

Complaints Handling Policy

How an organisation receives, resolves, records and learns from complaints, meeting ASIC RG 271 internal dispute resolution requirements and linking complaints to breach reporting and remediation. Ready to adapt for your organisation.

Version 1.0 · October 2026 · Free template from Risk Frameworks Australia (riskfa.com) · No membership or sign-up

How to use this industry policy. Adopt the structure, terms and requirements as written, so that your organisation speaks the same language as the rest of the industry. Fill in the text in **[square brackets]** with your organisation's details, set internal targets to match your size and customer base (never longer than the maximum IDR timeframes), delete obligations that do not apply to you, and approve the Policy through your governance process. This is the internal policy; publish a plain-language public complaints policy based on it (section 21). Regulatory requirements are summarised as at October 2026: confirm the current requirements that apply to your organisation before relying on them. This template is general information only, provided free of charge, and is used at your own risk (see the disclaimer at the end).

Document control

Item	Detail
Document	Complaints Handling Policy (internal dispute resolution policy)
Organisation	[Organisation name]
Document owner	[Head of Customer Resolution / Complaints Manager]
Second line oversight	[Head of Compliance]
Approved by	[Board] , on the recommendation of the [Board Risk Committee]
Version / date approved	[1.0] / [date]
Review cycle	At least [annually] , and after any change to RG 271, the AFCA Rules or the business
Supporting documents	[Public Complaints Policy] , [Internal Complaint Management Procedure] , [Hardship Procedure] , [Unreasonable Complainant Conduct Procedure]

1. Purpose

This Policy sets how [Organisation] receives, records, resolves and learns from complaints. It ensures that:

- everyone can complain easily and free of charge, and people who need additional assistance get it;
- every complaint is recognised, recorded and dealt with fairly, objectively and within the maximum timeframes;
- complainants receive clear written reasons and know they can take their complaint to the Australian Financial Complaints Authority (AFCA);
- systemic issues, possible breaches and customer harm found through complaints are escalated, fixed and remediated; and
- the Board and management receive complaints data and analysis, and ASIC receives IDR data, as required.

The Policy meets the standards and requirements for internal dispute resolution (IDR) in ASIC RG 271 *Internal dispute resolution*, which apply to complaints received on or after 5 October 2021 (RG 271.26). It reflects AS 10002:2022 *Guidelines for complaint management in*

organizations.

2. Scope and application

This Policy applies to all complaints made to or about [Organisation], its staff, its authorised representatives and credit representatives, and its service providers who handle complaints for us, through any channel. It applies to all employees, contractors, directors and representatives.

If [Organisation] is	Dispute resolution requirements (RG 271.1–RG 271.4, Table 1)
An AFS licensee	An IDR procedure that meets ASIC's standards and requirements for complaints by retail clients, compliance with that procedure, and AFCA membership (Corporations Act s912A(1)(g)).
An unlicensed product issuer or secondary seller	An IDR procedure that meets ASIC's standards and AFCA membership (s1017G).
A superannuation trustee (other than an SMSF trustee) or RSA provider	AFCA membership and an IDR procedure that meets ASIC's standards (SIS Act s101; RSA Act s47).
A credit licensee	An IDR procedure that meets ASIC's standards for disputes about its credit activities and those of its representatives, compliance with that procedure, and AFCA membership (National Credit Act s47(1)(h) and (i)).

At a minimum, the IDR process covers complaints by retail clients (including small businesses with fewer than 100 employees, as defined in the AFCA Rules: RG 271.36–RG 271.38), superannuation members and beneficiaries eligible to complain to AFCA (RG 271.41–RG 271.42), traditional trustee complaints (RG 271.39) and credit complaints by consumers, lessees and guarantors (RG 271.43). [Organisation] [also accepts complaints from wholesale clients and other parties as good practice] .

Outsourcing part or all of the IDR process does not transfer responsibility. Service providers are chosen with due skill and care, monitored, and held to account for falling short of this Policy (RG 271.46, RG 271.48).

