

## Own Motion Inquiry: Compliance with Standard 11 of the 2014 Insurance Brokers Code of Practice ('Promoting the Code & providing dispute resolution information')

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March 2015

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# 1. EXECUTIVE SUMMARY

## 1.1 About this report

This report is published by the Insurance Brokers Code Compliance Committee (the Committee) following an Own Motion Inquiry to assess Code subscriber's compliance with Standard 11 of the 2014 Insurance Brokers Code of Practice (the Code).

The Code was established in 2007 and revised in 2014. The revised 2014 Code came into effect on 1 January 2014. There are 358 insurance brokers subscribing to the 2014 Code as at 31 December 2014, of which 104 (29%) were included in this inquiry.

The inquiry specifically reviewed the accessibility<sup>1</sup> and visibility<sup>2</sup> of Code, Internal Dispute Resolution (IDR) and External Dispute Resolution (EDR) information on Code subscribers' websites. The desirable outcome is that the majority of Code subscribers provide information about the Code and IDR and EDR on their websites, which is easy to find and easy to understand.

A previous inquiry in 2012<sup>3</sup> found that most of the reviewed websites provided information about the Code subscriber's IDR and EDR procedures. However, 77% of Code subscribers provided little or no information about the Code and its rights and responsibilities. As a result, we made several recommendations and committed to a follow-up inquiry in 2014 to:

- determine whether Code subscribers had adopted any of our recommendations
- compare the subsequent levels of accessibility and visibility against the 2012 results, and
- assess good industry practice where Code subscribers had placed information about the revised Code on their websites.

The follow-up inquiry was conducted from June to August 2014, reviewing 104 Code subscriber websites, which had not been subject to the 2012 inquiry. Code subscribers were randomly selected across Australia. The majority were small organisations who had no more than 30 full-time equivalent employees.<sup>4</sup>

## 1.2 Code obligations

Standard 11 of the revised 2014 Code states that:

*"[Code subscribers] will support NIBA in promoting the Code and make information on the Code (including how to make a complaint) and [its] Covered Services readily available to [its clients]."*

Based on NIBA's guidance notes to the Code, some ways that Code subscribers can comply with Standard 11 of the Code are by:

- providing a link to the Code on their website

<sup>1</sup> For the purpose of this inquiry, accessibility refers to the 'ways' and 'means' of sourcing information on the Code, IDR and EDR from the website of a Code subscriber.

<sup>2</sup> For the purposes of this inquiry, visibility refers to the degree to which information on the Code, IDR and EDR is perceptible to the reader when viewing the website of a Code subscriber.

<sup>3</sup> Copy available at [http://www.fos.org.au/custom/files/docs/visibilityandaccessreport\\_june\\_2012.pdf](http://www.fos.org.au/custom/files/docs/visibilityandaccessreport_june_2012.pdf)

<sup>4</sup> See table 3 on page 7.

- making information about the Code available in customer brochures
- developing brochures on 'How to make a complaint' or including this information on their website, and
- including information about being a participant in the Code in advertising material or other customer documentation.

Such guidance is consistent with the recommendations found in the 2012 visibility and access report. Information about the Code should include as a minimum a link to the Code information on NIBA's website and what rights are provided to the client by the Code.

### 1.3 What we expect

As stated above, one way to comply with Standard 11 of the Code is to provide information about the Code and dispute resolution procedures on a Code subscriber's website. This is consistent with the Code's objective in having a free and transparent complaints and compliance procedure<sup>5</sup>.

It is not mandatory to do so and we acknowledge that Code subscribers may choose to provide Code and dispute resolution information through alternative means (including brochures displayed at offices and other written communications such as the Financial Services Guide (FSG), letters, terms and conditions and account statements).

However, internet based information is important because it aligns with the way clients make purchasing decisions. Increasing numbers of consumers use social media and research on mobile internet to carry out preliminary product and price research before making final decisions. It enables insurance brokers to build relations with clients and prospects through regular, low-cost personalised communication, reflecting the move away from mass marketing. The internet provides an important platform for building relationships with clients and increasing client retention levels as it enables Code subscribers to better align their disclosure with consumer preferences.

Further, there has been a push from the Australian Securities and Investment Commission (ASIC) for financial services providers to increase their disclosure obligations online. ASIC has recently made a proposal to update its Regulatory Guide 221 ([RG 221](#) - facilitating online financial services disclosures) to encourage more electronic disclosure and to remove uncertainty about the circumstances in which electronic communications can be used. The focus of the proposal is to make it easier for businesses to deliver financial services disclosures electronically while preserving choice for consumers. The proposal aims to encourage more innovative ways of delivering important information and to present them in a way that consumers can understand and act on. Further details about ASIC's proposal can be found in the link below.<sup>6</sup>

In the Committee's view, obligations of the Code should always be interpreted in a manner which is consistent with the spirit of the Code and its objectives. In order to promote better and more professional, informed and effective relationships between Code subscribers and their clients, the Committee highly recommends that Code subscribers promote the Code, IDR and EDR information on their websites, which is highly visible and easy to understand.

