



Banking
Ombudsman
Scheme

Te Whare
Rama
Tōkeke

Effective complaint handling: a guide

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Introduction

Customer complaints are an invaluable source of feedback about banks' staff, products and services. Customer complaints offer unique insights into what is working well and what isn't. Consider complaints as a **gift** - they highlight a problem, provide a chance to put it right not just for one customer, but for all, and when customers are happy, they tell other customers; retention improves, business volumes increase, revenue grows.¹

This document has been prepared by the Banking Ombudsman Scheme (BOS) to provide guidance to participants about how to structure and operate an effective internal complaints process.²

A checklist for banks is provided at the end of this document. The checklist is intended to help banks assess whether their complaint handling process is consistent with this guide.

What is a “complaint”

A complaint is when a customer tells a bank that they are dissatisfied with the bank's product, service or staff, or the way the bank has handled a complaint. The customer must also expect a response or resolution.

It is important that banks have, across the whole organisation, a collective understanding of what amounts to a complaint and how complaints should be dealt with through its internal complaint handling process.

In some cases, a complaint may be able to be resolved on the spot and need not proceed further through the internal complaint process. For example, a customer calls the call centre to complain about having been charged twice for an annual credit card fee. The staff member checks the system, sees the customer is correct, credits the customer's account, apologises for the error and inconvenience caused and the customer is satisfied with this outcome.

BOS Tip: Don't prejudge a complaint

Sometimes the staff member receiving a complaint will regard it as unjustified or without merit. This may be so but it must be regarded, and treated, as a complaint and handled accordingly regardless of a staff member's initial impression.

Where a complaint cannot be resolved immediately, a bank's internal complaints process should set out how the complaint should be handled next and what options a complainant has to escalate their concerns if they remain dissatisfied.

¹ KPMG UK, 'Why customer resolution really matters', May 2019.

² This Guide does not include reference to any additional complaint handling/dispute resolution requirements imposed by eg Credit Contracts and Consumer Finance Act 2003 and Financial Services Legislation Amendment Act 2019.

Fairness is key

Fairness is at the heart of effective complaint handling.³ The Code of Banking Practice sets out the principles of good banking practice. Banks have committed to:

- treat customers fairly and reasonably
- deal effectively with customer concerns and complaints
- put bank problems right, quickly and fairly.

BOS Tip: Fairness is key
A customer who feels their complaint to their bank was dealt with fairly is far less likely to escalate their complaint to BOS.

Features of an effective complaint handling process

A culture that values complaints

Banks with successful complaint handling functions can demonstrate a culture that values complaints and understand that the way complaints are handled has an impact on its reputation and business success. Such banks will:

- demonstrate a commitment to their complaint handling function at the most senior levels of management
- provide sufficient resources to do the job well
- train complaint staff so they are skilled in complaint handling and approach complaints with a resolution mindset
- understand, and respect, that unhappy customers will sometimes express their dissatisfaction in highly emotional and sometimes personal terms
- look beyond complainant hostility to understand the underlying concerns and motivations, and respond with empathy.

Specific features

Specific features of an effective complaint handling process include the following:

- the customer's journey through the bank's complaint process is user friendly and customer centric
- there is a clearly documented internal complaints process
- all bank staff know about the process and BOS services
- complaints are easy to make
- the bank has a dedicated, adequately resourced complaint resolution function
- staff dealing with complaints have the necessary authority to resolve them
- staff acknowledge complaints promptly, investigate them impartially and thoroughly, and respond to them quickly and fairly

³ In October 2020, the New Zealand Bankers Association (NZBA) launched Guidelines to help banks serve customer needs.

- customers feel respected, listened to and understood
- customers have confidence in the staff dealing with their complaint
- customers always know what stage their complaint is at in the bank's complaint process
- customers are told what their rights are if they don't agree with the bank's response
- a recording system is in place to record complaints and inform the business of problems and trends.

BOS Tip: The power of empathy

If a complainant is motivated by shock, anger, fear or desperation, responding with compassion, understanding and openness will not only be disarming, it will also be far more effective in moving a complaint towards a satisfactory resolution for bank and complainant.