3. Key definitions

Term	Meaning
Complaint	An expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required (AS/NZS 10002:2014, adopted by RG 271.27). The complainant does not need to use the word 'complaint' or put it in writing (RG 271.30).
Complainant	A person or small business making a complaint (including a dispute about credit activities), or a representative acting on their behalf with authority.
IDR response	A written communication telling the complainant the final outcome of their complaint at IDR, their right to take the complaint to AFCA, and AFCA's contact details (RG 271.53).
IDR delay notification	A written notice, given before the maximum timeframe expires, of the reasons for a delay, the right to complain to AFCA, and AFCA's contact details (RG 271.66).
Maximum IDR timeframe	The latest time by which an IDR response must be given (section 11). Day 1 is the first day after the complaint is received, whether or not the day of receipt is a business day (RG 271.56 note).
Systemic issue	A matter that affects, or has the potential to affect, more than one consumer (RG 271.117).
Customer who needs additional assistance	A person who, because of their circumstances (for example disability, language, literacy, illness, age, family or domestic violence, financial abuse or financial hardship), may need extra help to make or pursue a complaint (RG 271.131, RG 271.138, RG 271.158).
Customer advocate	An internal role that a complainant may choose to escalate to after receiving an IDR response, as an alternative to AFCA (RG 271.109).
AFCA	The Australian Financial Complaints Authority, the external dispute resolution scheme authorised under Pt 7.10A of the Corporations Act.

Incident, Issue, Breach, Root cause, Customer remediation and Reportable situation have the meanings in the RiskFA Incident & Issues Management Standard.

4. Principles

1. **Complaints are welcome.** Everyone has a right to complain. Complaints are valuable information about our products, services and controls (RG 271.15, RG 271.129).
2. **Easy and free.** Complaints can be made in any reasonable way, and the process is free (RG 271.136, RG 271.141).
3. **Recognise, never reclassify.** If it meets the definition, it is a complaint. It is never recorded as 'feedback' or an 'enquiry' because it was verbal, lacked merit or was settled with a goodwill payment (RG 271.31).
4. **Fair and objective.** Each complaint is considered on its merits, without actual or perceived bias, and wherever possible by someone not involved in the matter (RG 271.167).
5. **Timely.** We aim to resolve complaints at the first point of contact and always within the maximum IDR timeframes (RG 271.104, RG 271.163).
6. **Clear reasons.** Complainants receive enough detail to understand our decision and decide whether to go to AFCA (RG 271.54).
7. **No detriment.** No one is disadvantaged for complaining, and adverse action is postponed where appropriate while a complaint is open (RG 271.171).
8. **Learn and fix.** Complaints are analysed for systemic issues, possible breaches and root causes, which are escalated and fixed (RG 271.120).

5. Regulatory and standards framework

Source	What it provides
ASIC RG 271 (2 September 2021)	ASIC's IDR standards and requirements. The highlighted 'enforceable paragraphs' and those set out in ASIC Instrument 2020/98 are enforceable; other highlighted paragraphs reflect existing legal requirements and are also enforceable; the rest is guidance (RG 271.8–RG 271.9).
ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98	Gives legal effect to the RG 271 standards and requirements.
AS/NZS 10002:2014 and AS 10002:2022	RG 271 adopts the 2014 Standard's definition of complaint. The 2014 Standard was revised and reissued as AS 10002:2022 <i>Guidelines for complaint management in organizations</i> , which [Organisation] follows as good practice.
ASIC Corporations (Internal Dispute Resolution Data Reporting) Instrument 2022/205	Six-monthly IDR data reporting to ASIC (section 18).
AFCA Complaint Resolution Scheme Rules	AFCA's jurisdiction, time limits and procedures, which members are contractually bound to follow.
ASIC RG 78 and Instrument 2024/620	Breach reporting. A significant breach of the enforceable paragraphs of RG 271 may be a reportable situation (RG 78.14, RG 78.37(c)).
ASIC RG 277 <i>Consumer remediation</i>	Remediation of customers affected by systemic issues.
Industry codes	[Banking Code of Practice / General Insurance Code of Practice / Life Insurance Code of Practice / Insurance in Superannuation Voluntary Code / other] may set additional complaint requirements. Where a code is stricter, follow the code.

6. Three lines of accountability

Line	Who	Responsibilities
First line	Frontline staff, the [Customer Resolution team], business units and product owners	Recognise, record, acknowledge and resolve complaints; give IDR responses; implement outcomes; analyse complaints for root causes; fix product and service problems; escalate systemic issues and possible breaches.
Second line	Compliance and Risk	Oversee compliance with RG 271; review complaint data for possible breaches and systemic issues; assess reportability; run compliance audits of the IDR process; challenge root cause analysis and remediation.
Third line	Internal Audit	Independently review the design and effectiveness of the IDR process (RG 271.195).

