



# *Visibility and Access*

*An examination of web-based information available to customers relating to the Code of Banking Practice, internal dispute resolution and external dispute resolution.*

September 2010

<b>Contents</b>	<b>Page</b>
<b>Executive Summary</b>	<b>1</b>
<b>The Importance of Disclosure</b>	<b>7</b>
<b>The Review</b>	<b>9</b>
<b>What is “Visibility” and “Access”?</b>	<b>10</b>
<b>Conducting the Review</b>	<b>12</b>
<b>Results</b>	<b>15</b>
<b>Overall Rating</b>	<b>16</b>
<b>The Search Function</b>	<b>17</b>
<b>The Code</b>	<b>24</b>
<b>Dispute Resolution – Internal Dispute Resolution (IDR)</b>	<b>28</b>
<b>Dispute Resolution – External Dispute Resolution (EDR)</b>	<b>33</b>
<b>Findings and Conclusions</b>	<b>38</b>
<b>Recommendations</b>	<b>40</b>
<b>Annexure</b>	<b>41</b>

# Visibility and Access

## Executive Summary

---

In April 2010, the Code Compliance Monitoring Committee (CCMC) conducted a review of websites belonging to banks that subscribe to the Code of Banking Practice ('the Code'). This review identifies how the code subscribing banks manage their commitment to retail consumers and small businesses ("customers") with particular reference to visibility and accessibility of web-based information relating to the Code, internal dispute resolution (IDR) and external dispute resolution (EDR).

This report examines the key information provided via bank websites and includes a general assessment of whether the banks websites have complied with the obligations in the Code. It complements the themed review being conducted by the CCMC into clause 34 of the Code in relation to IDR.

The Code has a number of relevant clauses that establish certain standards and obligations with respect to the IDR and EDR and the Code, namely:

- Part B
  - Clause 9 – Availability of copies of this Code
- Part E
  - Clause 35 – Internal dispute resolution
  - Clause 36 – External dispute resolution
  - Clause 37 – Availability of information about dispute resolution process

In addition to these specific Code requirements and to ensure that all customers have access to the benefits of good business practices, the Code incorporates, via reference in Clause 35, the Guiding Principles of the Australian Standard, "*Customer Satisfaction – Guidelines for Complaints Handling in Organizations*" (AS ISO 10002:2004).

In all of these areas, visibility and accessibility are key requirements for ensuring that customers are able to raise complaints and disputes appropriately.

In order to ensure that customers are aware of the Code and the benefits, rights and responsibilities, the banks are required to<sup>1</sup>:

- publicise this Code;
- promote its adoption of the Code;
- make copies available in branches;
- display Code information on websites where applicable;
- upon request, mail copies of the Code to customers; and
- ensure that all employees, agents and representatives receive training in the Code and apply it in their dealings with customers.

This helps in establishing the Code as an effective way of improving standards and services as it places the onus on subscribers to:

- promote the existence of the Code to their customers;
- provide easy access to information about the Code;
- provide access to dispute resolution processes; and
- advise on appropriate action and escalation levels if services and standards do not meet the expectations set by the Code.

### **Why look at visibility and access?**

If we take the perspective of a customer, the issues of visibility and access are key requirements to ensure that customers are aware of how they can raise issues or concerns about poor services or products.

With respect to self-regulation and complaints handling, subscribing to a Code, or having the best processes to deal with complaints, is meaningless if customers are unable to understand their rights, benefits, or obligations.

---

<sup>1</sup> Code of Banking Practice 2004, Part B, Section 7, Section 8, & Section 9.

In response to an issues paper looking at industry self-regulation (2000), the Commonwealth Consumer Affairs Advisory Council observed that codes of conduct were invisible to certain consumers.<sup>2</sup>

In particular, it noted that the following members of the community are most unlikely to understand or access the benefits and rights provided by a code of conduct:

- Urban elderly women and men.
- Rural and remote families.
- Working parents who have little time.
- People isolated in their own homes because of poverty or ill health.
- People with low literacy and/or verbal skills.
- People of working age dependent on government support.
- Young people who have never had a full time permanent job.
- Non-English speaking people.

The underlying concerns raised in the Council's submission fall into the key areas of visibility and accessibility. For self-regulation to be truly effective, customers need to be able to identify and access key information, such as:

- the bank's commitment to comply with the principles of good banking practice set out in the Code;
- effective internal dispute resolution processes within the banks; and
- an accessible external dispute resolution scheme provided by the Financial Ombudsman Service.

In order to assess compliance with the Code requirements and the ability for customers to access key information via a bank website, we examined thirteen (13) websites using key word searches, website navigation and a consistent approach.

The results provided us with an overview of visibility and accessibility of key information on banks websites and a benchmark on the quality of information presented.

The key findings and recommendations for further improvement on the websites are summarised in the following table.

---

<sup>2</sup> Submission by Commonwealth Consumer Affairs Advisory Council in response to task force on industry self Regulation Issues Paper, October 1999, p 4

Key Finding	Background	Recommendation
<p><b>Overall rating</b></p> <p>Sixty-nine per cent (69%) of websites included in this review scored an overall rating of “four” or “five”. This means that majority of the websites reviewed were rated as being “above average”.</p>	<ul style="list-style-type: none"> <li>▪ Five out of the 13 websites reviewed had information visible and easily accessible, scoring five out of five.</li> <li>▪ 12 out of the 13 websites reviewed complied with the basic requirements and meet the basic standards regarding visibility and access to Code, IDR and EDR information.</li> </ul>	<p>Banks should review their websites against the standards outlined by the World Wide Web Consortium (W3C). W3C has developed international standards and guidance for website development including the area of accessibility.</p> <p>Banks may also refer to other industry guidance such as <i>NSW Website Style Directive</i><sup>3</sup> before developing or updating the websites.</p>
<p><b>Visibility and accessibility of Code information</b></p> <p>Whilst websites are not the only means of communicating to customers, all subscribing banks had information about the Code on their website.</p>	<ul style="list-style-type: none"> <li>▪ The majority of the websites reviewed (77%) had Code information located on, or linked to the “About Us” page, and the additional twenty-three per cent (23%) had the Code information accessible through the “Home” page.</li> <li>▪ Although all websites reviewed had Code information accessible on their website, only thirty-</li> </ul>	<p>As the Code is an important part of the relationship between a customer and the bank, banks should have Code information accessible and visible on their websites.</p> <p>CCMC believes that the ‘About Us’ or ‘Home’ page is the optimal place to promote the benefits, rights, and responsibilities.</p>

<sup>3</sup> NSW Government Website, 2009, Version 6, *NSW Government Website Style Directive – Explanatory Notes*, viewed 3<sup>rd</sup> May, 2010, <<http://www.gcio.nsw.gov.au/products-and-services/policies-guidelines/Style%20Directive%20Explanatory%20Notes%20v6.pdf>>

Key Finding	Background	Recommendation
	<p>one per cent (31%) of the websites provided customers with detail description explaining the Code and benefits for customers banking with a Code subscribing bank.</p>	
<p><b>Visibility and accessibility of IDR information</b></p> <p>All subscribing banks provided relevant information in relation to internal dispute resolution (IDR) processes.</p> <p>This includes websites that mentioned IDR in their Complaints and Dispute Handling Policy guidelines but had not provided any text based information on their websites.</p>	<ul style="list-style-type: none"> <li>▪ Ninety-two per cent (92%) displayed IDR information via a link, redirecting customers to a separate page with further information on IDR.</li> <li>▪ Although all of the reviewed websites do have an online feedback/comment form available, only thirty-one per cent (31%) had a clearly marked specifically designed complaint form available.</li> </ul>	<p>A clearly marked “Complaints” page with a prominent link from the “Home” page is highly recommended. IDR details should also be included in the “Contact Us” page with clear and concise guidance on the website regarding where and how to make a complaint.</p> <p>Banks should consider providing access to IDR processes across the banking distribution points, i.e.: branch, telephone, internet.</p>

