Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Customer Experience through the Lens of Customer Complaints

Cross-Sectoral Review

Central Bank of Ireland

Feedback Report

July 2026

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1. Overview

As set out in the Central Bank of Ireland's (Central Bank) 2026 Regulatory and Supervisory Outlook Report, and in line with our safeguarding outcomes, a key supervisory priority is securing consumer and investor interests in a rapidly changing world. One of our key focus areas to support better outcomes for consumers is to drive improvements in how firms service and support customers through the customer experience, particularly how firms engage with customers in resolving complaints[1].

Complaints play an important role in securing consumers' interests and strengthening the financial system.

In the course of our supervisory work, we continue to see instances across all sectors where consumers and investors do not always receive the quality of service they paid for and deserve. Poor customer service can create potential consumer risks and lead to a heightened risk of consumer harm. These risks can manifest through the complaints handling process, as is evident in recent reports from the Financial Services and Pensions Ombudsman (FSPO), which highlighted not only that complaints numbers are rising year on year, but circa 50% of complaints referred to the FSPO in 2024 and 2025 were linked to customer service[2] [3].

Complaints are distinctive because they are framed by consumers themselves, expressed in their own words and reflect their own experiences, rather than by regulation or firm procedures. This consumer-defined perspective makes complaints a uniquely powerful tool for consumers to assert their own expectations. A consumer's right to complain is a fundamental aspect of Ireland's consumer protection framework. For the financial services sector, there is a clear process and legislative framework in place with distinct roles for regulated financial service providers, the FSPO and the Central Bank[4]. A key part of that framework is the Central Bank's Consumer Protection Code (the Code)[5]. Securing customers' interests is an overarching obligation for firms

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[1] References to 'customer experience' relate to all aspects of engagement between a customer and a firm throughout the entire product or service lifecycle, including design, marketing, sales, post-sales and engagement.
[2] FSPO Overview of Complaints 2024 & FSPO Overview of Complaints 2025
[3] This figure is derived from the FSPO overview of complaints categorised under customer service, maladministration, claim handling and arrears handling.
[4] Central Bank of Ireland Consumer Hub: Making a complaint
[5] A revised Code came into effect in March 2026 through the Central Bank Reform Act 2010 (Section 17A) (Standards for Business) Regulations 2025 and the Consumer Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer Protection) Regulations 2025.

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and is set out in the Code's Standards for Business and Supporting Standards for Business. These standards include the requirement for firms to resolve any complaints they receive from customers efficiently, fairly and in a timely manner[6]. Therefore, in considering risks related to customer service, the complaints handling process and related regulatory requirements are crucial in ensuring consumers' rights and interests are protected.

Complaints play an important role in securing consumers' interests and strengthening the financial system. Firms must treat customer complaints as systemic risk indicators at Board and senior management level, and learn from them to drive improvements. We are seeing levels of complaints increasing both at home and globally and it is important that the industry overall recognises the systemic importance of complaints in strengthening the financial system and making it better for customers[7].

The Central Bank has been clear in our expectations of firms with respect to complaints handling – we expect firms to (i) fulfil their complaint resolution obligations under the Code and other relevant regulations, and (ii) use the complaints handling process as a means to monitor, address and learn from consumer risks more generally.

Securing consumers' and investors' interests starts with having a robust foundation of consumer-centric customer service and a fit-for-purpose consumer protection risk management framework. This is, in effect, a minimum standard when providing services to consumers and investors.

As part of our 2025/2026 supervisory work-programme to assess this risk area, one of the reviews we undertook was a cross-sectoral thematic review examining customer experience through the lens of customer complaints. The scope of this review included a range of firms across domestic life and non-life insurance, retail intermediary and payment institution/e-money sectors[8].

