

Lessons to be learned: How trustees use insights from superannuation complaints

Report 844 | November 2026

About this report

This report outlines key findings and areas for improvement from our review into how superannuation trustees use complaints to detect and address systemic issues and improve member services.

Contents

Executive summary 3
Section 1: Complaints in superannuation landscape 10
Section 2: Whole-of-industry review 15
Section 3: In-depth review of 10 trustees 19
- Culture, governance and reporting 19
- Learning from significant changes 26
- Systemic issue identification and management 29
- Use of advanced technology 45
- Compliance with other IDR requirements 47

Appendix 1: Trustees and funds reviewed 48
Appendix 2: Background 51
Appendix 3: Review methodology 53
Appendix 4: Accessible versions of figures 56
Key terms and related information 63

About ASIC regulatory documents

In administering legislation ASIC issues the following types of regulatory documents: consultation papers, regulatory guides, information sheets and reports.

Disclaimer

This report does not constitute legal advice. We encourage you to seek your own professional advice to find out how the Corporations Act and other applicable laws apply to you, as it is your responsibility to determine your obligations. Examples in this report are purely for illustration; they are not exhaustive and are not intended to impose or imply particular rules or requirements.

Executive summary

Trustees must act on what complaints are telling them

Superannuation trustees manage $3.4 trillion in retirement savings on behalf of Australians. They must have operations, systems and governance in place to deliver on member services that match the scale and significance of their responsibility.

Trustees have enforceable obligations to maintain internal dispute resolution (IDR) arrangements that meet ASIC's requirements, including on identifying systemic issues from member complaints.

This report is the latest in ASIC's multi-year member services program focused on closing the gap between the service trustees provide and the service members are entitled to expect. We place a spotlight on how well superannuation trustees learn from complaints they receive. More specifically, we examine how trustees detect and address systemic issues identifiable from complaints to improve service delivery and meet the expectations of members. ASIC's Regulatory Guide 271 *Internal dispute resolution* (RG 271) defines a systemic issue as a matter that affects, or has the potential to affect, more than one consumer.

Our work reveals that many trustees are not doing enough to use complaints as early warning signs of broader issues. We observed a similar pattern in our prior review of death benefit claims handling, where shortcomings were visible from complaints but not acted on effectively, resulting in significant harm to members' families and loved ones. We chose to intervene by taking enforcement action against two trustees: see Media Release (25-034MR) *ASIC sues AustralianSuper alleging significant death benefit claims failures* (12 March 2025) and Media Release (25-286MR) *Cbus ordered to pay $23.5 million penalty for serious failures in processing members death benefits and insurance claims* (25 November 2025).

The findings in this report should serve as a further wake-up call to all of industry. Trustees are too often failing to grasp the value and importance of complaints in both mitigating risk and delivering customer-centric services. We also found more basic shortcomings in several trustees' arrangements for ensuring compliance with their IDR obligations.

Trustees undermine confidence in the superannuation system when they fail to learn from complaints and act before member services issues become widespread. Inaction allows sub-standard services and recurring problems to continue, causing members avoidable inconvenience, frustration and potentially serious harm. Members can waste time seeking assistance on matters that should already have been resolved. In some cases, a lack of action compounds financial impacts to members, making ultimate remediation more expensive for trustees and their membership.

Complaints are not administrative noise. They are a direct signal of where systems, processes and services are failing members.

Note: Retirement savings are as at 30 June 2026. Source: Australian Prudential Regulation Authority (APRA).

Key findings

The results of our targeted assessment of all 45 superannuation trustees (whole-of-industry) and in-depth review of 10 superannuation trustees (reviewed trustees) highlight broader deficiencies in trustees' arrangements to identify and respond to systemic issues from complaints.

Our in-depth review examined arrangements in place for one superannuation fund for each of the 10 trustees. These funds together held **$1.6 trillion** in benefits for over **12.8 million members**, as at 30 June 2026.

We observed significant disparities in the adequacy and maturity of trustees' processes to identify and respond to systemic issues from complaints, as well as failures to implement those processes in actual practice.

Note:
Appendix 1 lists the trustees and funds included in our in-depth and whole-of-industry reviews.
Appendix 2 outlines the background leading to this report and the applicable legislative framework.
Appendix 3 provides more information about our review methodology and the data we collected.
The findings in this report reflect our consideration of multiple information sources and various review activities. As a result, not all findings relate to the same timeframe. The relevant period is identified where applicable.

Whole-of-industry review

We identified:

- **Close to one quarter of trustees across all of industry were not analysing complaints data on a regular basis to identify systemic issues**, despite this being an enforceable requirement.
- **More than half of trustees (24 out of 45) identified less than five systemic issues in two years,** including 14 trustees that failed to identify a single systemic issue. Some of the 24 trustees had high complaint numbers and/or higher rates of complaints than peers from which we expected more issues to have been identified. Other trustees had low rates of complaints compared to peers, indicating they may be under-recording member complaints. Not capturing all complaints means a trustee may have missed important warning signs of wider issues. We view the identification of low levels of systemic issues as a potential red flag as opposed to better performance.
- In the same two-year period, the **Australian Financial Complaints Authority (AFCA) identified systemic issues from complaints it received at almost twice the rate that trustees identified systemic issues from complaints they received.** This is based on 37 systemic issues identified by AFCA from 11,571 external dispute resolution (EDR) complaints, compared to the whole-of-industry identifying 700 systemic issues from 419,832 IDR complaints.

In-depth review of 10 trustees

From our detailed review of the practices of 10 trustees, we identified the following areas as particularly concerning and where improvement was required. We consider these improvements are well within the control of trustees.

› Lack of trustee diligence in meeting RG 271 obligations

A number of the reviewed trustees have not paid sufficient attention to their compliance with enforceable requirements in RG 271 related to using complaints to identify systemic issues. We also identified deficiencies in some trustees' satisfaction of other enforceable IDR requirements.

Only 5 of the 10 trustees reviewed had any audits or reviews of compliance with the systemic issues requirements of RG 271, even though our guidance states trustees should conduct such audits at least annually.

RG 271 has been in effect since 5 October 2021. There is no excuse for trustees not having compliant IDR arrangements.

› Insufficient customer focus, including being too quick to blame customers for complaints

Not all reviewed trustees demonstrated arrangements or practices consistent with a culture that values and uses complaints as a source of insight to improve member services. While some trustees have taken positive action to address this during the review period, cultural change requires ongoing commitment.

Several trustees had not effectively sought to understand the main reasons causing some of their most common types of complaints.

We also saw that several trustees' complaints data attributed the underlying reason for complaints to members (over 60% of recorded root causes). Assigning customers' expectations, customer awareness, or customer error as the cause of a complaint does not demonstrate sufficient member focus. It is unlikely to assist in identifying wider issues or delivering an uplift in the service being complained about, unless further investigation occurs.

› Learnings from significant transformational changes overlooked

We sought to understand how trustees capture lessons learned from significant transformational activity, such as successor fund transfers, fund mergers and changes to key service providers. These types of changes can cause disruptions to critical member services and when handled poorly can result in real harm. For example, if a member is, or becomes, vulnerable during a period of interrupted service, trustees need to be alert and responsive to complaints about access to benefit payments. A failure to efficiently consider urgent payment requests can have serious impacts for members.

Past engagements with trustees and notifications from AFCA have highlighted to us that complaints tend to increase at the time of a significant change, even more so when implementation of a change does not go as planned, and member impacts are not always considered in full.

In this review, 9 of the 10 reviewed trustees implemented major changes of varying types that we considered were material. However, only one of those trustees focused sufficiently on what members had experienced and how that experience could have been improved. This lack of member focus is concerning. It risks repeating the same mistakes as well as undermining the benefits of transformational change.

› Inadequate governance arrangements

Oversight and reporting related to identifying systemic issues from complaints was generally inadequate across the reviewed trustees. Relevant performance metrics were missing for 9 out of the 10 trustees. Reports often lacked crucial content and, in many cases, there was minimal evidence of boards or board committees challenging management about action taken to detect and respond to systemic issues identifiable from complaints.

These weaknesses were reflected in significant delays we observed in the rectification and remediation of several issues trustees had confirmed as systemic.

› Critical gaps in complaints data capture and analysis

Some reviewed trustees chose to define a 'complaint' or 'systemic issue' more narrowly than our guidance, increasing the likelihood that the voices of customers are not heard and wider issues causing member dissatisfaction are not identified.

Several trustees also failed to capture crucial data points about their complaints and data that was captured was often not detailed enough to provide for meaningful insights into complaint trends and systemic issues.

Where trustees lack data, whether because of restrictive definitions or poor data capture, they set themselves up to fail to learn from complaints from the very beginning.

Robust analysis of complaints data was also generally missing. Less than half of the reviewed trustees appeared to be conducting analysis on a regular basis to detect systemic issues. Where analysis was being undertaken, there were often flaws in a trustee's approach, which compromised the insights that could be generated.

Limited quality assurance was conducted on the accuracy of data, recorded root causes, and the identification of systemic issues.

Actions for all trustees

> Trustees should without delay review the findings in this report and assess the adequacy of their IDR arrangements to identify and respond to the systemic issues that complaints bring to their attention. They should then develop and implement a plan to make timely improvements necessary to fully comply with their obligations.
>
> Where necessary, trustees should consider whether they require external assurance to be confident their arrangements meet ASIC requirements.

Throughout this report, we describe poorer and better practices for industry to consider, as well as actions that we believe trustees should take. A summary is provided in Table 1.

Table 1: Key actions for trustees

Focus area	Actions for industry
Culture, governance and reporting	1. Regularly benchmark complaints, including volumes received and the age profile of members making complaints. 2. Establish a method to record and track service improvement insights from complaints. 3. Set performance metrics for identifying possible systemic issues from complaints. 4. Ensure regular reporting on complaints covers: › performance against metrics set for systemic issue identification › the number of possible systemic issues that have been identified, and › the status and outcome of investigating possible systemic issues.
Learning from significant transformational changes	5. Ensure adequate arrangements are in place to both: › monitor member impacts while a significant change is being implemented, and › review what members experienced post implementation to gather lessons to apply for future changes.
Systemic issue identification and management	6. Ensure definitions of 'complaint' and 'systemic issue' are clear, documented and consistent with RG 271 and applied in practice. 7. Ensure data captured on complaints has sufficient detail to allow for trends and possible systemic issues to be identified. 8. Conduct regular analysis of complete complaints data sets for the purpose of identifying possible systemic issues. 9. Consider the approach used for collecting and verifying the root causes of complaints. Avoid attributing customers as the cause of complaints. 10. Establish a method to record and track all possible systemic issues identified from both individual complaints and complaints data analysis. 11. Where systemic issues are confirmed, ensure sufficient oversight of action to identify affected members, fix the underlying issue, prevent recurrence and where required, provide fair and timely remediation.
Further uplifts	12. Strengthen assurance arrangements to regularly test the accuracy of complaints data being recorded and whether possible systemic issues are being identified from complaints. 13. Where artificial intelligence (AI) is used for member services, build clear pathways for detecting and rapidly escalating insights from complaints to relevant business owners on how AI is performing.

While our review focused on superannuation trustees, many of the findings and recommended actions in this report may also be relevant for other financial firms that must comply with RG 271.

What ASIC is doing

We remain committed to holding superannuation trustees to account for member service failures. We are further engaging with the reviewed trustees on our findings. We also continue to monitor all trustees' compliance with RG 271 through a range of supervisory activities, including analysis of IDR reporting data, considering AFCA notifications and EDR complaints data, entity breach reports, and other intelligence sources.

We will pay particular attention to trustees that have been put on notice that they need to improve (including through this report) but have not taken sufficient and timely action. We will also focus on trustee non-compliance that results in unacceptable risks or harms to consumers.

Where we are not satisfied with compliance by trustees, we will consider the appropriate regulatory response. This includes further supervisory engagement, compliance action, licensing conditions and, where appropriate, enforcement action.

We have already taken enforcement action against a trustee to enforce compliance with mandatory IDR standards – see Media Release (26-091MR) *Federal Court holds Telstra Super accountable for internal dispute resolution failures* (7 May 2026). We will not hesitate to take similar action again where we feel it is in the public interest to do so.

ASIC's review of how trustees use insights from superannuation complaints

Trustees have been required to meet ASIC's internal dispute resolution standards and requirements set out in RG 271 since 5 October 2021.

We examined how trustees identify and manage systemic issues from complaints to meet the requirements of RG 271, and how trustees use complaints to improve the services provided to members.

Whole-of-industry warning signs:

For 45 trustees for the period 1 July 2023 to 30 June 2025:



Over half identified less than five systemic issues from complaints. Of these, 14 identified no systemic issues.

In total, the 45 trustees received 419,832 complaints from which they identified 700 systemic issues



AFCA identified systemic issues at almost twice the rate when compared to all trustees.

AFCA received 11,571 complaints and notified ASIC it had identified 37 systemic issues

Low levels of issues being identified are a potential red flag – not better performance.

