

From: Ariarna.Hakaraia@fma.govt.nz
To: [REDACTED]
Subject: RE: Request
Date: Tuesday, 31 October 2023 11:44:32 am
Attachments: [Complaints about the FMA Policy CURRENT Sept 23.pdf](#)

Dear [REDACTED]

We have decided to treat your email below as a request for information made under the Official Information Act 1982. The information you have requested is **attached**.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to contact me.

Kind regards
Ariarna

From: [REDACTED]
Sent: Sunday, October 29, 2023 3:48 PM
To: questions@fma.govt.nz; questions@fma.govt.nz; questions@fma.govt.nz;
questions@fma.govt.nz
Subject: Request

Hi,

re the email sent 27 Oct 2023 re my Fromal Complaint,

may I please have a copy of the FMA Internal Complaints Policy referred to,
to assist me in responding to that email ...

thank you in anticipation

kind regards

[REDACTED]

Policy on Complaints about the FMA

Policy statement

1. The FMA’s external stakeholders have a right to express dissatisfaction with our work, and to be listened to when they do. We recognise that handling complaints about the FMA effectively enables us to improve our performance and build stronger relationships with our stakeholders. We make it easy for our stakeholders to lodge complaints and navigate the process, and we engage with complainants in a receptive and respectful way. Instead of aiming to minimise the number of complaints about the FMA we receive, we measure our success by the outcomes of our processes.

Purpose and scope

2. This policy outlines the approach the FMA must take to deal with complaints from people outside of our organisation about the way we have gone about our work. The Policy is supplemented by our **Complaints about the FMA - Staff Process Guide** which documents the process staff must take in dealing with complaints about the FMA.
3. This policy does not apply to complaints about the FMA made by FMA staff, nor complaints made about the FMA to the Minister, to the Ombudsman, or to any other person or organisation and our engagement with those organisations in relation to any review they undertake.
4. The purpose of this policy is to provide a framework of best practice in handling complaints to ensure we deal with them in a manner consistent with the complaint handling standards set by the Ombudsman¹ and the Australian/New Zealand Guidelines for complaint management.²
5. This policy must be followed by all our employees, consultants and contractors (**staff**). If FMA Board members receive a complaint about the FMA they can refer it to the Chief Executive who will deal with it in accordance with this Policy.

¹ Office of the Ombudsman, Guide, [Effective complaint handling](#) 2 October 2012 (**Ombudsman’s Guide**).

² Standard Australia/ Standards New Zealand, Australia New Zealand Standard Guidelines for complaint management in organizations (AS/NZS 10002:2014) (**Australia NZ Standard**).

Owner:	Internal Governance and Oversight		
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Approved by & date:	Chief Executive September 2023		

Principles for handling complaints

6. In handling complaints about the FMA, there are five principles we apply:³

1) *Accessibility*

- We will make it easy for external stakeholders to complain.
- We will acknowledge a complaint about the FMA and address it as promptly as possible.

2) *Fairness*

- We will deal with complaints fairly and properly.

3) *Responsiveness*

- We will communicate expected timeframes for dealing with complaints.
- We will resolve any problems that have been identified and will consider what changes, if any, we need to make to the way we go about our work.

4) *Efficiency*

- We will consider complaints as efficiently as possible, assigning appropriate staff within the organisation to resolve the complaint.
- Sometimes we may not be able to deal with complaints with urgency, because of competing priorities.
- Unreasonable complainant conduct cannot be allowed to become an undue burden.

5) *Confidentiality*

- Personal information relating to complaints, like all information held by the FMA, will be treated as confidential information. As with all personal information the requirements of the Privacy Act 2020 applies.

What is a complaint about the FMA?

7. A complaint about the FMA is an expression of dissatisfaction with the way in which we have gone about our work where a response is expected or required.⁴ This includes, but is not limited to, complaints regarding:

7.1 the way the FMA has treated its external stakeholders (including unreasonable or unprofessional behaviour, alleged bias or other misconduct);

7.2 any action taken or inaction by the FMA;

³ These have been developed based on the principles set out in the Ombudsman's Guide at p 5 and the guiding principles in the Australia NZ Standard at p 6-9.