The review examined a number of key areas including:

- Complaints Handling – the end-to-end complaint journey, firms' approach to

[6] Regulation 5(e) of the Standards for Business Regulations and Regulations 101 – 107 of the Consumer Protection Regulations outline the complaints resolution requirements.
[7] OECD Consumer Finance Risk monitor 2026 references "across all sectors, consumer complaints have generally risen: the total volume of consumer complaints received by supervisory authorities increased in 70% of responding jurisdictions between 2024 and 2025".
[8] To note, other sectors, such as MIFID investment firms, retail banks and credit firms, have been included in other customer experience/complaints/support-related supervisory reviews and will be included in further Central Bank work on customer experience as part of our work-programme.

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resolving complaints and a review of a sample of individual customer complaint files to assess how customers were treated; and
- Complaints Management Information (MI) - how firms use their MI to monitor and manage risks, learn from individual complaints and trends, and understand the underlying drivers that give rise to complaints.

This report sets out a summary of the findings of the review and the Central Bank's expectations of firms when dealing with customer complaints.

Overall, our assessment across all sectors in scope of the review is that, while all firms have frameworks in place for complaints handling, action needs to be taken to improve the customer experience in relation to how complaints are managed end-to-end, including post-resolution actions firms should take and how firms use, and learn from, complaints MI.

Action needs to be taken to improve the customer experience in relation to how complaints are managed end-to-end.

The review has highlighted that firms:

- Are not proactively identifying complaints on a consistent basis and firms are not always resolving the core issue(s) of the complaint/dissatisfaction for the customer;
- Engagement with customers can lack a customer-centric approach;
- Firms are not always effectively conducting root cause analyses; and
- Firms demonstrated varying levels of effectiveness in their quality assurance (QA) approaches to complaints handling. These findings support observations by the FSPO in relation to trends in complaints handling[9].

The four headline findings outlined in this report demonstrate the cyclical and connected nature of the complaint journey for a customer. Firm shortcomings in identifying and effectively resolving complaints can be compounded by ineffective engagement with customers, and if the drivers of the issue are not identified through effective QA and/or robust root cause analyses, the underlying issues are not identified and ultimately resolved for other customers, and the cycle is repeated. Enhancements can be made by firms to improve the support provided to customers during the complaint journey and to actions taken with respect to learnings from

[9] FSPO 2025 Overview of Complaints: The FSPO noted "how providers working to resolve complaints at an early stage creates positive outcomes for customers, and providers, alike".

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complaints-related MI and individual cases. This would deliver better outcomes for customers and firms alike.

Where specific issues or concerns were identified from the review, these are being followed up directly with individual firms.

The Central Bank expects that **all firms, in all sectors**, review and consider the findings of this review and examine their complaints handling processes and how they engage with customers to effectively resolve complaints.

Where gaps or weaknesses are identified, firms should develop and implement actions to mitigate any risk and to improve the customer experience, and escalate within the firm, depending on the significance of gaps or weaknesses identified.

Firms should also continually evaluate their complaints handling processes including root cause and read-across analyses, in addition to the QA of complaints, to ensure the processes are adequately robust and remain fit-for-purpose, and that learnings are applied throughout the process, appropriate to the nature, scale and complexity of their business and customer base.

The Central Bank expects that all firms, in all sectors, review and consider the findings of this review and take appropriate actions to address the Central Bank's expectations.