11
did not analyse complaints data regularly to identify systemic issues despite this being an enforceable requirement

15
restricted what they classify as a systemic issue

26
missing system capabilities to flag systemic issues

For the 2025–26 financial year:

A total of
257,544
superannuation complaints

Industry median of
97
complaints per 10,000 members

Some trustees had much lower rates and may be under-recording complaints



Trustees cannot learn from complaints if they are not recording them



Areas requiring attention:

Our in-depth review of 10 trustees highlighted common shortcomings:



Lack of diligence in meeting enforceable requirements



Critical gaps in complaints data capture and analysis



Insufficient customer focus



Learnings from significant transformational changes overlooked



Inadequate governance arrangements

Next steps for trustees:



- Review arrangements against the findings and better practice examples in this report
- Determine uplifts needed and implement them without delay
- Consider obtaining assurance that your arrangements are compliant and effective

Section 1: Complaints in superannuation landscape

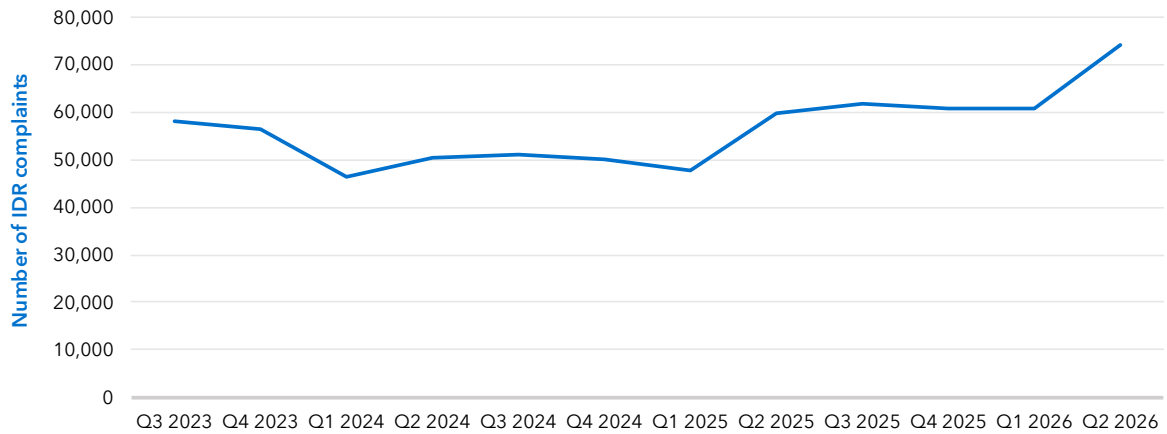
This section provides insights on recent complaints experience for the whole industry.

Complaints from members are made at significant scale and provide trustees with indications of where they are experiencing dissatisfaction, friction or harm.

> Trustees should regularly benchmark their complaints against peers, then investigate and address any disparities they observe.
>
> We are particularly concerned about trustees with low levels of complaints caused by under-recording, whether due to restrictive definitions, lack of staff training or any other reason. It indicates that customer dissatisfaction is not being heard. It also reduces the warning signs a trustee collects to alert them to wider issues.

Since we started collecting data on IDR complaints received by financial firms, **over 677,000 complaints** have been made about superannuation to the 45 trustees in our whole-of-industry review (superannuation complaints) from 1 July 2023 to 30 June 2026: see Figure 1.

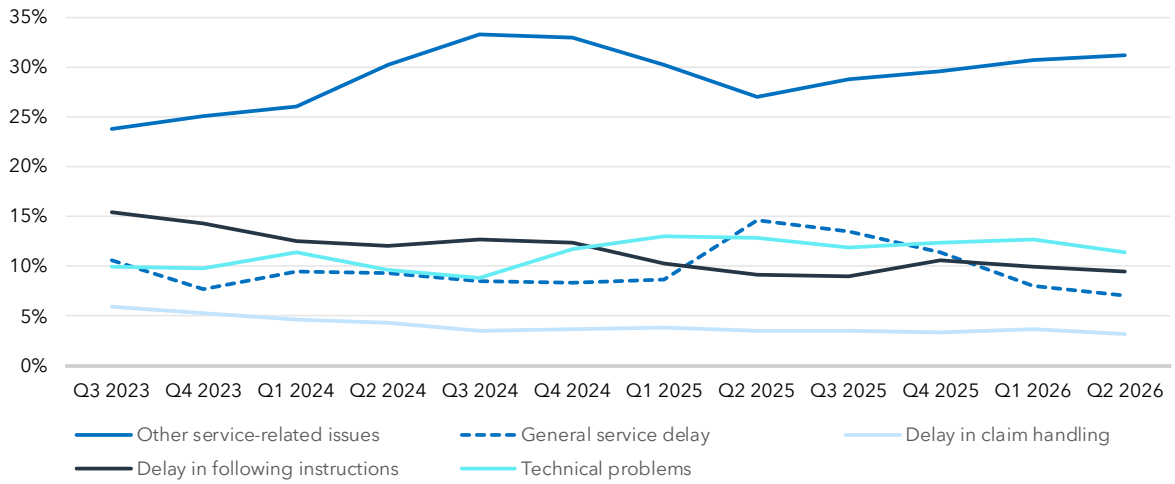
Figure 1: Number of superannuation complaints – 1 July 2023 to 30 June 2026



Source: ASIC IDR data.
Note: See Table 6 for the data shown in this figure (accessible version).

Member service issues account for most superannuation complaints. The most prevalent issue reported to ASIC was classified by trustees as 'Other service-related issues', which was more than double the rate of the second-most common issue type: see Figure 2. This issue type by itself provides limited insight. Trustees should ensure they are able to understand what those complaints are telling them about the services they provide.

Figure 2: Top 5 superannuation complaints – 1 July 2023 to 30 June 2026



Source: ASIC IDR data.
Note: See Table 7 for the data shown in this figure (accessible version).

IDR complaints in the 2025–26 financial year

Looking at superannuation complaints in more detail for the 45 trustees, for the 2025–26 financial year there were:

23,203,880
member accounts
as at 30 June 2026

257,544
complaints

70%
of complaints
were made by phone

Source: ASIC IDR data and APRA quarterly superannuation statistics.

Complaints received per trustee

The rate of complaints made to trustees across the industry was:

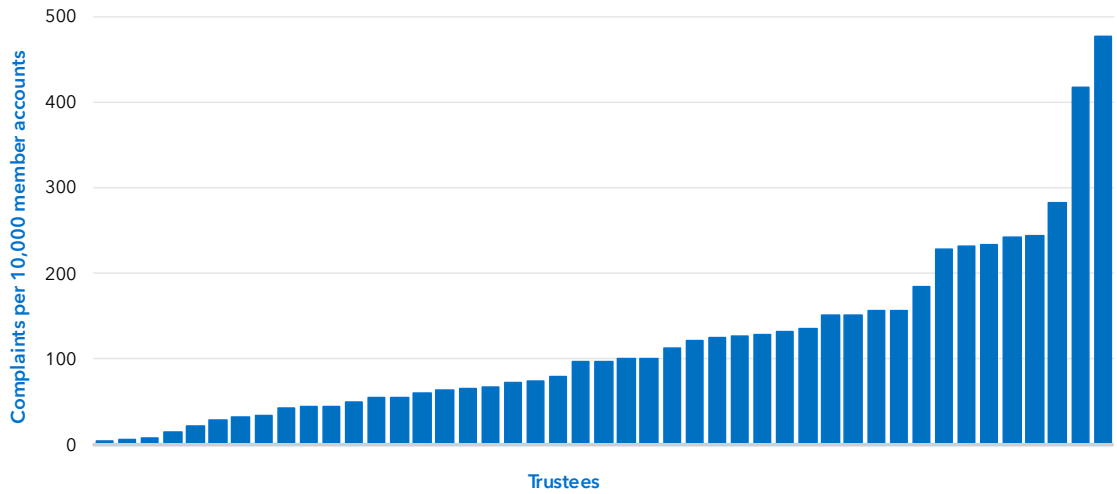
MEDIAN:
97
complaints per 10,000 member accounts

AVERAGE:
119
complaints per 10,000 member accounts

Source: ASIC IDR data and APRA quarterly superannuation statistics.

However, at the individual trustee level there was significant variation: see Figure 3.

Figure 3: Number of complaints received per 10,000 member accounts per trustee – 1 July 2025 to 30 June 2026



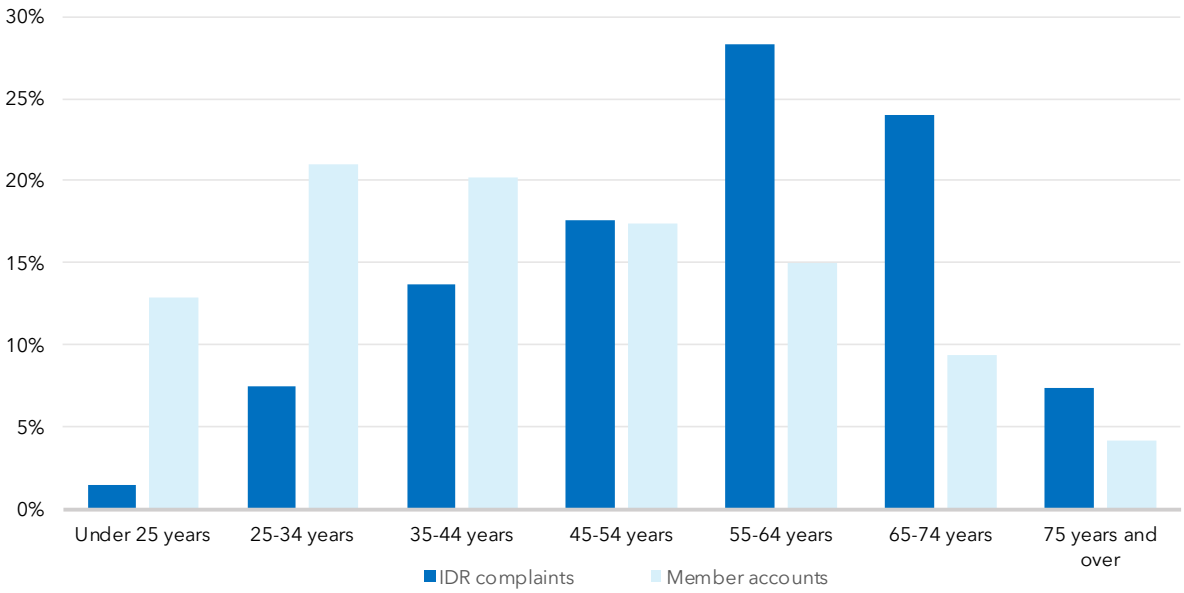
Source: ASIC IDR data and APRA quarterly superannuation statistics.
Note: The number of member accounts used to calculate the values in this figure is as at 30 June 2026 except for one trustee where 31 March 2026 has been used, reflecting that trustee ceased managing any superannuation fund from 30 April 2026. See Table 8 for the data shown in this figure (accessible version).

Trustees at the lower end of this comparison may be under-recording complaints, while those with higher levels of complaints may have service issues requiring attention.

Age of complainants

Across the industry, older members are making more complaints relative to the proportion of member accounts they hold: see Figure 4.

Figure 4: Proportion of superannuation complaints and member accounts by member age – 1 July 2025 to 30 June 2026



Source: ASIC IDR data and APRA quarterly superannuation statistics. Excludes accounts and complaints where age was undefined or not reported.
Note: See Table 9 for the data shown in this figure (accessible version).

> Trustees should analyse their own data to see if this pattern applies to their funds and consider issues driving older members to complain.

How complaints were dealt with

Trustees must deal with superannuation complaints within 45 calendar days. However, they can close certain complaints resolved in the first five business days without issuing a written response. Trustees also have a longer period to respond to complaints that are objections to a death benefit distribution decision.

Looking at closed superannuation complaints reported to ASIC for the period 1 July 2025 to 30 June 2026, excluding objections to a death benefit distribution decision, there were:

44%
closed on day received

68%
closed in 7 days or less

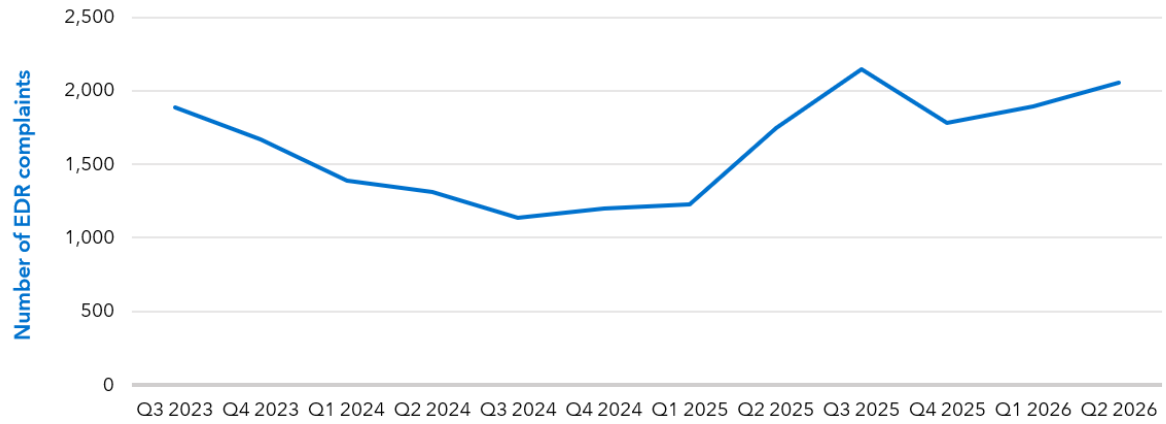
97%
closed in 45 days or less

Source: ASIC IDR data.
Note: ASIC only collects IDR data on the age of complaints based on calendar days. Seven calendar days is provided as an alternative measure to five business days.

Complaints made to AFCA

During the period 1 July 2023 to 30 June 2026, more than **19,400** complaints were made to AFCA about superannuation concerning the 45 trustees that were part of our whole-of-industry review: see Figure 5. Complaints made to AFCA are referred to as EDR complaints.

Figure 5: Number of EDR complaints about superannuation for 45 trustees – 1 July 2023 to 30 June 2026



Source: Unpublished AFCA EDR data.
Note: EDR complaints made about superannuation generally were slightly higher (22,193) for the same period, reflecting that some complaints about superannuation were made against non-trustees, such as insurers and advisers. For the 2025–26 financial year, all EDR complaints about superannuation increased by more than 40% compared to the prior financial year. See Table 10 for the data shown in this figure (accessible version).

Over the same period, the top five issues in EDR superannuation complaints for the 45 trustees were:

- delay in claim handling
- service issue
- account administration error
- failure to follow instructions/agreement, and
- delay (related to instructions).

AFCA systemic issue notifications

As part of its EDR role, AFCA has a mandatory requirement to proactively identify systemic issues from complaints and engage with financial firms to resolve them. AFCA must also refer the particulars of systemic issues it identifies to regulators, including ASIC.

Between 1 July 2023 and 30 June 2025, AFCA notified ASIC of 37 systemic issue matters relating to 16 superannuation trustees. Insurance-related matters, not connected to delays in death benefit claims, accounted for 38% of these notifications. Another 24% related to benefit payment processing.