<sup>5</sup> See "What the Code seeks to do? (Code Objectives), page 7 of the Code.

<sup>6</sup> See ASIC's media release at <http://www.asic.gov.au/about-asic/media-centre/find-a-media-release/2014-releases/14-303mr-asic-proposes-to-cut-red-tape-and-encourage-more-electronic-disclosure/>

## 1.4 What we found

The 2014 inquiry found that overall, Code subscribers have systematically improved the visibility and accessibility of Code and dispute resolution information. The largest area of improvement was Code information (40% increase). An increasing number of Code subscribers (compared to the 2012 inquiry) had at least mentioned the Code on their websites.

The Committee notes that there are three criteria's which scored a percentage below 50%:

- a copy or link to the Code
- a specific nominated complaint contact, and
- dispute resolution information on a separate 'Dispute/Complaints' page.

These are potential areas of improvement. Apart from these exceptions, the Committee is satisfied with the level of improvement found in the 2014 inquiry.

A summary of our key findings in comparison with the 2012 inquiry are found in **Table 1** below

**Table 1: Key findings – comparison between 2012 and 2014 inquiry**

Category	Key Findings	2012	2014	Analysis
Code Information	Websites made reference and/or provided information about the Code.	25%	65%	40% improvement
	Websites contained a copy or link to the Code	3%	44%	41% improvement
IDR Information	Websites provided some information on internal dispute resolution (IDR), albeit some of this information is limited.	71%	80%	9% improvement
	Websites displayed IDR information on a separate Disputes page.	11%	37%	26% improvement
	Websites nominated a specific complaint contact.	26%	32%	6% improvement
EDR Information	Websites provided some information on the approved external dispute resolution (EDR) scheme they subscribe to.	70%	84%	14% improvement
	Websites provide a direct website link to the approved EDR scheme they subscribe to.	45%	62%	17% improvement

## 1.5 Checklist – Code, IDR and EDR website-based information

Based on the findings of the inquiry, we have created a checklist which outlines ways in which a Code subscriber can improve the accessibility and visibility of their website-based Code, IDR and EDR information.

The Committee acknowledges that the development of website strategies and online communications are a matter for each Code subscriber and will be dependent upon the size,

nature and complexity of the business. The Committee encourages Code subscribers to utilise this checklist and adopt these recommendations, where practical. The checklist can be found in **Table 2 below**:

**Table 2: How to display Code, IDR and EDR information on your website**

- Display information about the Code on the 'About Us' or 'Home' page of the website.
- Code information should include the 12 service standards of the Code and the benefits and rights under the Code.
- Code information should present clear and concise guidance on where and how to raise a Code breach concern.
- Code information should include a direct link to the FOS website to lodge a Code breach concern.
- Provide a link to a copy of the Code and a link to the NIBA's website.
- Provide information about IDR and EDR procedures on a separate 'Complaints' page or a prominent link from the 'Home' or 'Contact Us' page.
- IDR information should present clear and concise guidance on where and how to make a complaint or how to raise a Code breach concern.
- IDR information should either include the contact details of a specific complaints person or an online complaint form, which should be different to a general feedback form.
- EDR information should be disclosed together with IDR information.
- EDR information should include a direct link to the website of the relevant EDR scheme.
- Check the search function (if available on the website) to ensure that simple searches on the Code and complaints handling provide results.
- Consider advertising access to translating services where required.
- Review website against the standards outlined by World Wide Web Consortium's (W3C) **Web Content Accessibility Guidelines (WCAG) 2.0**. W3C have developed international standards and guidance for website development including in the area of accessibility.

## 2. ABOUT THIS INQUIRY

### 2.1 Objectives

The key objective of this inquiry is to assess how well Code subscribers are complying with Standard 11 of the Code and whether there has been any improvement in the visibility and accessibility of Code and dispute resolution information on Code subscribers' websites since the 2012 inquiry. The inquiry also sought to:

- understand whether Code subscribers had updated information about the revised Code on their websites

- identify good industry practice in promoting the Code and providing dispute resolution information to clients and prospective clients, and
- recommend about areas for potential improvement.

A copy of this report will be published on the Financial Ombudsman Service (FOS) website ([www.fos.org.au](http://www.fos.org.au)) and shared with key stakeholders, including all Code subscribers, NIBA, and the Australian Securities and Investments Commission (ASIC).

## 2.2 Scope

We randomly selected 104 (29%) Code subscribers from across Australia representing small, medium and large organisations, as shown in **Table 3**. The selected Code subscribers in this inquiry had not been subject to the same inquiry conducted in 2012.

**Table 3: Selection of Code subscribers**

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	Total
Small organisation <sup>7</sup>	1	22	1	15	9	2	25	15	90
Medium organisation <sup>8</sup>	0	4	0	0	0	1	2	2	9
Large organisation <sup>9</sup>	0	3	0	2	0	0	0	0	5
<b>Total</b>	<b>1</b>	<b>29</b>	<b>1</b>	<b>17</b>	<b>9</b>	<b>3</b>	<b>27</b>	<b>17</b>	<b>104</b>

Between June and August 2014, we reviewed the:

- websites and associated content of each Code subscriber within the selected sample, and
- the Financial Services Guides (FSG), Product Disclosure Statements (PDS), Terms and Conditions and other documents available for downloading in Adobe Portable Document Format (PDF) from these websites.