Easy access to complaint information

A bank must make information available to its customers about their right to make a complaint and what that process will involve. This information should explain their right to complain to the bank itself, as well as to BOS. This information should be documented and available through a variety of means, including the bank's website and in branch.

Practical steps for banks to take to ensure this happens include:

- have available at point-of-sale material about how to make a complaint to the bank and to BOS
- display the current BOS brochure in all branches
- have a clearly labelled complaints section on the bank's website with information about BOS including that BOS is free and independent
- tell customers about their internal complaints process and their right to make a complaint to BOS, including our contact details and links to our website, ideally with our logo
- tell customers they can also approach BOS for advice before the bank's internal complaints process has run its course
- ensure all staff, including front-line staff, know about the bank's internal complaints process and have an understanding of BOS services (staff play a crucial role in recognising and resolving complaints and escalating those complaints that cannot be resolved on the spot).

Case study: Customers have a right to know their rights

Ravi had never missed a repayment on her home loan in 10 years, but when she rang the bank and asked for a small personal loan, the staff member turned down her request on the spot. Ravi was taken aback by this response and asked for it to be provided in writing. The staff member told her there was no point because the bank would still decline her application. Ravi replied that she felt this response wasn't fair and asked if she could complain. The staff member said there was no point because the decision wouldn't change. No information was given to Ravi about her right to complain.

The staff member should have explained that Ravi was entitled to complain to the bank and also to contact BOS (which she eventually did independently). We explained to Ravi her rights. We also explained that a decision to lend to her was ultimately the bank's commercial decision to make but that we could consider administrative errors in the lending application process and also whether she was treated fairly by the bank.

Making a complaint must be easy to do

Complaints should be accepted in a number of ways. We expect banks to offer customers a variety of ways to make a complaint, including:

- via its website
- over the phone – the bank should have a freephone 0800 complaint number (this number should be easily found on the bank's website and published in information about its complaint process)
- in person
- by letter
- by email
- through social media (if the complainant is identifiable and contactable)

Case study: Customer should have been allowed to make complaint

Tui had phoned her bank with some queries about her accounts. She wasn't happy with the answers the staff member gave her and said she wanted to make a complaint. The staff member said she couldn't help but would ask her manager to call. Tui was frustrated with this response, but nonetheless agreed to wait for the manager to call. No call ever came. Tui should have been able to make a complaint there and then over the phone.

Vulnerable complainants

Some people have greater difficulty than others in making a complaint and engaging with the bank through the complaint process. Complaint handling processes should be responsive to **all** complainants, including vulnerable customers.⁴ It is important to ensure staff have an awareness that some circumstances could result in customer vulnerability, know who to raise these with and understand how to potentially address them.⁵

⁴ Under the Code of Banking Practice banks commit to “do our best to meet the needs of all our customers”. See also Guidelines issued by the NZBA to help meet the needs of older and disabled customers.

⁵ See [Financial Markets Authority, 'Customer vulnerability- our expectations for providers', June 2020](#)

We also encourage banks to recognise the stresses complainants are often under when they are at a point of making a complaint. Complainants may be dealing with all kinds of life events and difficulties at the same time. Do not assume that everything is okay for them. Stress in different forms, and mental health challenges, can impact the way people behave, process information and make decisions. Complaint staff should be mindful of this when dealing with complainants and assist those who are having difficulty engaging in the complaint process.⁶

Assistance should be provided to people who are having difficulty formulating their complaint, or who need to communicate with the bank in a particular way. For example, this could include people for whom English is not their first language, people who cannot read or write and people with disabilities or injuries that affect their ability to communicate. We recommend that bank staff ask people if they have any special requirements for access or communications. Where a customer specifies a requirement, we would expect the bank to ensure that this is followed as far as reasonably practicable.

Case study: Insisting on phone calls breached obligation to treat customer fairly

Peta had a medical condition that made it difficult for him to use a phone. Peta told the bank about his condition and asked that it make a note on his file that it contact him only by email. Despite agreeing to his request, bank staff tried repeatedly to contact him by phone about a subsequent credit card debt. They even sent him emails asking him to call the bank back. Over the following three years, Peta repeatedly emailed the bank reiterating his difficulty with phone communication and asking that it use email instead. Peta eventually came to us and we concluded that the bank had breached its obligation to treat him fairly and reasonably.