⁴ This definition comes from the Australia NZ Standard at [4.2].

7.3 the FMA's conduct and/or process it followed when deciding on what actions, if any, it took on a matter; and

7.4 any other matter about the way in which the FMA has carried out its duties, functions or powers (including failure to show due care when dealing with a stakeholder or their information, or undue delay in handling a matter).

8. A complaint about the FMA may be made in person, over the phone, by letter or email. A complaint could also be made on one of the FMA's social media platforms.
9. A complaint about the FMA may be raised at any time, including during the course of a current matter being considered by the FMA, or at the conclusion of that matter.
10. Note that complaints are expressions of dissatisfaction *where a response is expected or required*. This is different from venting and negative talk. Venting and negative talk can be prevalent on platforms such as social media, and the FMA will not engage with this sort of communication.

Complaint management system

11. The FMA's complaint management system incorporates two levels of complaint management.⁵
 - **Level 1 Complaint: Frontline resolution** – where the complaint can be assessed, processed and responded to by the frontline team. The majority of complaints should be managed and resolved this way.
 - **Level 2 Complaint: Internal review** – where the complaint warrants an internal review by FMA staff to investigate the substance of the complaint and provide a response to the complainant.
12. Many complaints arise from communication problems that can be resolved by providing the complainant with clear information about the FMA's role, actions and decision, including reasons for its actions and decisions.
13. Examples of complaints about the FMA that would usually be most appropriate to address as a Level 1 Complaint may arise in relation to:
 - a matter outside the FMA's mandate, where the complainant did not accept that the FMA was not taking action;
 - a matter within the FMA's mandate, where the FMA exercised its discretion not to take action, the complainant did not accept this was an appropriate decision; or
 - the timeliness in the handling of a matter.
14. Features of some complaints may indicate it is appropriate to address as a Level 2 Complaint, for example where:
 - the substance of a complaint indicates there could be a systemic issue within the FMA; or
 - a complaint raises issues that require investigation to determine the appropriateness of FMA processes or action/inaction.

⁵ Australia NZ Standard, para [7.2] and Appendix H. The Standard provides that an effective complaint management system should have three levels of review.

Complaints concerning current matters

15. A party may raise a complaint during an inquiry, investigation, monitoring or supervisory work, or during any other current matter where they are dissatisfied with the way the FMA is approaching the matter.
16. In such cases, it may be appropriate for the FMA to treat the complaint as a submission or comment on the current matter. This means the FMA can respond to the complaint as part of completing that ongoing matter, instead of categorising the complaint as a Level 1 or Level 2 Complaint and actioning it separately under this Policy.
17. For example: A monitoring review of a financial advice firm is undertaken by the FMA and the firm disputes the findings. The FMA provides its findings and feedback to the financial advice firm and sets out a process for disputing any of the findings.
18. In practice, dealing with a complaint as part of completing a current matter will often involve the same process as dealing with the complaint as a Level 1 Complaint.

Conclusion of the complaint process

19. The complaint process will conclude when the FMA informs the complainant on the outcome of their complaint.
20. At this time, FMA staff should advise the complainant of their right to complain to the Ombudsman if they are dissatisfied with the outcome of their complaint. The Ombudsman can assess whether we have acted reasonably or followed a fair and proper process.
21. Staff should be conscious that complainants may continue to engage with the FMA even after the matter is concluded. This may occur because, for example, the complainant does not:
 - understand our response and/or they ask for further clarification or reasoning on our decision; or
 - accept the FMA's decision on the complaint.
22. FMA staff should take reasonable efforts to engage with complainants to address their residual concerns. However, if necessary and appropriate, staff may issue a final response to the complainant with an emphasis that the complainant's further avenue to escalate the matter is with the Ombudsman (or any other relevant regulator or authority).

Roles and responsibilities

All staff

23. All staff must follow this policy and are responsible for ensuring that complaints about FMA are always identified and recorded in accordance with the requirements in this Policy and the accompanying Staff Process Guide. Staff should raise any questions with their manager in the first instance.