The following fell outside the scope of this inquiry:

- information available at Code subscribers' branches and offices, and
- documents and information distributed by Code subscribers through other means.

## 2.3 What we did

In this follow up inquiry, we used the same set of criteria used in 2012 to assess the availability, visibility and accessibility of Code, IDR and EDR information for each website.

An overall rating was given to each participant based on these criteria. Higher overall ratings of between 23 to 33 points reflected good industry practice. A score between 12 to 22 points reflected minimum standards met and a score of 11 points or below indicated that information was not as accessible and visible as it should have been.

[Appendix C](#) sets out the review's assessment and rating structure in more detail. Code subscribers may use this table as a self-assessment of their own websites.

<sup>7</sup> Up to 30 full time equivalent staff.

<sup>8</sup> 31 to 100 full time equivalent staff.

<sup>9</sup> More than 100 full time equivalent staff.

### 3. INQUIRY FINDINGS

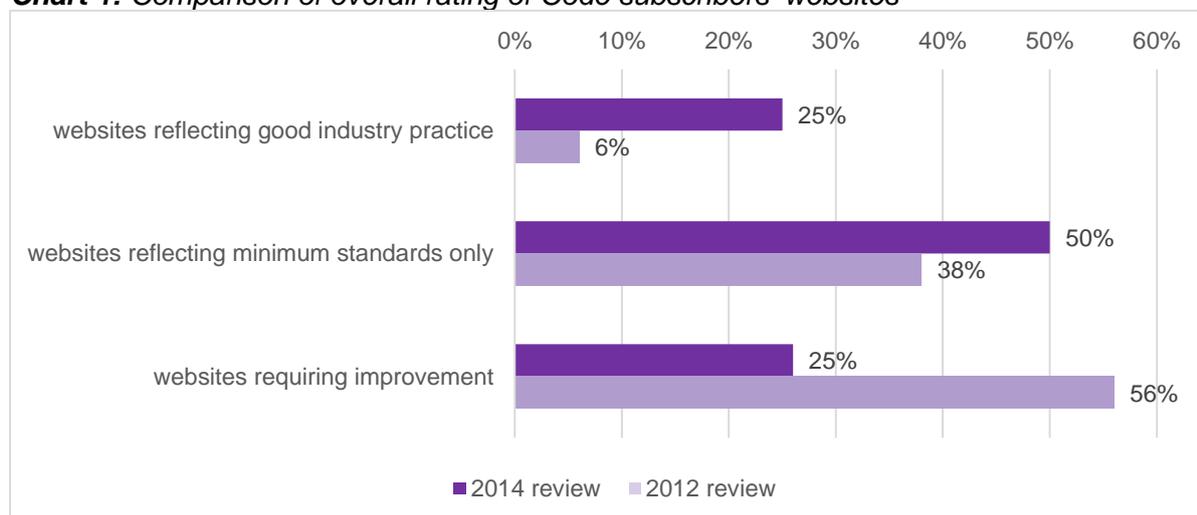
#### 3.1 Overall findings

We found that 50% of the reviewed websites met minimum standards in promoting the Code and dispute resolution information (12% improvement), whilst 25% reflected good industry practice (22% improvement). The Committee acknowledges that this is a positive result and commends Code subscribers who have improved the availability, accessibility and visibility of Code, IDR and EDR information on their websites.

The Committee notes that there are some websites which could still be revised and updated. A large number of surveyed Code subscribers (25%) provided little or no information about the Code and IDR and EDR procedures on their websites or in their web-based disclosure documentation.

The Committee encourages Code subscribers to refer to the checklist found in **Table 2** and to implement any recommendations set out in the checklist. Further information regarding the overall rating between the 2012 and 2014 review are found in **Chart 1** below.

**Chart 1: Comparison of overall rating of Code subscribers' websites**



#### 3.2 Code information

##### What we expect

Under Standard 11 of the Code, a Code subscriber is obliged to support NIBA in promoting the Code. A Code subscriber's website is an optimal place to highlight the benefits to clients to do business with an insurance broker that subscribes to the Code. Information contained on the website should be highly visible and highlight the responsibilities of a Code subscriber towards their client and the client's rights if the Code subscriber fails to comply with its obligations under the Code.

This may also be a source of competitive advantage over non-Code subscribers and highlights the professionalism of the industry. The Code emphasises the promise and commitment by an insurance broker to act in the best interest of its client over and above legal and contractual obligations. The Committee notes that the publication of the revised 2014 Code is a good opportunity to refresh websites.

