no further information is forthcoming from the disputant, the Member Engagement team should provide a recommendation to the MSC for the determination of the dispute based on the available evidence.

Further details about the process for investigating and determining disputes are contained in the Procedures.

7 EXTERNAL RESOLUTION OF DISPUTES

7.1 Statutory appeal rights

Members, former members and beneficiaries of the STC schemes have a statutory right to make an appeal to a NSW court if they are aggrieved by a decision of STC or the MSC when determining their dispute, or by a decision of PSAC or Allianz as delegates for STC in a matter that arises under the PRS Act by reason of a member or former member of the Police Force being hurt on duty. As mentioned in section 6.1 of this Policy, the latter situation does not involve a statutory right to dispute the decision with STC, but instead there is a direct statutory right of appeal to the District Court. (There is also a statutory right of appeal to the District Court for person aggrieved by a decision made by the Commissioner of Police under various provisions of the PRS Act).

The rights to appeal are to:

- (a) The Industrial Relations Commission in Court Session (the *Commission*) under section 88 of the SA Act where the person is aggrieved by a decision of STC or the MSC when determining their dispute. The timeframe for making such appeal is 6 months after the aggrieved person is notified of the decision against which the appeal will be lodged, or within such further period as the Commission allows.
- (b) The District Court of New South Wales under section 21 of the PRS Act where the person is aggrieved by a decision of PSAC or Allianz on a matter that arises under the PRS Act by reason of a member or former member of the Police Force being hurt on duty. The timeframe for making such appeal is within 6 months after the aggrieved person is notified of the decision which is to be appealed.

Any member, former member or beneficiary of an STC scheme who has a decision made by STC, or a delegate of STC where there is a statutory right of appeal has to be informed of their right of appeal at the time they are notified in writing of the decision. They are informed at that stage of the timeframe in which an appeal must be lodged and the name and contact details of the Court to which they can appeal.

The relevant contact details for the Industrial Relations Commission of NSW are as follows:

Level 10, 10-14 Smith St
Parramatta NSW 2150

Industrial Court of NSW
Level 1, 47 Bridge Street
Sydney NSW 2000

Postal address
PO Box 927
Parramatta NSW 2124

Ph. 02 8688 3516

Email: IRC.Registry@courts.nsw.gov.au

The relevant contact details for the Registry of the District Court of NSW in Sydney are as follows:

District Court Civil Registry
Level 4 John Maddison Tower
86 Goulburn Street
Sydney NSW 2000

Postal address
PO Box K1026
Haymarket NSW 1240

Ph. 1300 679 272

Email: ag-sdc-civil@justice.nsw.gov.au

Complaints to NSW Ombudsman

If a person has a complaint about STC that does not involve a right to raise a dispute to be determined by STC's Member Services Committee or to appeal to a court, then the person can contact the NSW Ombudsman's office directly by emailing www.ombo.nsw.gov.au. To see when and how a member may be able to make a complaint to the NSW Ombudsman visit: www.ombo.nsw.gov.au/Making-a-complaint/how-to-make-a-complaint

Decisions made by STC or a delegate in relation to the STC schemes cannot be appealed to the Australian Financial Complaints Authority (AFCA), because the STC schemes are "exempt public sector superannuation schemes" within the meaning of the SIS Act. This means that the Australian Financial Complaints Authority has no jurisdiction with respect to decisions made by STC or its delegates.

When an appeal is made against a decision of STC or its delegate to either the Industrial Relations Commission in Court Session or the District Court, STC will defend the appeal as the respondent or defendant.

Where an appeal is made to the Industrial Relations Commission of New South Wales under section 88 of the SA Act, where the person is aggrieved by a decision of STC or the MSC when determining a dispute, the STC Legal team will take carriage of the appeal for STC.

Where an appeal is made to the District Court under section 21 of the PRS Act where the person is aggrieved by a decision of PSAC or Allianz on a matter that arises under the PRS Act by reason of a member or former member of the Police Force being hurt on duty, the STC Legal team will take carriage of the appeal for STC if it is concerning a matter relating to an HOD pension entitlement, but it is Allianz who will take carriage of the appeal if it is concerning a matters relating to a claim for medical expenses and/or permanent impairment.

STC and Allianz generally use experienced barristers for the litigation of appeals.

7.2 Obligations upon STC as a model litigant

STC aims to comply with the NSW *Model Litigant Policy for Civil Litigation*, which is designed to provide guidelines for best practice for government agencies in civil litigation matters, in its conduct of appeals against its decisions. Under the policy, government agencies are required to:

- deal with claims promptly;
- not take advantage of a claimant who lacks the resources to litigate a legitimate claim;
- pay legitimate claims;
- avoid litigation;
- keep costs to a minimum, and
- apologise where the State has acted inappropriately.

The MSC is delegated by the Board, the authority to authorise a settlement of legal proceedings but will take advice as required from the STC Legal team and, where necessary, will seek external legal advice.