Unreasonable complainant conduct

We recognise the challenges for bank staff when dealing with complainants who display unreasonable or challenging behaviour. Despite the challenges, it is vital that staff deal with complainants in a measured and equitable way.

We recommend banks have in place their own policy for dealing with unreasonable or challenging complainant conduct and that all relevant staff, including front line staff, are trained in dealing with such conduct.

⁶ Australian Securities and Investments Commission, 'Making it right: How to run a consumer-centric remediation', December 2020

The complaint process

The stages in the complaint process

Each bank will decide on its own complaint handling process, the design of which is usually based on the nature, scale and complexity of its business and customer base. While there is no 'one size fits all' approach, all banks should seek to ensure their process has the following key features:

- **clear and timely communication** with the complainant, which includes providing them with regular updates about progress of their complaint (this will build trust with the complainant that their complaint will be properly considered)
- an **uncomplicated, user-friendly process** that does not have excessive layers that a complainant must go through in order to receive a final position response
- **transparency at all stages** around the complainant's rights to escalate their concerns – for example if the bank's initial response to the complainant is that their complaint is not upheld, the bank should, in the same communication, tell the complainant what rights they have to seek a review of that decision internally or externally through BOS if the bank has reached its final position.

There are several stages in the complaint process:

- Receiving and allocating a complaint
- Acknowledging a complaint
- Investigating a complaint
- Updating the complainant
- Responding to a complaint
- Record keeping and learnings.

Receiving and allocating a complaint

Some complaints will require more urgent attention than others, so we recommend that any complaints process allows for flexibility around responding to complaints.⁷

We recommend assessing the urgency of each complaint so that urgent complaints can be prioritised (sometimes called 'triaging'). Examples of complaints that may require prioritisation include (this is not an exhaustive list) where the complainant(s):

- are exhibiting signs of mental distress including threats of harm to themselves or others
- are the victims of domestic or financial abuse
- are suffering from a serious or terminal medical condition (or close family members are)
- are experiencing financial difficulty and may be unable to pay for food, accommodation, power and other necessities if the bank dealt with the complaint in its usual timeframes.

⁷ Some complaints lodged with BOS will be placed by BOS into our Financial Difficulty Fast Track process. This is a separate process to the bank's own internal triaging of complaints.

Care should be taken when deciding who within the bank to allocate a complaint to. If a staff member is the subject of a complaint, they will generally not be the right person to investigate that complaint or communicate with the complainant about it because the complainant may feel that staff member lacks independence.

Case study: Bank allocated complaint to wrong staff member

Eric, who was terminally ill and struggling with his financial affairs, went to his local branch to advise the bank of his situation and also of his wish to hand his affairs over to his lawyer. He later complained to us about the service he received. He said the branch manager treated him disrespectfully, had shown no empathy and had ignored his requests to transfer his accounts to his lawyer's control. We referred the complaint to the bank's complaint team, who allocated the complaint to the branch manager about whom Eric had complained. The branch manager phoned Eric about his complaint. Eric described the call as "horrible". He said the branch manager spent the entire call defending his behaviour and repeatedly spoke over the top of Eric.

Eric felt attacked and became very distressed, described himself as shaking and decided to end the call because he "felt like topping" himself. Eric contacted BOS about what had happened. We contacted the bank and asked if it could allocate the complaint to someone else. The bank agreed and apologised to Eric for having such an unpleasant phone call from the branch manager.

Acknowledging a complaint

The Code of Banking Practice requires banks to advise complainants that their complaint has been received within five working days. The bank's acknowledgement of a complaint can be verbal or in writing.

Acknowledging a complaint is a valuable opportunity for a bank to reassure a customer that their concerns are being considered, and to give their customer confidence both in the person handling their complaint and also the complaint process itself.

Each bank will set its own timeframes for acknowledging complaints received through its own internal channels, but we recommend complaints be acknowledged promptly. It is also best practice to explain to the complainant at the outset that they have the right to refer their complaint to BOS if the bank cannot resolve it to the complainant's satisfaction.