Between 1 July 2025 to 30 June 2026, AFCA notified ASIC of another 17 systemic issues relating to 12 trustees, 7 of which related to benefit payment processing.

> ⚠ **AFCA appears to be almost twice as likely to detect systemic issues than trustees themselves.** This is based on comparing the number of systemic issues the 45 trustees told us they detected as a proportion of all IDR complaints they received during the two years to 30 June 2025, versus the number of systemic issues AFCA reported to ASIC as a proportion of EDR complaints made about the 45 trustees, during the same period.

Section 2: Whole-of-industry review

We used our mandatory information gathering powers to collect targeted information across the superannuation industry on how trustees identify systemic issues from complaints and the extent of actual systemic issue identification.

We collected information from all 45 trustees regulated by ASIC in our whole-of-industry review for one superannuation fund for each trustee. Our findings are provided below.

Note:
Appendix 1 lists the 45 trustees and funds that were included in this assessment.
Appendix 3 provides more information on our review methodology, time periods covered and the data we collected.
The findings in this report reflect our consideration of multiple information sources and various review activities. As a result, not all findings relate to the same timeframe. The relevant period is identified where applicable.

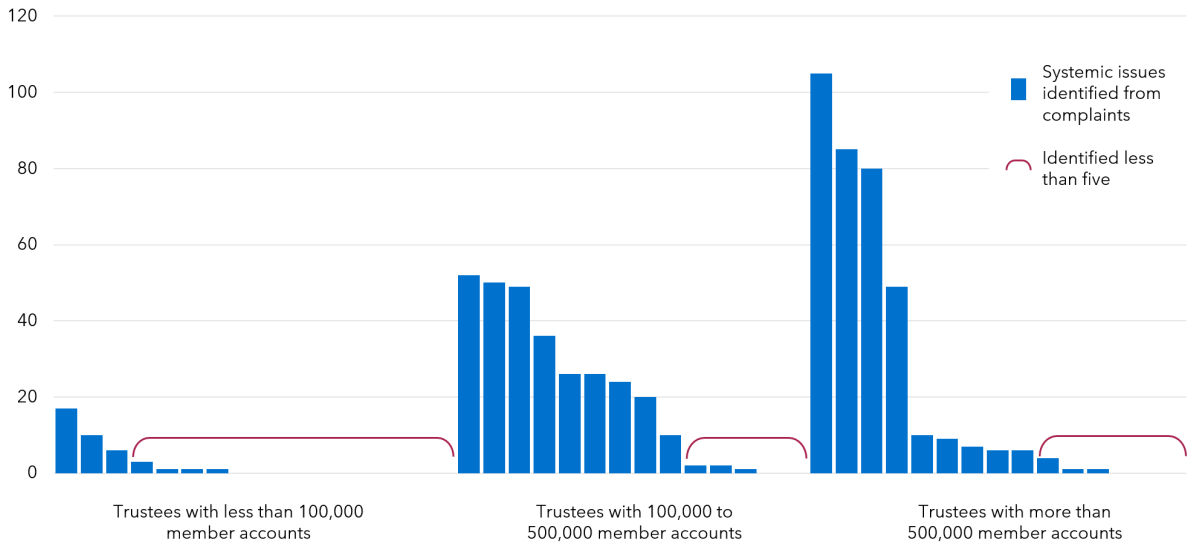
> Overall, we found that a significant proportion of trustees need to improve how they use their complaints data to identify systemic issues.

No or low levels of systemic issue identification

We asked trustees to tell us the number of actual systemic issues they had identified from complaints during the period 1 July 2023 to 30 June 2025 (i.e. issues the trustee had confirmed were systemic).

The numbers reported to us varied significantly across the 45 trustees, including among those of similar size and/or who experienced similar volumes of complaints: see Figure 6.

Figure 6: Number of actual systemic issues identified from complaints during the period – 1 July 2023 to 30 June 2025



Source: Unpublished ASIC data and APRA annual superannuation statistics.
Note: The number of member accounts for each trustee is as at 30 June 2025. In most cases, trustees provided us with actual systemic issue information or data based on the trustee's own definition of systemic issue. These definitions were often, but not always, aligned to ASIC's RG 271 definition.
See Table 11 for the data shown in this figure (accessible version).

More than **50% of trustees identified no or very low levels of systemic issues** over the two-year period, including:

- 31% reported no systemic issues, and
- 22% reported between one and four systemic issues.

Fund size and complaint volumes did not necessarily predict the number of systemic issues detected.

Some trustees had relatively high complaint volumes, yet they identified no or limited numbers of systemic issues during the two-year period. For example, four trustees that received more than 10,000 complaints identified between zero and four systemic issues.

The trustees with the two highest average rates of complaints received per 10,000 members in the two-year period had a similar number of member accounts, yet they detected vastly different numbers of systemic issues. One identified only one, while the other identified 50.

For the four trustees who each identified more than 50 actual systemic issues, their average rate of complaints per 10,000 members did not deviate materially from the industry average, and the number of member accounts they looked after ranged from a few hundred thousand to more than one million.

Acknowledging that there may be exceptions, we expect complaints to regularly bring issues to a trustee's attention that affect more than just the individual complainant.

> ⚠ **Trustees who identified higher numbers of issues than their peers are more likely to have a positive complaint culture, where genuine efforts are made to learn from complaints. The absence or low number of issues being identified may look superficially positive, but they are hard to reconcile with the reality that trustees manage complex operations where some errors and service failures are inevitable.**
>
> **We believe that low numbers generally suggest that trustees' processes to identify and escalate systemic issues are not operating effectively in practice.**

Divergent approaches on what is a systemic issue

How trustees define systemic issues can influence what is identified and escalated. RG 271 sets a broad definition of what should be considered a systemic issue.

One-third of trustees had adopted a definition that restricts the types of issues they would consider as systemic. For example:

- only recognising systemic issues after multiple complaints about the same matter had been received
- requiring impacts to be 'significant' without clear criteria, or
- limiting systemic issues to complaints that were upheld.

Data analysis practices vary

Regular and effective analysis of complaints data is critical to identifying trends and systemic issues over time. However, trustee practices across industry varied significantly. Looking at the period 1 July 2024 to 31 October 2025:

- **24% of trustees (11 of 45) did not analyse complaints data on a regular basis to identify systemic issues** (and of these it was not surprising that 7 trustees had not identified one actual systemic issue), and
- 11 trustees conducted analysis on a weekly to fortnightly cadence, which could limit their ability to detect patterns over time, unless data for longer periods was included in their analysis.

Indicators of capability gaps

Effective identification of systemic issues relies on systems that support consistent and effective capture and escalation, and staff capability to recognise potential issues during the life of a complaint: see Figure 7.

Figure 7: Typical lifecycle for handling a complaint



Some 16% of trustees reported that no formal training on systemic issue identification was provided to any staff between July 2024 and October 2025.

Over half of the trustees reported limitations in their systems capability to flag a complaint as indicating a possible systemic issue, including:

- 27% said they had no systemic issue field in any complaint management system, and
- 31% said a systemic issue field was only implemented in some but not all of their complaints management systems.

> Having the ability to flag a complaint as involving a possible systemic issue is a basic functionality that trustees should consider including in all systems used to manage complaints. Not having one means a reliance on manual or informal processes, which increases risks that issues will be overlooked.

Flaws in reporting and governance arrangements

Around 16% of trustees told us they did not include content on systemic issues identified through complaints in complaint reporting (or had no reporting on complaints) to any of their board, a board committee or an executive committee between July 2024 and October 2025.

Of the trustees that said their reporting did cover identified systemic issues, it was concerning that 10 also told us they identified no systemic issues over the same period. This raises questions about the clarity of their reporting or the effectiveness of oversight in practice.

> Our whole-of-industry review indicates common deficiencies in detecting and escalating systemic issues, analysing complaints data and governance arrangements. The findings from our in-depth review into 10 of the 45 trustees contained in the following pages provide more detail on these and other topics, and further insights all trustees should consider.

Section 3: In-depth review of 10 trustees

Culture, governance and reporting

Trustee boards, chief executives and senior management should be actively interested in and support complaint management by:

- fostering a positive culture that welcomes and values complaints
- maintaining effective board and/or senior management oversight of the IDR process, which includes systemic issue identification from complaints, and
- ensuring IDR arrangements are effective, including by investing sufficiently in adequate resources and IT systems.

Culture of valuing and acting on complaints

We expect all financial firms to adopt a culture that values complaints: see RG 271.127.

Valuing complaints isn't limited to merely resolving individual dissatisfaction. Rather it also involves appreciating the insights complaints can provide into the broader member experience and using these insights to improve services and support for members.

We therefore sought to understand whether trustees were using complaints not only to meet their compliance obligations, but also as an early indicator of service issues, a driver of continuous improvement and a tool to support member trust and retention.

Based on initial information obtained from trustees up to October 2025, we only observed clear evidence of analysis of complaints to detect service delivery issues or improvement opportunities, and evidence of improvement action taken, in half of the reviewed trustees. Within that half, some trustees had only taken action on an ad-hoc basis.

The trustees we considered were better at acting on service insights from complaints generally had a method to register and track continuous improvement opportunities, or a dedicated forum to regularly consider service gaps or deficiencies identified from complaints, or both. Their reporting also demonstrated that service issues were being escalated and addressed.

Understanding the reasons customers are complaining

We obtained further information in mid-2026 on whether trustees had conducted any reviews in recent years (since 1 January 2024) on the underlying reasons causing heightened member dissatisfaction across several areas we had observed from data obtained earlier in our review and from ASIC IDR data. From that information we noted:

- For 7 of the 10 reviewed trustees who had technical problems as one of the top five issues in IDR data reported to ASIC, only 3 had looked into what was driving those types of complaints.

- Where benefit payment or withdrawal processing complaints was a top five issue in trustees' own IDR data (7 of the 10 reviewed trustees), only 4 trustees had conducted a review to better understand difficulties the members were complaining about.
- Six trustees had claims handling-related complaints (mainly about delays) as a top five issue either in ASIC IDR data and/or their own IDR data. However, when we asked them if they had reviewed what was driving complaints about the handling of disablement claims we found only three of those six trustees had done so.

Note: We did not ask trustees about the handling of death claims in consideration of the work we have already done on this topic: see Report 806 *Taking ownership of death benefits: How trustees can deliver outcomes Australians deserve* (REP 806) and Report 831 *Delivering on death benefits: Have super trustees stepped up?* (REP 831).

Positively, some of the reviewed trustees did conduct detailed reviews on what was driving the above-mentioned types of complaints, even when they were not one of their top issues. We also observed some trustees taking steps to improve how they leveraged complaints for service insights after we first commenced engagement with them.

> We urge all of industry to consider if they are fully utilising complaints as a rich source of information to improve the overall customer experience, assist business decision-making and support member satisfaction.
>
> Trustees should establish a method to record and track service improvement insights from complaints.

Examples of service improvements triggered by complaints

- One trustee identified that for the second consecutive year their online member portal was one of the top five areas complained about. They reviewed the digital transactions that had the highest level of recurring complaints and identified several impactful fixes to reduce future complaints. They also established a new monthly governance process to review technical problem complaints.
- One trustee reviewed complaints from members about the process for making an appointment for intra-fund advice. They then changed how appointments could be made, simplified the tools their staff used for this purpose, and built a better way for calls from members to get to the right team to book an appointment.

Innovative reviews

Some trustees demonstrated a more sophisticated approach to complaints analysis than their peers. They conducted analysis that demonstrates the types of insights that can be derived from considering complaints from different angles or perspectives.

Better practice examples

- One trustee participated in a broader review examining data across related companies on matters reported to regulators as potential breaches. This review determined that for every one customer who had complained, there were 215 impacted 'silent' customers who had not. It also found that 40% of reported matters had been identified through complaints, confirming they acted as an early indicator of risk.
- A different trustee looked at common factors across members who had made a complaint in the 2024–25 financial year. It found that someone who complained was three times more likely to exit the fund than their general population of members. Their 'retiree' cohort (aged 50+ years) was also six times more likely to complain than other cohorts. This review was complemented by a wider customer insights program which confirmed that dissatisfied members often do not complain but instead leave the fund or share negative feedback externally. This shows the value of complaints data to identify and address service friction points to prevent future dissatisfaction and assist with member retention.

Setting performance metrics

Boards and senior executives need appropriate governance and oversight structures to ensure IDR arrangements operate effectively and in accordance with RG 271. Performance metrics can provide the objective data that boards and leadership need for this purpose.

Our work focused on superannuation trustee conduct has consistently reinforced the need for trustees to strengthen their governance arrangements through the effective use of data and development of meaningful performance metrics that are subject to timely and regular oversight.

All 10 reviewed trustees had some metrics or performance measures for the identification and management of incidents, which in many cases would include systemic issues identified from complaints where they meet the trustee's definition of an incident.

However, 9 out of the 10 reviewed trustees had no measurable performance objectives or other metrics in place on identifying systemic issues from complaints. This includes no set measures to track that regular analysis of complaints data was occurring for the purpose of detecting systemic issues, nor to track that possible systemic issues were being identified by complaints handling staff when they managed complaints.

> Trustees need to consider what performance metrics they should set for systemic issue requirements in RG 271. Having measures to track whether systemic issues are being identified is an important way to ensure it occurs in practice.

Better practice example

One trustee monitored whether the proportion of complaints flagged as 'possible systemic' fell below a set threshold of 5% of complaints.

Performance against this metric was documented in monthly reporting to the trustee's complaints forum attended by senior executives. The trustee uses this metric as an indicator of how effectively staff are identifying and considering possible systemic issues as part of complaints handling.

Where a team identifies less than the 5% threshold, the trustee decides if assurance activity to identify any omissions, gaps or uplift is required.

Reporting

Trustees have an enforceable obligation under RG 271 that reporting to their boards and senior executives must cover metrics and analysis of complaints data, including about systemic issues identified from complaints: see RG 271.119.

Missing content on systemic issues

While all 10 reviewed trustees produced regular reporting to their boards, committees and/or executives on complaints, 2 trustees didn't include any content on systemic issues identified from complaints.

For the eight trustees that did include reporting on systemic issues, the quality varied significantly. In many cases, the content was minimal. There was also material variation in the frequency of reporting.