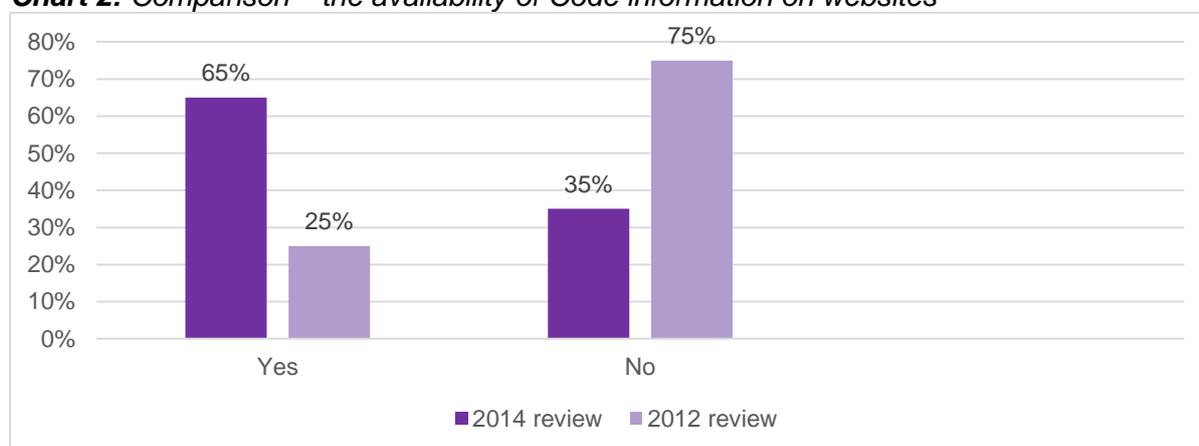
## What we found

**Chart 2** below shows that compared to the 2012 inquiry, more Code subscribers (40% increase) provided Code information on their websites. However, 35% of the reviewed websites failed to mention the Code at all. Only a small percentage (3%) of Code subscribers displayed Code information on the front page of their websites.

Other key findings in regards to Code information include:

- 27% of websites reflected good industry practice by promoting the rights, benefits and responsibilities of the Code (in comparison to 3% in 2012).
- 29% of websites displayed minimum standards only (i.e. only mentions the Code).
- 44% of websites provided a link to the Code information via the NIBA website (in comparison to 3% in the 2012 review). More than half of these also displayed an explanatory text. However, 14% continued to make reference to the old 2007 Code.
- 30% of websites provided one tab/link to Code information (which is aligned with the Committee's recommendation and considered good industry practice).

**Chart 2: Comparison – the availability of Code information on websites**



The Committee is pleased to see a 40% improvement in the availability of Code information on Code subscriber's website since the last inquiry. However, the average rating for displaying Code information reflects compliance with minimum standards only, whereby Code information is limited.

The Committee encourages all Code subscribers to at least mention the Code (if not already done so) on their websites and believes it is good industry practice that Code information include the Code's rights, responsibilities and benefits.

## Recommendations

Key ways to achieve good industry practice in promoting the Code and making information on the Code readily available to clients:



### 3.3 Internal Dispute Resolution (IDR) information

#### What we expect

IDR information is an integral part of the relationship between a client and the Code subscriber, in particular as this is how a client raises concerns that Code obligations have been breached. In addition to Standard 11 of the Code, Step 1 and 2 of the General Standards of the complaints and dispute resolution process state that:

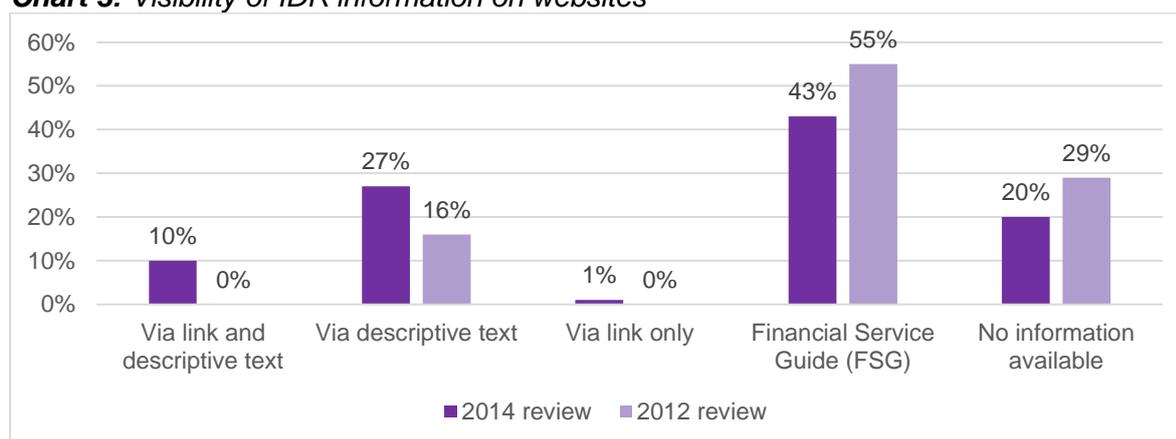
*“[Code subscriber’s] internal complaints and disputes handling process ...must meet any relevant standard required by law.”*  
*“[Code subscribers must]...make information on [their] Complaints and Disputes resolution process available to [their clients].”*

ASIC’s Regulatory Guide 165 ([RG165](#)) and the *Corporations Act 2001* require that IDR information be provided to existing and potential clients. The Committee considers that in order to be aligned with the Code’s objective in raising high standards of service, IDR information should be highly visible and accessible so that existing and potential clients know exactly what to do and who to contact if they need to make a complaint, including what they could do if they had a concern that the Code has been breached. This means that IDR information should be prominent and separate from documents such as a Code subscriber’s Financial Services Guide (FSG).

