



# IDR data reporting handbook: Overview of changes between April 2023 and December 2025

This document outlines the changes we have made to the internal dispute resolution (IDR) data reporting handbook. It follows the structure of the handbook:

- Table 1 sets out the changes to Section A: Overview;
- Table 2 sets out the changes to Section B: IDR data dictionary;
- Table 3 sets out the changes to Section C: IDR data glossary; and
- Table 4 sets out the changes to Appendix 3: Submission checklist

Note: We have also made minor changes to the IDR data reporting handbook to update references and clarify wording, which are not captured in the tables.

**Table 1: Changes to Section A: Overview**

December 2025 version	April 2023 version	Summary of changes
<b>Submitting IDR Data to ASIC</b> 28 Financial firms must lodge their IDR data file through the <a href="#">ASIC Regulatory Portal</a> . Submissions of IDR files cannot be made by email.	<b>Submitting IDR Data to ASIC</b> 32 Financial firms must lodge their IDR data file via <a href="#">ASIC Regulatory Portal</a> .	Added line to clarify IDR data files cannot be submitted by email.

**Table 2: Changes to Section B: IDR data dictionary**

December 2025 version	April 2023 version	Summary of changes
Consumer credit 9.1 Buy now, pay later (Low cost credit contract) 9.2 Buy now, pay later (not Low cost credit contract)	Consumer credit 9 Buy now, pay later	Updated product number and type in line with Buy now, pay later law reform.  Product number 9 no longer exists. For reporting on complaints received from 1 January 2026 onwards, firms must select either 9.1 or 9.2.
Derivatives/hedging 81 Digital assets	Derivatives/hedging 81 Cryptocurrency	Update to name of product type.
Non-cash 141 Digital asset payment	Non-cash 141 Cryptocurrency	Update to name of product type.

December 2025 version	April 2023 version	Summary of changes
Mutual risk products (MRPs) 189 Mutual risk products	N/A	Addition of product category: Mutual risk products (MRPs).  Addition of product number and type: 189 Mutual risk products.
Financial firm decision—Specific to credit and lending  42 Responsible lending (excluding modified obligations for Low cost credit contracts)  42.1 Responsible lending (modified obligations for Low cost credit contracts)	Financial firm decision—Specific to credit and lending  42 Responsible lending	Updated issue types to reflect law reform in Buy now, pay later sector: <ul style="list-style-type: none"><li>• Modified issue type 42 to exclude modified obligations for Low cost credit contracts.</li><li>• Addition of issue number and type 42.1 Responsible lending (modified obligations for Low cost credit contracts).</li></ul>

**Table 3: Changes to Section C: IDR data glossary**

December 2025 version	April 2023 version	Summary of changes
<p><b>9.1 Buy now, pay later (Low cost credit contract)</b></p> <p>Buy now, pay later (BNPL) arrangements allow consumers to buy and receive goods and services immediately from a merchant, and repay the BNPL provider in instalments over time. Typically, BNPL providers do not charge interest, but can charge merchant and consumer fees.</p> <p>Note: Only select this option if the BNPL contract meets the definition of a low cost credit contract in s13E of the National Credit Code, including that it satisfies requirements in the regulations that relate to fees and charges that are, or may be, payable under the contract (see reg 69G of the <i>National Consumer Credit Protection Regulations 2010</i>).</p> <p><b>9.2 Buy now, pay later (not Low cost credit contract)</b></p> <p>Buy now, pay later (BNPL) arrangements allow consumers to buy and receive goods and services immediately from a merchant, and repay the BNPL provider in instalments over time. Typically, BNPL providers do not charge interest, but can charge merchant and consumer fees.</p> <p>Note: Only select this option if the BNPL contract meets the definition in s13D of the National Credit Code but does not meet the definition of a low cost credit contract in s13E of the National Credit Code (such as, it does not satisfy the requirements in the regulations that relate to fees and charges that are, or may be, payable under the contract (see reg 69G of the <i>National Consumer Credit Protection Regulations 2010</i>)).</p>	<p><b>9 Buy now, pay later</b></p> <p>Buy now, pay later (BNPL) arrangements allow consumers to buy and receive goods and services immediately from a merchant, and repay the BNPL provider in instalments over time. Typically, BNPL providers do not charge interest, but can charge merchant and consumer fees.</p>	<p>Updated BNPL definition in line with law reform. There are now two distinct BNPL product numbers and types, with corresponding definitions.</p>