For one trustee, the extent of its reporting was noting whether any systemic issues were identified during the relevant reporting period.

One trustee had reduced its reporting so that it only covered systemic issues notified to them by AFCA.

Better practice example

The better reporting example we reviewed included the number of systemic issues identified during the reporting period, even if there were none, the status of each systemic issue, a description of the issue, the date it was identified, the rating of the issue, any related incident identifier (where applicable), and the actions being undertaken to address the issue.

Focus on high-level complaint trends with little challenge

All reviewed trustees provided some degree of reporting on complaint trends, mainly to board committees and/or executive committees. For several funds this was limited to a chart or list of complaint types or categories with minimal commentary on the drivers of these complaints. This type of quantitative reporting does little to inform the reader on reasons for the high volume of complaints in these areas.

Where explanations of what might be driving complaint trends were stated in reports, there were many examples where there was no mention of what was being done in response.

There was limited evidence in board or committee minutes of inquiries about complaint drivers or actions being taken to prevent future complaints of a similar nature. Where such evidence existed, it appeared to be isolated rather than part of regular challenge or oversight. This was even the case where one trustee told us they relied on a governance forum reviewing high-level charts in reporting as a key method for detecting systemic issues.

In more limited cases, we did see some better reporting, which provided sufficient detail to understand the key drivers of member complaints within particular categories, and what was being done to address those drivers.

Over-reliance on incident management reporting

Given the connection between systemic issues and incident management, we reviewed incident reporting to boards and board committees.

We found that all trustees produced reporting on incidents that covered the volume of incidents identified during the reporting period, the status of incidents, commentary regarding the nature of the incidents and actions undertaken to address incidents.

However, reporting did not consistently note how incidents were identified, including whether they were identified from complaints. Therefore, it was difficult for us to conclude whether the boards and executives that were exclusively relying on incident reporting to monitor if systemic issues are being identified from complaints had sufficient information to do so.

Relying solely on separate incident reporting to cover systemic issues identified from complaints may not give those responsible for ensuring compliance with IDR obligations enough assurance that the requirements to detect and respond to issues from complaints are being met.

> Trustees should review the content and frequency of complaints reporting to ensure they comply with the provisions in RG 271 related to systemic issues.

Reviews and audit

We looked at how trustees assessed the compliance and effectiveness of their complaints handling arrangements for identifying and escalating systemic issues. This included obtaining details of findings from any reviews or audits of IDR arrangements conducted by the reviewed trustees since 1 January 2023.

Compliance audits

Trustees should conduct audits or other checks of compliance with RG 271 and their own internal IDR requirements, at least annually: see RG 271.189 and RG 271.190.

We found evidence of annual audits or reviews of RG 271 compliance for 7 of the 10 trustees reviewed. However, the scope and depth of this activity varied. Only five trustees had at least one audit that checked that the requirements of RG 271 related to systemic issues were being met.

Most trustees had findings that indicated weaknesses in controls, oversight and data needed to effectively identify systemic issues from complaints. Some findings were repeated in consecutive audits, indicating a failure to sufficiently address known shortcomings.

Reviewing effectiveness of IDR practices

We also looked at any reviews a trustee had undertaken to assess the operation of their IDR processes and procedures.

RG 271 states that senior management should conduct or arrange for regular reviews of the IDR process to consider the suitability, effectiveness and efficiency of the IDR system and assess whether systemic issues are being promptly identified and remediated: see RG 271.193.

Across the 10 reviewed trustees, only half demonstrated that they had undertaken substantive reviews that considered the effectiveness of systemic issue identification and remediation.

We noted that some trustees conducted reviews after our announcement that the next phase of our member services project would focus on learning from complaints. While it is encouraging that those trustees appear to have responded to our messaging, it is disappointing that similar reviews had not occurred earlier. We note that RG 271 came into effect on 5 October 2021.

Sustainable IDR capability

Trustees need to sufficiently invest in the structures that support meeting IDR obligations, including requirements relating to identifying systemic issues from complaints. This includes adequate resourcing, providing training and support to staff handling complaints, and having fit-for-purpose technology and systems for managing complaints.

Trustees need to consider if their IDR arrangements are proportionate to their fiduciary role as custodians of retirement savings, reflecting the scale, complexity and significance of their operations, the number of members they serve, and any known areas of weakness.

We observed several examples of trustees who were aware they needed to improve on how they used complaints to identify and address systemic issues before we commenced our review. However, they had delayed their response for some time or failed to take appropriate action to implement necessary changes.

We did see some positive examples of improvements trustees had already commenced before we announced our focus on learning from complaints in mid-2025, as well as some trustees who have made efforts to uplift since.

Examples of positive uplifts

- new governance forums for overseeing systemic issues and/or service improvement opportunities
- employing a dedicated systemic issues manager responsible for overseeing the identification and assessment of possible systemic issues detected from complaints
- updating service provider agreements to include specific obligations in relation to identifying, managing and reporting on systemic issues from complaints
- developing a structured complaints training program to build capability in complaint data analysis, thematic identification and risk insight generation
- implementing a new complaints management system, and
- using new technologies, including AI, to assist with systemic issues identification.

Learning from significant changes

Superannuation has undergone a wave of consolidation in the last decade, with the number of funds reducing significantly due to successor fund transfers and mergers. Some trustees have also made major changes to their administration, service arrangements or the products they offer.

These types of significant transformational changes are typically large and complex and can involve a 'limited-services period' where processing of member transactions is paused while the change is being implemented. Generally, on-line access ceases during this time while phone access for members can be materially reduced.

Such changes can cause additional stress to members and have flow-on service impacts for some time after a limited-service period ends.

We have observed the potential for real harm to members, particularly vulnerable members, where trustees do not have adequate arrangements in place to respond to issues highlighted through complaints during and/or immediately after implementation of the change.

What we looked at

All 10 reviewed trustees told us they had made at least one significant change between January 2023 and October 2025.

We looked further into 16 successor fund transfers and mergers, as well as the most significant administrator transitions, service provider changes, and major technology, product and brand transformations that had occurred amongst the reviewed trustees. Altogether, we looked more closely at 24 significant changes across 9 of the trustees.

Most of the trustees only had one or two relevant changes. However, one trustee had six (including three successor fund transfers) and another had eight (including six successor fund transfers). The one trustee that was excluded from further review identified one change, which we determined as not meeting our materiality threshold.

We aimed to understand how each trustee responded to the impact the significant changes had on members, including how they considered issues being raised by members through complaints.

We also sought to understand how each trustee used complaint information and post-implementation reviews to better understand and learn about impacts to members arising from each significant change. This is particularly relevant where the trustee might again engage in similar activity (e.g. successor fund transfers or mergers).

Member impacts

The impacts to member services reported to us by trustees were generally consistent across all changes. These included delays in processing transactions, difficulties accessing accounts or services, communication gaps, increased contact volumes and longer call wait times. These impacts tended to translate into higher complaint volumes during and immediately following implementation of the change.

Most reviewed trustees had made efforts to prevent or mitigate negative impacts to members, such as by deploying additional contact centre staff or enhancing complaints handling resources.

Most, but not all, reviewed trustees stated that they had heightened monitoring of complaints and member enquiries and service levels while the change was underway. However, one large trustee told us that they did not establish additional or specific arrangements to monitor complaints or member service issues related to a major multi-staged change in a service provider, which we know had significant impacts on members. The trustee advised that its existing monitoring, governance, quality assurance and performance management arrangements were already in place and were used throughout the transition.

Post-implementation insights

Only three trustees appeared to tailor the complaints data they collected to capture issues raised that were specific to significant changes.

We also only observed post-implementation reviews being conducted for 15 of the 24 changes. This meant that nine major transformational changes were not reviewed afterwards to capture learnings for the future. Of those nine that weren't reviewed, three were successor fund transfers managed by the same trustee. Unsurprisingly, that trustee was unable to advise us of any lessons it applied from one successor fund transfer to the next. In comparison, another trustee with multiple successor fund transfers that had conducted post-implementation reviews each time, was able to advise us of notable service improvements it had made based on learnings from earlier transfers.

Of further concern was that for post-implementation reviews that were conducted, the content of the reviews generally had no or very little content on the actual impacts of the change on members and any associated learnings. Reviews tended to focus on project management aspects of a change, such as implementation timeliness, governance arrangements, data migration issues, technology performance and operational readiness.

Only one trustee had conducted reviews of significant changes that looked at impacts to member services or the experience of members in detail.

Better practice examples

- New complaint issue codes were set by one trustee to record areas of dissatisfaction specific to the significant change.
- One trustee conducted surveys of members who joined its fund under a successor fund transfer, to assess member satisfaction and seek member input on things that would have improved their experience. This provided a direct source of member feedback and a richer understanding of member experiences.

Trustees need to review the service experience of members during significant changes, including what issues members are raising in complaints about the changes, and determine what lessons can be applied for future changes.

Trustees should also observe the experiences of other trustees in implementing significant changes to inform their own plans and to help avoid making the same mistakes where member services failures have occurred.

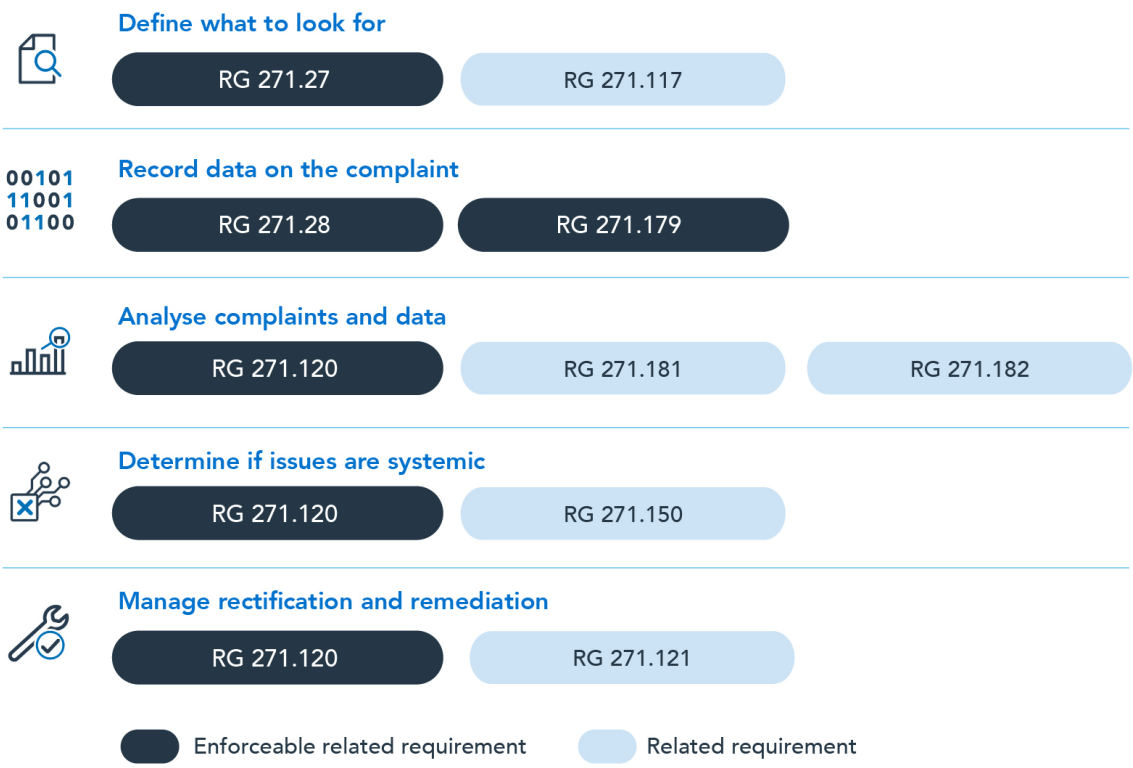
Systemic issue identification and management

RG 271 sets out some minimum standards and requirements for using complaints to identify wider issues that all trustees must comply with. RG 271.117 states:

> *'Consumer complaints are a key risk indicator for systemic issues within a financial firm.'*

There are several stages in the effective identification and management of systemic issues, reflected in various requirements within RG 271: see Figure 8. Any deficiencies in practice within each of these stages can undermine trustees' efforts to understand and respond to broader issues identifiable from complaints.

Figure 8: **Requirements in RG 271 related to using complaints to identify systemic issues**



Note: See Table 12 for the data shown in this figure (accessible version).

Ensuring robust processes are in place to support systemic issue identification from complaints and their management is non-negotiable. However, we observed that too often this has not been the case in practice.

At the time we completed our first collection of information for this report in October 2025:

- 8 of the 10 trustees knew they had problems with the complaints data they collected
- 6 of the 10 trustees knew that analysis of complaints to detect issues needed improvement, and
- 5 of the 10 trustees knew they had weaknesses with how they managed issues that were detected.

We also detected a number of additional gaps in trustees' practices through our review of information provided.

While less common, we did see some better practices from some trustees who had taken substantive steps to improve before we commenced our engagement with them.

A case study highlighting key deficiencies and the impact they can have on members is provided below.

Case study 1: Behind every complaint and issue are members

A system configuration issue meant that the tax treatment of superannuation benefits for fund members invested in a particular investment option was incorrect. This caused some members to be given incorrect information about the split between their taxable and tax-free components. Other members had an incorrect amount of tax deducted when their benefit was paid out. Some members paid too much tax on their superannuation, while others did not pay enough.

The trustee of the fund began handling complaints from small numbers of affected members from 2017. In at least one complaint response, as early as 2020, a member was informed that the trustee would be looking into what was causing the tax components to be incorrect. However, it was not until late 2023 that the trustee started investigating the issue and whether it was affecting multiple members. The root cause was identified around four months later. However, it took until December 2025 for the trustee to implement the necessary system fixes.

Early estimates suggested around 1,200 members were likely affected and required review. A smaller sub-set of these members were identified as having potential financial impacts, with remediation activities continuing into 2026.