#### What we found

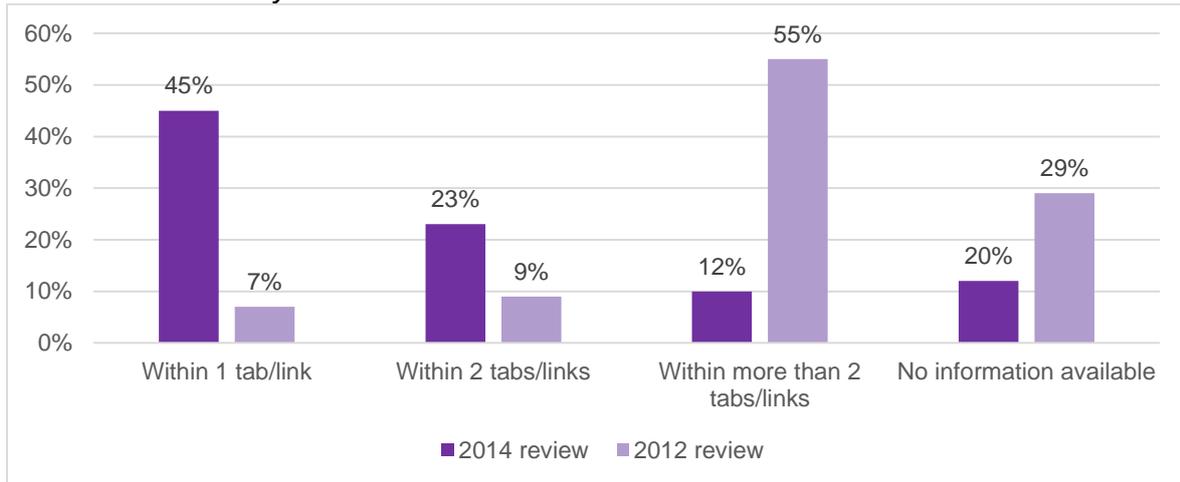
The Committee is pleased to see that majority (80%) of the websites reviewed provided IDR information (in comparison to 71% in 2012). Overall, as shown in **Chart 3** and **Chart 4** below, it appears the visibility and accessibility of IDR information has improved. Similarly to the 2012 inquiry, a large percentage of websites (43%) provided IDR information via their FSG document only, rather than a standalone item. This meets the minimum standard set out in ASIC’s Regulatory Guide 165, the *Corporations Act 2001* and the Code.

**Chart 3:** Visibility of IDR information on websites



In comparison to the 2012 inquiry, it appears more Code subscribers are increasing the transparency of their dispute resolution procedures by providing a separate ‘Complaints’ or ‘Dispute resolution’ link on their website, which is located within one tab. The Committee recommends all Code subscribers (if not already done so) to adopt a similar approach in providing IDR information on their websites, as clients often do not read the fine prints such as a FSG.

**Chart 4: Accessibility of IDR information on websites**



## Recommendations

Key ways to achieve good industry practice in providing IDR information:



## 3.4 External Dispute Resolution (EDR) information

### What we expect

EDR information should be visible and provide clear and concise guidance as to where and how to make a complaint if the client is unable to resolve a dispute or Code breach concern with the Code subscriber.

In addition to Standard 11 of the Code, Step 2 of the General Standards of complaints and dispute resolution process of the Code state that:

*“...if [the Code subscriber has] been unable to resolve a dispute with [their client]... [they will] provide... [their client] with information on how [their client] can seek to access the Financial Ombudsman Service, or such other ASIC-approved independent external dispute resolution scheme [they] belong to...”*

Although it is not a formal Code requirement, having transparent, accessible and visible EDR website-based information may strengthen trust in Code subscribers and support the Code’s objectives to improve trust and client confidence in the insurance brokering industry. In addition, having a direct link to the approved EDR scheme may be an efficient and cost effective way to provide clients with all the relevant information they need if a Code subscriber was unable to directly resolve a complaint with them.