7. Roles and responsibilities

Role	Responsibilities
Board	Sets clear accountabilities for the complaints handling function, including the management of systemic issues identified through complaints (RG 271.118); receives regular complaints reports (RG 271.183); approves this Policy.
Board Risk Committee	Oversees complaint trends, systemic issues, IDR compliance and remediation; challenges management on root causes.
Chief Executive Officer and executive team	Support effective complaint management, oversee the IDR process, provide adequate resources and systems, and make complaints a source of improvement (RG 271.128).
Accountable executive for complaints	[Executive title] , accountable for the IDR process end to end and for this Policy.
[Head of Customer Resolution / Complaints Manager]	Manages the IDR process day to day; ensures complaints are resolved within timeframes; produces complaint reporting and IDR data reports; escalates systemic issues.
Head of Compliance / General Counsel	Oversees RG 271 compliance; assesses complaints that may involve a breach or reportable situation; owns the compliance audit of the IDR process.
Business unit and product owners	Investigate and fix the causes of complaints in their areas; own systemic issues and remediation.
Complaint handlers	Handle complaints fairly and on time; apply delegations; write clear IDR responses; identify complainants who need additional assistance.
All staff and representatives	Recognise complaints in any channel; resolve them at first contact where possible; record every complaint; refer complaints they cannot resolve straight away.
Customer advocate (if any)	Reviews complaints escalated by complainants after an IDR response; makes recommendations to improve the IDR process (RG 271.191–RG 271.192).

8. Recognising a complaint

It is the complainant's expression of dissatisfaction that starts our obligations, not the referral of a matter to a complaints team (RG 271.35, RG 271.106). Staff must be proactive in recognising complaints (RG 271.30).

8.1 These are complaints (RG 271.32)

- posts that meet the definition on a social media channel or account owned or controlled by [Organisation], where the author is identifiable and contactable (protect the person's privacy when responding);
- an objection to a proposed decision about how and to whom to pay a superannuation death benefit;
- complaints about a matter that is the subject of an existing remediation program, or about the remediation program itself (for example delays or lack of communication); and
- complaints about the handling of an insurance claim (for example excessive delays or unreasonable information requests).

8.2 These are not complaints, unless they raise a complaint (RG 271.33)

- employment-related complaints by our staff (handled under [HR policies]);
- comments where no response is expected, such as survey feedback or simple reports (for example that an ATM is damaged);
- hardship notices or requests to postpone enforcement proceedings, unless the customer raises issues that meet the definition of complaint; and
- reports of unauthorised transactions under the ePayments Code and chargeback disputes, unless the customer raises separate issues or is dissatisfied with the outcome or handling.

If in doubt, treat it as a complaint.

9. Making a complaint and accessibility

- Complaints can be made by phone ([toll-free or local call number]), email, letter, online form, social media, in person, and through representatives. Complaints do not need to be in writing (RG 271.136–RG 271.137).
- The IDR process must be easy to understand and use, including for people with disability or language difficulties (RG 271.134). [Organisation] offers interpreters, the National Relay Service, accessible formats and adjustable website text (RG 271.135).
- The IDR process, and material explaining it, are free (RG 271.141).
- Complainants may use a representative, such as a financial counsellor, lawyer, family member, friend or member of parliament. Once told of an authorised representative, we deal with the representative and do not contact the complainant directly, except in the circumstances in RG 271.139.
- Information about how to complain and about AFCA is in our Financial Services Guide, Product Disclosure Statements, Credit Guide, periodic statements and National Credit Code notices, on our website, and in welcome packs (RG 271.113–RG 271.114, RG 271.132).

10. Customers who need additional assistance

- Staff are trained to identify, support and assist people who need help to make a complaint (RG 271.138), and to recognise signs of vulnerability.
- Complaints are triaged on receipt. They are prioritised where the complainant is experiencing family or domestic violence or financial abuse, has a serious or terminal illness, or where delay could affect their basic living conditions (RG 271.158).
- We adapt how we communicate (channel, timing, format, interpreter, trusted contact) and record the adjustments with the person's consent.
- We take care not to disclose information that could put a person at risk, for example to a joint account holder who is a perpetrator of abuse.
- Where a complaint involves financial hardship, we tell the complainant about our hardship assistance and refer them to free financial counselling (for example the National Debt Helpline).