Chief Executive

24. The Chief Executive's responsibilities include:

- appointing a staff member to the position of Complaints Officer to coordinate the approach to, and oversight of, complaints about the FMA;⁶
- having an understanding of the nature of all Level 1 and Level 2 Complaints via the quarterly briefings from the Complaints Officer;
- following being briefed on a serious complaint, this being a complaint that could impact the liability or reputation of the FMA, reporting the matter to the Chair of the Board and the Chair of Audit and Risk Committee, and additionally the Board if agreed appropriate.

Complaints Officer

25. The Complaints Officer's responsibilities include:

- ensuring referral to the Chief People Officer if a complaint involves alleged misconduct of a staff member(s);
- in respect of a Level 2 Complaint, reviewing the proposed outcome and recommendation of the internal review and providing guidance on the review process and proposed approach to the handling of complaints;
- facilitating a review of the complaints received about the FMA on a quarterly basis to identify any risks and issues the FMA may wish to address;
- reporting to the Chief Executive and the Audit and Risk Committee, and other relevant staff as appropriate, on a quarterly basis on the risks and issues identified as well as sharing key learnings and recommendations for improvements.

Responsible Manager

26. The Responsible Manager's responsibilities include:

- assigning Level 2 Complaints to appropriate staff for review;
- briefing relevant staff on a Level 2 Complaint;
- approving the internal review outcome and recommendation, after consultation with the Complaints Officer and any relevant staff; and
- sharing key learnings from complaints within their teams and where appropriate implementing any necessary changes.

⁶ Australia NZ Standard, requires that the Chief Executive appoint a complaints management manager, at [6.4].

Complaint Handler

27. The Complaint Handler's responsibilities include:

- For Level 1 Complaints, processing and responding to the complainant;
- For Level 2 complaints, reviewing the complaint and providing the Responsible Manager and Complaints Officer with the internal review outcome and recommendation, and ensuring appropriate contact is made with the complainant throughout the complaint process; and

Reasonable assistance

28. The FMA wants to make it easy for complainants to complain.

29. Staff should be alert to people who might require assistance, and provide support to people who are having difficulty formulating their complaint, or who need assistance to communicate with the FMA in a particular way due to a disability or language barrier.⁷

Objective to resolve complaints and identify opportunities for improvement to the FMA's approach

30. Staff should engage with complainants in an open-minded and respectful way.

31. Staff should always consider what options are available for most effectively communicating with complainants in a manner that is most likely to assist them to understand the issues.

32. The FMA is subject to confidentiality requirements which may impact the information it can share with complainants. However within these constraints, staff should provide complainants with clear information about its role, actions and decision, including reasons for its decision, in relation to the complaint.

33. The FMA should admit when it has made a mistake and focus on putting it right.⁸

34. The FMA must take responsibility for its actions in resolving a complaint where the complaint arises because⁹

- there was an unreasonable delay;
- inadequate advice, explanation or reasons were provided;
- FMA policies or procedures were not correctly followed;
- there was an inadequate or unfair process followed;
- there was a factual or legal error;
- there was unprofessional behaviour or misconduct by FMA staff;
- the act or decision complained about was unfair or unreasonable; or
- the act or decision was just plain wrong.

⁷ Ombudsman's Guide at p7, Australia NZ Standard, at para [8.2].

⁸ Any mistakes made by the FMA should be admitted and put right: Ombudsman's Guide at p15.

⁹ Ombudsman's Guide at p14-15.

35. Complaints can be resolved in many different ways including by:¹⁰

- acknowledging what has happened;
- providing an explanation, assistance or reasons;
- taking responsibility and providing an apology;¹¹
- taking action if there has been a delay;
- reconsidering or changing a decision where this is appropriate;
- amending records; and /or
- changing policies, procedures or practices.

36. Staff should use complaints as an opportunity to consider whether there are changes we may need to make about the way we go about our work.

Using a fair process to conduct an internal review

37. The internal review of a Level 2 Complaint that is undertaken must be fair.

38. To ensure a fair process, the Responsible Manager and Complaint Handler must act in accordance with the Ombudsman's guidance which requires them to:¹²

- deal with complaints on their merits;
- act independently and have an open mind;
- take measures to address any actual or perceived conflict of interest (see the FMA's Conflicts of Interest Policy);
- consider all information and evidence carefully;
- keep the complaint confidential as far as possible. The complaint must be considered in private and information only disclosed if necessary to properly review the matter of concern (see the FMA's Privacy Policy for External Persons and the FMA's Security of Information Policy); and
- act without undue delay.