Key Finding	Background	Recommendation
<p><b>Visibility and accessibility of EDR information</b></p> <p><b>Only one (1) website reviewed did not have any EDR information available on the website.</b></p>	<ul style="list-style-type: none"> <li>▪ Information about EDR contained only in a separate FSG file was considered inadequate, as it is often not readily accessible or visible to customers due to the limitation of the search function of the websites to look for keywords in PDF files.</li> <li>▪ Based on the 12 websites that do have EDR, only seven websites reviewed provided descriptive information on the webpage outlining the EDR scheme and contact information.</li> <li>▪ Only fifty-eight per cent (58%) of the websites reviewed had a direct link to the EDR scheme.</li> </ul>	<p>The CCMC recommends that EDR information should be disclosed together with IDR information and preferably on a specific dispute or complaint handling page.</p> <p>The CCMC would consider a direct link as a very efficient way and cost effective way to provide customers with details and information about their relevant EDR scheme.</p>

# The importance of appropriate disclosure

---

The CCMC sought the views of industry stakeholders such as the Ombudsman - Banking and Finance (Financial Ombudsman Service).

In particular, the views and opinions of the Ombudsman highlight that there are benefits for customers and service providers in developing and promoting transparent and accessible processes for escalating and resolving concerns, complaints, and disputes.

## **A comment from Philip Field, Ombudsman - Banking and Finance in relation to visibility and accessibility on web-based information:**

*“The Financial Ombudsman Service welcomes this report by the Code Compliance Monitoring Committee (CCMC). The report highlights the need for subscribing banks and other financial services providers to review their websites to ensure they provide easy access to information about their internal and external dispute resolution processes”*

He also added:

*“In my experience, the sooner the financial services provider was made aware of their customer’s concerns, the more likely it was that those concerns can be resolved to the satisfaction of both parties. Providing details about external dispute resolution and a link to the FOS website is also important. Customers should only have to come to FOS as a “last resort” if their dispute is not resolved by their financial services provider. Even if the dispute is not escalated to FOS, there is a wealth of information on our website about our approach to different types of disputes that the customer might find useful in their dealings with their financial services provider. Financial services providers should review their website content in light of the CCMC Report on Visibility and Access to ensure that their customers can easily find information about internal and external dispute resolution processes and Code obligations. Any changes that need to be made to websites should be considered as an investment in increasing customer satisfaction through the early resolution of complaints without the need to escalate the matter to FOS.”*

## **Next Steps**

- The CCMC will publish the paper on its website.
- We will provide electronic copies to each code subscribing bank.
- We will provide a copy to Australian Bankers Association (ABA), Financial Ombudsman Service (FOS) and Australian Securities & Investments Commission (ASIC).
- We will continue to monitor website development and measure any improvements.
- We will work with FOS to monitor disputes and assess whether visibility and access to information has been a contributing factor in earlier resolution or delays.

# The Review

---

## Purpose and Scope

### **The purpose of this review was to assess visibility and accessibility to:**

- web-based information relating to the Code of Banking Practice (“the Code”);
- web-based information on dispute resolution between customers and their banking institutions; and
- alternative dispute resolution in the event that a dispute is either not resolved or not resolved to the satisfaction of the customer.

### **The Scope**

- code subscribers<sup>4</sup> (‘the banks’);
- banks websites and content; and
- Product Disclosure Statements, terms and conditions, and other documents available for download in Adobe Portable Document Format (PDF) from websites.

### **Considered outside of scope**

- Banks branches and other physical presences;
- documents and/or information distributed through other means; and
- non-code subscribers.

### **The objectives of the review are to:**

- gain further understanding of the banking industry and its customers and how information is or could be provided;
- examine how information relating to the Code and dispute resolution is disclosed;
- assess how effectively the Code is promoted by the banks via their websites;
- identify and promote what is considered by CCMC as good business practice in relations to visibility and accessibility of information about the Code, internal and external dispute resolution (IDR and EDR); and
- identify any potential opportunities to improve disclosure and promotion of the Code and dispute resolution processes.

---

<sup>4</sup> A list of Code Subscribing banks can be found at [www.codecompliance.org/codes.html](http://www.codecompliance.org/codes.html) .

# What is “Visibility” and “Access”?

---

## Visibility

For the purpose of this review, we examine visibility in relation to the Code and dispute resolution - either internal or external (IDR and EDR).

The characteristics of good visibility include the following:

- Customers know their rights under the Code;
- Customers know the methods available to express dissatisfaction with the services and products provided;
- All staff, especially working in a customer facing/contact role, are able to provide customers with information regarding the various options and processes for lodging a complaint; and
- Customers are aware that if their complaint is not resolved or resolved to their satisfaction, an external dispute resolution scheme exists where the complaint can be escalated.

There are no prescriptive methods for creating visibility. Some approaches include:

- Posters and brochures displayed at banks service contact points.
- A designated complaints section displayed on the website with a link from the homepage.
- Promotion of special complaint telephone hotlines on letterhead, product disclosure statements, financial services guides, leaflets and advertising.
- Provision of information in written communications, such as letters, loan contracts, terms and conditions, account statements and annual reports.
- Liaison with special-needs groups to inform customers of particular arrangements which accommodate their requirements.

## Access

The term access in the context of the Code and dispute resolution generally relates to the “ways” and “means” by which customers can gain understandable information and engage appropriate processes. This might include time and effort involved, ease and convenience, and visibility.

Good access establishes the expectations of the customers by providing:

- information about being a subscriber to the Code;
- information to customers about how to make a complaint if they are unhappy with any aspect of the products or services provided;
- information about the complaints processes and expected timeframes;
- information on alternative options available if the complaint is not resolved or customers they are not satisfied with the resolution of a dispute; and
- information on making a complaint about a possible breach of the Code.

Whilst each organisation and customer may have specific needs and requirements, some common characteristics of accessibility include:

- information which is readily accessible in ‘plain’ English, and other languages, for customers on how, when, where and to whom to make complaints;
- accepting oral complaints;
- ensuring financial counsellors or other advocates can represent customers and that the process for providing authorisation for these third parties is relatively simple.
- cross-cultural training;
- providing straightforward and easy-to-understand information regarding the Code and the complaints process. This information should be prominently displayed and circulated, in locations where customers access the services and products. This can include branch networks, websites, product statements and brochures;
- simple and flexible arrangements for customers lodging complaints regarding products, services or conduct; and
- special arrangements for people with disabilities or particular needs, such as access to a telephone interpreter’s services and W3C-compliant websites.

These suggestions are good business practices, designed to promote a positive impact on brand loyalty and customers' satisfaction. In addition, effectively dealing with complaints can result in earlier resolution of disputes and proactive improvements in products and services.

## Conducting the Review

---

We conducted a questions based survey of Code subscribers' websites, which examined the visibility and accessibility of information relating to the:

- Banking Code of Practice;
- internal disputes resolution process (how to make a complaint); and
- membership and availability of an external dispute resolution scheme (what customers could do if the complaint is not resolved or they were not satisfied with the resolution or response).

These questions, together with the methodology were designed around the objectives.

### **How did we conduct the review?**

In order to assess the accessibility and visibility of the Code and the complaints handling processes, we compiled a set of questions for each area being reviewed and documented a defined process so that the results were comparable and consistent.