11. Handling a complaint

Step	What must happen
1. Receive and record	Record every complaint in the [complaint management system] on the day it is received, including those resolved immediately (RG 271.179).
2. Acknowledge	Acknowledge the complaint within 24 hours (or one business day) of receipt, or as soon as practicable, in the channel the complainant used or prefers (RG 271.51–RG 271.52).
3. Triage	Assess urgency and severity; identify additional assistance needs, hardship, default notices and enforcement action; assign an owner (RG 271.158).
4. Protect the complainant	Postpone actions that could adversely affect the complainant until the complaint is finalised, where appropriate (RG 271.171). For default notice complaints, do not start or continue enforcement or debt collection while the complaint is at IDR and for a reasonable time afterwards (at least 14 calendar days after the IDR response) unless a limitation period is about to expire (RG 271.89–RG 271.91).
5. Investigate	Give each party an opportunity to put their case; where possible use a person not involved in the subject matter; gather the facts and evidence (RG 271.167).
6. Check for wider problems	Ask: could this affect other customers? Could this be a breach, an incident or a possible reportable situation? If yes, escalate the same day (sections 14 and 15).
7. Resolve	Consider the full range of remedies: explanation, apology, assistance, refund or fee waiver, goodwill payment, compensation, debt waiver, correcting records, changing contract terms, stopping action, or improvements to systems and products (RG 271.161). Use delegations that allow fair and efficient resolution (RG 271.146–RG 271.147).
8. Respond	Give an IDR response within the maximum IDR timeframe (sections 12 and 13), or an IDR delay notification before it expires.
9. Implement and close	Implement agreed outcomes (refunds, waivers, record corrections, payments) promptly (RG 271.162, RG 271.165). Record the outcome, remedy and any amount paid (RG 271.164).

11.1 Unreasonable complainant conduct

Every complaint is handled equitably, including those from people whose behaviour is unreasonable or challenging. The [\[Unreasonable Complainant Conduct Procedure\]](#) sets how we manage such conduct while protecting staff (RG 271.152, RG 271.170). Restrictions are approved by [\[the Complaints Manager\]](#), recorded with reasons, and never prevent access to AFCA.

12. Maximum IDR timeframes

These are the **maximum** timeframes in RG 271 Table 2 (enforceable: RG 271.56–RG 271.60). [\[Organisation\]](#)'s internal targets are shorter. Time runs in calendar days from the day after the complaint is received (RG 271.56 note).

Complaint type	Maximum time to give an IDR response	RG 271
Standard complaints	No later than 30 calendar days after receiving the complaint	RG 271.56
Traditional trustee complaints	No later than 45 calendar days after receiving the complaint; time stops in limited court-related circumstances	RG 271.76–RG 271.78
Superannuation trustee complaints (except death benefit distributions)	No later than 45 calendar days after receiving the complaint. For insurance in superannuation, time runs from first lodgement with either the trustee or the insurer	RG 271.79
Objections to a proposed superannuation death benefit distribution	No later than 90 calendar days after the end of the 28 calendar day objection period under s1056(2)(a) of the Corporations Act	RG 271.80–RG 271.85
Credit complaints involving default notices	No later than 21 calendar days after receiving the complaint	RG 271.86–RG 271.91
Credit complaints involving hardship notices or requests to postpone enforcement proceedings	No later than 21 calendar days after receiving the complaint. If more information is needed, request it within 21 days; respond within 21 days of receiving it, or within 7 days if it is not received within 21 days of the request. If agreement is reached, confirm the terms in writing within 30 days	RG 271.92–RG 271.101

Complaint type	Maximum time to give an IDR response	RG 271
Unauthorised transaction complaints covered by card scheme rules	The timeframes in the scheme rules	RG 271.62

Credit hardship timeframes in RG 271 follow the National Credit Code hardship provisions (s72, s177B). As at October 2026 the Code sets the same periods: a decision within 21 days of the hardship notice; any request for information within 21 days, with the information due 21 days after the request date; then a decision within 21 days of receiving it, or 28 days after the request date if it is not received (s72(2), (5); s177B). Since RG 271 was issued, the Code has removed its decision notice and 30-day written notice of change for agreed changes that defer or reduce obligations for no more than 90 days (s72(4A) and s73(1A); for leases, s177B(4A)). RG 271 Table 2 has not been updated for this: confirm with [\[Legal\]](#) how you meet both.

12.1 Delays

An IDR response may be given after the maximum timeframe **only if** there was no reasonable opportunity to respond in time because the complaint is particularly complex or circumstances beyond our control are causing delay, **and** we gave the complainant an IDR delay notification before the timeframe expired (RG 271.64–RG 271.66). Examples of complexity and of circumstances beyond our control are in RG 271.67–RG 271.68. Workload or resourcing shortfalls are not acceptable reasons. Delay notifications are approved by [\[the Complaints Manager\]](#) and tracked; the complainant can still go to AFCA at any time.