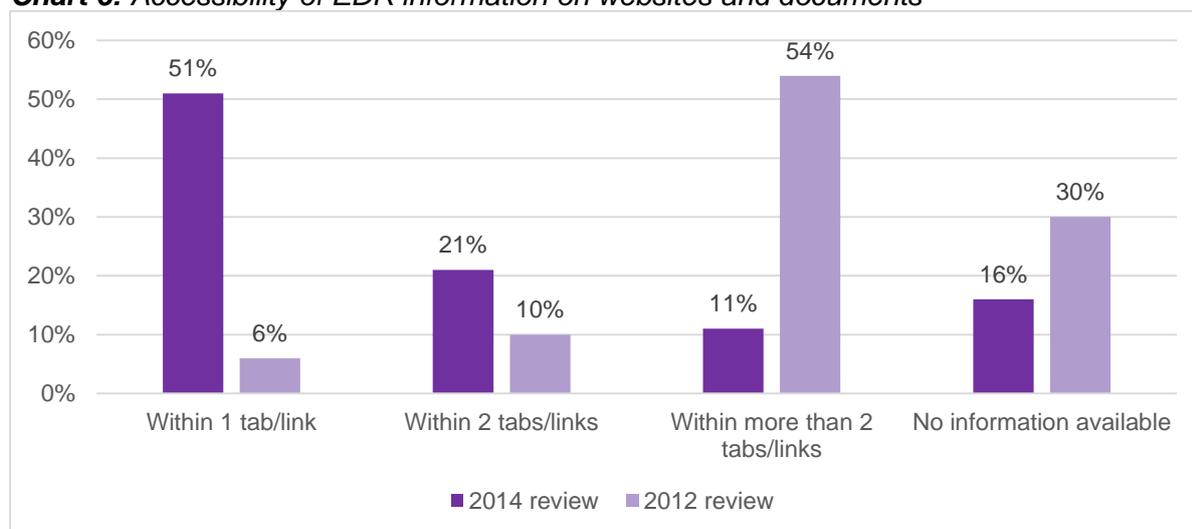
### What we found

The inquiry found that 84% of reviewed websites had no EDR information, in comparison to 30% in 2012. Of the Code subscribers who provided EDR information on their websites, 62% had a direct link to the FOS website (in comparison to 45% in 2012).

As shown in **Chart 6** and **Chart 7** below, Code subscribers are generally improving the accessibility and visibility of its website-based EDR information. 30% of websites reflected good industry practice by providing some information about the EDR process and including a direct link to the relevant EDR scheme, in comparison to 12% in 2012.

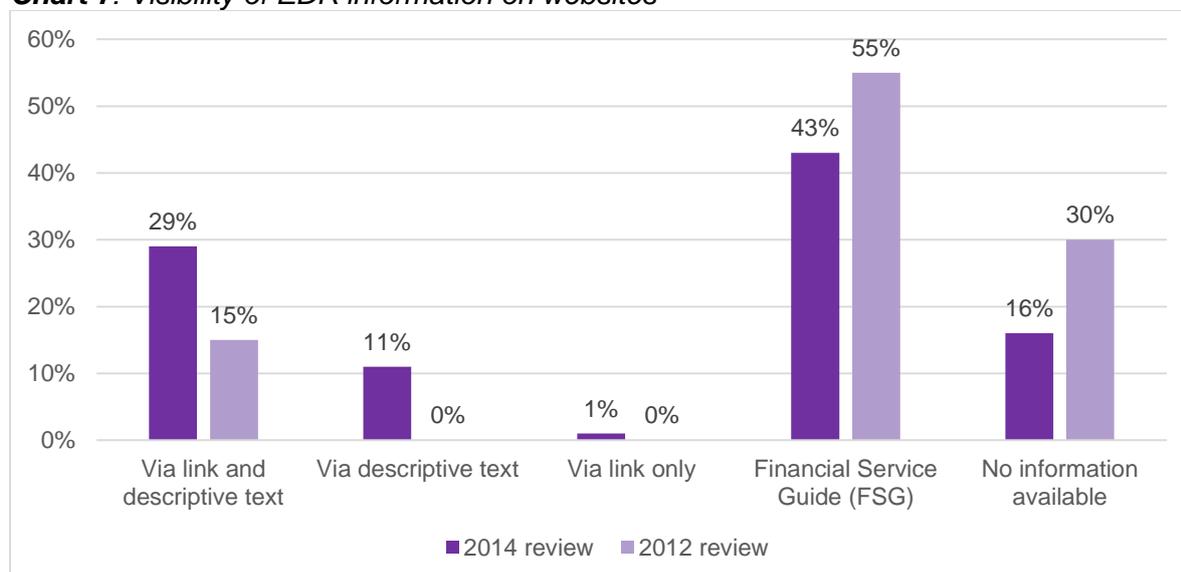
We identified that EDR information is generally located in the same position within the website as IDR information, establishing the link between the two processes. As shown in **Chart 3** and **Chart 7**, 20% of websites did not provide IDR information and 16% did not provide EDR information respectively. This indicates that there are some Code subscribers who are not providing their dispute resolution procedures on their websites or a copy of their FSG online. The same charts also show that 43% of websites displayed IDR and EDR information via their FSGs only.

**Chart 6: Accessibility of EDR information on websites and documents**



The Committee highly recommends Code subscribers to increase its engagement in transparent communication by placing both IDR and EDR website-based information via a prominent link so that clients have immediate access to relevant information if they have a dispute with the Code subscriber or Code breach concern.

**Chart 7: Visibility of EDR information on websites**



## Recommendations

Key ways to achieve good industry practice in providing EDR information:



## 4. RECOMMENDATIONS

Website strategies and online communications are a matter for each Code subscriber and will depend on the size, nature and complexity of the business. Providing at least some basic information about the Code and dispute resolution processes on websites enhances the visibility and accessibility of this information. It may build trust with clients and potential clients that redress is available if things go wrong.