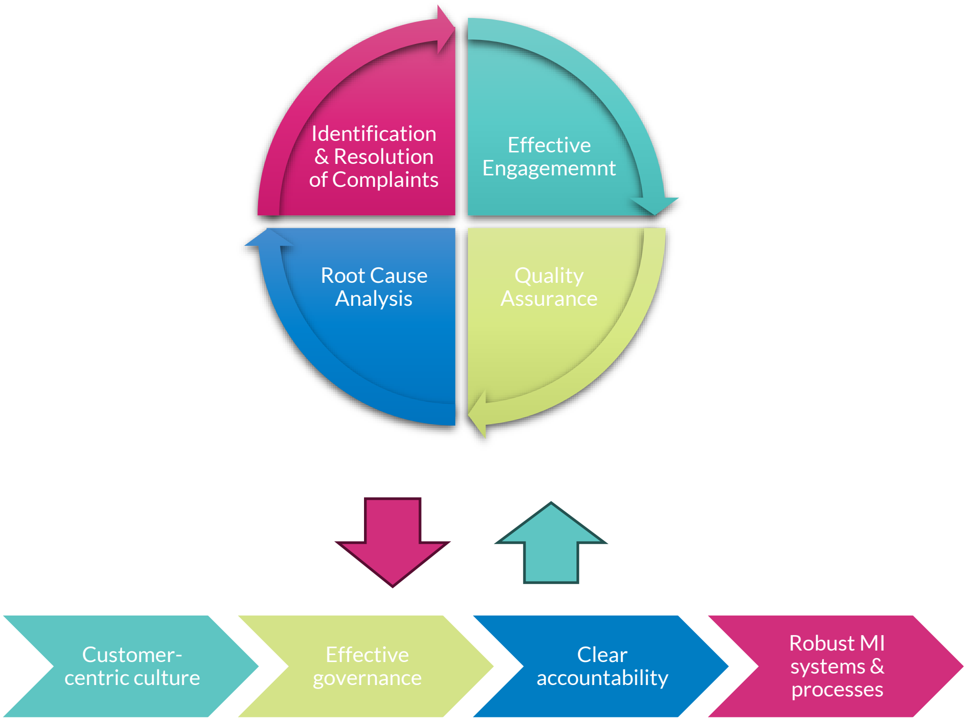

Figure 1 - Cyclical Nature of the Complaint Journey and Interconnected Factors

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A customer’s right to refer their complaint to the FSPO is an important part of Ireland's consumer protection framework. However, firms have an obligation to resolve customer complaints effectively in the first instance, thereby reducing the need for escalation to the FSPO where possible. Firms should consider the issue at the heart of the customer’s dissatisfaction and adopt the most effective approach to resolving the complaint.

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2. Summary of Findings and Central Bank Expectations of Firms

The objective of the review was to gain insights in to firms' approaches to promoting good customer service and, specifically, identify opportunities where firms can make improvements to how they are managing complaints. To this end, the review assessed firms' handling of complaints against regulatory requirements; whether complaints were appropriately investigated and resolved; firms' engagement with customers throughout the complaint journey; and firms' approaches to identifying root causes and applying lessons learned from complaints across their business to prevent recurrence. It included a review of the complaints logs firms are required to maintain and full case file reviews of a sample of individual cases, including calls, emails and all related documentation.

The four most prevalent findings across all firms and sectors in scope of the review are outlined below, including some examples of the issues identified, along with Central Bank expectations of firms underpinned by Code requirements and related guidance[10].

2.1 Failure to Identify and Resolve Complaints

Proactive complaint identification and effective complaints handling play an important role in consumer protection. The Code sets out a regulatory framework requiring firms to recognise and respond to expressions of customer dissatisfaction, whether oral or written, to help ensure customers receive timely resolution of their complaints[11].

It is important that firms recognise and identify complaints when they arise, so that customers' issues can be investigated and resolved in a timely manner. The review found that some firms failed to identify a complaint, as defined in the Code, at

If firms fail to recognise expressions of dissatisfaction as complaints, customers do not receive the full protections of the framework, and this can have serious potential impact on customers.

[10] General Guidance on the Consumer Protection Code (the Guidance).

[11] In addition to Code requirements, some firms need to comply with sector-specific legislation, e.g. additional relevant legislation for in scope Payment Institutions is the "European Union (Payment Services) Regulations 2018" (PSR).

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the earliest opportunity when customers were clearly expressing dissatisfaction, either in writing or orally.

The complaint file reviews provided evidence that firms did not consistently identify and/or record these interactions as complaints, and often not until much later in the engagement with the customer on the same issue. In some instances, it wasn't until the customer expressly stated they wanted to make a complaint, that the complaint was identified by the firm.

There was also evidence in some cases that customers were not advised of the option to have an oral complaint treated in line with the firm's complaints procedures (in line with the Code).