12.2 Complaints closed within five business days

A written IDR response is not needed if, by the end of the fifth business day after receipt, the complaint has been resolved to the complainant's satisfaction, or we have given an explanation or apology where no further action can reasonably be taken (RG 271.71–RG 271.74). A written IDR response **is** still required if the complainant asks for one; the complaint is about hardship, a declined insurance claim or the value of an insurance claim; or it relates to a decision (or failure to decide) of a superannuation trustee (RG 271.75). These complaints are still recorded and reported.

12.3 Multi-tier processes and customer advocates

- The maximum timeframes apply to the whole IDR process, including internal escalations and reviews (RG 271.102, RG 271.105).
- A customer advocate review may be offered after an IDR response, as an alternative to AFCA, never as a mandatory step. The total time (IDR plus customer advocate) must not exceed the maximum timeframe, with time stopping between the IDR response and the complainant's request for review (RG 271.109–RG 271.110).

13. The IDR response

The IDR response is in writing and must (RG 271.53–RG 271.55):

- state the final outcome of the complaint at IDR: confirmation of the actions taken to fully resolve it, or reasons for rejecting or partly rejecting it;
- if the complaint is rejected or partly rejected, identify and address each issue raised, set out our findings on material questions of fact with reference to the supporting information, and give enough detail for the complainant to understand the decision and decide whether to go to AFCA;
- tell the complainant of their right to take the complaint to AFCA if not satisfied, and give AFCA's contact details;
- for death benefit decisions, include the 28 calendar day time limit for lodging a complaint with AFCA (RG 271.53 note 2, RG 271.85); and
- match the level of detail to the complexity of the complaint, without breaching privacy or other laws such as the AML/CTF Act 'tipping off' provisions (RG 271.55).

Responses are written in plain language. The checklist in Appendix A is used, and pro forma letters are reviewed by Compliance before use and at least **[annually]**. A pro forma letter that leaves out AFCA details can lead to a significant, reportable breach (RG 78 Example 4(d)).

14. AFCA

- **[Organisation]** is a member of AFCA, complies with the AFCA Rules and cooperates with AFCA, including on information requests and determinations.
- When a complaint is unresolved at IDR, or not resolved within the maximum timeframe, we tell the complainant of their right to go to AFCA and how to contact AFCA (RG 271.111–RG 271.112).
- The AFCA Rules set time limits for lodging a complaint with AFCA, which run from the date of the IDR response and from when the complainant became aware of their loss (rule B.4.3). Check the current AFCA Rules for the limits and exceptions. IDR responses are dated and kept.
- Complaints referred back to IDR by AFCA are handled within AFCA's refer-back timeframes. The RG 271 delay exceptions do not extend those timeframes (RG 271.66 note 3).
- We may refer an unresolved complaint directly to AFCA only with the complainant's consent (RG 271.115–RG 271.116).
- AFCA must report systemic issues it identifies to ASIC, APRA or the ATO within 15 calendar days (RG 271.123). AFCA systemic issue referrals and adverse determinations are escalated to **[Compliance]** and the accountable executive on receipt.
- AFCA complaint volumes, outcomes and determinations are analysed alongside IDR data for root causes.

15. Systemic issues

Complaints are a key risk indicator for systemic issues (RG 271.117). **[Organisation]** must (RG 271.118–RG 271.120, enforceable):

- set clear accountabilities for the management of systemic issues identified through complaints (Board responsibility, section 7);
- encourage and enable staff to escalate possible systemic issues they see in individual complaints;
- regularly analyse complaint data to identify systemic issues;
- promptly escalate possible systemic issues to the appropriate areas for investigation and action; and
- report internally on the outcome of investigations, including actions taken, in a timely manner.

