



AUSTRALIAN INSTITUTE of
SUPERANNUATION TRUSTEES

19 February 2021

Senior Manager, Behavioural Research and Policy Unit
Australian Securities and Investments Commission
Level 5, 100 Market Street
SYDNEY NSW 2000

Email: idrdata@asic.gov.au

Dear Sir/Madam,

Re: IDR data reporting requirements consultation

In brief: AIST supports the proposal to record all complaints, provide reasons and that reporting to ASIC is needed. We submit that certain aspects of the data framework must be appropriately designed to avoid both operational inefficiencies and potential harm to vulnerable members.

About AIST

Australian Institute of Superannuation Trustees (“AIST”) is a national not-for-profit organization whose membership consists of the trustee directors and staff of industry, corporate and public sector superannuation funds.

As the principal advocate and peak representative body for the \$1.4 trillion profit-to-members superannuation sector, AIST plays a key role in policy development and is a leading provider of research.

AIST advocates for financial wellbeing in retirement for all Australians regardless of gender, culture, education, or socio-economic background. Through leadership and excellence, AIST supports profit-to-member funds to achieve member-first outcomes and fairness across the retirement system.

General comments

As we noted in our submission to Consultation Paper 311, AIST strongly endorses the proposals to record all complaints, provide reasons and that reporting to ASIC is needed. As previously noted, we reinforce our view that the handling, recording, and reporting of complaints assists with building confidence and trust in the financial services industry.

Specific comments

AIST welcomes the release of the IDR data dictionary and we would like to thank ASIC for the opportunity to make this submission. We have limited our responses to those questions where AIST believes it is best placed to respond.

1. Will the draft data dictionary be practical for industry to implement? If not, why not?

AIST submits that implementing the draft data dictionary may cause certain operational challenges for funds. Specifically, AIST is concerned that time needed for certain customer service staff to decipher the appropriate sub-category for a complaint may be difficult for those staff given the need to manage calls efficiently and in line with member expectations. It may be more suitable for those staff who are handling complaints to record 'product or service' categories, as opposed to the complaint issue. Notwithstanding, the listed complaint issues includes complaint terminology that can be difficult to distinguish (e.g. failure to act in client's best interest and failure to prioritise client's interest).

AIST proposes that the complaint issue could be recorded for complaints that require escalation for resolution and are directed to staff who have more advanced skills in complaints handling.

There is also a risk that requiring customer service staff to categorise complaint types may also lead to an increase in call handling times and/or lead to inaccurate complaint recording due to the complexity of some of the definitions of the complaints issues. By restricting call centre staff to selecting from the broader categories, the likelihood of misinterpretation is reduced. In addition, if staff are required to consider a range of complaint sub-categories at the conclusion of every complaint call, this will likely increase call handling times.

2. Do you support the two proposed additional data elements that would capture consumer vulnerability flags and the channel via which the complaint was received? If not, why not?

Capturing vulnerability data can be problematic when it is not appropriately protected by safeguards. It follows that not all members from disadvantaged backgrounds identify as vulnerable and it may not always be appropriate for staff to solicit this information unprompted. If members are to be flagged as vulnerable on internal systems, members should be provided with information that clearly outlines why the collection of such data/information is necessary.

If the channel is to be collected and linked to specific vulnerability flags, any reporting of such data needs to ensure it does not jeopardise the use of that channel by that group of members. For example, if it were to be reported that members experiencing family violence are more likely to use the chat function with their fund, then this could lead to preparators restricting access to this channel.

3. Which IDR data elements do you think will be most useful for firms to benchmark their IDR performance against competitors?

AIST submits that the most useful elements to benchmark funds should include data that is of most value to consumers. Such as days to resolution, number of complaints referred to AFCA, number of repeat complaints and broad complaint category.

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For further information regarding our submission, please contact Samuel Lynch at

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Yours sincerely,

Eva Scheerlinck
Chief Executive Officer