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Consultation Paper 311: Internal Dispute Resolution: Update to RG 165

Dear Jacqueline

On behalf of GS1 Australia I would like to thank you for the opportunity to provide input to the proposals in consultation paper 311.

In general, GS1 Australia supports the initiative to see greater efficiencies for the internal dispute resolution (IDR) framework, and provide both greater consumer protection, but also increased assurance for the financial firm that is tasked with handling these complaints.

GS1 Australia acknowledges that the IDR process can create financial burdens, be complicated and involve multiple stakeholders. The framework of identification within the IDR process therefore becomes very important to reducing inefficiencies, lowering costs and elevating transparency around clear and unique identification of the stakeholders involved in each complaint, and importantly the identification of each complaint itself.

We have submitted the following comments in relation to the specific questions that were asked in the consultation paper 311, these are set out in Appendix A. Supporting information to these answers, and a defined use case for a GS1 globally unique identifier are also provided and set out in Appendix B.

If you have any further queries or questions, please contact me on [REDACTED] or +61 39550 3474.

Regards

A handwritten signature in black ink, appearing to read 'Marcel Sieira', with a stylized flourish at the end.

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Appendix A

Comments on CP 311 – Internal Dispute Resolution: Update to RG165.

Questions	Comments
<p>B2Q1: Do you consider that the guidance in draft updated RG165 on the definition of ‘complaint’ will assist financial firms to accurately identify complaints?</p>	<p>GS1 Australia generally agrees that the updated draft in RG165 will assist financial firms to accurately identify complaints.</p> <p>In being able to correctly disseminate between what is and isn’t a complaint will provide greater accuracy to the data set when recording and identifying a complaint.</p>
<p>B4Q1: Do you agree that firms should record all complaints that they receive?</p>	<p>GS1 Australia generally agrees that there should be a recording of each complaint received by a firm. Within each recording of a complaint, with the assumption that it might be shared with the regulating body at a point in time, the linkage between the complaint and the firm who has recorded it should be defined.</p> <p>Such a proposal will provide greater accountability for professional practise, and increased consumer protection.</p>
<p>B5Q1: Do you agree that financial firms should assign a unique identifier, which cannot be reused, to each complaint received?</p>	<p>GS1 Australia agrees that financial firms should assign a unique identifier, which cannot be re-used, to each complaint received.</p> <p>Such a proposal will provide greater transparency and understanding to the number of complaints that are received in the industry over a defined time period.</p>

In establishing the identifier for each complaint, it is GS1 Australia’s experience that the identifier framework that is adopted must be of a globally unique standard to aid interoperability between ecosystems on a global scale.

It is GS1 Australia’s recommendation that the Global Document Type Identifier (GDTI) be considered as the unique complaint identifier for use in identifying complaints recorded by financial firms

The GDTI is a GS1 key that is recognised by the International Organisation for Standardisation (ISO/IEC 15418) and ensures global interoperability and uniqueness.

The GDTI’s uniqueness is such that its naming structure ensures cross functionality within an organisation’s existing document management system, and increased stability within a data collection point.

The GDTI can be leveraged to meet applicable regulatory requirements, and as such the standard can be written to be single use, i.e. a truly unique global complaint identifier that cannot be re-used.

B5Q2: Do you consider that the data set proposed in the data dictionary is appropriate?

GS1 Australia in general agrees that the data set proposed in the data dictionary is appropriate.

b) Do the proposed codes for ‘complaint issue’ and ‘financial compensation’ provide adequate detail?

b) GS1 Australia agrees that the proposed codes for ‘complaint issue’ and ‘financial compensation’ provide adequate detail.

GS1 Australia would also like to refer to one of the key attributes of the GDTI, and that is its granularity of identification.

In the event that a complaint is recorded by a financial firm, it is possible for firms to also include in the structure of the GDTI a reference to the ‘complaint issue’. In this instance, the GDTI would provide: (Refer Appendix B, Example 1)

- Unique number assigned by GS1

	<p>to the recording financial firm (GS1 Company Prefix).</p> <ul style="list-style-type: none"> - Unique identification of the complaint issue (Document Type). - Unique identification of the individual complaint (Serial Component).
<p>B13Q1: Do you consider that our proposals for strengthening the accountability framework and the identification, escalation and reporting of systemic issues by financial firms are appropriate? If not, why not? Please provide reasons.</p>	<p>GS1 Australia generally agrees that the proposals mentioned under B13 are appropriate.</p> <p>It is GS1 Australia’s experience that embedding a robust system of unique identification standards will enable a stronger accountability framework.</p> <p>It is possible to enable greater transparency around specific complaints and identify the reporting firm of each of the complaints (See Appendix B, Example 1, a GS1 Company Prefix).</p>

Appendix B

Information to support comments made in Appendix A.

GS1 Australia and GS1 Standards

GS1 Australia is a not-for-profit industry association that locally administers the most widely used identification standards in the world, GS1 Standards. GS1 Standards are used by industry and governments to increase the transparency of their supply chains, improve safety and increase Australia’s competitive trade edge in international markets.

We introduced barcoding to Australia in 1979 and today we enable nearly 20,000 member companies, of all sizes, to become more efficient by implementing GS1 Standards in over 21 industry sectors.

We bring business, government agencies, associations and industries together to address common issues in common ways. This blended community comes to GS1 Australia for advice, networking and solutions to their supply chain challenges.

GS1 Australia is one of 114 member organisations worldwide, servicing over 150 countries. The GS1 Global office is based in Brussels, Belgium.

Unique Identification

Unique and persistent Identification is the foundation for end to end traceability. The ability to uniquely identify products, locations, documents and people etc allow industry participants to capture and share data with others in a way in which all participants can understand. In an increasingly global economy, we need to ensure global uniqueness in the identifiers used for products,

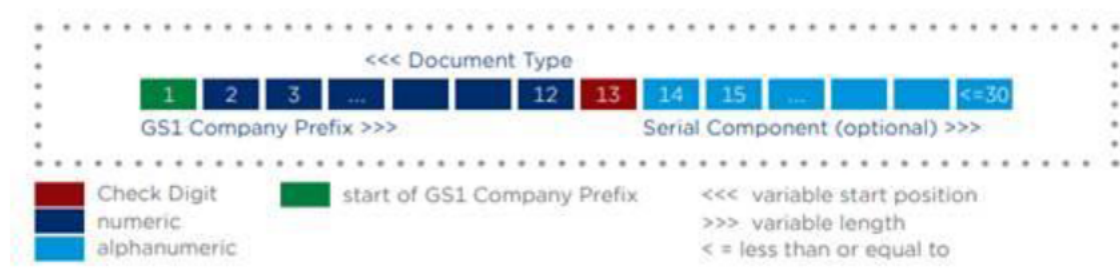
documents, instances and locations. This one of the key benefits of GS1 Identifiers as they guarantee global uniqueness.

Documents (Global Document Type Identifier GDTI)

The GDTI can be used by organisations to identify physical documents such as certificates, invoices, contracts, testaments, and electronic documents such as digital images and EDI messages.

The GDTI identifies the type of document, and if needed also the individual document instances via the optional serial component.

Example 1:



For example, the GDTI would be applicable as a unique identifier for complaints recorded by firms.

- GS1 Company Prefix **93123456**
- Document Type **0001** (for a "complaint registration" – up to the issuing organisation how they want to fill this in)
- A calculated Check Digit (in this case **4**)
- And a Serial Component of up to 17 alphanumeric characters to uniquely identify each individual complaint recording (e.g. **ABC0002154684**)
- In this example the GDTI would then be **9312345600014ABC0002154684**