Step	Requirement	Timeframe
------	-------------	-----------

Step	Requirement	Timeframe
Identify	Complaint handlers flag possible systemic issues on the complaint record; [Customer Resolution analytics] reviews trends, root cause codes and repeat themes	Flag on the day identified; data review [monthly]
Escalate	Raise the possible systemic issue using Appendix C and record it as an incident or issue under the RiskFA Incident & Issues Management Standard, linked to the complaints	Within [2 business days] of being flagged
Assess	[Compliance] assesses whether the issue is a breach or possible reportable situation (RiskFA Compliance and Breach Reporting Policy)	Decision recorded by day [20] after the date identified
Investigate and fix	The issue owner investigates root cause and extent of condition and fixes the cause	Per the Incident & Issues Management Standard
Remediate	Where a systemic issue is confirmed, identify affected customers and provide fair remediation (RG 271.121) under the RiskFA Customer Remediation Policy	Start without waiting for every detail to be known
Report	Report systemic issues, investigation outcomes and actions to the [Executive Risk Committee] and [Board Risk Committee]	[Monthly] / [quarterly]

16. Links to breach reporting, incidents and remediation

- Complaint data is analysed regularly to identify matters that may need to be reported to ASIC under s912D (RG 271.181(c)). Any complaint that may involve a breach of a legal or regulatory obligation is referred to [\[Compliance\]](#) the same day under the RiskFA Compliance and Breach Reporting Policy.
- Receiving a complaint, and short preliminary inquiries to resolve it, are not usually a reportable investigation. But once steps are taken to find out whether a significant breach has occurred, an investigation has started, and it must be reported to ASIC if it continues for more than 60 days (RG 78.55, RG 78 Example 6(d)).
- Breaches of the enforceable paragraphs of RG 271 are breaches of a core obligation. A single breach is not deemed significant merely because the IDR requirements are civil penalty provisions (ASIC Instrument 2024/620 s5; RG 78.37(c)), but it must still be checked against the other deeming categories and the significance factors (RG 78.40–RG 78.41), and repeated or systemic IDR failures may be significant and reportable (RG 78.37(c), Example 4(d)). IDR timeliness and content failures are recorded as breaches.
- Complaints about an existing remediation program are complaints and are handled under this Policy (RG 271.32(c)). Remediation programs are run under the RiskFA Customer Remediation Policy and RG 277.
- Complaints that reveal incidents are recorded under the RiskFA Incident & Issues Management Standard, which requires complaints data to be reviewed at least [\[monthly\]](#) for incidents and systemic issues (section 14 of that Standard).
- Disclosures that may qualify for whistleblower protection are handled under the RiskFA Whistleblower Policy and are not recorded in a way that identifies the discloser.

17. Records and the complaint management system

- All complaints are recorded in the [\[complaint management system\]](#), which tracks the progress of each complaint (RG 271.179–RG 271.180). Appendix B lists the minimum fields, which include the data ASIC requires for IDR data reporting.
- Records are accurate, complete and kept up to date, with every change dated. Complaints resolved at first contact are recorded too.
- Complaint records are handled in line with the Privacy Act and our [\[Privacy Policy\]](#) (RG 271.169).
- Records, including IDR responses and delay notifications, are kept for at least [\[7 years\]](#), or longer where the law requires.
- Complaint data quality is checked [\[monthly\]](#) before internal and ASIC reporting.

18. IDR data reporting to ASIC

- AFS licensees that provide financial services to retail clients, credit licensees, unlicensed product issuers and secondary sellers covered by s1017G(1)(d), superannuation trustees and RSA providers must report IDR data to ASIC for each six-month reporting period ending 30 June and 31 December (ASIC Corporations (Internal Dispute Resolution Data Reporting) Instrument 2022/205 ss 4–6). This is separate from the RG 271 requirements (RG 78.13(d), RG 78.14).
- Reports are lodged through the ASIC Regulatory Portal, in CSV format as set out in ASIC's *IDR data reporting handbook* (the version named in the instrument), **within two months** after the end of each reporting period (Instrument 2022/205 s5(1)–(2)).
- If there were no reportable complaints in a period, a nil confirmation is lodged through the Portal within the same two months (s5(3)–(4)).
- As at October 2026, Instrument 2022/205 is due to be repealed on 1 April 2027 (s8). Compliance tracks its replacement as a regulatory change.
- Giving ASIC IDR information is a core obligation for breach reporting purposes (RG 78.148(a)(xi), RG 78.149(a)(ix)). A late or materially inaccurate IDR data report is recorded as a breach and assessed.
- ASIC publishes IDR data. The **[Complaints Manager]** reviews our published data against peers.
- The IDR report is reviewed by **[Compliance]** and approved by the **[accountable executive]** before lodgement.

