



An tOmbudsman Seirbhísí
Airgeadais agus Pinsean

Financial Services and
Pensions Ombudsman

FSPPO Customer Engagement Policy



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1. Purpose of this Policy

The Financial Services and Pensions Ombudsman (FSPO) is an independent, fair, and impartial service that helps resolve complaints with pension providers and regulated financial services providers.

This policy sets out how the FSPO will engage with our customers and other stakeholders. It should be read in conjunction with the [FSPO Customer Charter](#), which outlines the standard of service and behaviour that should underpin our interactions with all customers and expresses our aim to foster an environment of mutual respect between team members in the FSPO and those we serve.

Information on the FSPO's role and governing legislation can be found at: www.fspo.ie.

2. Our accessibility commitments

2.1. Physical access – visiting our Offices

We provide clean and accessible public offices to you for visits that ensure privacy, and comply with occupational and safety standards, including facilitating access for those with specific needs. Our team includes a Safety Officer, Fire Wardens and an Access Officer.

To help us ensure the privacy of discussions and to ensure the most appropriate person is there to discuss your complaint, we encourage visitors to our office to make an appointment before visiting.

2.2. Assistance with our processes

We are committed to delivering a service that accommodates the specific needs of all our customers, to make our services available to all. Where a complainant or provider customer contacts the FSPO and indicates that they have a visual impairment, physical impairment, poor literacy or any other circumstances that may impact their participation in our complaints service, we will work with them to facilitate complaint submission and management through reasonable accommodations where possible.

We have internal procedures relating to access to our services which we keep under frequent review. The Access Officer who provides guidance and organises any assistance that may be needed to meet your needs, including assistance to those who require any reasonable accommodations. [Contact details for the Access Officer](#) can be found in Section 7.

2.3. Foreign language complaints

We are a member of [FIN-NET](#), a national network of national organisations responsible for settling consumers' financial services complaints. Where any terms of user agreement that is subject of the complaint is not governed by Irish law, we will guide or refer the customer to any relevant Alternative Dispute Resolution (ADR) Scheme as appropriate.

We provide quality services through Irish, English, or using a mix of both official languages. We also facilitate complaints via Irish Sign Language. Where a complainant makes a complaint in another language, and the complaint is within our remit, we will make our service accessible through translation or interpretation as appropriate.

3. Safeguarding customers in vulnerable circumstances

We understand that people can find themselves in vulnerable circumstances at any point in their lives and this may be for a temporary period or may be ongoing in the longer term. Our customers may be in vulnerable circumstances arising because of individual or contextual circumstances.

Recognising vulnerable circumstances may be nuanced and will be specific to the particular circumstances that present in each case, but by way of non-exhaustive example, we would encourage our team members to pay particular attention to the following potentially vulnerable customer circumstances, whether self-disclosed by our customer, or proactively identified by our team members:

- Learning difficulties
- Mental health problems
- Physical disabilities
- Literacy or numeracy challenges

- Digital exclusion (lack of technology or 'know-how' to access online services, complete an FSPO Complaint Form or engage with us by email, for example)
- Chronic or terminal illnesses
- Experiencing serious financial hardship
- Experiencing separation, relationship or family breakdown
- Addiction issues (or being closely related to someone in such circumstances)
- Being a customer with a conviction and/or who is currently incarcerated (or being closely related to someone in such circumstances)
- People in or fleeing domestic abuse
- Being a customer unable to provide autonomous consent/being underage
- Homelessness or threat of homelessness, and
- Having an unsettled way of life.

We aim to provide a service that is accessible to all who need to access it, individualised to best meet their needs wherever possible.

We train our staff to recognise indicators of customers in vulnerable circumstances and to understand the impact this can have on customers' ability to access our services. This helps our team members to provide information and support to customers to facilitate access to our services in a way that best suits customers, whilst still meeting the FSPO compliance requirements and other procedures.

Where somebody may express to us any indication of harming themselves or another person, we will take any threats of this nature very seriously. As we have a duty of care to our customers and to our team members, we will contact An Garda Síochána in these circumstances.

4. Our commitments to Equality and Human Rights

4.1. Defending diversity

We are committed to fulfilling our public service duty to eliminate discrimination, promote equality of opportunity and treatment and to protect the human rights of those we provide services to and our staff. We have made several commitments to deliver on our public service duty and to establishing a specific strategy relating to our actions to support Equality and Human Rights in our organisational goals and operations.