39. The Ombudsman's guidance also requires that, in the appropriate circumstances, the complainant is given a fair chance to:¹³

- present their position;
- be advised of any adverse findings against them; and
- comment on any adverse findings against them before a final decision is made.

Complaints concerning alleged staff misconduct

40. If a complaint involves alleged misconduct by a member of our staff and potentially requires reference to our Code of Conduct and Disciplinary Policy, it must be forwarded to the Chief People Officer for consideration.

41. Not all allegations naming or referencing staff members need to be forwarded to the Chief People Officer. If a complaint alleges misconduct by a staff member, simply because actions condoned by

¹⁰ Ombudsman's Guide at p15.

¹¹ Refer to Appendix 1 for guidance from the Ombudsman on the elements of an effective apology.

¹² Ombudsman Guide, p13.

¹³ Ombudsman Guide, p13.

the FMA have been carried out by that staff member, then the matter is not required to be considered by the Chief People Officer. For example, allegations about lack of timeliness of response, or insufficiency of explanation, would not usually amount to a complaint in substance about an individual staff member. It is the FMA systems and processes, including sufficiency of training and checks that have supported the approach taken. A contrasting example, appropriate for direction to the Chief People Officer, would be an allegation that a particular staff member has been abusive or made inappropriate unprofessional personal comments. Even if there is no merit to the allegation, this is the nature of an allegation appropriate for direction by the Chief People Officer.

42. The Chief People Officer should liaise with the Complaints Officer and a decision must be made on how the complaint should be handled. The Complaint may be solely managed by the People and Capability Team under the Code of Conduct Policy and the Disciplinary Policy. Alternatively the complaint may be managed by both the People and Capability Team (under the relevant policies) and under this Policy.

Managing unreasonable complainant conduct

43. Unreasonable complainant conduct is behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the FMA and its staff. It includes conduct where complainants are aggressive or verbally abusive towards FMA staff, threaten harm or violence, repeatedly contact the FMA with unnecessary and excessive phone calls and emails, make inappropriate demands on time and resources, or refuse to accept the FMA's decisions and recommendations in relation to their complaints.¹⁴ When a complainant behaves in this way, the FMA may consider their conduct to be unreasonable.
44. Unreasonable complainant conduct does not preclude valid issues from being addressed by the FMA.¹⁵ However, the FMA has limited resources and it can sometimes be wasteful if these are deployed managing complainants who are behaving unreasonably.
45. Establishing whether a complainant's conduct is unreasonable will be determined by an Executive Director in consultation with the Complaints Officer.
46. If the FMA takes the view that a complainant's conduct is unreasonable, we can take steps to manage our communications with the complainant (for example put in place a communications plan) or decide to not engage with the complainant further. Should this occur we will advise the complainant of our view, the steps we are taking and their right to complain to the Ombudsman.

Privacy considerations and confidentiality

47. Complaint information can, like other official information, be requested under the Official Information Act 1982 and the Privacy Act 2020.
48. However, subject to the requirements of these Acts, each complaint is considered confidential within the FMA and is only to be accessed for business purposes.

¹⁴ Australia NZ Standard, p28.

¹⁵ For more information and guidance on how to manage unreasonable complainant conduct, refer to: Office of the Ombudsman, Manual: Managing unreasonable complainant conduct: a manual for frontline staff, supervisors and senior managers, October 2012. See also, Australia NZ Standard, p29.

49. If a complaint is particularly sensitive or is made against a staff member, discuss with the Complaints Officer whether the 'CLaRE access alert function' should be activated so access to the complaint in CLaRE is audited for all staff except the case owner, or whether the complaint should be logged in CLaRE as a Complaint about the FMA received [date], but all other information saved in a restricted access folder in Tiaki.

