

Comments Template on EIOPA-CP 13/006a and EIOPA-CP 13/006b Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance Intermediaries and Draft Report on Best Practices by Insurance Intermediaries in handling complaints		Deadline 28 June 2013 12:00 CET
Company name:	NFU (Nordic Financial Unions)	
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
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ 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 <u>no comment</u> on a paragraph, keep the row <u>empty</u>. 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. <ul style="list-style-type: none"> ○ 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. <p>Please send the completed template to CP-13-006@eiopa.europa.eu, in MS Word Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers and questions below correspond to document no. EIOPA-CP-13/006a. There is an additional section at the end of the table for general comments on the draft Best Practices Report (document no. EIOPA-CP-13/006b).</p>		

**Comments Template on EIOPA-CP 13/006a and EIOPA-CP 13/006b
 Consultation Paper on the Proposal for Guidelines on Complaints-Handling by Insurance
 Intermediaries and Draft Report on Best Practices by Insurance Intermediaries in
 handling complaints**

**Deadline
 28 June 2013
 12:00 CET**

Reference	Comment	
General Comment		
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24.		
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26.		
Q1. - on Impact Assessment		
Q2a. - on Impact Assessment		
Q2b. - on Impact Assessment		
Q2c. - on Impact Assessment		
Q2d. - on Impact Assessment		
Q3. - on Impact Assessment		
Best Practices Report Comments (EIOPA-CP-13/006b)	<p>With regard to point (vii), training of staff, concerning the "Content of a 'complaints management policy'", it must be made crystal clear that it is the responsibility of the insurance undertaking or insurance intermediary to provide its staff with adequate time and resources to fulfil the training requirement.</p> <p>With regard to point (iv), ensuring necessary internal information flows concerning the "Organisation of the internal complaints management function", existing trade union structures for sharing and disseminating information from management to staff within the undertaking or intermediary must be respected. Where applicable, such trade union structures can be an important tool to ensure the necessary internal flows of information and reporting.</p>	