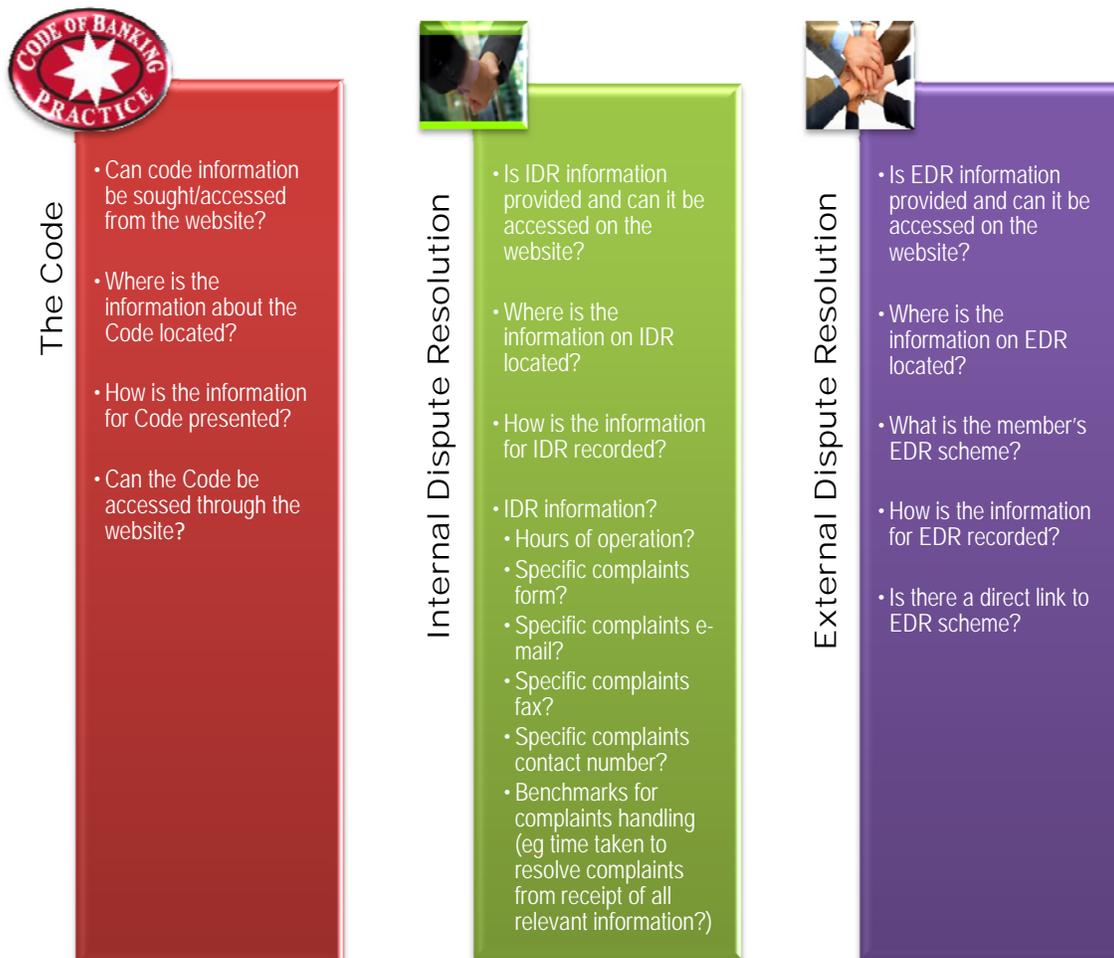
### **The methodology**

In conducting this review, we adopted the perspective of a customer trying to access information via websites. We researched trends in web-based behaviours of consumers and, due to an ostensible lack of suitable methodologies, we devised a simple approach. The table below summarises the web pages reviewed and the search criteria examined.

Web pages reviewed:	Search Criteria
Home page	<ul style="list-style-type: none"> <li>▪ Overall layout and contents examined.</li> <li>▪ Particular attention is given to how information is presented on websites and whether key pages such as “About Us”, “Contact Us” and “Site Map” are easily accessible and visible.</li> <li>▪ Examine if Code information is available as a link on the page and if a link is available to direct customers to the Complaints page.</li> </ul>
Locate search function availability	<ul style="list-style-type: none"> <li>▪ If search function is available, the keywords searched are “Code”, “Code of Banking Practice”, “Complaint” and “Dispute”.</li> <li>▪ The top five search results returned are examined and ranked based on the relevance of the inquiry.</li> <li>▪ Information on search results are reviewed (e.g. what type of information/links returned i.e. link to complaint page, link to PDS/FSG, link to online form?).</li> </ul>
About Us page	<ul style="list-style-type: none"> <li>▪ Examine page and locate Code information.</li> <li>▪ Review how easy it is to locate the information and note which subpage information is located.</li> <li>▪ Examine how it is presented (e.g. is there a link to ABA’s website, copy available via PDF format?).</li> </ul>
Contact Us page	<ul style="list-style-type: none"> <li>▪ Locate and examine if IDR information is available on website.</li> <li>▪ How easy is it to locate the information?</li> <li>▪ Special attention is given to where and how the information is presented (e.g. is there a specific complaints page, information presented via text or PDF format, specific contact details for complaints, information on complaint process and guidelines).</li> <li>▪ Locate and examine if EDR information is available on website.</li> <li>▪ How easy is it to locate the information?</li> <li>▪ Special attention is given to where and how the information is presented (e.g. information on EDR schemes available, information presented via text or PDF format, link available to access EDR website).</li> </ul>

The methodology provided a consistency and repeatable results when criteria were re-examined in each of the websites. We believe that this was an important part of the review in order to produce results that were objective and reliable.

In addition to a set procedure for examining each website, we designed a set of questions to answer during each examination. The responses to these questions formed the basis of the results.



# The Results

---

## An overview of web-based information relating to the Code, IDR and EDR.

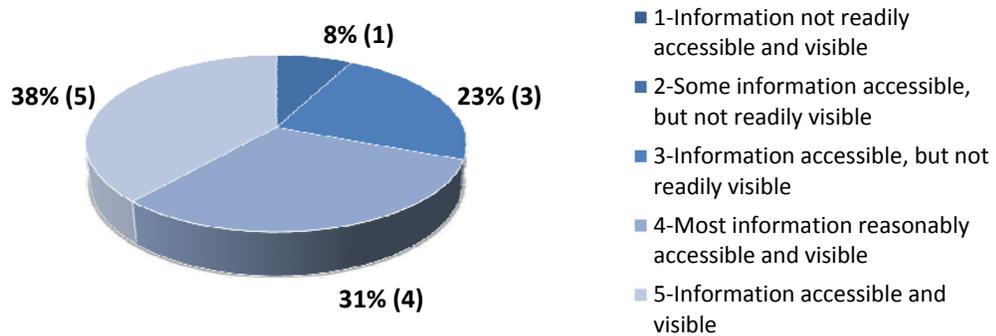
**Four Key elements reviewed  
(Overall Rating)**

The Search Function	Code Information	IDR Information	EDR Information
Is a search function available?	Is Code information accessible?	Is IDR information available?	Is EDR information available?
Does the search return Code information?	Location of Code information?	Is there a copy of IDR guidelines?	Location of EDR information?
Does the search link us to a Complaint Page?	Visibility of Code information?	Location of IDR information?	Visibility of EDR information?
Does the search link us to an online/feedback complaint form?		Specific complaint form available?	Direct link to EDR?
Does the search link us to a copy of the complaints guidelines?		Visibility of IDR information?	
Does the search return results on dispute information?			

## Overall Rating

---

### Overall Rating (Score out of 5)



This chart relates to an overall score given to each website as to the visibility and accessibility of all researched information - being the Code, IDR and EDR information.