Reporting requirements, oversight and learnings

50. The Chief Executive will immediately report serious complaints, these being complaints where our internal review has identified serious implications which could impact the liability or reputation of the FMA, to the Chair of the Board and the Chair of Audit and Risk Committee, and additionally the Board if agreed appropriate.
51. On a quarterly basis the Complaints Officer is responsible for facilitating a review of all Level 1 and Level 2 Complaints to identify any risks and issues the FMA may wish to address. The Complaints Officer must report to the Audit and Risk Committee, the Chief Executive, and other relevant staff as appropriate, on the nature of the Level 1 and Level 2 Complaints received, the risks and issues identified, as well as key learnings and recommendations for improvements or resolving systemic problems.

Released under the Official Information Act 1982

Complaints about the FMA - Staff Process Guide

1. This Staff Process Guide supplements the ***Policy on Complaints about the FMA***. When dealing with a complaint about the FMA please also refer to that policy..
2. Additional to the processes explained in this Guide, all usual FMA knowledge management process should be followed in relation to the saving of information in the FMA's knowledge management systems.
3. Note at any time during the process staff can seek advice from the Complaints Officer or the Internal Governance and Oversight Team as to the consistency of their approach to this Policy for handling complaints about the FMA.

Step one – confirm matter is complaint about the FMA

4. On receipt of correspondence or communication, the staff member should assess whether the party has raised a complaint about the FMA: “an expression of dissatisfaction with the way in which we have gone about our work where a response is expected or required”. If so, the Policy will apply.
5. Staff do not need to engage with general negative comments where a response is not expected or required. However, staff can exercise their discretion and respond in accordance with the policy should they consider it is appropriate to do so in the circumstances.
6. Where it is not clear if someone is making a complaint about the FMA, the staff member who received or noted the concerns should seek clarification, and if helpful direct them to the FMA's Complaints web page.¹⁶ An example includes a market participant advising the FMA that they disagree with our decision on a licensing application because we made unreasonable demands for information.

Step two – triage the complaint

7. The staff member should consider whether the complaint can be resolved or addressed in the context of a current or ongoing matter. If so, the staff member may wish to treat the complaint as a submission in relation to the current matter, and address the complaint through that process.
8. If the complaint cannot or should not be dealt with as part of a current matter, the staff member shall determine whether it should be treated as a Level 1 Complaint or Level 2 Complaint.
9. In assessing what level the complaint is, the staff member should consider:
 - a. What the complaint is about;
 - b. How serious or urgent the complaint is;
 - c. Whether the complaint may indicate a systemic problem;
 - d. What risks the complaint raises for the FMA;
 - e. What kind of resolution the complainant is seeking;
 - f. Whether the complaint can be resolved quickly and informally (eg by an explanation) or whether a formal review is needed.

¹⁶ Web page to be updated following approval of this Policy.

10. The staff member should also consider the nature of the previous contact the complainant has had with the FMA and the complainant's dissatisfaction with how their matter has been dealt with. However, determining the level of the complaint should primarily be based on the substance or merit of the complaint rather than complainant conduct.
11. The staff member shall determine the level of the complaint in consultation with their manager. If further guidance is needed on how to treat the complaint, the staff member can seek assistance from the Complaints Officer.
12. The staff member should then open a case in CLaRE, record the *case template* as 'Information Report' and *case template type* as 'FMA Complaint', and load all the relevant information.

Step three – assign complaint and notify relevant parties

Level 1 complaints

13. If it is determined the case is a Level 1 Complaint, the staff member who receives the complaint will become the Complaint Handler and be responsible for resolving the complaint.
14. The Complaint Handler should notify their manager and the Complaints Officer of the Complaint.

Level 2 Complaints

15. If it is determined the case is a Level 2 Complaint, the staff member who receives the complaint should refer the case to the Complaints Officer.
16. The Complaints Officer shall identify and notify the appropriate **Responsible Manager** of the Level 2 Complaint.
17. The Responsible Manager will normally be the staff member at 'Head of' level of the team responsible for the activity to which the complaint relates, however the Complaints Officer may choose a Responsible Manager at a higher level if:
 - a. The 'Head of' is not the appropriate person to assess a complaint (for example if it relates to an action, inaction, decision or policy made or approved by him or her;
 - b. If the complaint is particularly serious and/or would be harmful to FMA's reputation if made public;
 - c. The complainant has also raised their concerns with the media or a Minister; or
 - d. The Complaints Officer identifies any other reason why the Head of staff member cannot or should not assess the complaint.
18. If necessary, the Complaints Officer will consider whether the nature and circumstances of a particular complaint requires an increased level of independence for the responsibility of the internal review. This could involve assigning a Responsible Manager from a different team, or engaging a third party to conduct the internal review.
19. When they are first notified of a Level 2 Complaint, the Responsible Manager should brief:
 - a. The relevant Executive Committee member(s), and if appropriate, the Chief Executive;
 - b. the General Counsel on any complaint that contains concerns that either the FMA or