STC will not appeal the decision of a court to a superior court merely on the basis that the court provided the appellant with a better outcome than that provided by STC or its delegate. However, if the decision of the court is one that affects the interpretation of the STC scheme legislation, has policy ramifications for the rules of an STC scheme or would result in an abnormal cost to the Pooled Fund as a result of giving a large number of members an opportunity to make a similar claim that would otherwise not be available, STC will consider appealing the decision to a superior court after seeking external legal advice on the prospects of success of any appeal.

Any such appeal made by STC has to be approved by the STC CEO under delegation from the Board. The STC General Counsel provides regular monthly reports to the Board on the progress of appeals.

7.3 External complaint rights where a complaint made to Administrator not concerning administration matters

Both Mercer and Allianz are members of the Australian Financial Complaints Authority (AFCA), the external dispute resolution scheme applicable to complaints that do not relate to superannuation matters.

If an STC scheme member, former member or beneficiary has a complaint concerning an Administrator about a matter that does not relate to the administration of the STC scheme that they are a member of or a beneficiary (and therefore does not involve STC) and the complaint cannot be satisfactorily resolved by the Administrator, the complainant can complain further to the Australian Financial Complaints Authority (AFCA). The complainant should be informed of their rights to make such further complaint by the Administrator together with the name and contact details of the Australian Financial Complaints Authority (AFCA). AFCA can be contacted at:

GPO Box 3
Melbourne VIC 3001
Ph. 1800 931 678
www.afca.org.au

It should be noted that in practice it is very unlikely that an STC scheme member, former member or beneficiary could have a complaint concerning an Administrator about a matter that does not relate to the administration of an STC scheme.

8 REVIEW & AUDIT

8.1 Review of Policy

- (a) The Chief Experience Officer will conduct an internal review of this Policy, and the processes flowing from it, every 3 years (or more frequently if required) to:
 - (i) ensure the Policy and Procedures are appropriate and effective, taking into account, at a minimum, the size of STC's business, the range of financial products and services offered by STC, the nature of STC's member base and the likely number and complexity of complaints or disputes;
 - (ii) ensure that the procedures accurately reflect the practices of STC and its Administrators in complaints and disputes handling;
 - (iii) ensure that any legislative or operational changes have been captured;
 - (iv) incorporate any recommendations from any review or audit of this Policy or the Procedures or any recommendation from the MSC or the Board; and
 - (v) improve STC's business management practices, complaint and dispute resolution procedures and quality of products and services.
- (b) The Chief Experience Officer will arrange an external review of this Policy, in conjunction with any review of STC's governance structure, every five years. Such a review should:
 - (i) verify that appropriate governance structures and processes are in place; and
 - (ii) consider best practice and industry standards and make recommendations as to how STC should align its practices accordingly.
- (c) The Chief Experience Officer will report the results of both the internal and the external review to the Member Services Committee.

8.2 Audit

The Chief Risk Officer will:

- (a) arrange for an independent external audit (by STC's internal audit function) of this Policy and Procedures every 5 years, or as may otherwise be considered necessary; and
- (b) report the findings of the audit to the Member Services Committee.

9 MONITORING OF COMPLIANCE WITH PROCEDURES

The Chief Experience Officer is responsible for:

- a. Monitoring the Administrator in their compliance with the Procedures; and
- b. Following up with the Administrators in the event of breaches of the Policy or Procedures.

10 DEFINITIONS

In the Policy and the Procedures, the following terms have the following meanings:

“Administrator” means either or both of Allianz and Mercer.

“Allianz” means Allianz Australia Insurance Limited ABN 15 000 122 850.

“Beneficiary” means, in relation to any STC scheme, a person who is entitled to a benefit from an STC scheme and for the purpose of this Policy includes a person who makes a claim to be a beneficiary from the scheme.

“Board” means the Board of SAS Trustee Corporation.

“Complaint” is defined in section 4 of this Policy.

“Dispute” is defined in section 4 of this Policy.

“Hurt on duty” or **“HOD”** has the meaning given to it under section 1(2) of the *Police Regulation (Superannuation) Act 1906 (NSW)*.

“Mercer” means Mercer Administration Services (Australia) Pty Limited ABN 48 616 275 980.

“MSC” means the STC Member Services Committee.

“PSAC” means the Police Superannuation Advisory Committee constituted pursuant to the PRS Act.

“SA Act” means the *Superannuation Administration Act 1996 (NSW)*.

“SIS Act” means the *Superannuation Industry (Supervision) Act 1993 (Cth)*.

“Staff” includes all employees, secondees, contractors or temporary employees of the STC Staff Agency or STC.

“STC schemes” means the:

- a) the Police Superannuation Scheme (PSS) established under the *Police Regulation (Superannuation) Act 1906 (NSW)* (**PRS Act**);
- b) the State Superannuation Scheme (SSS) established under the *Superannuation Act 1916 (NSW)* (**SS Act**);
- c) the State Authorities Superannuation Scheme (SASS) established under the *State Authorities Superannuation Act 1987 (NSW)* (**SAS Act**); and
- d) the State Authorities Non-contributory Superannuation Scheme (SANCS) established under the *State Authorities Non-contributory Superannuation Act 1987 (NSW)* (**SANCS Act**).

Diagram of Complaint & Dispute Resolution Process