Some of the complaints made by members conveyed the impact this issue had on them personally, with several complainants having received early payment of their benefit due to disablement or permanent incapacity:

> *' … from the bottom of my heart, I request that you really push this as hard as you can to get this rectified … It is impacting not only my health and my finances, but my family, and it's causing a lot of unnecessary stress, and I just want to get things right so that I can access my funds correctly to pay for my medical expenses.'*
>
> *' … so, when I made the withdrawal, they processed it and they got the components completely incorrect. They got the taxable components incorrect, and they got the tax-free component incorrect ... And I made that withdrawal to pay for medical expenses, and <fund name withheld> have really, really stuffed it up.'*
>
> *'… my financial advisers have actually said do not start a pension account until this is fixed because they don't know what's [going to] happen … It's been pushing four months since this first reared its head … So, I really do want to get that pension account made for, it'll make my life a lot easier for money flow, budget-wise, I can plan my life around my immunotherapy, and my medical condition, and then knowing how much money I've got to pay for bills.'*

The trustee in this case study has, since 2024, been taking substantive steps to improve the way they use complaints to detect systemic issues.

> All trustees should consider the practices we are calling out and challenge themselves on where they can improve.

Setting clear definitions

To effectively learn from complaints, trustees need to properly identify contact from customers that are complaints and then determine what issues raised in complaints could be systemic and therefore impact other customers.

This means they need to have a clear, compliant and well-documented definition for both 'complaint' and 'systemic issue' that staff dealing with members and complaints can refer to.

Definition of 'complaint'

We found that all reviewed trustees used the RG 271 definition of a complaint in their complaints handling policies and procedures. See RG 271.27 which defines a complaint as:

> *'[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.'*

However, two of the trustees also added qualifications to their definition, essentially carving out some contact, such as requests for information, clarification or error corrections from being deemed a complaint. This means those trustees are likely failing to capture queries or requests where the customer also expressed clear dissatisfaction. In fact:

- our analysis of IDR data for those two trustees shows they had a lower level of complaints than peers, and
- one of the trustees reported to ASIC that it had identified more than 4,000 complaints which had been incorrectly classified as 'feedback'. This represented a significant proportion of their overall complaints.

If a trustee fails to identify and record complaints then they are unable to learn from them, as well as being in breach of enforceable IDR requirements. Importantly, trustees will not be able to provide a fair and timely response to the complainant, including about the right to escalate their complaint to AFCA: see Figure 7 above.

Definition of 'systemic issue'

RG 271 deliberately sets a broad definition of systemic issue. RG 271.117 states:

> *'A systemic issue is a matter that affects, or has the potential to affect, more than one consumer.'*

This reflects that what can appear as an inconsequential impact or small issue on the surface, can be the tip of the iceberg of a larger problem.

We found stark differences in the definition set for systemic issues across the 10 reviewed trustees.

- Five trustees documented the broad RG 271 definition of a systemic issue in their complaints and/or incident handling policies and procedures.

- Four trustees had a more restrictive definition. One trustee excluded human errors from being considered a systemic issue, while another's definition stated an issue needed to impact a large number of clients and/or be of sufficient frequency generally in line with a medium- or high-rated incident, and could not be a 'standalone' potential weakness where an impact to customers could, but had not yet, occurred.
- One trustee failed to document a definition of systemic issue in any of its policies.

Without a clear, written definition it would be difficult for staff and service providers to know what to look for. Further, restricting what may be considered a systemic issue increases the risk of missing early warning signs, delaying taking action until issues become much larger or more prevalent.

We are deeply concerned that something so fundamental as documenting a definition of systemic issue persists even though we communicated this was an issue in 2022 in Report 751 *Disputes and deficiencies: A review of complaints handling by superannuation trustees* (REP 751).

> Trustees must ensure that definitions of 'complaint' and 'systemic issue' are clear, documented, and compliant with RG 271 and applied consistently by both the trustee and its service providers.

Recording data

It is an enforceable requirement in RG 271 that financial firms must record all complaints that they receive and have an effective system for recording information about complaints: see RG 271.179.

The quality of data collected directly affects the ability to obtain insights from complaints.

Flag for possible systemic issues

Only seven of the reviewed trustees had a data field in their complaint management systems that allowed staff to record whether a complaint indicated a possible systemic issue. Across those trustees, the average rate of complaints flagged as indicating a possible systemic issue was 3.5%.

However, we did note that two of the seven trustees had given the field a name, which was, in our view, confusing, and could limit the type of issues being flagged. For example, setting a field name of 'ongoing issue' meant issues no longer occurring may not be flagged even if the underlying impacts or causes of that issue still needed to be addressed.

Better practice examples

- Some trustees included an additional data field to enter free text on what the possible systemic issue was.
- Some trustees made completion of the systemic issue data field mandatory to prompt complaints handling staff to consider potential impacts to other members.

Linking complaints to incidents

All reviewed trustees had a process to handle systemic issues through their incident management process.

Nine of the 10 reviewed trustees had the ability in their complaint management system to indicate whether a complaint had been raised as a new incident or related to an existing incident. However, one of those trustees only had 'yes' or 'no' as the response options for this field rather than a link or reference to an incident identifier.

Noting vulnerability or First Nations complainants

Only six trustees had a data field in their complaint management systems which would allow them to flag that a complaint involved a person who was a First Nations member or someone experiencing vulnerability.

Having this type of field is better practice to allow the trustee to detect patterns where the particular service needs of these types of members (or claimants) are not being met.

Level of detail on the nature of complaints

All trustees had data fields to categorise what complaints were about (often referred to as complaint issues). However, the usefulness of that data, in our view, varied considerably based on the level of detail that was recorded. We observed that:

- One trustee limited the detail it collected on complaint issues to that set out in our data dictionary: see IDR data reporting handbook. These are standardised mandatory fields that must be included in IDR reporting to ASIC by all financial firms. In our view, a trustee should keep more granular data to allow it to better analyse complaints and identify systemic issues.
- Some trustees used multiple complaint systems which recorded data differently. This increases the risk of errors when amalgamating data for analysis. For one trustee, a different system was used by frontline staff to record complaints which did not capture the same level of detail on complaint issues as its other system. This meant they missed out on richer data for a significant proportion of their complaints.

Trustees with better data collection tended to have several levels of data fields to categorise complaint issues.

Better practice example

One trustee had comprehensive data fields on complaint issues. For every complaint, they recorded the:

- business function the complaint relates to (e.g. administration, contact centre, fund's website)
- product feature, service or transaction complained about (e.g. investments, claims or benefit payments)
- detail specific to the product feature, service or transaction complained about (e.g. aspect of investments, type of claim, type of benefit payment), and
- nature of the complainant's dissatisfaction (e.g. poor service, a delay, an error).

Capturing this level of detail increases the ability for trustees to pinpoint the exact areas that receive more complaints and what concerns members are raising about them.

Trustees need to ensure their complaints data systems are fit for purpose for their operations and capture enough detail to allow for the detection of trends and issues affecting multiple members which require further investigation.

Having data fields to flag complaints which staff believe may point to a systemic issue, or which relate to an incident, are important. They assist with identifying:

- matters to check further
- patterns in the type of complaints which may be systemic, and
- complaints that may need to be taken into account when handling incidents or reporting breaches to ASIC.

Recording root causes: Are trustees uncovering the true cause of complaints or blaming the customer?

Seven trustees had one or more data fields in complaint management systems to record details on the root causes of complaints. Those capturing better data had categories and sub-categories for root causes and the ability to record optional free text on the cause.

It is better practice to have the ability to record data on root causes against complaints. However, we also recognise that given the volume of complaints some trustees receive it may not be feasible to determine root causes in every case.

Where root cause fields are completed at the time a complaint is handled, the trustee should be clear on the level of confidence it can assume for or apply to that data. Complaints handling staff may not be in a position to undertake detailed root cause analysis. Therefore, the root causes being entered may be the staff member's impression of what the root cause was from handling the complaint, not the definitive underlying cause.

Staff handling complaints may require training to ensure that they can determine accurate root causes and avoid automatically attributing root causes of complaints to complainants.

⚠ **In the more detailed complaints data we collected for the 18 months to 30 June 2025 for this review, we noticed that several of the reviewed trustees had a high proportion of their recorded root causes (over 60%) attributed to members (e.g. customers' expectations or awareness, customer error).**

Trustees should be mindful of high levels of root causes in complaints data being attributed to members. Not meeting members' expectations, members misunderstanding processes or members making errors can be symptoms of wider service issues, such as poor communication or unclear processes and not the root cause. Such attribution should be subject to further investigation.

Analysing complaints and data

Complaints are a crucial source of information through which trustees can identify possible systemic issues. The key methods for identifying possible systemic issues from complaints should include:

- the trustee or its service provider considering the circumstances of an individual complaint and whether the same problem could affect or has affected other members, and
- regular analysis of complaints data to detect patterns or trends over time that point to possible systemic issues.

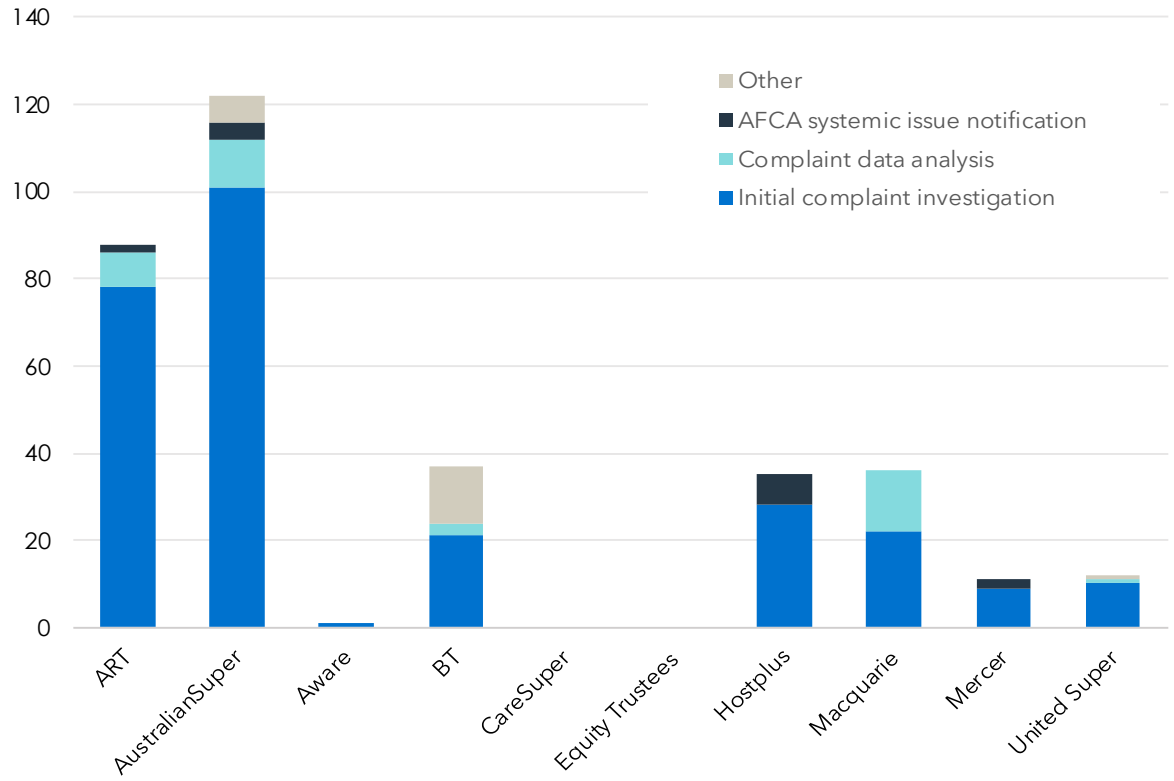
Both of these methods are also useful to detect opportunities for improving the services a trustee provides.

We could see that some trustees were consistently detecting possible systemic issues from individual complaints, although four trustees had much lower levels than their peers, and one trustee detected no possible systemic issues.

In fact, detailed data we collected about actual systemic issues (i.e. those issues trustees had confirmed as being systemic) and possible systemic issues which trustees were still investigating, confirmed that the vast majority had been identified when handling individual complaints. **Only half of the trustees detected any of these issues from data analysis**: see Figure 9.

This concerns us, as RG 271 makes it an enforceable requirement for trustees to regularly analyse complaint data sets to identify systemic issues: see RG 271.120(b), with further guidance at RG 271.181 and RG 271.182.

Figure 9: How trustees detected systemic issues from complaints for issues handled – 1 January 2024 to 30 June 2025



Source: Unpublished data we collected for one superannuation fund per trustee (as listed in Table 4 of Appendix 1).
Note: The above includes both actual (confirmed) systemic issues and possible systemic issues identified before 30 June 2025 still being investigated as at 2 October 2025 to determine if they were actually systemic. In most cases, trustees provided us with data based on the trustee's own definition of systemic issue. These definitions were often, but not always, aligned to the definition in RG 271. Appendix 3 provides more information on our review methodology, time periods covered and the information and data we collected. See Table 13 for the data shown in this figure (accessible version).

We also asked trustees to explain the method of analysis they used and obtained documents and data sets connected to the analysis the trustees had conducted for the purposes of identifying systemic issues. We observed that:

- there was no evidence of analysis of data to detect systemic issues for two reviewed trustees
- only four reviewed trustees appeared to be conducting analysis on a regular basis, and
- where analysis did occur, there were deficiencies in how it was conducted for most trustees.

Examples of deficiencies in complaints data analysis we observed:

- not delving deeper into the types of issues raised by complainants or increases in certain types of complaints. For example:
  - noting high levels of complaints about 'service' but not seeking to understand what types and aspects of service were being complained about
  - relying on self-serve dashboards presenting information as adequate analysis, and
  - creating volume-based tables or charts for complaints reporting without more detailed interrogation of the data
- only looking at trends in the top complaint issues (by volume received), which might mean insights on other types of complaints are missed until issues become larger

- only comparing data over short periods of time, such as one month or quarter at a time
- leaving out crucial data from analysis, such as data on complaint issues that was collected, root causes, or data within fields used to indicate if there is a possible systemic issue
- only focusing on individual complaints to determine if each might point to systemic issues, rather than also looking for patterns and trends across all complaints – both are necessary
- pausing regular analysis of data for periods of time, or only conducting analysis on an ad hoc basis, and
- excluding data from analysis for complaints that were closed in the first five business days, which can be the majority of complaints.