The review also identified cases where complaints were deemed to be 'closed' by the firm, despite not being effectively investigated and resolved and, in some instances, were reopened at the customer's request. In addition, the review identified cases where customers had expressed dissatisfaction in relation to additional issues that were not identified and/or investigated as part of the complaint, meaning complaints were not fully resolved.

Where firms fail to recognise all expressions of dissatisfaction as complaints, customers do not receive the full protection of the framework, and this can have serious potential impact and/or detriment to customers. The onus should not be on the customer to explicitly request that a complaint is lodged, or to have to continuously engage with a firm to ensure a complaint is dealt with.

Full compliance with obligations in relation to prescribed communications to customers was not demonstrated in all cases reviewed, for example, acknowledgements and updates were not issued at specified intervals in line with relevant legislation.

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Case Study 1 - Failure to identify and resolve complaints

A customer was unable to access their account because of a hold the Firm A had put on it while it carried out checks. Over a four-month period, the customer made repeated contact and resolution attempts (16 calls and 10 emails), expressing clear grievance and dissatisfaction as the matter remained unresolved.

Despite these communications, Firm A failed to identify and properly categorise the customer's complaint. The issue was only resolved after a third party assisted the customer in making a complaint. Because the customer was not communicated with effectively and was not able to access their account for a long period of time, it had significant operational and financial consequences for the customer, preventing them from conducting their business and accessing their funds.

Expectation

The Code sets out the regulatory framework for firms in dealing with customer complaints and provides protections to customers who express a grievance or dissatisfaction either orally or in writing[12].

As set out in the Code, a complaint is an expression of grievance or dissatisfaction by a consumer, either orally or in writing, in connection with:

1. The provision or the offer of the provision of a financial service to a consumer by a regulated entity; or
2. The failure or refusal of a regulated entity to provide a financial service to a consumer[13].

Firms must comply with all regulatory requirements relating to complaints handling and complaints management including that:

1. All expressions of dissatisfaction (written or oral) are identified, clearly categorised, and addressed as defined in the Code; and

[12] And PSR in respect of Payment Institutions/Electronic Money Institutions.
[13] "Financial services" include financial products.

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2. Firms must have systems and controls in place to effectively investigate and resolve complaints prior to closing them.

A firm must have regard to its obligation to implement the formal complaints procedure for consumers as outlined in the Code. This applies whether or not the consumer ultimately decides to purchase the product.

Proper complaints handling requires that regulated firms correctly categorise complaints, as distinct from queries, or negotiations on price. The Central Bank expects firms to decide on a case-by-case basis whether any expression of dissatisfaction regarding price is part of the negotiation of the price, or whether it constitutes a complaint. The Central Bank expects firms to adopt a substance-over-form approach to mitigate the risk of issues being excluded from the complaints process.

Where the firm provides a facility for a complaint to be submitted online by entering a complaint on a website (for example through a webform) or through an app, the firm is required to provide an immediate or automatic acknowledgement to the customer that confirms receipt of the complaint, and which includes the following details:

- Details of the firm's procedure for handling complaints; and
- The procedure and circumstances whereby the consumer can refer the matter to the relevant ombudsman and the contact details of that ombudsman.

Customers should not need to use formal language or the word "complaint" for firms to treat an expression of grievance or dissatisfaction as a complaint (examples of such expressions of grievance or dissatisfaction are set out in Appendix 1)[14]. When a firm receives an oral complaint, it must offer the consumer the opportunity to have that complaint handled in accordance with the firm's complaints process.

The responsibility lies with the firm, not the customer, to ensure that the expression of grievance or dissatisfaction is recognised and handled in accordance with the required complaints procedure. Individual complaints must be logged as such, to ensure that firms are dealing with all the issues a customer raises. Firms need to support their customers and resolve complaints in a timely manner.

[14] It is important to note that not every customer issue or query constitutes a complaint under the Code. Where a firm addresses a customer's concern promptly and effectively at the point of contact or by return, without the customer expressing grievance or dissatisfaction, this would not constitute a complaint under the Code.