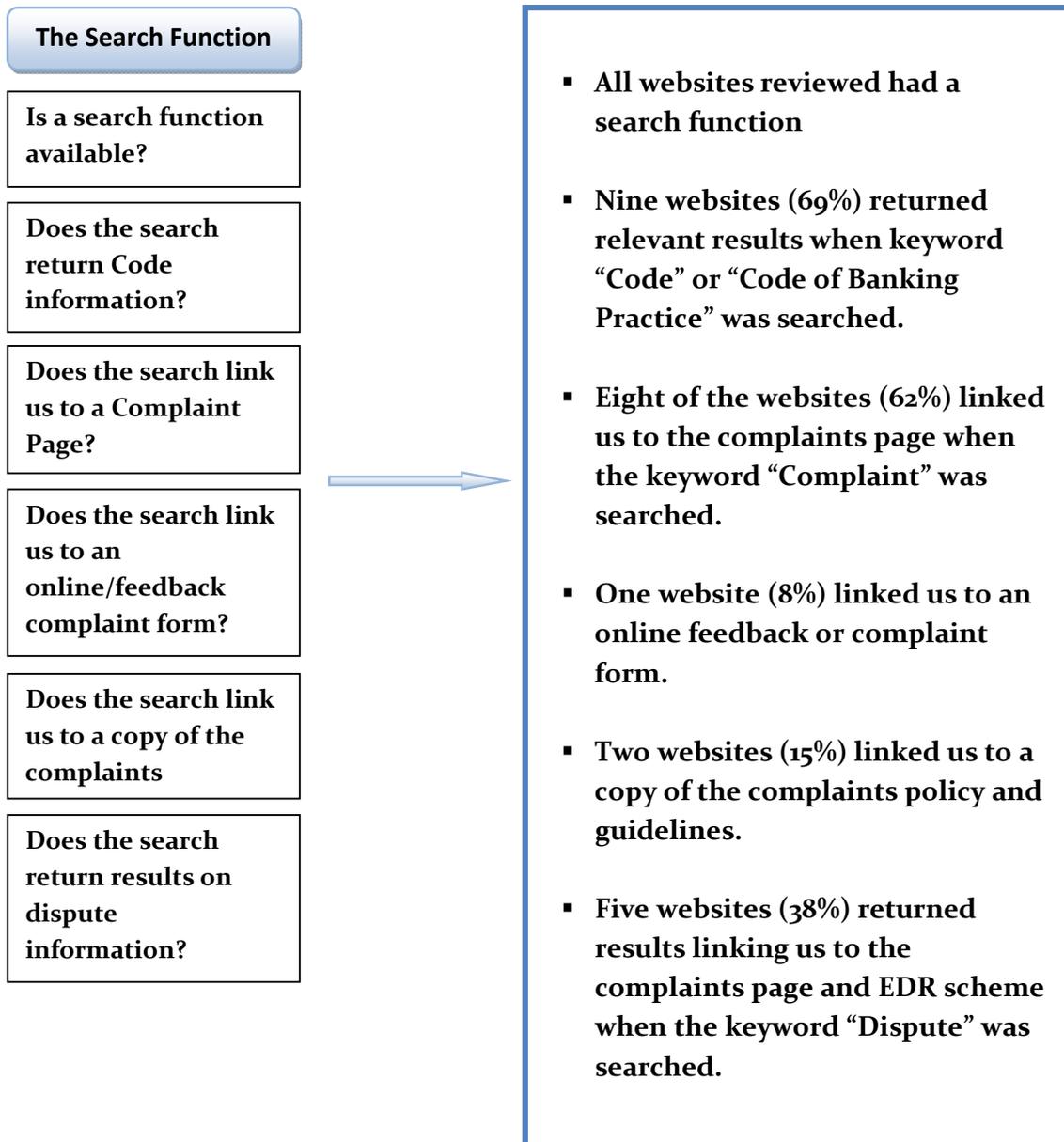
Based on the findings, we were pleased to find that sixty-nine per cent (69%) of websites included in this review had necessary information visible and accessible where the customer is able to find the required information within a reasonable time and with only basic computer literacy skills. These websites scored a rating of “four” or “five” out of five.

Majority (92%) of the websites reviewed, scored an overall rating of “three”, “four” or “five”, indicating that all the sites complied with the basic requirements and meet the basic standards regarding visibility and access to Code, IDR and EDR information.

## The search function

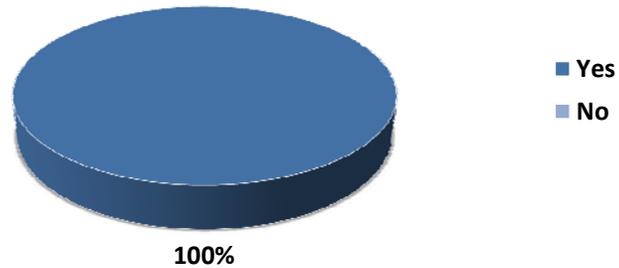
---

An overview of the web-based information relating to the search function and the key observations are as follows:



**The following are the results relating to the search function.**

**Is a search function available?**



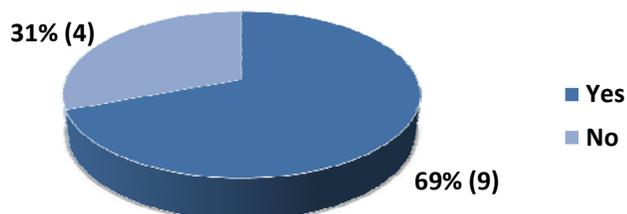
All the websites reviewed have a search facility. However, in one instance, the search facility is not located on the “Home” page and was only available on the subsequent webpages.

We did not rate websites in regard to the existence of a search facility, as this is a commercial decision for each company concerned. However if a search facility exists, there is an expectation that simple searches should provide relevant information and/or links to Code and dispute resolution information.

Some websites did have a ‘site map’ facility; however, this was not taken into consideration when trying to locate the key information.

## Search results for keyword “Code” or “Code of Banking Practice”

Does search function respond to "Code" or "Code of Banking Practice"?



We tested the all the websites and searched the keywords “Code” and “Code of Banking Practice”.

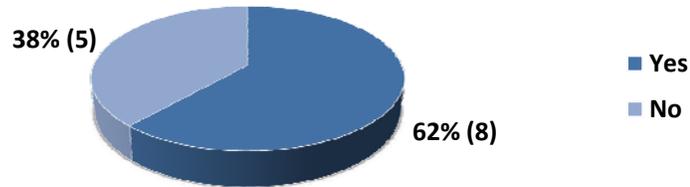
Nine out of the thirteen (69%) websites displayed results relevant to the search, the majority linking customers to a copy of the Code that is displayed in a PDF format.

We also searched the keywords “complaint” and “dispute” and noted the top five search results. For the keyword “complaint”, special attention was given to the results returned to identify the information provided (format and quality), the existence of a link to a complaints page, online feedback form and the complaint policy and guidelines.