Better practice examples

- One trustee looked at complaints where the outcome included a monetary remedy. From this review, the trustee was able to identify opportunities to streamline complex processes to both reduce costs and enhance customer satisfaction.
- Another trustee used advanced technology, specifically natural language processing, to look deeper into early resolution of complaints (those resolved within the first five business days), which was approximately 65% of their complaints. They uncovered that a large proportion of those complaints that had been classified as 'customer service' related to a phone call or email. However, almost half of those complaints were actually related to withdrawals.

We discuss the use of advanced technology further in a later section in this report: see Use of advanced technology.



Determining if an issue is actually systemic

Where the trustee identifies there is a possible systemic issue, they need to determine if it is actually systemic.

RG 271 sets out that trustees must promptly escalate possible systemic issues to appropriate areas for investigation. This is an enforceable requirement under RG 271.120(c).

To do this well involves:

- having a method to keep track of possible systemic issues that are identified and whether they have been investigated, and
- investigating the nature of identified issues and the extent they impact customers, in a timely manner.

Most trustees we reviewed needed to improve how they further assessed possible systemic issues identified through data analysis and should better consider the root cause analysis that is used as part of that assessment.

Some trustees also failed to consistently investigate complaints that staff had flagged as possibly involving a systemic issue.

Registering and tracking possible systemic issues

In 38% of systemic issues covered in the data we collected across the 10 reviewed trustees we observed that trustees did not supply the date when they either started investigating if a possible systemic issue was actually systemic, or the date when they had determined a matter was an actual systemic issue.

We also observed that not all trustees were recording possible systemic issues in a register, or a complaints or risk and compliance system. However, by mid-2026 most reviewed trustees told us they had adopted this type of practice.

We also noticed that trustees who had a dedicated process to regularly consider possible systemic issues identified from complaints, such as through a working group or review forum established for that purpose, tended to be better at ensuring issues were investigated and escalated as appropriate.

One trustee told us that after implementing a systemic issues register and a dedicated group to review possible systemic issues, it saw an increase in matters being logged and handled as incidents.

> Trustees need to ensure they have a robust method to record and track possible systemic issues – both those identified from handling individual complaints and from data analysis.

Root cause analysis

Conducting root cause analysis is one way a trustee can understand the true underlying causes of issues. It can also help to determine if the issue could affect other members.

Most of the reviewed trustees advised us that root cause analysis was undertaken for all complaints received, or for all complaints except those resolved at first point of contact. Some also said that the depth of the root cause analysis differed based on the complexity of a complaint.

We are concerned that root cause analysis that is only conducted at the time a complaint is handled may be limited to a cursory assessment for the purposes of completing root cause data fields in complaint management systems. Staff handling complaints may focus more on what happened and what needs to happen next to resolve a complaint, rather than understanding the real underlying cause of a member's dissatisfaction.

Further, root cause data captured in complaint management systems may not be detailed enough to confirm underlying causes of issues and if a possible systemic issue exists without further investigation occurring.

We have seen several examples where despite claims of conducting root cause analysis on all complaints, multiple complaints were made on the same systemic issue and trustees failed to confirm there was an actual systemic issue for some time.

> Trustees should consider what root cause analysis should occur on matters identified as possible systemic issues as part of investigating those issues, and how such root cause analysis will be best completed. Trustees should also ensure adequate root cause analysis is completed for all actual systemic issues.

Connection with incident management

Generally, trustees have processes where staff will log an incident if they detect an error or omission resulting in financial loss to a member, or a known breach of business rules or legislative obligations. Those matters are then handled under the trustee's incident management framework.

Most trustees told us they conduct deeper root cause analysis as part of their incident management process, which is positive. We understand that investigating the impact an issue could have on other members is generally also a part of handling incidents. However, not all systemic issues are logged as an incident.

We observed that 17% of actual systemic issues identified by the 10 reviewed trustees in the 18 months to 30 June 2025 did not appear to be logged as an incident.

> Trustees need to ensure that systemic issues not logged as an incident are still recorded, investigated and addressed.

Case study 2: Tracking issues and investigating wider member impact

Trustees may issue disclosure material and communications to members by making a document available online and notifying members that the document is available to view.

One trustee we reviewed, received complaints that some documents were not actually available to view in members' online accounts. Complaints first started in the 2021–22 financial year and continued at low numbers for several years.

Some of the documents members stated were not available included annual statements, letters outlining payment options on retirement, Centrelink statements for allocated pension members and notices about lapsing insurance cover.

Members who complained expressed concern about not having information needed to make investment decisions, missing documents needed to apply for the Age Pension and losing insurance cover, as well as general frustration about the inability to access annual statements.

The trustee only commenced investigating the matter in late 2024, after one of its employees, who was also an affected member, raised concerns. The trustee identified two separate system configuration flaws, which meant that over 250,000 members had been unable to view documents online, at different times. It detected that other types of documents were also affected, including welcome letters and significant event notices. The trustee reverted to mailing out documents until the online issues were fixed in late 2025. They then sent a communication to affected members stating documents could now be viewed online.

Ensuring members have the information they need to make informed decisions on their superannuation is a core trustee obligation. Where a complaint indicates that information or documents were not received or are inaccessible, it should be treated as a warning sign and timely action taken to determine the underlying cause and if it could affect other members.

This case study emphasises the importance of having a method to record possible systemic issues for further investigation. The trustee in this case did not have a data field in its complaint management system to flag possible systemic issues and only started keeping a register of these types of issues requiring investigation in August 2025.

Managing rectification and remediation

RG 271 states that if an investigation confirms that a systemic issue exists, we expect the financial firm to take prompt action to identify affected consumers and provide fair remediation: see RG 271.121.

Generally, we found that trustees were handling resolution and remediation of the majority of systemic issues identified from complaints as incidents under their incident management frameworks. In more limited cases, issues were handled under separate processes for IT system fixes, continuous improvement initiatives or risk and issue management.

From the data we collected as at 2 October 2025 on 342 actual systemic issues and possible systemic issues still being investigated that were handled between 1 January 2024 and 30 June 2025, we observed that:

- for actual systemic issues where resolution was still ongoing, 35% had been open for more than 360 days and another 15% were estimated to take more than 360 days to close, and
- for actual systemic issues that were closed, 12% took more than one 360 days to be rectified and remediated in full. One trustee was responsible for half of those cases.

We also observed that there were gaps or quality issues in data provided to us for 6% of issues, which meant their age could not be properly determined: see Table 2.

Table 2: Breakdown of systemic issues identified from complaints and dealt with in the two years to 30 June 2025, based on status and age as at 2 October 2025

Status	0 to 90 days	91 to 180 days	181 to 270 days	271 to 360 days	More than 360 days	Unable to determine	Total number of issues
Actual systemic issue – closed	98	56	32	14	27	1	228
Actual systemic issue – ongoing	3	15	16	20	29	1	84
Possible systemic issue still being investigated	5	5	1	0	1	18	30

Source: Unpublished data we collected for one superannuation fund per trustee (as listed in Table 4 of Appendix 1).

> While trustees typically have a process to manage incidents based on significance and/or matters requiring early attention, trustees also need to ensure that regardless of how an issue is being managed, there is sufficient oversight of the status and age of resolution.
>
> Delays in managing systemic issues can increase harm to consumers and the complexity and cost of resolution for trustees.

Case study 3: Delayed rectification

In 2023, a trustee identified an increase in complaints it received from members who were seeking early release of their superannuation due to severe financial hardship or compassionate grounds. The trustee promptly identified (within one month) that several changes were needed to both its systems and processes to improve its handling of these types of payment requests.

The trustee commenced making some improvements by mid-2023 but it took until March 2026 for all planned improvements to be completed.

The delay in fully addressing known weaknesses meant problems persisted and complaints about early release applications continued to be made by members in high numbers for years. Those members were already facing financial distress, serious illness or other difficult personal circumstances – some mentioned they were dealing with foreclosure on their house, having to reschedule medical treatments, being homeless and needing money to get back on their feet.

Instead of receiving timely support and fast payment, many members were given incorrect information on what they needed to do or when their payment would be made, or had processing of their payment request stalled, stopped or rejected in error.

This case study highlights the need to effectively monitor and respond to complaints data, including after an issue becomes known. Monitoring of data helps a trustee better understand member impacts and prioritise improvements necessary to prevent further avoidable harm.

Case study 4: Delayed remediation

In early 2024, a trustee became aware from complaints that some members who had set up a pension account had not received a 'retirement bonus' they were entitled to. This retirement bonus was a tax saving the trustee had communicated would be automatically passed on to eligible members.

The trustee took prompt action to investigate what occurred and confirmed that members had not received their promised retirement bonus due to a processing error. Within one month, it had taken steps to fix its processes to prevent any other members being affected. One month later, the trustee estimated that approximately 500 members had not been paid over $1.3 million in retirement bonuses since 2018. The trustee noted that further work was needed to validate the estimated member and financial impacts.

As at May 2026, two years after becoming first aware of the issue, members have not yet been remediated. The trustee still had not completed its analysis to confirm all impacted members had been identified and how much each one was owed.

Breach reporting

Trustees and other financial firms have an obligation to report certain breaches to ASIC: see Regulatory Guide 78 *Breach reporting by AFS licensees and credit licensees* (RG 78). Trustees should consider this obligation when managing systemic issues identified from complaints, including for those handled outside of incident management processes.

ASIC publishes data annually on reported breaches that were:

- significant breaches of core obligations, or
- situations where the licensee is no longer able to comply with a core obligation and the breach, if it occurs, will be significant (likely significant breaches).

We looked at these types of core obligation breaches reported to ASIC by the 10 reviewed trustees, compared to all reported breaches on superannuation and those reported by all financial services firms: see Table 3.

Table 3: Comparison of reported core obligation breaches with an initial submission date – 1 July 2024 to 30 June 2025

Measure	10 reviewed trustees	All superannuation	All financial services
Investigation triggered by a complaint	28%	24%	24%
Impacted more than one customer	46%	49%	35%
More than one year to be detected	38%	40%	22%
More than one year from detection to rectification	3%	3%	1%
More than one year from detection to compensate affected customers	9%	9%	3%

Source: Unpublished ASIC data and sector level ASIC data published at Reportable situations data dashboard on 31 October 2025.

We observed that complaints are leading to the detection of around one in four core obligation breaches reported for all superannuation to ASIC. This supports the crucial role complaints play in trustees' identification and rectification of compliance deficiencies and remediation of associated consumer harms. The rate is slightly higher for the 10 reviewed trustees, noting that this group includes the three largest superannuation funds in Australia.

Additionally. around two out of five core obligation breaches took more than one year to be detected, for both the group of 10 reviewed trustees and for all superannuation. We find this concerning, particularly given that close to half of reported superannuation breaches affected multiple customers. When compared to all financial service sectors, superannuation trustees appear to take longer to pick up breaches and have a higher rate of issues that involve multiple customers.

Trustees should ensure their processes for identifying systemic issues from complaints support timely detection and reporting of core obligation breaches. Where breaches are identified, trustees should also be taking timely action to both remediate and minimise impacts to members.

Supporting arrangements

We also examined other supporting arrangements the reviewed trustees had in place to make systemic issue identification and management work in practice.

Documenting processes and procedures

As set out in RG 271, the trustee's internal IDR procedure should be a comprehensive and useful tool for staff who deal with complaints, providing a step-by-step guide to the entire IDR process, including in relation to systemic issues.

More often than not, the IDR policy and procedure documents we reviewed did not incorporate sufficient detail on identifying and escalating systemic issues and complaint trends. In particular, content was generally missing on how and when analysis of complaints data should occur to detect systemic issues.

Five trustees did not have guidance or training material specific to identifying systemic issues.

All 10 reviewed trustees stated that root cause analysis formed part of their approach to investigating possible systemic issues. However, only six had documented guidance on root cause analysis that provided effective detail for staff on when it should be undertaken and how it should be conducted.

A lack of documented guidance increases the risk that root cause analysis will not identify the true underlying reasons of an issue, preventing effective flow-on insights and action.

We note that several trustees improved their supporting documentation during the period of our review.

Better practice example

One trustee developed a specific root cause training module for staff covering investigation techniques, root cause analysis methods, and the process for validating root cause findings. Practical examples and case studies were used to demonstrate how root cause analysis could be applied to real issues.

Quality assurance

We looked at what quality assurance activities were conducted to check the recording of complaints, the accuracy of complaint data, and the identification and escalation of systemic issues from complaints. Out of the 10 reviewed trustees we found that:

- three trustees did not do any quality assurance checking of this nature
- only four trustees did some form of quality assurance on frontline contact with members, specifically on whether complaints were being properly identified during phone calls
- only three trustees conducted checks on the accuracy of data recorded for complaints
- no trustees conducted regular quality assurance of root causes that were recorded

- only three trustees conducted any checks on whether systemic issues were being identified when complaints were handled. This included one trustee who only checked complaints dealt with in frontline phone calls, and another trustee who only checked complaints for which they issued a written response, and
- only four trustees had checks on whether incidents were being correctly escalated from complaints.

Most quality assurance was completed on a sampling basis, with the frequency varying from anywhere between fortnightly to limited one-off occurrences. Although one trustee did check every complaint for which it issued a written response.

> Trustees should strengthen quality assurance to assist in detecting weaknesses in data quality and systemic issue identification.
>
> Quality assurance should regularly test whether complaints are being correctly identified and recorded and if possible systemic issues are being escalated.
>
> Findings from quality assurance should be used to improve procedures, training, systems and reporting,

Other mechanisms to detect systemic issues

Given the low levels of systemic issue identification by some reviewed trustees and across a significant proportion of the industry, we made inquiries of the 10 reviewed trustees to understand other mechanisms they used to identify systemic issues.

The information we collected showed that outside of complaints, systemic issues are most commonly detected through incident management, from assurance activities (e.g. quality assurance and compliance checks) and by audits (both internal and external).

For the period 1 July 2023 to 30 June 2025, issues detected from complaints comprised 13% of all actual systemic issues identified across the 10 reviewed trustees. However, at a single trustee level, this ranged anywhere from 0% to 100%.

Three trustees reported that they had not identified one systemic issue from other mechanisms during that two-year period.