In respect of complaints lodged with BOS, these are referred to banks through agreed referral methods (usually email).

Appendix A sets out example wording for a bank's complaint acknowledgement email.

BOS Tip: Explain to a complainant what to expect

BOS expects that when providing the complainant with an acknowledgement of their complaint, the bank at the same time:

- *explain the complaint process*
- *give a timeframe in which the complainant can expect a substantive response*
- *provide the name and contact details of the person who will be handling the complaint.*

Investigating a complaint

The extent of investigation required will depend on a range of factors, in particular, the nature and complexity of the complaint. Whatever the extent of investigation required, it should be done fairly, impartially and without actual or perceived bias. At a minimum this requires that:

- staff approach investigation of the complaint with sensitivity, empathy and an open-mind (avoid making assumptions)
- staff should show a willingness to identify and explore all the issues raised, to get to the heart of the problem and to understand all perspectives
- the investigation should be completed promptly and without undue delays⁸
- the complainant must be given adequate opportunity to explain their complaint and the impact on them – this may require a series of communications with the complainant to ensure the circumstances leading to the complaint are fully understood by the bank
- if the bank wishes to rely on terms and conditions attaching to an account or other product/service, these should be researched to see if, and how, they apply
- all relevant sources of evidence should be considered including listening to relevant recorded phone calls and, where applicable, viewing CCTV footage⁹
- where a version of events is in dispute, the version of a bank staff member should not automatically be given added weight or presumed to be the correct version over the complainant's. If one version is to be preferred, then there should be a clear reason for this.

BOS Tip: BOS can help

Banks can seek our advice, without identifying the customer, through our “participant advice line”. This is available for complaints which have been made to the bank directly and have not been referred by BOS. Banks can also refer a customer to us in situations where the bank’s discussion with the complainant is ongoing but they feel the complainant would benefit from some independent guidance.

⁸ Bear in mind that after two months, a complainant is entitled to ask BOS to formally consider their complaint (see para 6 of the BOS Terms of Reference). Note that different timeframes apply for complaints in the BOS Fast Track process.

⁹ CCTV footage will be important where a complaint relates to a customer’s conduct in branch. In addition to being reviewed as part of its investigation, banks should also secure the footage from routine destruction if it is the subject of, or relevant to, a complaint. The same applies to relevant recorded phone calls.

BOS Tip: The power of a conversation

Often a conversation will illicit more details about a situation than a written complaint provides – which is important to get to the bottom of what has happened. Unless a complainant has asked not to be contacted by phone, it is best practice to speak with a complainant to give them the opportunity to provide their version of events.

An open, empathetic conversation with a bank employee can also go a long way to rebuilding trust with a customer who is otherwise unhappy with their bank and often has not felt ‘heard’ by their bank to date.

Updating the complainant

A complainant should be kept updated while the bank is considering their complaint.

We recommend bank staff check in regularly even if it is just to say that the bank is still investigating the complaint and provide a new date by which the complainant can expect to hear from them again. Radio silence is never helpful and only increases complainant frustration and distrust, which ultimately may reduce the likelihood of resolution being reached.

BOS Tip: Stick to timeframes

Sometimes we hear from complainants that, after lodging their complaint, the bank promised to get back to them by a certain date, but they never did. Sometimes weeks pass with no update from the bank. This causes significant frustration and distrust for complainants already unhappy with their bank. Putting the onus back on a complainant to chase for updates, particularly where timeframes provided by the bank have passed, is not helpful in resolving complaints. We recommend banks ‘front foot’ communications about any delays.

Responding to a complaint

A bank should send a complainant a full written response as soon as practicably possible after completing its investigation. While a bank has up to two months to investigate and respond to a complaint under BOS rules¹⁰, that timeframe is a back-stop timeframe and we encourage banks to respond to a complaint as soon as possible.¹¹ That response should:

- summarise the bank’s understanding of the complaint and relevant issues
- summarise the steps taken by the bank to investigate the complaint
- set out the bank’s conclusion and resulting action, which could be to:
 - accept the complaint (or specified parts of it) and offer some form of settlement;
 - offer some form of settlement without accepting the complaint (often referred to as a goodwill offer or gesture); or
 - reject the complaint and give clear reasons for doing so.