December 2025 version	April 2023 version	Summary of changes
<p><b>81 Digital assets</b></p> <p>Derivatives of any type that aim to track or represent Digital assets. A digital representation of value or rights (including rights to property), the ownership of which is evidenced cryptographically and that is held and transferred electronically by:</p> <ul style="list-style-type: none"> <li>• a type of distributed ledger technology; or</li> <li>• another distributed cryptographically verifiable data structure.</li> </ul> <p>Note: Digital assets can function as an investment, a payment product and/or as a method of payment. Use investments code 81 (Digital assets) if the complaint is about a derivative with Digital assets as an underlying asset, and use payment systems code 141 (Digital asset payment) if the complaint is about Digital assets as a payments product (e.g. a stablecoin) or a method of payment.</p>	<p><b>81 Cryptocurrency</b></p> <p>Internet-based virtual currency, such as Bitcoin and Ethereum, which is created and stored electronically. It uses cryptography to secure transaction records, to control the creation of additional currency, and to verify the transfer of currency ownership.</p> <p>Cryptocurrency units are sometimes called coins or tokens and typically do not exist in physical form (like paper money).</p> <p>Note: Cryptocurrency can function as an investment and/or as a method of payment. Use investments code 81 (Cryptocurrency) if the complaint is about cryptocurrency as an investment, and use payment systems code 141 (Cryptocurrency) if the complaint is about cryptocurrency as a method of payment.</p>	<p>Change in product type name and definition to reflect Government-wide approach to regulation of Digital assets and ASIC's recent clarification in Information Sheet 225 <i>Digital assets: Financial products and services</i> (<a href="#">INFO 225</a>) about digital assets as financial products.</p>
<p><b>141 Digital asset payment</b></p> <p>A digital representation of value or rights (including rights to property), the ownership of which is evidenced cryptographically and that is held and transferred electronically by:</p> <ul style="list-style-type: none"> <li>• a type of distributed ledger technology; or</li> <li>• another distributed cryptographically verifiable data structure.</li> </ul> <p>Note: Digital assets can function as an investment, a payment product and/or as a method of payment. Use investments code 81 (Digital assets) if the complaint is about a derivative with Digital assets as an underlying asset, and use payment systems code 141 (Digital asset payment) if the complaint is about Digital assets as a payment product (e.g. a stablecoin) or a method of payment.</p>	<p><b>141 Cryptocurrency</b></p> <p>Internet-based virtual currency, such as Bitcoin and Ethereum, which is created and stored electronically. It uses strong cryptography to secure transaction records, to control the creation of additional currency, and to verify the transfer of currency ownership.</p> <p>Cryptocurrency units are sometimes called coins or tokens and typically do not exist in physical form (like paper money).</p> <p>Note: Cryptocurrency can function as an investment and/or as a method of payment. Use investments code 81 (Cryptocurrency) if the complaint is about cryptocurrency as an investment, and use payment systems code 141 (Cryptocurrency) if the complaint is about cryptocurrency as a method of payment.</p>	<p>Change in product type name and definition to reflect Government-wide approach to regulation of Digital assets and ASIC's recent clarification in <a href="#">INFO 225</a> about digital assets as financial products.</p>