We are dedicated to ensuring that no-one is discriminated against in their interactions with us, whether they are external or internal FPSO customers.

5. Engaging with mutual respect

We understand that in times of trouble or stress, people may act out of character. There may have been upsetting or distressing circumstances leading up to your communication with the FSPO. We do not view behaviours as unacceptable or unreasonable just because someone is forceful or determined. We believe that people have the right to be heard, understood and respected. However, we also consider that our team members have the same rights. We have developed this policy to set out how we will engage with our customers and the standards of behaviour that we expect in return from those engaging with our service.

5.1. Mutual respect and unreasonable behaviour

In communicating with you, we require our team members to listen, respond to your concerns and treat you fairly and with respect. We also require them to be professional and courteous. However, this does not mean that we expect our team members to tolerate behaviour by any customer that is abusive, offensive, threatening or, due to the frequency of contact, takes up a disproportionate amount of time and resources.

The types of behaviour which we see as unreasonable conduct includes:

- **Unreasonable behaviour** - This is behaviour or language that may cause our staff to feel afraid, threatened or abused. This includes any threats of violence, abuse of FSPO team members, rude, offensive or aggressive conduct. It also includes unfair denigration of the work of this Office, becoming physically violent toward staff, or refusing to leave the FSPO Office when asked.
- **Unreasonable persistence** – Persisting with an issue that has already been considered and closed by this Office. This may materialise in different ways; for example, refusing to accept an FSPO decision, repeatedly insisting that an FSPO team member looks again at an issue, or making contact numerous times over a short period of time through one or more channels.
- **Unreasonable demands** – This can include a demand for an action regarding a matter outside of our remit, seeking a solution that is not realistic or is disproportionate, demanding your complaint be dealt with within a specific timeframe or ahead of others, demanding a response within a short or specific

timeframe, or demanding specific team members must or must not deal with your complaint.

- **Unreasonable lack of cooperation** – This may be demonstrated by withholding information that is needed to advance a complaint, insisting your version of events is accepted as fact where there is no objective evidence to support it, or refusing to consider other versions of events. It also includes non-cooperation by customers with the Office, which may hinder, obstruct or delay the complaint review process.
- **Unwillingness to comply with FSPO procedures** – This could consist of customers not clearly identifying the issue being raised, expecting an immediate response or a decision to be made, refusing to send information or documentation requested by the FSPO, not acting in good faith or being dishonest in relation to facts. It also includes unwillingness to accept that any investigation by the FSPO will be fair, impartial and unbiased.

Where it is a customer's genuinely-held belief that any decision or determination by the Ombudsman will not be a fair, impartial or unbiased one, and as any such decision is legally binding on the customer and would close off any other channel of legal redress to the customer, it may be more appropriate in such circumstances for the Ombudsman to decline to investigate the complaint, where there is available to the customer, an alternative and satisfactory means of redress in relation to the conduct complained of, such as through the Courts.

5.2. How we will manage unreasonable behaviour

When we consider that a customer's behaviour is unreasonable, we will tell them why we find their behaviour unreasonable, and we will ask them to change it. Where it might be of assistance, we will consider possible adjustments to our service which may help the customer to avoid unreasonable behaviour in the future.

FSPO team members who directly experience unreasonable behaviour may deal with the behaviour at the time of the incident in a manner they consider appropriate and in line with this policy and this may include politely terminating a conversation. When they experience unreasonable behaviour, they will report the matter to their line-manager without delay for consideration in line with this policy.

If the unreasonable behaviour continues, we will take action to restrict the customer's contact with the FSPO. The decision to restrict access to our Office will only normally be taken after we have reviewed the service given by our Office to the particular customer. The decision will be taken at Director level. Any restrictions put in place will be appropriate and proportionate.

The options we are most likely to consider are:

- restricting contact to a particular form, such as in writing only.
- requiring contact to take place with a named team member.
- restricting telephone calls to specified days and times.
- asking the customer to enter into an agreement about their future conduct; and
- where the options above prove unsuccessful, or where the unreasonable behaviour shows no signs of abating, we may terminate all contact with the customer.

In general, we will write to tell the customer why we believe their behaviour is unreasonable and what action we propose to take. However, where the behaviour threatens the immediate safety and welfare of the FSPO's team members or others, we will consider any and all other options, for example, reporting the matter to An Garda Síochána or instigating legal action.