¹⁰ Note that different timeframes apply for complaints placed in the BOS Fast Track process.

¹¹ Note that the two month timeframe begins when the customer first complains to the bank. This is often an earlier date than when the complaint reaches the bank’s internal complaints team.

- if the bank makes an offer to settle the complaint, it should give details of that offer with a clear explanation of how the bank decided on that offer, along with instructions on how the complainant can accept or reject it and any conditions that attach to it
- explain the next steps in the process if the complainant is not satisfied with the bank's response:
 - if the bank has not reached its final position, then the complainant should be informed of the next steps within the bank's internal complaints process; or
 - if the bank has fully considered the complaint and reached its final position, then the bank's response should clearly state this and advise that the complainant now has the right to take their complaint to BOS but must do so within three months.¹²

Appendix B provides an example of the format, headings and wording style that a response to the complaint could take where a bank accepts a complaint. Also included within Appendix B is example wording for an effective apology.

Appendix C provides example wording for inclusion in a final position letter to a complainant that explains their rights to refer their complaint to BOS.

Case study: Bank failed to tell complainant his rights to escalate complaint

Arthur had complained directly to his bank. The bank's complaints team investigated his complaint and responded to him by letter advising they had undertaken an investigation and did not accept it had done anything wrong. The letter was silent on what Arthur could do if he was unhappy with the bank's response. Arthur assumed from the bank's letter that this was the end of the complaint process and his only other option would be to take the bank to court, which he lacked the resources or energy to do.

Arthur should not have been put in this position by the bank. The bank should have explained in its letter to him what his rights were if he wasn't happy with its response or, if the letter was the bank's final position, then the bank should have advised Arthur of his right to bring his complaint to BOS within three months.

BOS Tip: It isn't always about the money

Each complaint and complainant will be different. BOS encourages banks to 'think outside the box' to find ways to resolve individual complaints. BOS sees many creative and thoughtful examples of banks doing this to great effect, and in a way that not only repairs the bank's relationship with its customer but often improves it.

Examples BOS has observed include sincere, powerful apologies, undertaking to change bank product offerings to better meet customer needs, updating information provided to front line staff to ensure future customers don't encounter the same problem (and thanking the complainant for bringing the problem to their attention), sending a gift basket or flowers to a complainant or affected family member.

¹² This requirement is set out in BOS Terms of Reference, para 6.

Record keeping and learnings

BOS expects banks to have a suitable system for recording complaint details which can also be utilised as a tool for capturing learnings and to stimulate continuous improvement.

We strongly encourage banks to capture all complaints, so they have every opportunity to improve their products and services for customers.

An effective complaint handling process will enable a bank to identify problems in its own products or systems and address any systemic issues, serious risks or areas that could benefit from improvements to policies or practices.

Case study: Complaint helped bank improve its process

Lin used her bank credit card to pay for a service that would be supplied in the future, but ultimately was not. Lin called the bank's call centre. A staff member told her she had no chargeback right because of the timeframe that had passed since she made the purchase. The staff member had relied on information given to frontline staff about chargebacks that was correct in most cases, but not in Lin's. She made a complaint. The bank's complaint team immediately recognised the inaccuracy in the information the call centre staff were relying on. The complaints team processed Lin's chargeback request and updated the information used by frontline staff so the problem didn't recur.

BOS Practical tips

This section provides some additional tips around complaint handling.