19. Resourcing, delegations and training

- The IDR process is resourced to operate fairly, effectively and efficiently, including for spikes in volume, and resourcing is reviewed at least [quarterly] (RG 271.142–RG 271.143, RG 271.153).
- Complaint handlers have authority to resolve complaints, and financial delegations allow fair and efficient resolution: [\$X] for frontline staff, [\$Y] for complaint handlers, [\$Z] for the Complaints Manager (RG 271.146–RG 271.147).
- All staff are trained at induction and [annually] to recognise and record complaints. Complaint handlers are trained in RG 271, consumer protection laws, AFCA approaches, codes, our products, assisting people who need additional assistance, unreasonable conduct, written communication and systemic issue identification (RG 271.148–RG 271.150).
- Complaint handlers have the tools they need (scripts, templates, systems) and access to support such as debriefing and employee assistance (RG 271.151–RG 271.152).
- Performance measures and incentives for complaint staff reward fair outcomes and quality, never low complaint numbers or low payments.

20. Quality assurance, compliance audits and review

- **Quality assurance:** [Customer Resolution QA] reviews a sample of at least [X%] of complaints each [month] for correct recording, clear and consumer-focused communication, fair outcomes, and AFCA information (RG 271.188).
- **Compliance audits:** [Compliance] audits compliance with RG 271 and this Policy at least [annually] (RG 271.189–RG 271.190). Non-compliance leads to feedback, retraining, supervision and, where appropriate, rectification for affected complainants.
- **Review program:** the IDR process is reviewed at least every [2 years] by [Internal Audit / an independent reviewer] for suitability and effectiveness, prompt identification of systemic issues, the effectiveness of remedial action, improvements needed, and customer satisfaction (RG 271.193–RG 271.196). Actions are tracked to completion.
- Customer advocate recommendations, where applicable, are considered through a transparent process (RG 271.191–RG 271.192).

21. Public complaints policy

[Organisation] publishes a plain-language complaints policy on its website in an accessible location, available in other formats and languages and in hard copy on request, free of charge (RG 271.172, RG 271.174). It explains (RG 271.173):

- how to make a complaint (online, email, phone, in person and other channels);
- the help available to people who need additional assistance;
- the key steps: acknowledgement, assessment and investigation, and the IDR response;
- response timeframes; and
- how to contact AFCA if the complaint is not resolved.

22. Internal reporting, measures and key risk indicators

Complaints reports go to senior management [monthly] and to the [Board Risk Committee] [quarterly] (RG 271.183). Reports to the Board and executive committees must include metrics and analysis of complaints, including systemic issues (RG 271.119). They cover at least the items in RG 271.184:

- complaints received and closed, and the products, services and issues involved;
- time to acknowledge and to resolve;
- outcomes (resolved, unresolved, withdrawn) and amounts paid;
- possible systemic issues, underlying causes and trends;
- complaints escalated to AFCA, AFCA outcomes and AFCA systemic issue referrals; and
- recommendations to improve products and services.

Measure or KRI	Typical target
IDR responses given within the maximum IDR timeframe	[100%]; any miss recorded as a breach
Complaints acknowledged within one business day	≥ [95%]
Complaints resolved at first contact or within 5 business days	Trending up
Average days to resolve	≤ [15] calendar days (standard complaints)
IDR delay notifications as a share of complaints	≤ [5%]
Complaints escalated to AFCA as a share of IDR complaints	Trending down; AFCA outcomes in the complainant's favour reviewed for root causes

Measure or KRI	Typical target
Repeat complaints by the same customer on the same issue	Trending down
Possible systemic issues escalated within [2 business days]	[100%]
QA pass rate (recording, fairness, AFCA information)	≥ [95%]
IDR data reports lodged on time and accurately	[100%]
Complaints from customers who needed additional assistance, and their outcomes	Monitored for fair treatment

These targets are common industry practice, not regulatory requirements. A rising number of recorded complaints can reflect better recognition rather than worse service. Set your own targets in line with your risk appetite.

23. Related documents

- [Public Complaints Policy], [Internal Complaint Management Procedure], [Hardship Procedure] and [Unreasonable Complainant Conduct Procedure]
- the RiskFA Compliance and Breach Reporting Policy, [Incident & Issues Management Standard] and the RiskFA Customer Remediation Policy
- [Privacy Policy], the RiskFA Whistleblower Policy and [Vulnerable Customers Policy]
- ASIC: RG 271 *Internal dispute resolution*, RG 267 *Oversight of the Australian Financial Complaints Authority*, RG 78 *Breach reporting by AFS licensees and credit licensees*, RG 277 *Consumer remediation*, IDR data reporting handbook
- AFCA: Complaint Resolution Scheme Rules and Operational Guidelines
- Standards: AS 10002:2022 *Guidelines for complaint management in organizations*