6. Making submissions to us

6.1. Graphic/distressing content submissions

In communicating with us, we expect that the content of your submissions is respectful and does not contain any unacceptable images, profanities or graphic and distressing content. In circumstances where emails and/or letters do contain any of the above, they may not be acknowledged, and your correspondence may be delayed due to the nature of the content being sent. If emails of this nature persist, we may block the sender's email address.

6.2. Volume and relevance of submissions

When sending documentation and/or information to us, only submit information that is relevant and material to the specific complaint that has been submitted to the FSPO. Presenting documentation in large volumes or in a disorganised way may lead to delays in correspondence as it can take up a disproportionate amount of time to review.

6.3. Confidentiality

In accordance with Section 56 (4) of our governing legislation, the Financial Services and Pensions Ombudsman Act 2017¹, which reads as follows:

“(4) The Ombudsman shall, without prejudice to the form of investigation, ensure investigations are conducted otherwise than in public.”

we are obliged to protect the confidentiality of the FSPO process.

The details of any Legally Binding Decision arising as a result of an FSPO investigation may be made public by us in due course but will be published in a manner that will ensure the anonymity of all parties to the complaint.

Out of fairness to all parties to a complaint, we require that customers do not copy complaint-related correspondence to other third parties, who are not party to the complaint.

Where customers breach the confidentiality of the process, the requirement for us to redact third party personal data may lead to an increased timeframe for the complaint progression through our process.

6.4. How we will manage unnecessary submissions to us

We will only process data that is relevant and necessary for the consideration or investigation of a complaint. In circumstances where we deem any part of the submission to be unnecessary, content may be redacted at our discretion. Customers will, of course, be informed of any such redactions from our file.

¹ A full copy of the [Financial Services and Pensions Ombudsman Act 2017](#) is available via our website.

7. Contacting Us

Service / Officer	Contact Details	Service Overview
Access Officer	<p>Phone: (01) 567 7000</p> <p>Phone lines are open Monday to Friday (except bank and public holidays) from 9am–1pm and 2pm–5pm.</p> <p>Email: access@fspo.ie</p> <p>Webpage: Accessibility Statement</p>	<p>The Access Officer’s role is to provide or arrange for, and coordinate assistance and guidance to persons with disabilities accessing the services we provide.</p>
Data Protection Officer	<p>Phone: (01) 567 7000</p> <p>Phone lines are open Monday to Friday (except bank and public holidays) from 9am–1pm and 2pm–5pm.</p> <p>Email: dataprotection@fspo.ie</p> <p>Webpage: Privacy Statement</p>	<p>Provides a facility for an individual to exercise their rights under the General Data Protection Regulation in respect of personal data records held by the FSPO.</p>
Freedom of Information Officer	<p>Phone: (01) 567 7000</p> <p>Phone lines are open Monday to Friday (except bank and public holidays) from 9am-1pm and 2pm-5pm.</p> <p>Email: foi@fspo.ie</p> <p>Webpage: Freedom of Information</p>	<p>Information is widely available through our webpage, publications and in response to oral and written enquiries.</p> <p>If information required is not readily available, the request can be made to the Freedom of Information Officer.</p>
Environmental Officer	<p>Phone: (01) 567 7000</p> <p>Phone lines are open Monday to Friday (except bank and public holidays) from 9am–1pm and 2pm-5pm.</p> <p>Email: facilities@fspo.ie</p>	<p>Requesting access to information on the environment that the FSPO holds.</p>

	Webpage: Access to Information on the Environment	
Director of Corporate and Communication Services	Email: oireachtas@fspo.ie	Members of the Oireachtas seeking information relating to the Office of the FSP0
Irish Language Officer	<p>Phone: (01) 567 7000</p> <p>Phone Lines are open Monday to Friday (except bank and public holidays) from 9am–1pm and 2pm–5pm.</p> <p>Email: ato@fspo.ie</p>	The Irish Language Officer's role is to provide or arrange for, and coordinate assistance and guidance to persons wishing to access our services as Gaeilge.
Human Rights and Equality Officer	<p>Phone: (01) 567 7000</p> <p>Phone lines are open Monday to Friday (except bank and public holidays) from 9am–1pm and 2pm–5pm.</p> <p>Email: CustomerOperations@fspo.ie</p>	The Human Rights and Equality Officer's role is to ensure equal access to our services for all of our customers, promoting fairness and welcoming diversity by working to identify and eliminate barriers to accessing our services.



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