Do

- Give complainants copies of any documents the bank has relied on in its written response to a complaint such as terms and conditions and contractual documents.
- Spell out precisely which terms and conditions the bank is relying on, and why, if they are the basis on which the bank is rejecting a complaint, rather than broad statements such as “the bank’s actions were permitted by the terms and conditions” or “the customer was in breach of the terms and conditions”.
- Volunteer information about complainant’s rights to seek a review of the bank’s decision about their complaint and to seek help from BOS, rather than relying on complainants asking about their rights.
- Ensure staff know how to identify circumstances that result in customer vulnerabilities and how to address them.
- Be mindful of cultural factors and how they impact a complainant – for example people of some cultures may be reluctant to lodge complaints because of cultural reasons, for example a complaint may be seen as insulting behaviour, or people fear it may lead to unwelcome consequences. These and other barriers can be reduced if customers are told that complaints are welcomed, they will be handled confidentially and are valued by the bank.
- Recognise that many complainants will feel there is a significant power imbalance between them and the bank and may be worried that if they complain, the bank will take retaliatory action against them – such as calling in loans and closing accounts. Bank staff shouldn’t treat customers negatively because they make a complaint and it can pay to reassure customers of this.
- Actively look for signs that a complainant is experiencing financial difficulty and whether they may benefit from making a hardship application. Don’t rely on a complainant to self-identify or use bank terminology such as ‘financial hardship’; be alert to the indicators and advise complainants of their rights to ask for changes to their lending arrangements (although the bank is not obligated to agree to the requested changes, they are required to give hardship applications proper consideration).

Don't

- Assume complainants understand legal or banking terminology, acronyms or jargon – banks should communicate in plain language and provide explanations that people without banking or legal experience can understand.
- Assume a new complaint lacks credibility because the complainant has lodged numerous complaints in the past. Each complaint should be assessed on its own merits.
- Wait out two months to provide a final position response to a complainant when the bank has already reached a final view.
- Delay fulfilling a complainant's information or Privacy Act 2020 request so that it can be provided at the same time as a final position letter. This is neither fair nor helpful in resolving a complaint and may put the bank in breach of its legal obligations to the complainant.

Checklist

This checklist is intended to help banks assess whether their complaint handling process is consistent with this guide.

Complaint Process – system overview

- Do staff understand what amounts to a complaint and what must be dealt with through the bank's internal complaint process?
- Is there a clearly documented internal complaint process?
- Does the bank have a culture that values complaints and understands the importance of effective complaint handling?
- Do senior management support and oversee the complaint process and provide sufficient resources to do the job well?
- Does the bank ensure complaint staff are skilled in complaint handling and approach complaints with a resolution mindset?
- Do complaint staff have the necessary authority to resolve complaints?

Accessibility of information about the complaint process

- Do all staff, especially frontline staff, know about the bank's complaint process and do they offer this information to customers who complain?
- Do all staff, including frontline staff, know about BOS and about customers' rights to complain to BOS, or seek advice from BOS at any time, and that BOS services are free and independent?
- Do staff offer this information to customers who complain?
- Does the bank have a clearly labelled complaints section on its website that includes information about BOS, and ideally the logo?
- Does the bank have information about making a complaint (to the bank and to BOS) readily available in all branches?
- Does the bank display the current BOS brochure in all branches?

Making a complaint is easy to do

- Can complaints be made in different ways including through the bank's website, over the phone, in person, by letter, by email or through social media?
- Does the bank have a freephone complaint number and is it easily found on the bank's website, published in information about the bank's complaint process and made known to frontline staff?
- Does the bank provide access to translation or interpreting services for non-English speaking customers to help them make a complaint?
- Is the complaint process accessible to all customers, including people with vulnerabilities such as people who cannot read or write and people with health issues, injuries or disabilities that affect their ability to communicate?
- If a complainant has special requirements for accessing the process, or communications, does the bank have a system to ensure these requirements are followed as far as reasonably practicable?

Receiving and allocating the complaint

- Does the bank's process allow for flexibility around responding to, and prioritising, complaints?
- Does the bank's process ensure that, where a staff member is the subject of a complaint, that same staff member is not allocated the complaint for investigation?

Acknowledging the complaint

- Does the bank's process ensure that a complaint is acknowledged promptly, whether received directly or via BOS?
- Do acknowledgements:
 - explain the complaint process
 - give an estimated timeframe for a substantive response
 - give the name and contact details of the staff member handling the complaint?

Investigating a complaint

- Does the bank ensure that staff undertake investigations fairly, promptly, impartially and with sensitivity, empathy and an open mind (avoiding making assumptions)?
- Do staff ensure they identify and explore all issues raised in a complaint?
- Are complainants given adequate opportunity to explain their complaint and the impact on them?
- Do staff members fully consider all relevant sources of potential evidence, which might include listening to phone calls and viewing CCTV footage?
- Do staff research and understand any relevant terms and conditions or applicable contractual documents?