Use of advanced technology

We recognise that the use of advanced technologies, such as AI, has the potential to deliver efficiencies, improve accessibility and enhance consumer engagement in financial services, including in superannuation.

AI presents a significant opportunity for innovation and productivity gains that can deliver better consumer outcomes. However, AI also introduces risks and challenges, which need to be appropriately managed.

Safe and responsible use of AI may be realised through strong governance, transparency and accountability, including human oversight and monitoring, as well as data quality controls and robust information security.

Existing laws and related guidance are technology-neutral and apply to the use of AI. These include obligations to provide financial services efficiently and honestly, avoiding misleading conduct, and treating beneficiaries fairly.

Using AI for customer complaints

AI presents an opportunity for trustees to scale up or enhance their handling and analysis of complaints, subject to proper guardrails.

It can assist trustees to analyse both individual complaints and larger sets of complaints data to detect possible systemic issues as well as service improvement opportunities. It can also assist in improving the identification of complaints from member interactions.

When we commenced our in-depth review of 10 trustees in October 2025, only one trustee was using AI to assist with analysing complaints data to detect systemic issues.

By the time we completed our review in May 2026, one more trustee had commenced using AI and another had trialled its use. One other trustee had built an AI agent to analyse incident data for systemic issues.

Additionally, six of the reviewed trustees were using AI to support complaints handling. Common uses included generating call summaries or transcripts, supporting quality assurance, assisting staff to draft complaint correspondence, and helping staff access relevant knowledge materials more quickly.

Several trustees had plans to expand the use of AI in complaints handling in the next 12 months. Of those, only one trustee intended to adopt AI for enhanced complaints analysis to assist with the identification of systemic issues.

Better practice examples

- One trustee uses a dedicated machine-learning model to review data on individual complaints to determine the probability they involve a possible systemic issue. A manual review is then conducted of complaints where the probability rating given to the complaint was above a certain threshold. After the model was in use for several months, the trustee assessed that it was assisting to detect issues that staff had missed in the initial handling of complaints.
- Another trustee used an AI-enabled monitoring tool to analyse customer interactions and identify missed complaints and failures in handling customer vulnerability. The tool provides near real-time quality assurance across customer contacts, enabling the trustee to detect previously unrecognised issues and use these insights to support remediation and broader improvements to complaints handling and customer support practices.

Examples of trustee practices to oversee AI outputs included:

- testing and validating models before deployment against historical datasets and known outcomes
- cross-checking AI outputs against other sources, such as reporting dashboards, complaint files or call recordings, and
- conducting periodic reviews of AI-generated trend analysis and systemic issue assessments.

Building a feedback loop: Use of complaints to detect issues with AI

Complaints will be an important way for trustees to identify whether AI-enabled processes are producing inaccurate, confusing or unfair outcomes, particularly where they are used to handle member inquiries (e.g. chatbots) or member requests (e.g. agentic AI).

Customers will not always know whether AI was used to support an interaction or transaction they are having a problem with, so trustees need to actively monitor issues raised in complaints to identify where AI may be contributing to service frictions or poor outcomes.

> Trustees should build clear pathways for rapidly escalating insights from complaints relating to the performance of AI to relevant business owners, so they can fix problems without delay.

Compliance with other IDR requirements

We observed that trustees continue to experience challenges in meeting some of the IDR requirements outlined in RG 271, which are outside the scope of this review.

These challenges extend to a number of areas highlighted as requiring attention in our broader review in 2022: see REP 751. Three trustees in our in-depth review were part of that earlier review.

RG 271 has been in effect for more than five years (since 5 October 2021) and there is no excuse for superannuation trustees not having compliant dispute resolution arrangements.

Across the reviewed trustees we observed:

- **Response timeliness remains a core issue:** Several trustees had periods of time where they failed to respond to complaints within the maximum 45-day timeframe set out in RG 271. Reasons for delays in responding to complaints included resourcing issues, failures to refer complaints into the IDR process, complaints being incorrectly classified, or complaints being missed due to human errors or system failures.
- **Failures to acknowledge receipt of complaints:** Several trustees failed to consistently acknowledge complaints or maintain accurate records of acknowledgements.
- **Incorrect IDR reporting to ASIC:** A small number of trustees had complaints data quality failures, which resulted in incorrect or incomplete complaints data being reported to ASIC. Another trustee omitted key demographic information in reporting, such as age and postcode, for more than a third of its complaints.
- **Inadequate governance and attention to IDR:** One trustee had not consistently recognised, recorded or tracked failures of IDR requirements in accordance with its processes, but was rectifying that oversight following engagement with ASIC. The same trustee previously had external audit findings on the adequacy of its complaints data system, service provider oversight, and assurance arrangements for complaints handling activities.

> Trustees should conduct regular compliance audits to test compliance with RG 271 and remedy any non-compliance with internal complaints handling requirements in a timely manner.
>
> Trustees should consider whether they require further assurance to obtain the requisite level of confidence that their IDR system meets our requirements.

Appendix 1: Trustees and funds reviewed

Table 4: Trustees and superannuation funds included in our in-depth review

Reviewed trustee	Superannuation fund
Australian Retirement Trust Pty Ltd (ART)	Australian Retirement Trust
AustralianSuper Pty Ltd (AustralianSuper)	AustralianSuper
Aware Super Pty Ltd (Aware)	Aware Super
BT Funds Management Limited (BT)	ASGARD Independence Plan Division Two
CareSuper Pty Ltd (CareSuper)	CareSuper
Equity Trustees Superannuation Limited (Equity Trustees)	Smart Future Trust
Host-Plus Pty. Limited (Hostplus)	HOSTPLUS Superannuation Fund
Macquarie Investment Management Ltd (Macquarie)	Macquarie Superannuation Plan
Mercer Superannuation (Australia) Limited (Mercer)	Mercer Super Trust
United Super Pty Ltd (United Super)	Construction and Building Unions Superannuation Fund

Note: Information on each superannuation fund's profile is available from APRA's quarterly superannuation statistics.

Table 5: Trustees and superannuation funds included in our whole-of-industry review

Superannuation trustee	Superannuation fund
ANZ Staff Superannuation (Australia) Pty. Limited	ANZ Australian Staff Superannuation Scheme
Australian Ethical Superannuation Pty Ltd	Australian Ethical Retail Superannuation Fund
Australian Meat Industry Superannuation Pty Ltd	Australian Meat Industry Superannuation Trust
Australian Retirement Trust Pty Ltd	Australian Retirement Trust
AustralianSuper Pty Ltd	AustralianSuper
Avanteos Investments Limited	Colonial First State FirstChoice Superannuation Trust
Aware Super Pty Ltd	Aware Super
Bendigo Superannuation Pty Ltd	The Bendigo Superannuation Plan
Brighter Super Trustee	Brighter Super Fund
BT Funds Management Limited	ASGARD Independence Plan Division Two
BUSS (Queensland) Pty Ltd	Building Unions Superannuation Scheme (Queensland)
CareSuper Pty Ltd	CareSuper
Challenger Retirement and Investment Services Limited	Challenger Retirement Fund
Commonwealth Superannuation Corporation	Public Sector Superannuation Accumulation Plan
Diversa Trustees Limited	OneSuper
Equity Trustees Superannuation Limited	Smart Future Trust
Fiducian Portfolio Services Limited	Fiducian Superannuation Fund
Fire and Emergency Services Superannuation Board	Fire and Emergency Services Superannuation Fund
First Super Pty Limited	First Super
H.E.S.T. Australia Ltd.	HESTA
Host-Plus Pty. Limited	HOSTPLUS Superannuation Fund
HTFS Nominees Pty Ltd	HUB24 Super Fund
I.O.O.F. Investment Management Limited	IOOF Portfolio Service Superannuation Fund
Legal Super Pty Ltd	legalsuper
Macquarie Investment Management Ltd	Macquarie Superannuation Plan
Mercer Superannuation (Australia) Limited	Mercer Super Trust
N. M. Superannuation Proprietary Limited	AMP Super Fund
NESS Super Pty Ltd	NESS Super

Superannuation trustee	Superannuation fund
Netwealth Superannuation Services Pty Ltd	Netwealth Superannuation Master Fund
NGS Super Pty Limited	NGS Super
NSW Fire Brigades Superannuation Pty Limited	Crown Employees (NSW Fire Brigades Firefighting Staff Death & Disability) Superannuation Fund
Nulis Nominees (Australia) Limited	MLC Super Fund
Oasis Fund Management Limited	Oasis Superannuation Master Trust
OnePath Custodians Pty Limited	Retirement Portfolio Service
Prime Super Pty Ltd	Prime Super
Rei Superannuation Fund Pty Limited	Rei Super
Retail Employees Superannuation Pty. Limited	Retail Employees Superannuation Trust
Team Super Pty Ltd	Team Superannuation Fund
Telstra Super Pty Ltd	Telstra Superannuation Scheme
Togethr Trustees Pty Ltd	equipsuper
Total Risk Management Pty Limited	Russell Investments Master Trust
Unisuper Limited	Unisuper
United Super Pty Ltd	Construction and Building Unions Superannuation Fund
Vanguard Super Pty Ltd	Vanguard Super
Vision Super Pty Ltd	Local Authorities Superannuation Fund

Note: Our whole-of-industry review included all trustees regulated by ASIC that managed at least one superannuation fund as at 20 November 2025, with one fund selected for each.
From 30 April 2026 the Telstra Superannuation Scheme closed, and Telstra Super Pty Ltd (now known as Tetra Servicing Pty Ltd) ceased acting as trustee for any superannuation fund.

Appendix 2: Background

Supporting better retirement outcomes and member services remains one of our key strategic priorities: see ASIC's Corporate Plan 2026-27.

This report forms part of a broader program of ongoing work aimed at driving improved services for superannuation fund members. We previously reviewed the adequacy of superannuation trustee complaints handling in 2022.

ASIC's member services project

The way superannuation trustees approach their interactions with people can have a significant impact on their lives. For this reason, in 2024, we commenced a multi-year project looking at industry practices and compliance with laws relating to trustee administration and contact centres.

An increase in complaints was one of the reasons that led to our earlier review of death benefits claims handling, the first phase of our member services project.

Service complaints to AFCA about death benefit claims more than tripled in a two-year period, and in 2023, we saw an increase in these same complaints in trustees' IDR data.

These events and our associated work culminated in the publication of our landmark death benefits claims handling report: see REP 806. The report strongly reinforced the importance trustees should place on using complaints data as an early warning system to detect and mitigate risks to members.

Earlier this year, we followed up trustees' progress in improving their handling of death benefit claims and published REP 831 in June 2026.

Overall, we saw serious shortcomings in trustee claims handling practices. In many cases, the warning signs were already visible in member complaints, but trustees had not acted on them effectively. This was a key reason why we chose to intervene by taking enforcement action against two trustees:

- In March 2025, we commenced civil penalty proceedings against AustralianSuper alleging delays in the processing of death benefit claims: see Media Release 25-034MR *ASIC sues AustralianSuper alleging significant death benefit claims failures* (12 March 2025).
- In November 2025, we secured a $23.5 million penalty against United Super, the trustee for the Construction and Building Unions Superannuation Fund (Cbus), for serious failures in processing member death benefits and insurance claims: see Media Release 25-286MR *Cbus ordered to pay $23.5 million penalty for serious failures in processing members death benefits and insurance claims* (25 November 2025).

Past reviews of trustees' complaints handling

In December 2022, we issued REP 751, which called on trustees to '… *use the information in this report to assess their own IDR process, looking at their compliance with legal obligations in RG 271 and how complaints can be used to drive improvements for all members.*'

Following that review, we also took enforcement action against a trustee for non-compliance with mandatory IDR requirements.

On 30 April 2026, the Federal Court found Telstra Super (now known as Tetra Servicing Pty Ltd) breached its complaints handling obligations after ASIC took action against the trustee for failures to respond to about one-third of complaints received between 22 October 2021 and 13 January 2023 within the mandatory 45-day timeline. This outcome sends a clear message that compliance with mandatory IDR standards is not optional but a legal obligation: see Media Release 26-091MR *Federal Court holds Telstra Super accountable for internal dispute resolution failures* (7 May 2026).

Legislative framework

IDR procedures

Under section 912A of the *Corporations Act 2001* (Corporations Act), financial firms, including superannuation trustees, must have a dispute resolution system in place that consists of:

- an IDR procedure that meets the standards or requirements made or approved by ASIC, and
- membership of AFCA.

ASIC has set out the standards and requirements for IDR procedures in RG 271.

Certain provisions in RG 271 have been made **enforceable** through *ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98*. Contraventions of these enforceable standards and requirements can give rise to civil penalty consequences.

The IDR instrument also exercises ASIC's power to modify the Corporations Act and imposes an **additional obligation under section 912A for trustees to comply with their own IDR procedure as they relate to enforceable provisions of RG 271.**

IDR reporting

Trustees are required to report the data specified in ASIC's IDR data reporting handbook to ASIC every six months: see section 912A(1)(g)(ii) of the Corporations Act and *ASIC Corporations (Internal Dispute Resolution Data Reporting) Instrument 2022/205*.

Appendix 3: Review methodology

We collected information from trustees using ASIC's compulsory information gathering powers for the purpose of assessing practices for identifying, investigating and addressing systemic issues and service improvements from complaints.

We collected more detailed information from 10 trustees which we had selected for an in-depth review (reviewed trustees) and targeted information from the remaining 35 trustees regulated by ASIC.

We then used this information to compare all 45 trustees on a narrow range of items and conducted a deeper assessment on the 10 reviewed trustees.

Trustee selection

In selecting the 10 trustees for the in-depth-review, we endeavoured to include trustees who may have either good or poor practices, to ensure we could share examples of what industry was doing well as well as where practices were falling short.

We used a range of criteria to inform our selection, including:

- fund size by number of member accounts – with a preference for trustees with higher numbers of member accounts (i.e. above 100,000)
- volume of IDR complaints – including trustees with both high and low levels reported to ASIC
- fund type – covering a mix of industry, retail and public sector funds, and
- other intelligence – including findings from prior related projects, reportable situations lodged by trustees and notifications from AFCA.