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Firms should examine their complaints handling processes and procedures on foot of these findings and should ensure that all staff dealing with customers have adequate training to identify and act on a customer's expression of grievance or dissatisfaction. Firms should ensure that they are logging all such complaints correctly and are including them in their returns to the Central Bank.

2.2 Ineffective Engagement

How firms engage with customers is fundamental to effective complaints handling. If firms do not ensure that their staff have sufficient knowledge, capability and training to be able to resolve customer issues efficiently, and to communicate with customers in a clear, accurate and respectful manner throughout the complaint journey, the customer can experience negative outcomes.

Ineffective engagement and communication in handling complaints results in poor customer service outcomes.

During the review, supervisors identified ineffective engagement with customers as an issue across all sectors. A customer-focussed approach was not always evident, with ineffective engagement resulting in poor customer service in some cases. Supervisors reviewed customer files where the issues complained of were relatively straightforward and not overly complex, yet some firms took a disproportionate amount of time to resolve the issues, resulting in a drawn-out complaint process for the customer.

Instances were also identified where firms did not follow up on requests and/or engage with customers as promised, and customers needed to engage with the firm multiple times to have issues resolved. In some cases, customers received incomplete or inaccurate information and were not always communicated with in a professional manner.

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Case Study 2 – Ineffective Engagement

Over a four-week period, a customer made repeated contact attempts with Firm B, expressing dissatisfaction and seeking resolution.

Firm B failed to follow up on requests, failed to provide timely updates and gave inaccurate information throughout the complaint journey.

Due to Firm B's failure to engage effectively and provide timely communication, the customer stated they experienced a financial loss of €500 that could have been mitigated had Firm B communicated clearly and effectively, provided accurate information and timely updates.

Expectation

As set out in Regulation 4(1)(e) & Regulation 9 of the Standard for Business Regulations, firms must communicate clearly, effectively and in a timely manner. Effective engagement with customers is key to resolving complaints. Firms must ensure that consumers are engaged with in a manner that seeks to effectively inform. Information provided to customers should be clear, accurate, up to date and written in plain language, taking account of the circumstances of the case.

Customers should not have to repeatedly engage with a firm to ensure their dissatisfaction is recognised and treated as a complaint. Firms should seek to fully understand the issue that a customer engages on at the earliest point of engagement to ensure that it can be dealt with effectively and that the communication with the customer is clear and deals with the issue(s) raised.

Some customers contacting a firm and expressing a grievance or dissatisfaction could also be experiencing vulnerable circumstances. Code Guidance on Protecting Consumers in Vulnerable Circumstances sets out Central Bank expectations of firms in this regard.

Firms should examine their governance and control frameworks, processes and procedures to ensure that they are robust and effective so that all customer complaints are handled speedily, efficiently and fairly, in accordance with the Code, including complying with regulatory timelines for issuing prescribed communications and the inclusion of prescribed information in such communications. Firms should ensure that

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staff have the competence, capability and adequate training to engage effectively with customers at all points of engagement, including training on how to deal with customers experiencing vulnerable circumstances.

2.3 Ineffective Root Cause Analysis

Complaints data provides valuable insight into the customer experience. Where firms do not use complaints information proactively to identify root causes of problems, including systemic issues that may affect multiple customers, they miss opportunities to implement corrective actions that address underlying governance control and cultural factors, and to prevent recurrence.

From the review, it is evident that some firms may not be effectively identifying the root cause of complaints with the result that underlying issues are potentially not being identified and resolved for all customers, and some complaints being incorrectly classified as individual, isolated cases.

Repeated negative experiences without resolution can drive customer dissatisfaction, and systemic issues not being addressed could mean that many customers are potentially treated unfairly and/or experience poor outcomes.

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Case Study 3 - Root Cause Analysis

Firm C identified a material increase in complaints related to a specific topic. A root cause analysis conducted by the firm identified the driver of the increase in complaints as an operational backlog, caused by an increase in applications that needed to be manually reviewed, coupled with resourcing issues. However, the actual underlying root cause of the increase in applications requiring manual review should have been attributed to a recent process change.