Based on our experience and the results of the inquiry, we have set out recommendations and examples of good industry practice which may help Code subscribers comply with Standard 11 of the Code in promoting the Code and having a transparent complaints procedure.

These recommendations and examples may assist Code subscribers to build their professional competence in the broking profession, increase consumer confidence and trust in insurance brokers and act as a positive point of differentiation between brokers who subscribe to the Code and those who do not. Further, such recommendations can help support key principles within the Code, including:

*"...providing fair, honest and diligent services to enhance and maintain public confidence in insurance brokers and insurance intermediaries."<sup>10</sup>*

The specific Code obligations, recommendations and examples of good industry practice are detailed below:

### 4.1 Code information

#### Code Obligation

Standard 11: *"We will support NIBA in promoting the Code... (including how to make a complaint)...readily available to you.*

#### Recommendation

- provide detailed information about the Code on the Home Page or 'About Us' page
- actively advertise subscription to the Code
- promote the objectives and benefits of the Code

<sup>10</sup> See 'How is the Code Applied? (Code Principles)', page 9 of the Code

- highlight the Code's promises
- use the Code as a competitive advantage to promote professionalism of the insurance broking industry
- create a hyperlink to a copy of the Code and the NIBA website
- information on how to report concerns about a breach of the Code, and
- create a hyperlink to the FOS website to report a Code breach concern.

## Good Industry Practice

*Example 1: Code information on website or other relevant documents*

*"We subscribe to the **Insurance Brokers Code of Practice**. The Code provides that brokers:*

- *Act in the best interests of the client.*
- *Provide advice and guidance to enable clients to make informed decisions on risk and insurance protection.*
- *Provide full and accurate information for effective underwriting.*
- *Respect the client's confidentiality in relation to all records and information.*
- *Ensure the validity and accuracy of all documentation.*
- *Make available all relevant documentation, policies and certificates, endorsements, and premium calculations as may be required.*
- *Be professional, efficient and responsive in all dealings.*
- *In the event of a claim, take every step necessary to ensure prompt and fair settlement.*
- *Work towards maintaining and enhancing the reputation of NIBA and its members.*
- *Act in the spirit of the Code and encourage others to do likewise.*

*To obtain a copy of the Code, [click here](#)"*

## 4.2 IDR information

### Code Obligation

Standard 11:	<i>"We will support NIBA in promoting the Code... (including how to make a complaint)...readily available to you."</i>
General Standard Step 1:	<i>"Our internal complaints and disputes handling process...must meet any relevant standard required by law..."</i>
General Standard Step 2:	<i>"We will make information on our Complaints and Disputes resolution process available to you."</i>

### Recommendation

- provide general information on IDR processes and how they are embedded in Code obligations to clients and potential clients
- provide specific contact details to raise a complaint
- explain what will happen and by when, following receipt of a complaint, and
- consider an online complaint form, which should be different to a general feedback form.

## Good Industry Practice

### Example 2: IDR information on website and letter to clients

“ABC Insurance Brokers subscribe to the **Insurance Brokers Code of Practice** and are a member of the **Financial Ombudsman Service (FOS)**. As part of the Code obligations, we are committed to the fair, transparent and timely resolution of disputes. If you are unhappy with any of our services please lodge your complaint in writing or contact our complaints Manager Mr XYZ. You can also lodge any alleged breach of the Code with us.

We will acknowledge your complaint in writing and genuinely attempt to resolve your complaint fairly and efficiently within 20 days through our internal disputes resolution system.

Specific contact details are as follows:

Mr XYZ  
ABC Insurance Brokers  
Phone/Email

We will keep you informed about how we handle your complaint and provide you with reasons for our decisions. If we require further information to determine or resolve your complaint, then we will inform you of this and agree with you an appropriate time frame, keeping you informed of the progress.”

## 4.3 EDR information

### Code Obligation

Standard 11:	“We will support NIBA in promoting the Code... (including how to make a complaint)...readily available to you.”
General Standard Step 2:	“...if [our dispute resolution manager has] been unable to resolve a dispute with you...[we will] provide you with information on how you can seek to access the Financial Ombudsman Service, or such other ASIC-approved independent external dispute resolution scheme we belong to...”

### Recommendation

- identify the EDR scheme
- provide a website hyperlink to the EDR scheme's website
- provide context about the role of the EDR scheme and what can be expected of this resolution process, and
- provide EDR scheme contact details.

## Good Industry Practice

### Example 3: EDR information on website and letter to clients

“If your complaint cannot be resolved to your satisfaction within 20 business days, you have the right to refer the matter to **Financial Ombudsman Service (FOS)** for further consideration and/or review. FOS is an ASIC-approved external dispute resolution service accessible to clients free of charge.