In only one instance, the search results came up with no response for the entire search. The following graphs identify the results:

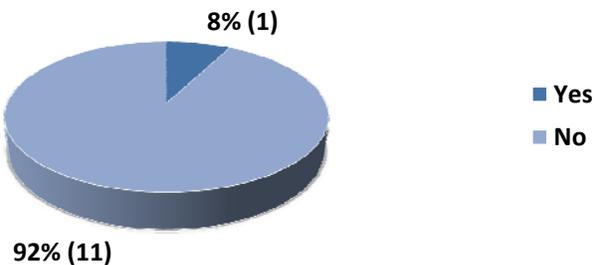
## Search results for keyword “Complaint”

### Does search return results linking us to a Complaint Page?



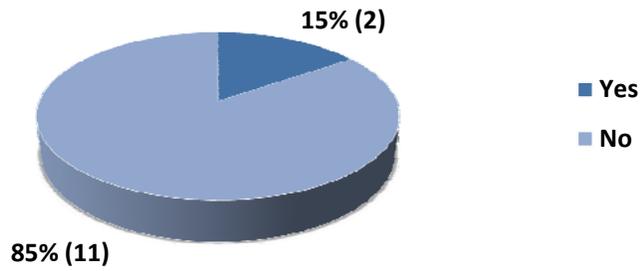
Out of the top five search results, sixty-two per cent (62%) of the search responses linked us to the complaints page that includes information on contact details, basic information, and description relating to the complaints process.

### Does search results link us to an online feedback/complaint form?



Only one (1) website linked us to an online feedback or complaint form. Given that lodging a complaint online is a much quicker and easier option than contacting the call centre, the CCMC recommends that banks should review their websites and link customers to a complaint form with additional information when a search is for “complaint” is performed.

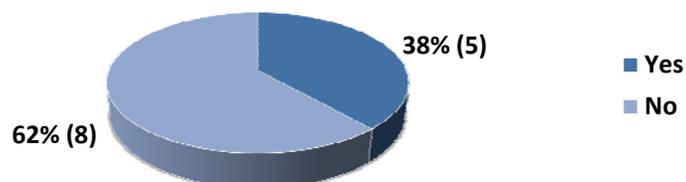
**Does search return results linking us to a copy of complaints guideline?**



Fifteen per cent (15%) of search results linked us to a copy of the complaints policy and guidelines in a Portable Document Format (PDF). The majority of the websites reviewed (85%) did not link us to a copy of the complaints guideline.

## Search results for keyword “Dispute”

### Does search return results on dispute information?



In relation to the keyword “dispute”, we were specifically looking for results that guide and provide information in relation to the external dispute resolution (EDR) scheme used by the banks, preferably with a link to a complaints page.

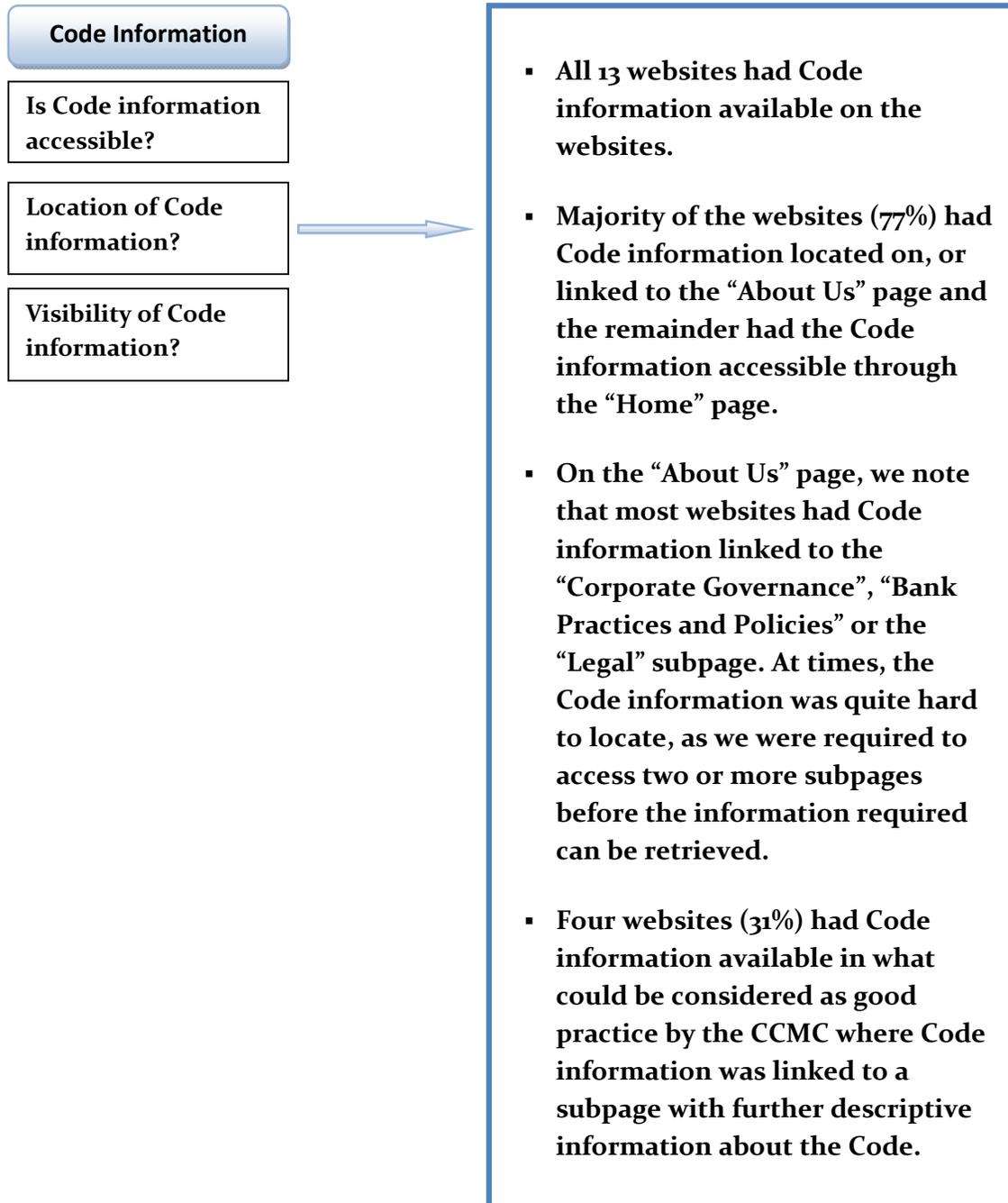
Only thirty-eight per cent (38%) returned results linking us to the complaints page and EDR scheme. The majority of the results displayed were links to the Financial Services Guide (FSG) or Product Disclosure Statements (PDS), which we do not consider as relevant results in this assessment.

The CCMC recommends that banks should test their search facility on their websites to ensure its functionality and quality of information provided in relation to Code, IDR and EDR information.

## The Code

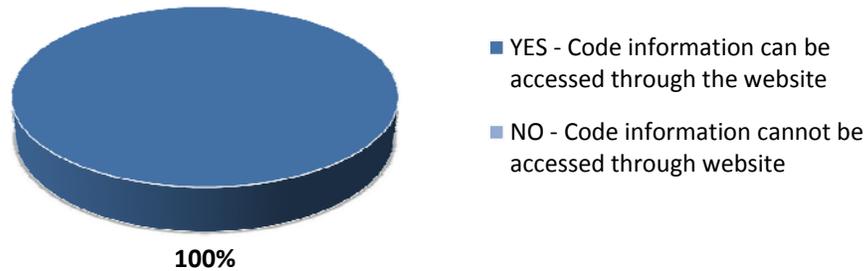
---

An overview of the web based information relating to the Code and the key observations are as follows:



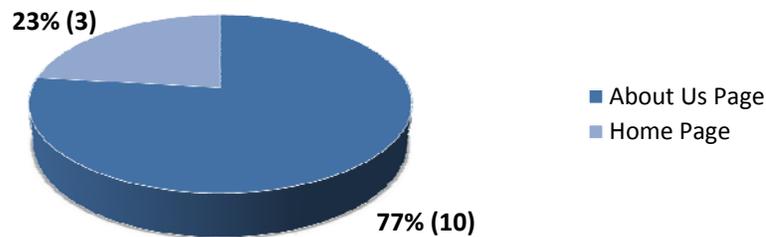
The following are the results of the review on Code information.