Firm C focussed on resolving the symptoms of the issue i.e. the operational backlog, as opposed to addressing the underlying root cause i.e. that the process change was implemented without appropriate due consideration before implementation. Firm C did not demonstrate that it considered the impact of the process change on the customer journey prior to implementation, and it did not anticipate the issues experienced by customers and so did not take actions to mitigate against them. An effective root cause analysis could have identified the true underlying cause, and Firm C could have taken steps to proactively mitigate the impact on customers of future changes, and to prevent similar issues arising in future change implementation.

Expectation

The Central Bank expects firms to take a proactive approach to identifying the underlying root causes of complaints through an effective root cause analysis, particularly for those complaints that occur repeatedly, whether identified through complaints trend analysis (**at least** once every 6 months as specified in the Code) or through other processes[15]. Firms should not only resolve individual complaints but should seek to reflect on whether they have stopped the harm by taking ownership of the issue, fixing it, learning from it and ensuring it does not reoccur, thereby enhancing overall customer service standards.

In conducting this analysis, firms should ensure appropriate expertise is involved, including employees with knowledge of the issue in addition to participants who are

[15] Regulation 107(2)(b), Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer Protection) Regulations 2025.

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independent of the issue, such as second line risk specialists. Firms are reminded of the importance of having, and using, appropriate and timely MI (for example, to monitor complaints and conduct effective complaints trend analysis) and should implement structured reporting arrangements to, for example, relevant functions, the board of directors and/or senior management, as appropriate.

Firms should examine their governance, controls, processes and procedures to ensure it is clear when and how a root cause analysis should be undertaken, and where responsibility lies for such reviews. An effective root cause analysis helps firms move beyond addressing the immediate symptoms, to identifying and addressing the underlying causes enabling early corrective action, reducing the risk of problems escalating, and strengthening governance and risk management.

Firms should also assess whether their initial corrective actions constitute clear accountability for remediation and evidence of learning from the issue, or if further intervention is required. Consideration should also be given to the potential impact of identified issues on other areas of the business and customer experience and firms should conduct a read-across analysis, where applicable, and apply lessons learned more broadly across the business.

2.4 Quality Assurance Effectiveness

Robust quality assurance (QA) processes (i.e. processes that systematically review and assess the quality of firms' complaints handling and provide independent oversight) enable objective assessment of customer outcomes, and translate QA findings into targeted improvements in outcomes for consumers.

In firms where complaints QA was reviewed, supervisors found that whilst firms demonstrate QA activity in respect of complaints, variances in the effectiveness of firms' QA approaches were observed, with potential for improvements identified. Supervisors noted that some systemic issues may not be identified or mitigated by the approaches taken by some firms e.g. relying on front line QA and peer reviews, and a

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lack of structured and/or second line QA activity[16]. Ineffective QA can result in systemic issues remaining unidentified. This can lead to repeated negative customer experiences, without the necessary service improvements and potential consumer harm.

In some cases, the Central Bank's file review identified deficiencies not captured by the firms' QA activities, including timeline breaches, ineffective resolution of complaints and ineffective engagement with customers. This variance suggests that some firms' QA approaches may not be sufficiently effective in identifying and mitigating all issues in their complaints handling processes. It was also noted that firms have diverging approaches to complaint sampling and how they incorporate QA findings into staff training and systemic improvements.

Firms should conduct effective root cause analyses, including where QA findings point to potentially systemic issue(s). Firms must understand what caused the issue(s), in order to effectively use their findings to implement fixes, learn from failures and prevent recurrence.

Case Study 4 – Quality Assurance Effectiveness

A customer expressed dissatisfaction in relation to misinformation they were provided by Firm D, and raised a complaint. However, during the course of the customer's engagement with Firm D, they also expressed dissatisfaction with a price increase that resulted from inaccurate information held on Firm D's system, but there was no evidence this was captured in the firm's documenting of the customer's complaint.