December 2025 version	April 2023 version	Summary of changes
<p><b>189 Mutual risk products (MRPs)</b></p> <p>Risk products that provide an alternative to conventional general insurance products. Generally, MRPs involve participation in a 'mutual' scheme based around particular professions, small business associations, franchise operations or community groups and offer protection against events or risks. MRPs are discretionary, meaning the provider is obligated to consider any claims made, but has discretion on whether to pay a claim.</p>	N/A	<p>Addition of product category: Mutual risk products (MRPs).</p> <p>Addition of product number and type: 189 Mutual risk products.</p> <p>Inclusion of new product definition.</p>
<p><b>41 Appropriate lending</b></p> <p>The financial firm has provided credit that is <i>not</i> regulated under the <i>National Consumer Credit Protection Act 2009</i> (National Credit Act) (e.g. small business lending) in breach of the firm's lending obligations, or without proper assessment of the borrower's capacity to repay the debt.</p> <p>Note: For complaints about the provision of credit that is regulated under the National Credit Act, use complaint issue code 42 Responsible lending (excluding modified obligations for Low cost credit contracts) or 42.1 Responsible lending (modified obligations for Low cost credit contracts).</p>	<p><b>41 Appropriate lending</b></p> <p>The financial firm has provided credit that is <i>not</i> regulated under the National Credit Act (e.g. small business lending and buy now pay later) in breach of the firm's lending obligations, or without proper assessment of the borrower's capacity to repay the debt.</p> <p>Note: For complaints about the provision of credit that is regulated under the National Credit Act, use complaint issue code 42 (Responsible lending).</p>	<p>Removal of reference to Buy now pay later from 41 Appropriate lending.</p> <p>Addition of reference to revised issue type names: Responsible lending (excluding modified obligations for Low cost credit contracts) and Responsible lending (modified obligations for Low cost credit contracts).</p>

December 2025 version	April 2023 version	Summary of changes
<p><b>42 Responsible lending (excluding modified obligations for Low cost credit contracts)</b></p> <p>The financial firm has provided credit that is regulated under the National Credit Act in breach of the firm's responsible lending obligations, or without proper assessment of the borrower's capacity to meet repayment obligations. Select this issue number if the complaint does not relate to modified obligations for Low cost credit contracts.</p> <p>Note: For complaints about the provision of credit that is not regulated under the National Credit Act (e.g. small business lending), use complaint issue code 41 (Appropriate lending).</p> <p><b>42.1 Responsible lending (modified obligations for Low cost credit contracts)</b></p> <p>The financial firm has provided credit that is regulated under the National Credit Act in breach of the firm's responsible lending obligations, or without proper assessment of the borrower's capacity to meet repayment obligations. Select this issue number if the complaint relates to modified obligations for Low cost credit contracts.</p> <p>Note: For complaints about the provision of credit that is not regulated under the National Credit Act (e.g. small business lending), use complaint issue code 41 (Appropriate lending).</p>	<p><b>42 Responsible lending</b></p> <p>The financial firm has provided credit that is regulated under the National Credit Act in breach of the firm's responsible lending obligations, or without proper assessment of the borrower's capacity to meet repayment obligations.</p> <p>Note: For complaints about the provision of credit that is not regulated under the National Credit Act (e.g. small business lending and buy now pay later), use complaint issue code 41 (Appropriate lending).</p>	<p>Modified complaint issue type 42.</p> <p>Added complaint issue number and type 42.1 Responsible lending (modified obligations for Low cost credit contracts).</p> <p>Removed reference to buy now pay later from 'Note'.</p>

**Table 4: Changes to Appendix 3: Submission checklist**

December 2025 version	April 2023 version	Summary of changes
Conditional business rules	Conditional business rules	Replaced word 'Null' with 'Blank' in all applicable fields.
<p>Enhanced deep validation rules</p> <p><b>ComplainantPostcode</b></p> <p>Data in this field should be either:</p> <ul style="list-style-type: none"> <li>• a valid 4-digit Australian postcode; or</li> <li>• 'Overseas' or 'Not applicable'.</li> </ul> <p><b>DateReceived</b></p> <p>Data in this field:</p> <ul style="list-style-type: none"> <li>• should not be blank;</li> <li>• should not have an invalid date (for example, 31/02/2025); and</li> <li>• should be after 01/07/2022 (start of IDR collection).</li> </ul> <p><b>DateClosed</b></p> <p>Data in this field:</p> <ul style="list-style-type: none"> <li>• should not have an invalid date (for example, 31/02/2025).</li> </ul> <p><b>DaysOpen</b></p> <p>If there is a value in this field, then:</p> <ul style="list-style-type: none"> <li>• it should not be a negative value (less than 0).</li> </ul> <p><b>CompensationAmount</b></p> <p>If there is a value in this field, it should not:</p> <ul style="list-style-type: none"> <li>• include separators such as points (.) or commas (,); or</li> <li>• include special characters, for example (\$).</li> </ul>	N/A	Addition of table 23: Enhanced deep validation rules.