Whole-of-industry review

In November 2025, as the basis for our industry-wide assessment, we asked the 35 trustees not selected for the in-depth review, eight standard questions that matched the information we were separately collecting from the 10 reviewed trustees. The questions related to the period 1 July 2024 to 31 October 2025 and covered:

- the definition of systemic issue
- training for staff on the identification and escalation of systemic issues
- whether complaints systems included fields to flag complaints which indicated possible systemic issues
- the analysis of complaints data, and
- reporting on complaints.

Most questions required the trustee to select from a range of pre-defined response options.

We also asked the trustees about the number of actual systemic issues they had identified from complaints during the period 1 July 2023 to 30 June 2025.

We then combined the responses from the 35 trustees with our assessment of corresponding information and data collected from, and later verified with, the 10 reviewed trustees.

In-depth review of 10 trustees

The 10 reviewed trustees were required to provide detailed written responses, data workbooks and supporting documentation on their complaints handling and systemic issue management practices. We also sought some information on major transformational activities (e.g. successor fund transfers/mergers, changes in administrators).

The material gathered initially from notices issued in October 2025 included the following:

- performance metrics and reporting on systemic issues from complaints made to a board, board committees, executive committees and Accountable Persons since 1 January 2023
- outsourcing arrangements
- data fields used in complaint management systems
- complaints analysis and systemic issue identification practices, including evidence of the results of analysis conducted since 1 January 2023 and two samples of data sets that were analysed
- documented IDR and incident management procedures, and other training or guidance materials for staff
- reviews, audits and quality assurance activities since 1 January 2023
- the use of advanced technology to support IDR, and
- details on significant changes since 1 January 2023, including information related to monitoring complaints and member impacts as well as post implementation learnings.

At the same time, we also obtained:

- an extract of data recorded in selected data fields for complaints made during the period 1 January 2024 to 30 June 2025
- data on the number of possible and actual (confirmed) systemic issues identified from complaints during the period 1 July 2022 to 30 June 2025, broken down into six-month periods, and
- data as at 2 October 2025 for nine trustees and 3 October 2025 for one trustee on:
  - actual systemic issues identified from complaints during the period 1 January 2024 to 30 June 2025,
  - possible systemic issues identified from complaints during the same period which were still being investigated, and
  - actual systemic issues and possible systemic issues that were identified prior to 1 January 2024 and still ongoing on or after 1 January 2024.

We subsequently obtained further details up to 21 May 2026 on:

- changes made to IDR arrangements on or after 3 October 2025
- related reviews or audits conducted or still ongoing on or after 3 October 2025
- root cause analysis practices relevant to complaints and systemic issues management
- other mechanisms used to identify systemic issues outside of from complaints during 2024 and 2025
- thematic reviews of selected types of complaints since 1 January 2024
- incident reporting relevant to systemic issues management
- further details on particular systemic issues each trustee had identified from complaints
- the number of possible and actual systemic issues identified from complaints during the period 1 July 2025 to 31 December 2025, and
- the number of actual systemic issues identified from any mechanism during the period 1 July 2023 to 31 December 2025.

Information or data collected on systemic issues

RG 271 defines a systemic issue as:

> *'A systemic issue is a matter that affects, or has the potential to affect, more than one consumer.'*

Our information requests included a supporting definition to assist trustees in identifying relevant matters:

> ***Systemic issue*** *means an incident, issue, error, omission, or control failure, that may affect, or has the potential to affect, more than one consumer, including but not limited to:*
>
> - an issue detected from a single complaint, for example a system error or a defective disclosure document, or
> - an issue that has been identified from a pattern or theme observed across multiple complaints that are similar in nature, for example, about the same type of delay, procedural weaknesses or mistakes made by staff.

In most cases, trustees provided us with information or data about the number of 'possible' or 'actual' (i.e. confirmed) systemic issues identified, based on their own definition of systemic issue.

As detailed in the body of our report, many trustees in both our whole-of-industry and in-depth reviews use a 'systemic issue' definition that mirrors or factors ASIC's RG 271 definition. However, some trustees use an internal definition that restricts the types of issues they would consider as systemic.

Appendix 4: Accessible versions of figures

Table 6: Number of superannuation complaints – 1 July 2023 to 30 June 2026

Period	Number of IDR complaints
Q3 2023	58,099
Q4 2023	56,576
Q1 2024	46,538
Q2 2024	50,265
Q3 2024	51,046
Q4 2024	49,902
Q1 2025	47,671
Q2 2025	59,735
Q3 2025	61,687
Q4 2025	60,781
Q1 2026	60,853
Q2 2026	74,223

Source: ASIC IDR data.
Note: This is the data shown in Figure 1.

Table 7: Top 5 superannuation complaints – 1 July 2023 to 30 June 2026

Period	Other service-related issues	Delay in following instructions	Technical problems	General service delay	Delay in claim handling
Q3 2023	23.7%	15.3%	9.8%	10.5%	5.9%
Q4 2023	25.0%	14.2%	9.8%	7.7%	5.2%
Q1 2024	26.0%	12.4%	11.3%	9.5%	4.5%
Q2 2024	30.2%	12.0%	9.6%	9.3%	4.3%
Q3 2024	33.3%	12.7%	8.8%	8.5%	3.5%
Q4 2024	32.9%	12.4%	11.6%	8.3%	3.7%
Q1 2025	30.2%	10.3%	12.9%	8.7%	3.8%
Q2 2025	26.9%	9.1%	12.8%	14.6%	3.4%
Q3 2025	28.8%	8.9%	11.8%	13.5%	3.5%

Period	Other service-related issues	Delay in following instructions	Technical problems	General service delay	Delay in claim handling
Q4 2025	29.6%	10.6%	12.3%	11.4%	3.4%
Q1 2026	30.7%	10.0%	12.7%	7.9%	3.6%
Q2 2026	31.1%	9.5%	11.3%	7.0%	3.2%

Source: ASIC IDR data.
Note: This is the data shown in Figure 2.

Table 8: Number of complaints received per 10,000 member accounts per trustee – 1 July 2025 to 30 June 2026

Trustee	Complaints per 10,000 member accounts
1	4.0
2	5.2
3	8.2
4	13.8
5	22.0
6	28.3
7	32.3
8	33.2
9	42.2
10	43.8
11	44.0
12	50.0
13	55.1
14	55.1
15	60.9
16	64.1
17	65.4
18	67.5
19	73.1
20	74.1
21	79.4
22	96.2
23	97.5

Trustee	Complaints per 10,000 member accounts
24	99.5
25	99.9
26	113.0
27	121.4
28	125.4
29	127.3
30	127.9
31	131.0
32	136.0
33	150.5
34	151.1
35	155.8
36	156.9
37	184.3
38	227.8
39	231.6
40	232.8
41	242.2
42	243.3
43	282.8
44	417.2
45	475.8

Source: ASIC IDR data and APRA quarterly superannuation statistics.
Note: This is the data shown in Figure 3.
The number of member accounts used to calculate the values in this figure is as at 30 June 2026 except for one trustee where 31 March 2026 was used, reflecting that trustee ceased managing any superannuation fund from 30 April 2026.
The order of trustees shown in Figure 3 and this table do not correspond to the order used for other figures and tables in this report.

Table 9: Proportion of superannuation complaints and member accounts by member age – 1 July 2025 to 30 June 2026

Age bracket	Proportion of IDR complaints	Proportion of member accounts
Under 25 years	1.5%	12.9%
25–34 years	7.5%	21.0%
35–44 years	13.6%	20.2%
45–54 years	17.6%	17.4%
55–64 years	28.3%	15.0%
65–74 years	24.0%	9.4%
75 years and over	7.4%	4.2%

Source: ASIC IDR data and APRA quarterly superannuation statistics. Excludes accounts and complaints where age was undefined or not reported.
Note: This is the data shown in Figure 4.

Table 10: Number of EDR complaints about superannuation for 45 trustees – 1 July 2023 to 30 June 2026

Period	Number of EDR complaints
Q3 2023	1,886
Q4 2023	1,669
Q1 2024	1,388
Q2 2024	1,313
Q3 2024	1,133
Q4 2024	1,203
Q1 2025	1,230
Q2 2025	1,749
Q3 2025	2,143
Q4 2025	1,783
Q1 2026	1,891
Q2 2026	2,053

Source: Unpublished AFCA EDR data.
Note: This is the data shown in Figure 5.

Table 11: Number of actual systemic issues identified from complaints during the period – 1 July 2023 to 30 June 2025

Trustees with less than 100,000 member accounts

Trustee	Number of systemic issues identified from complaints
1	17
2	10
3	6
4	3
5	1
6	1
7	1
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0

Trustees with 100,000 to 500,000 member accounts

Trustee	Number of systemic issues identified from complaints
17	52
18	50
19	49
20	36
21	26
22	26
23	24
24	20
25	10
26	2
27	2

Trustee	Number of systemic issues identified from complaints
28	1
29	0
30	0

Trustees with more than 500,000 member accounts

Trustee	Number of systemic issues identified from complaints
31	105
32	85
33	80
34	49
35	10
36	9
37	7
38	6
39	6
40	4
41	1
42	1
43	0
44	0
45	0

Source: Unpublished ASIC data and APRA annual superannuation statistics.
Note: This is the data shown in Figure 6.
The number of member accounts for each trustee is as at 30 June 2025.
In most cases, trustees provided us with actual systemic issue information or data based on the trustee's own definition of systemic issue. These definitions were often, but not always, aligned to ASIC's RG 271 definition.
The order of trustees shown in Figure 6 and this table do not correspond to the order used for other figures and tables in this report.

Table 12: Requirements in RG 271 related to using complaints to identify systemic issues

Description	Enforceable related requirement	Related requirement
Define what to look for	RG 271.27	RG 271.117
Record data on the complaint	RG 271.28 RG 271.179	Not applicable
Analyse complaints and data	RG 271.120	RG 271.181 RG 271.182
Determine if issues are systemic	RG 271.120	RG 271.150
Mange rectification and remediation	RG 271.120	RG 271.121

Note: This is the data shown in Figure 8.

Table 13: How trustees detected systemic issues from complaints for issues handled – 1 January 2024 to 30 June 2025

Trustee	AFCA systemic issue notification	Complaint data analysis	Initial complaint investigation	Other
ART	2	8	78	0
AustralianSuper	4	11	101	6
Aware	0	0	1	0
BT	0	3	21	13
CareSuper	0	0	0	0
Equity Trustees	0	0	0	0
Hostplus	7	0	28	0
Macquarie	0	14	22	0
Mercer	2	0	9	0
United Super	0	1	10	1

Source: Unpublished data collected by ASIC for one superannuation fund per trustee (as listed in Table 4 of Appendix 1).
Note: This is the data shown in Figure 9.
The figure includes both actual (confirmed) systemic issues and possible systemic issues identified before 30 June 2025 still being investigated as at 2 October 2025 to determine if they were actually systemic. In most cases, trustees provided us with data based on the trustee's own definition of systemic issue. These definitions were often, but not always, aligned to ASIC's RG 271 definition. Appendix 3 provides more information on our review methodology, time periods covered and the information and data we collected.

Key terms and related information

Key terms

AFCA	Australian Financial Complaints Authority
APRA	Australian Prudential Regulation Authority
complaint	An expression of dissatisfaction made to or about a trustee, 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
Corporations Act	*Corporations Act 2001,* including regulations made for the purposes of that Act
EDR	External dispute resolution
IDR	Internal dispute resolution
incident	An incident or issue being handled under the trustee's incident management process
incident management	End-to-end activities undertaken by or on behalf of the trustee which cover: › identifying an incident or issue (e.g. errors, omissions, misconduct, control gaps or failures, possible systemic issues and/or matters which may require reporting to ASIC pursuant to s912DAA of the Corporations Act 2001) › recording or escalating the incident or issue › analysing and investigating the incident or issue, including to understand and determine its root cause and impact, or › ensuring actions are taken to rectify and/or prevent reoccurrence of the incident or issue, and to remediate any impact(s) that the incident or issue had on consumers
reviewed trustees	The 10 trustees included in the in-depth stage of our review, listed in Appendix 1
RG 271	ASIC Regulatory Guide 271 *Internal dispute resolution*
significant (transformational) change	A change to a superannuation fund that is material and results from the: › transfer of a group of members' benefits from one registrable superannuation entity to another (such as a successor fund transfer or other merger or joint venture activity) › closure of a product, plan or division in a fund which involves the movement of affected members to a new membership category or new member accounts › change to a new administration system or administration service provider, or › change to a new system or service provider used for the provision of services for fund members
SIS Act	*Superannuation Industry (Supervision) Act 1993*
superannuation fund (fund)	Has the same meaning given in s10(1) of the SIS Act
systemic issue	A matter that affects, or has the potential to affect, more than one consumer
trustee (superannuation)	A constitutional corporation, body corporate or group of individual trustees that holds a registerable superannuation entity (RSE) licence granted by APRA under s29D of the SIS Act (also known as an 'RSE licensee'), which had a superannuation fund as at 20 November 2025, but excluding trustees who only manage small APRA-regulated funds with no more than six members

Related information

Headnotes

complaint, complaints handling, external dispute resolution, incident, internal dispute resolution, member services, super fund, superannuation, systemic issues, trustee

ASIC documents

25-034MR *ASIC sues AustralianSuper alleging significant death benefit claims failures*

25-286MR *Cbus ordered to pay $23.5 million penalty for serious failures in processing members death benefits and insurance claims*

26-091MR *Federal Court holds Telstra Super accountable for internal dispute resolution failures*

RG 267 *Oversight of the Australian Financial Complaints Authority*

RG 271 *Internal dispute resolution*

IDR data reporting handbook

REP 751 *Disputes and deficiencies: A review of complaints handling by superannuation trustees*

REP 806 *Taking ownership of death benefits: How trustees can deliver outcomes* Australians deserve

REP 831 *Delivering on death benefits: Have super trustees stepped up?*

Legislation

Corporations Act 2001

Superannuation Industry (Supervision) Act 1993

Legislative instruments

ASIC Corporations, Credit and Superannuation (Internal Dispute Resolution) Instrument 2020/98

ASIC Corporations (Internal Dispute Resolution Data Reporting) Instrument 2022/205