Firm D's quality assurance (QA) processes failed to identify the customer's dissatisfaction with the price increase as part of the complaint and the incomplete data was not identified as the cause. This resulted in the complaint not being fully considered for the customer. Had Firm D implemented more effective QA, it could have identified the issue causing the additional dissatisfaction for the customer. This case study demonstrates the cyclical and connected nature of the findings as articulated in this feedback report.

[16] The front/first line of defence is the function that owns and manages the risk. The second line of defence is the function that oversees or specialises in, for example, risk management or compliance. A peer review is a process whereby, in this context, complaints handling staff at a similar level review each other's files.

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Expectation

The Central Bank expects that firms have effective complaints handling QA processes in place[17]. Such processes should enable firms to conduct thorough post-resolution assessments that enable objective oversight of the full complaints handling process and resulting customer experience and ensure that systems, controls, policies, processes and procedures are designed to deliver appropriate levels of service.

The Central Bank expects there to be sufficient independent oversight to ensure that any issues in complaint identification, resolution and customer engagement are identified and mitigated.

If not already in place, firms should establish mechanisms to integrate QA findings into training and continuous improvement initiatives at staff, team and broader level, as appropriate. This integration should support clear accountability for remediation of issues identified so that findings are used to mitigate the risk of similar issues arising in the future. This approach helps ensure that staff learn and receive appropriate feedback and development to support continuous improvement in complaints handling, leading to improved outcomes for customers.

[17] As set out in Regulation 107 of the Code, a regulated entity shall implement robust governance arrangements for the appropriate handling of complaints, and the arrangements shall include processes for the proper oversight of complaints handling.

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3. Securing Customers' Interests

Firms must be able to demonstrate that they have effective governance and risk management arrangements in place to respond to the range of risks facing firms and to ensure customers' interests are secured. This includes that complaints are identified, investigated and resolved effectively and appropriately, in a customer-centric manner.

Firms need to be proactive in adopting a customer-focussed approach in identifying and addressing dissatisfaction when it is raised and when engaging with their customers to truly secure customers interests.

There is clearly more that firms can do to be proactive in adopting a customer-focussed approach, especially in addressing dissatisfaction when it is raised and when engaging with their customers. Alongside the publication of the Code, the Central Bank published guidance, including General Guidance on the Consumer Protection Code, Guidance on Securing Customers' Interests and Guidance on Protecting Consumers in Vulnerable Circumstances, to provide clarity and support to firms in meeting regulatory obligations.

Securing consumers' interests starts with having a robust foundation of consumer-centric customer service and fit-for-purpose consumer protection risk management frameworks. Effective complaints handling is supported by a combination of factors working together. Firms' training should support and equip staff with the knowledge and skills to handle complaints effectively and empathetically. Timely and accurate MI enables firms to monitor complaints trends, identify emerging issues, and make informed decisions about process improvements. When these factors are integrated effectively, and reflected in the culture, firms are better positioned to resolve customer issues fairly, identify systemic problems early, and continuously improve their complaints handling practices, for more positive customer outcomes.

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Appendix 1

Examples (not an exhaustive list*) of ***expressions of grievance or dissatisfaction*** could include:

- "I'm disappointed with the service"
- "I'm not happy about that/unhappy with how X was handled"
- "I've had to ring/contact you multiple times about this"
- "This is taking too long/the delay is unacceptable”
- "That doesn't seem right/fair"
- “Nobody got back to me”
- “This is not good enough”
- “I don’t think the adviser explained that properly”
- “I’m dissatisfied with the delay in X”
- “I want this investigated”
- “This is unacceptable”
- “I think I have been treated unfairly”
- “I disagree with your decision and want it reviewed”
- “I’ve had to repeatedly raise this”
- “I was not informed of that”

** This is not an exhaustive list and firms need to consider what is appropriate to the nature, scale and complexity of their firm and the products and services the firm offers, and on a case-by-case basis.*

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