FOS contact details are as follows:

**POST:** GPO Box 3 MELBOURNE VIC 3001  
**PHONE:** Toll Free: 1300 780808  
**EMAIL:** info@fos.org.au

An online complaint form is also available at the FOS website at [www.fos.org.au](http://www.fos.org.au)”

## **APPENDIX A: About the Code and the Committee**

### **The 2014 Insurance Brokers Code Of Practice**

The Code is owned and published by the National Insurance Brokers Association ([NIBA](#)). A copy can be downloaded from NIBA's website at <https://www.niba.com.au/codeofpractice/index.cfm> .

All NIBA members are automatically bound by the provisions of the Code. There are 358 Code subscribers as at 31 December 2014.

The Code sets standards of good practice for subscribing insurance brokers, who follow these standards when dealing with persons who are, or who may become, an individual or small business client of an insurance broker.

The Code is intended to promote good relations between insurance intermediaries, their clients, insurers and others within the insurance industry. It also promotes efficiency in transactions by describing standards of good practice and the level of service to be expected from Code subscribers.

The principles and obligations set out in the Code apply to all insurance broking services delivered to individuals and small business across Australia. In that sense, the Code forms an important part of the broader national consumer protection and financial services regulatory frameworks.

### **About the Insurance Brokers Code Compliance Committee**

The Committee independently monitors compliance with the Code's obligations by subscribing insurance brokers.

The Committee has appointed the Financial Ombudsman Service ([FOS](#)) as Code Administrator to independently administer and monitor compliance with Code obligations by Code subscribers.

## APPENDIX B: Summary of key findings

	2014 review (included review of 104 websites)	2012 review (included review of 301 websites)
<b>Overall rating</b>		
Website reflects good industry practice	25%	6%
Website reflects minimum standard only	50%	38%
Website requires improvement	25%	56%
<b>Code information</b>		
Code information could be sought / accessed on the website	65%	25%
Code information could be accessed with two or less clicks	46%	15%
Code information included copy of or a link to the Code and explanatory notes	31%	3%
<b>Internal Dispute Resolution (IDR) information</b>		
IDR information could be sought / accessed on the website	75%	71%
IDR information could be accessed with two or less clicks	68%	16%
IDR information included specific IDR process details and explanatory notes	37%	36%
<b>External Dispute Resolution (EDR) information</b>		
EDR information could be sought / accessed on the website	75%	70%
EDR information could be accessed with two or less clicks	72%	16%
EDR information included a direct link to the relevant EDR website	62%	46%

## APPENDIX C: Assessment and rating structure

QUESTION	ASSESSMENT	RATING
<b>2014 CODE INFORMATION</b>		
Is the Code mentioned on the website?	On front page	2
	Yes	1
	No	0
Can Code information be sought/accessed on the website?	Yes	1
	No	0
Where is the information about the Code located?	Within 1 tab/link	3
	Within 2 tabs/links	2
	Within more than 2 tabs/links	1
	No information available	0
How is the information about the Code recorded?	Via link and descriptive text	3
	Via descriptive text	2
	Via link only	1
	In the Financial Service Guide (FSG) only	1
	No information available	0
Can the information about the Code be accessed through the Search function?	Yes	1
	No	0
	No search function available	0
<b>INTERNAL DISPUTE RESOLUTION (IDR) INFORMATION</b>		
Can IDR information be sought / accessed on the website?	Yes	1
	No	0
Where is the information for IDR located?	Within 1 tab/link	3
	Within 2 tabs/links	2
	Within more than 2 tabs/links	1
	No information available	0
How is the information for IDR recorded?	Via link and descriptive text	3
	Via descriptive text	2
	Via link only	1
	In the Financial Service Guide (FSG) only	1
	No information available	0
Can the information about IDR be accessed through the Search function?	Yes	1
	No	0
	No search function available	0
Is a specific complaints form available through the website?	Specific online complaint form	2
	General online feedback form	1
	General feedback form in PDF format	1
	No form available	0
Does the IDR information contain specific complaints contact information?	Specific complaints contact information provided	2
	General contact information provided	1
	No contact information provided	0
Does the IDR information provide benchmarks for	Benchmarks provided	1

QUESTION	ASSESSMENT	RATING
complaints handling (ie how long the organisation will undertake to resolve a complaint from receipt of all relevant information)?	No benchmarks provided	0
<b>EXTERNAL DISPUTE RESOLUTION (EDR) INFORMATION</b>		
Can EDR information be sought / accessed on the website?	Yes	1
	No	0
Where is the information for EDR located?	Within 1 tab/link	3
	Within 2 tabs/links	2
	Within more than 2 tabs/links	1
	No information available	0
How is the information for EDR recorded?	Via link and descriptive text	3
	Via descriptive text	2
	Via link only	1
	Financial Service Guide (FSG)	1
	No information available	0
Is there a direct link to an EDR scheme?	Yes	1
	No	0
Can the information about EDR be accessed through the Search function?	Yes	1
	No	0
	No search function available	0
<b>OVERALL RATING</b>		
Overall Rating	Excellent information standard	5
	Very good information standard	4
	Good information standard	3
	Limited information standard	2
	Poor information standard	1

The combination of ratings made up the overall website rating, which was then divided into three categories

Summary of points	Overall rating categories
23–33 points	website reflects good industry practice
12–22 points	website reflects minimum standard only
1–11 points	website requires improvement