### Accessibility of Code Information



We were very pleased that all 13 websites provided sufficient information about the Code, in line with Section B.9(c) of the Code in regards to the availability of the Code.

### Location of Code Information

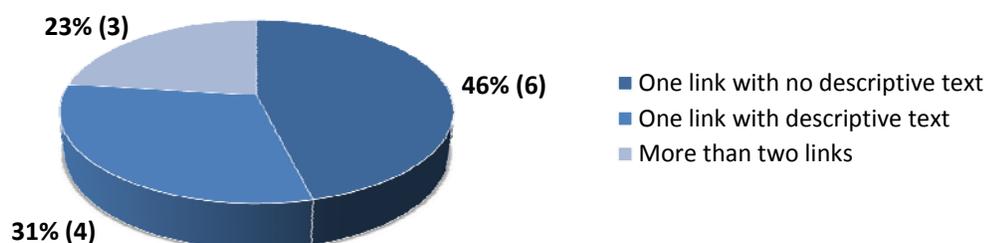


Majority of the websites (77%) had Code information located on, or linked to the “About Us” page, and the additional twenty-three per cent (23%) had the Code information accessible through the “Home” page.

On the “About Us” page, we note that most websites have the Code information linked to the “Corporate Governance” page, “Bank Practices and Policies” page, or the “Legal” subpage. At times, the Code information was quite hard to locate, as we were required to access two or more subpages before the Code information can be retrieved. This is not considered satisfactory, as a customer with limited knowledge on the industry would not be able to locate the information on a timely manner.

As the Code is an important part of the relationship between a customer and the banks, forming part of the terms and conditions for all relevant products and services, we believe that the “About Us” or “Home” page is the optimal place to promote the benefits, rights, and responsibilities of the Code.

### Visibility of Code Information



A ‘link’ is defined as one click of the mouse on the website to direct the user to a specific point in the website. This link might then connect to another link or a descriptive text.

CCMC believes that visibility of Code information is best achieved with one specific link from the ‘Home’ or ‘About Us’ webpage to a subpage providing more descriptive information about the Code and benefits of being a code subscriber, with the option to obtain a PDF copy of the Code.

Links with no further description of the Code, or more than two links appeared to be too confusing. A customer with no knowledge of the industry would not be able to find such information in a timely manner.

The review identified that thirty-one per cent (31%) of the websites with Code information in

a format that the CCMC considered “good practice”.

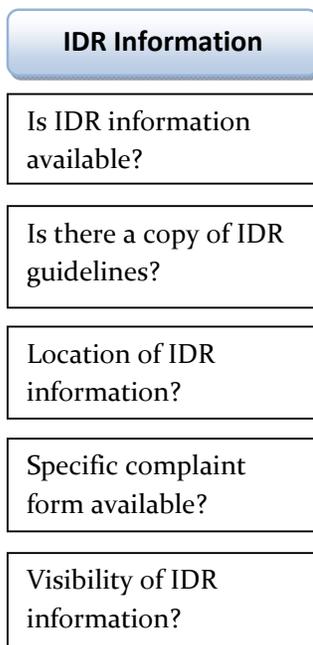
Forty-six per cent (46%) only provided a link with no further explanatory information. In most cases, the link enabled the user only to open up a PDF copy of the Code.

The CCMC considers that providing an explanation regarding the benefits of banking with a bank who has adopted the Code, and explanation of how the Code affects the customer’s rights and responsibilities, would provide more certainty for customers, and help promote the Code as a competitive advantage.

## Resolving disputes - Internal Dispute Resolution (IDR)

---

An overview of the web-based information relating to IDR and the key observations are as follows:

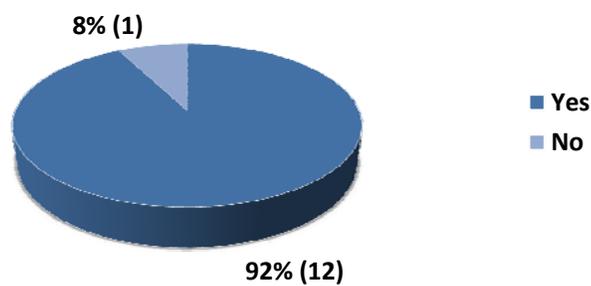


- All 13 websites had IDR information available on the websites.
- 12 out of the 13 websites provided a link or option to download the IDR guidelines. However, there are instances where the bank's Complaints and Dispute handling Policy guidelines for IDR is located on a different page and was quite hard to locate.
- Majority of the websites had IDR information located on the "Contact Us" page, followed by the "Home" page and the "About Us" page.
- Although all of the websites had an online feedback/comment form, only four websites had a clearly marked specifically designed complaint form available.
- Seven of the websites had descriptive information on the webpage and a link to the Complaints and Dispute Handling Policy guidelines, which was considered best practice by CCMC.

The following are the results relating to IDR information.

All 13 banks provided relevant information in relation to internal dispute resolution (IDR) processes. This includes websites that mentioned IDR in their Complaints and Dispute Handling Policy guidelines but had not provided any text based information on their websites.

### Is a copy of the IDR guidelines available on the website?



Ninety-two per cent (92%) of websites do provide customers with a link or the option to download the IDR guidelines.

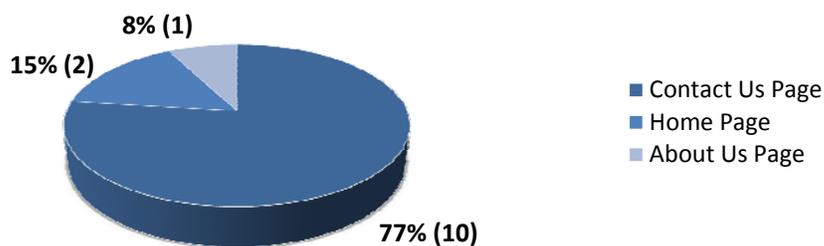
It was noted that the Financial Services Guide (FSG) does provide the relevant details as required by the Corporations Act, however, the use of FSG's to promote and set expectations in relations to IDR guidelines as part of a website strategy is questionable and as such was not considered suitable as part of this assessment.

Where the bank solely relies on the FSG or PDS as a means of disclosure, there may be a breach of section 37.1 of the Code, which states:

*"We will prominently publicise the availability and accessibility of both our internal and external processes for resolving disputes through our points of contact with you where we control that point of contact including:*

- (a) branches;*
- (b) internet sites; and*
- (c) telephone-based banking services."*

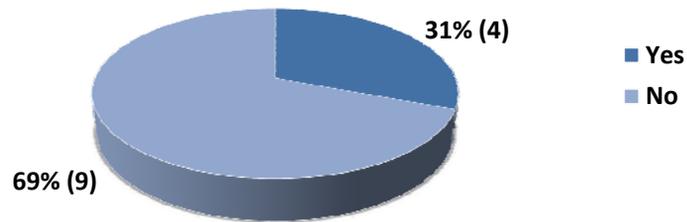
### Location of IDR Information



It was identified that seventy-seven per cent (77%) of the websites reviewed had IDR information located on the 'Contact Us' page. The other areas used to provide IDR information were "Home" page (15%) and "About Us" page (8%).

The Standards Australia Handbook "*The why and how of complaints handling*" recommends "prominent signage about how and where to complain at the point of service delivery" as one of the measures to increase visibility. The CCMC recommends that IDR information for customers should easily be accessible via websites as IDR is the first point of resolution for any concerns or complaints regarding poor services or products.