Keeping the complainant informed

- Does the bank process ensure complainants are kept informed about the progress of their complaint, including any delays?
- Does the bank process ensure it meets its own commitments to communicate with complainants within certain timeframes?

Responding to the complaint

- Does the bank respond to complaints as soon as reasonably practicable and without undue delay?
- Are responses written in plain language and with reference to any laws/standards/contractual terms relied on by the bank, along with an explanation of how they apply?
- Where a response is not the bank's final position, does the response explain to the complainant the next step in the bank's complaint process if they are not satisfied with the response?

- Where a response is the bank's final position, does the response advise that the bank has fully considered the complaint, it has reached its final position and the complainant now has the right to take their complaint to BOS but must do so within three months?

Record keeping and learnings

- Does the bank have a fit for purpose system for recording complaint details that can also be utilised as a tool for learnings and to stimulate continuous improvement?

Example wording for bank communications

Appendix A – example complaint acknowledgement email

Dear [name of complainant]

Thanks for taking the time to let [select: us/the Banking Ombudsman Scheme] know about your complaint. We are sorry you've needed to complain, but we appreciate the opportunity to review your concerns.

Next steps

We will now investigate your complaint. We'll aim to contact you by [insert date] to try to resolve things with you if we can – but if we're unable to meet this timeframe, we'll keep you up-to-date with what we're doing.

Sometimes it can take a bit of time to ensure that we obtain the full picture. We may request further information from you and appreciate your patience while we do this. If you have any questions in the meantime, or there is information or documents you would like to share with me, please feel free to contact me on [phone number], or by return email.

[Name of bank's] complaint process

If you would like to know more about [name of bank's] complaint process, you can find it on our website: [insert link.]

The Banking Ombudsman Scheme

[Name of bank] is a member of the Banking Ombudsman Scheme. The Scheme offers a free and independent service to all bank customers and you're welcome to discuss your complaint with them at any time. They can be contacted at: www.bankomb.org.nz, 0800 805 950 or help@bankomb.org.nz. They are available between 8:30 a.m. and 5:00 p.m., Monday to Friday.

Yours sincerely,

[name of staff member, position, team
full contact details]

Appendix B – example response where bank accepts complaint

Dear [name of complainant]

Thanks so much for your complaint and for your patience while we've looked into things for you. Thank you also for taking the time to speak with me on the phone about your experience.

Summary of your complaint

For completeness, I have summarised the issues you have raised with the bank [and the Banking Ombudsman Scheme] below. If I have not fully captured your concerns, please let me know.

[summarise issues]

Our investigation

To get to the bottom of what happened, we have:

[list investigative steps taken]

We're sorry

[Name of complainant], I'd like to say how genuinely sorry we are for your experience. It's not good enough and we are grateful you have brought it to our attention. We accept that your experience falls short of the level of service we expect our staff to provide to our customers.

Resolving your complaint

Thank you for the opportunity to resolve your complaint.

We would like to put things right so [set out details of any offer of settlement the bank wishes to make, an explanation of how the bank decided on that offer, along with instructions on how the complainant can accept or reject it as well as any conditions attaching to it]

Yours sincerely,

[name of staff member, position, team
full contact details]

Appendix C – final position wording – referral to BOS

Example wording for inclusion in a final position letter to a complainant that explains their rights to have their complaint referred to BOS.

[Name of bank] has now fully considered your complaint and this is our final position [or offer]. If you remain dissatisfied, you can ask the Banking Ombudsman Scheme to consider your complaint and our response to it. Their service is independent and free to use. If you choose to do this, you need to contact the Scheme within three months of the date of receiving this notice. That is, by [insert date]. If you don't make contact by then, the Scheme may not be able to consider your complaint.

For more information on the Banking Ombudsman Scheme, see:

Website: www.bankomb.org.nz

Phone: 0800 805 950

Email: help@bankomb.org.nz

Acknowledgements

The following external resources are acknowledged as having informed and assisted in the development of this document:

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