Appendix A. IDR response letter content checklist

Check	Requirement	Source
1	Written, dated, addressed to the complainant (or their authorised representative) and in plain language	RG 271.53
2	Restates the complaint and each issue raised	RG 271.54(a)
3	States the final outcome at IDR: the actions taken to fully resolve the complaint, or that it is rejected or partly rejected	RG 271.53(a)
4	If rejected or partly rejected: addresses each issue, sets out findings on material questions of fact and the information relied on, and gives enough detail to understand the decision	RG 271.54
5	Describes any remedy offered (amount, how it was calculated, interest, when and how it will be paid or implemented)	RG 271.161, RG 271.165
6	States the right to take the complaint to AFCA if not satisfied	RG 271.53(b)
7	Gives AFCA's contact details (website, email, phone, post); good practice: notes that AFCA has time limits for lodging a complaint	RG 271.53(c); AFCA Rules B.4.3
8	Death benefit decisions: states the 28 calendar day limit for complaining to AFCA	RG 271.53 note 2, RG 271.85
9	Superannuation trustees: provides written reasons for the trustee's decision	RG 271.57; SIS Act s101(1)(d)
10	Credit hardship: states whether the change or postponement is agreed, with the terms, or the reasons if not, and AFCA details	RG 271.99–RG 271.100
11	Does not disclose information in breach of privacy law or AML/CTF tipping-off rules	RG 271.55
12	Sent within the maximum IDR timeframe, or an IDR delay notification (reasons, AFCA right and contact details) was sent before it expired	RG 271.56, RG 271.66
13	Customer advocate review (if offered) is presented as optional and does not discourage going to AFCA	RG 271.109
14	Copy saved to the complaint record with the date sent	RG 271.179

Appendix B. Complaint record fields

Field	Description
Complaint ID	Unique reference; links to related complaints, incidents, issues and breaches
Complainant details	Name, customer number, contact details, consumer type (individual, small business, member, beneficiary, guarantor), representative and authority
Date and time received	Receipt date (Day 0), channel received, and the business unit or representative who received it
Additional assistance	Indicators and adjustments made (with consent), priority flag
Product and issue	Product or service, and the issue and sub-issue, using the categories in ASIC's IDR data reporting handbook
Description	What the complainant is dissatisfied with and the resolution sought
Acknowledgement	Date and method
Timeframe	Applicable maximum IDR timeframe and due date (standard, trustee, death benefit, default notice, hardship, scheme rules)
Owner and stage	Complaint handler, current stage and escalation history
Delay notification	Date sent and reasons, where applicable
Outcome	Resolved in the complainant's favour, partly, or not; withdrawn; referred to AFCA
Remedy and amount	Type of remedy, amount paid or waived, date implemented
IDR response	Date sent, approver and copy
Root cause	Root cause category (RiskFA Incident & Issues Management Standard), product or process fault
Flags	Possible systemic issue; possible breach; incident raised; referred to Compliance; whistleblower; hardship; default notice
AFCA	AFCA reference, stage, outcome and date, where applicable
Closure	Date closed, closure reason, QA result

Appendix C. Systemic issue escalation template

Section	Content
1. Reference and date	Systemic issue reference; date first flagged; who flagged it; linked complaint IDs
2. Summary	What is happening, in two or three sentences
3. Evidence	Number of complaints and over what period; examples; data, trends or AFCA referrals
4. Products, processes and systems	What is affected, and since when (estimated start date)
5. Customers	Estimated number affected, any customers needing additional assistance, and the type of harm
6. Impact and rating	Initial rating (Critical, High, Medium, Low) under the RiskFA rating scale, with rationale
7. Possible breach	Obligations that may be breached; referred to Compliance on [date] for breach and reportability assessment
8. Immediate actions	Containment steps to stop further harm (for example stopping a process, correcting a letter, holding fees)
9. Owner	Accountable issue owner and executive
10. Next steps	Investigation, root cause and extent of condition, remediation approach and due dates
11. Outcome (when closed)	Root cause found, fix made, customers remediated, regulator reports made, and how the outcome was reported internally (RG 271.120(d))



[Risk Taxonomy](#) [Operations](#) [Library](#) [Obligations Register](#) [Why a standard](#) [About](#)

Disclaimer

© 2026 Risk Frameworks Australia

Free general information only, provided free of charge. Not legal, financial or other professional advice, and used

at your own risk. [Read the full disclaimer.](#)