### Is there a specific complaint form available?

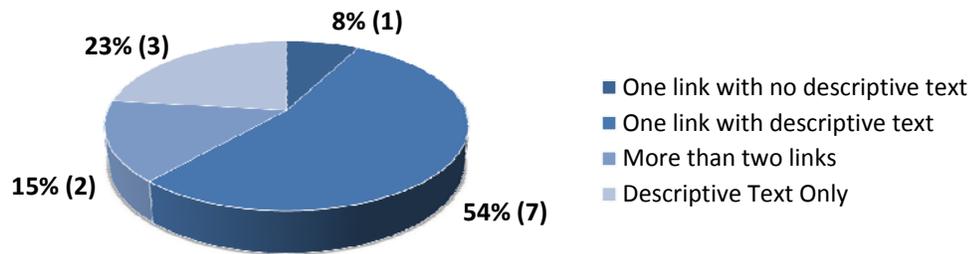


Although all of the reviewed websites have an online feedback/comment form available, only thirty-one per cent (31%) had a clearly marked specifically designed complaint form available. There should be a clear distinction between feedback, general inquiries, concerns, and complaints to ensure that customers have some certainty that their complaint is handled appropriately and being channelled to the right department.

Other considerations are:

- Having a separate disputes page – with a prominent link from the Home page.
- Include in the Contact Us page, clear contact details for your complaints manager or customer relations team.
- Consider an online complaint form, which should be different to a general online feedback/comment form.

## Visibility of IDR Information



Of the websites reviewed, ninety-two per cent (92%) displayed IDR information via a link, redirecting customers to a separate page with further information on IDR. Additional information on the Complaints and Dispute Handling Policy guidelines was also available for download via a PDF document.

In addition, good business practices would include an explanation on what the customer could expect to occur after a complaint was lodged.

However, there are instances where the bank's Complaints and Dispute Handling Policy guidelines are located on a different page and are difficult to locate (eg. Complaints and Dispute Handling Policy guidelines was located under Legal and Policy page, separate from the contact details). Customers who want to obtain further information about the dispute process or their expectations once the complaint is lodge, may find this very confusing.

Fifty-four (54%) of the websites had descriptive information on the webpage and also a link to the Complaints and Dispute Handling Policy guidelines, which was considered best practice by CCMC. Fifteen per cent (15%) of the websites used two or more links to obtain the required information that was not considered satisfactory.

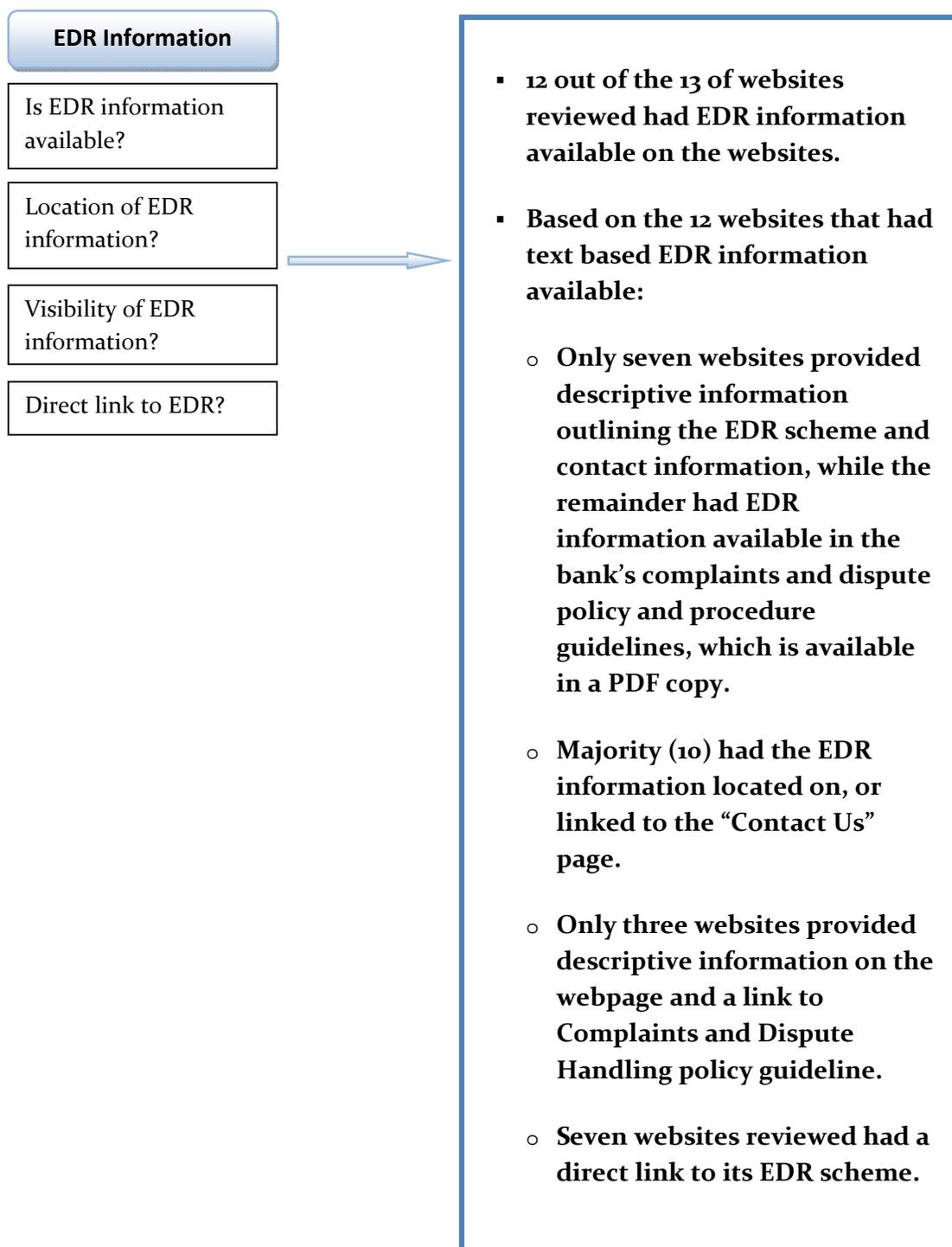
The CCMC recommends and good business practice requires:

- specific contact details for IDR related issues;
- explanatory notes in regards to the company's procedures on how to deal with IDR issues; and
- an explanation regarding what will happen and by when, following receipt of the complaint.

## Resolving disputes - External Dispute Resolution (EDR)

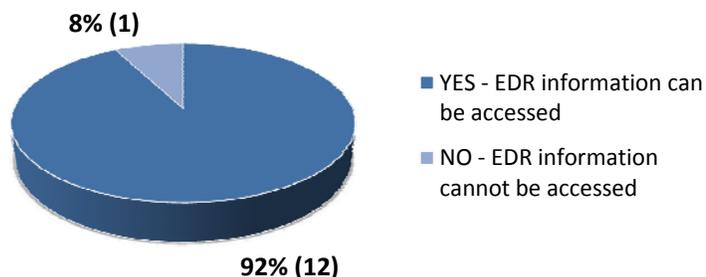
---

An overview of the web-based information relating to EDR and the key observations are as follows:



## The following are the results of the review of the EDR information:

### Accessibility of EDR Information

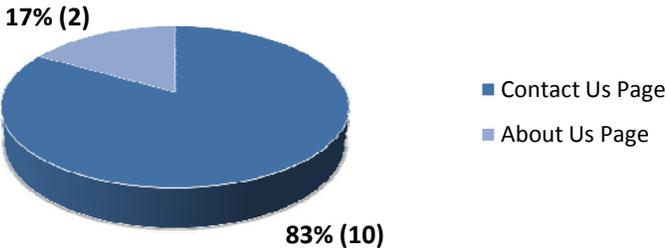


Of the 13 websites we reviewed, we found that only one (1) website did not have any information on EDR information available on their websites. This represents a potential breach of clause 37.1 of the Code, as discussed above. However, out of the twelve (12) websites that had EDR information available, only one (1) had no text based information referring to EDR on the website but had comprehensive information relating to IDR and EDR available in the bank's Complaints and Dispute Handling Policy guidelines, which is only available via a PDF document.

The CCMC recommends that the identification of the relevant EDR scheme, web links to the relevant website and contacts details should be included on the banks websites, be clearly visibly and easily accessible for customers to obtain the information required if their complaint is not resolved or they are not fully satisfied with the response or outcome of the IDR.

Of the 11 websites that do have a text-based reference to EDR on the website, we were surprised to find that only seven of these websites provided descriptive information on the webpage outlining the EDR scheme and relevant contact information.

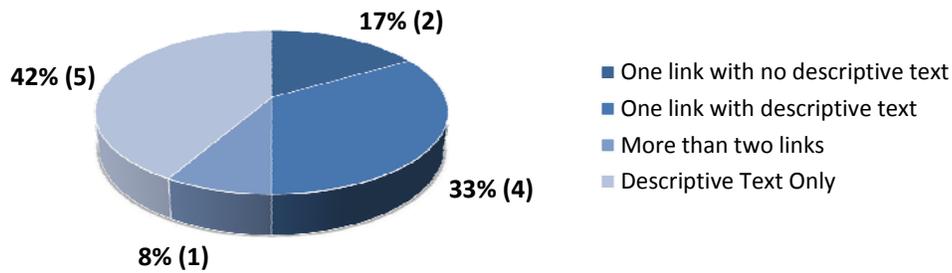
### Location of EDR Information



From the twelve (12) websites that had information on EDR, we then assessed where the information was located. It is noted the majority of the websites (10) had EDR information located on, or linked to the “Contact Us” page. The remainder had the EDR information located on, or linked to the “About Us” page, which was not considered satisfactory, as a customer would generally be looking at the “Contact Us” page for means to contact the bank when lodging a complaint.

The CCMC recommends that EDR information should be disclosed together with IDR information and preferably on a specific dispute or complaints handling page. Alternatively, the ‘Contact Us’ page is suitable if the page is clearly set out and provides specific information and/or links regarding contact details of the relevant EDR scheme.

## Visibility of EDR Information



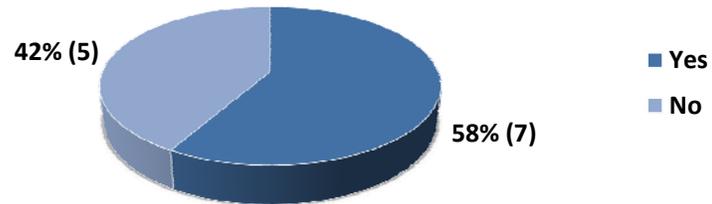
The same method and descriptions were used in this review as in the assessment of the visibility of IDR information.

Forty-two per cent (42%) of the websites reviewed provided us with only the basic information such as the EDR scheme used and contact details, with no further detailed explanation regarding the process. On the other hand, seventeen per cent (17%) only provided a link to the Complaints and Dispute Handling Policy guideline where further information about the EDR scheme is available via a PDF format.

Only four websites (33%) had descriptive information on the webpage and a link to the policy and guideline information.

In one instance, it was noted that EDR information was presented in a separate webpage with no direct link from the IDR page.

### Direct link to the EDR facility?



As part of the review, we examined the use of links as a quick and simple way of directing customers to relevant sources of information.

While there are no requirements to provide direct links to external websites, we were surprised that only fifty-eight per cent (58%) of surveyed websites displayed a direct link to the EDR scheme.

The CCMC would consider a direct link as a very efficient and cost effective way to provide customers with details and information about their relevant EDR scheme.

# Our findings and conclusions

---

## Overall Rating

The overall results show that thirty-eight per cent (38%) of the surveyed websites had information visible and easily accessible, scoring a 5 out of 5. In addition, the majority (92%) of the websites reviewed scored an overall rating of “three”, “four”, or “five”, indicating that all these sites complied with the basic requirements and met the basic standards regarding visibility and access to Code, IDR and EDR information. Only one (1) website reviewed scored a “two”, and had not complied or met the basic requirements and standards.

## Code

One of the key promises made to customers is supporting and promoting the Code. Whilst websites are not the only means of communicating to customers, we were very pleased to find that all the websites surveyed had accessible information about the Code.

The Australian Bankers Association (ABA) is the industry association representing subscribers to the Code. While all websites do provide information about the Code, banks should consider linking the Code to the ABA’s website as this provides customers with background information on the Code, their rights, benefits and obligations.

## IDR

All 13 websites reviewed had satisfactory information about their own dispute resolution process in a visible and accessible form. Ninety-two per cent (92%) of websites do provide customers with a link or the option to download a copy of the Complaints and Dispute Handling Policy guidelines.

Information about IDR contained only in a separate FSG file was considered inadequate, as it is often not readily accessible or visible to customers due to the limitation of the search function of the websites to look for keywords in PDF files. (This was not the case for every site and depended on the technical capabilities for the web site).

## **EDR**

The visibility and access to external dispute resolution schemes were relatively consistent across the websites. The majority of the websites reviewed had text based information relating to EDR accessible via their websites however in one instance EDR information was only mentioned in the bank's Complaints and Dispute Handling Policy guidelines, which was available via a PDF document.

However, across the 12 websites that had EDR information, it was noted that seven websites reviewed provided text based information on the webpage outlining the EDR scheme. Of the remainder (4) had EDR information available in the bank's Complaints and Dispute Handling Policy guidelines, available only via a PDF download.

Only fifty-eight cent (58%) had a direct link to EDR scheme.

## Recommendations

---

- While all websites did provide a link to the Code, it is good practice to provide customers with some background information relating to the Code and the benefits of banking with a subscriber of the Code.
- Advertise that copies of the Code are available either through branches or via mail upon request.
- Include brief information about IDR and EDR procedures on the “Home” or “Contact Us” page with a link to a separate complaints page.
- Include a link to the website of the relevant EDR scheme.
- Include a specific complaint form or a complaint option in the online enquiry form (if one exists).
- Check the search function (if available on the website) to ensure that simple searches on the Code and complaints handling provide results.
- Under “Contact Us”, provide key staff or dedicated methods for compliments and complaints.
- Consider advertising access to translating services where required.
- Review your website against the standards outlined by the World Wide Web Consortium (W3C). W3C have developed international standards and guidance for website development including in the area of accessibility. (refer Annexure)
- Refer to the other industry guides such as the *NSW Government Website Style Directive* as the guide has been developed based on best practices and focuses on user’s experience.

# ANNEXURE

The principles for accessibility in web site content include:<sup>5</sup>

---

## Perceivable

- Provide **text alternatives** for non-text content
- Provide **captions and alternatives** for audio and video content
- Make content **adaptable**; and make it **available** to assistive technologies
- Use **sufficient contrast** to make things easy to see and hear

## Operable

- Make all functionality **keyboard accessible**
- Give users **enough time** to read and use content
- Do not use content that causes **seizures**
- Help users **navigate and find** content

## Understandable

- Make text **readable and understandable**
- Make content appear and operate in **predictable** ways
- Help users **avoid and correct mistakes**

## Robust

- Maximize **compatibility** with current and future technologies

---

<sup>5</sup> W3C Web Accessibility Initiative [Web Accessibility QuickTips](#) Feb 2010