- an FMA staff member has acted unlawfully so that appropriate legal advice can be considered; and
- c. Any other relevant staff the Responsible Manager considers should have knowledge of the complaint.

The Responsible Manager should assign the complaint to an appropriate staff member within their team to undertake the internal review (**Complaint Handler**). Alternatively, the Responsible Manager can elect to review the complaint themselves (taking on the role of Complaint Handler). In assigning the complaint the Responsible Manager must ensure the FMA's Conflict of Interest Policy is followed.

Step four – take action on complaint

Level 1 Complaints

20. For Level 1 Complaints, the staff member should take appropriate action to respond to and resolve the complaint¹⁷ as promptly as possible, providing as much detail as possible to ensure the complainant understands the FMA's reasons for its decision on the complaint.
21. If the complaint cannot be effectively responded to in a prompt manner, the staff member should acknowledge receipt of the complaint before taking the appropriate steps to resolve it.
22. A response to a Level 1 Complaint will usually be provided by the Complaint Handler after consultation on the response with their manager.

Level 2 Complaints

23. The Complaint Handler must review the complaint using a fair process.¹⁸ In reviewing the complaint, the Complaint Handler shall consider:¹⁹
 - the act or decision that is being complained about;
 - who needs to be kept informed of the review;
 - the priority given to the matter (i.e. how serious or urgent the complaint is);
 - what information or evidence needs to be gathered (and from who);
 - what risks the complaint raises for the FMA;
 - what kind of resolution the complainant is seeking; and
 - when the review is likely to be completed.
24. The Complaints Handler and Responsible Manager should engage with the Complaints Officer throughout the internal review process. This will allow the Complaints Officer to ensure the correct process is being followed and to provide any views or comments on how best to manage the complaint.
25. On completion of the review, the Complaints Handler shall send an email or memo to the Responsible Manager and the Complaints Officer with the outcome of their review and a recommendation on how to manage and/or resolve the complaint.

¹⁷ See paragraph 34 of the policy for possible ways in which a complaint can be resolved.

¹⁸ Refer to 'Using a fair process to conduct an internal review' section in the Policy on Complaints about the FMA.

¹⁹ Ombudsman's Guide at p 12.

26. The Responsible Manager should review the email or memo from the Complaint Handler and any comments from the Complaints Officer before deciding how to manage the complaint. The Responsible Manager may consult with others, including the Chief Executive, before confirming their decision.
27. The FMA must ensure it has appropriate contact with the complainant at the beginning, throughout and at the conclusion of the review process. Responsibility for who has direct contact with the complainant can be decided by the Complaints Handler in consultation with the Responsible Manager.
28. When contacting the complainant, the FMA should:
 - a. notify that we are reviewing the complaint;
 - b. outline the steps to be taken as part of the review and the possible or likely outcomes if known;
 - c. provide the complainant with an expected completion date if known (and update the complainant on any subsequent changes to timeframes); and
 - d. give the complainant contact details should they have any questions throughout the process.
29. The FMA may seek additional information from the complainant at any time during the complaint process.
30. Once the internal review and outcome is finalised, the FMA must notify the complainant of the outcome of the complaint, including:²⁰
 - the issues considered as part of the complaint and investigation into the complaint;
 - the reasons for any decisions that have been made;
 - any remedy that is offered; and
 - their right to refer the matter to the Ombudsman (or other authorities if appropriate).

Step five – close the complaint file

31. Once the complaint has been actioned and the matter is concluded, the Complaint Handler should ensure the case is closed in CLaRE, and in doing so, review and update the title and description given to the case to ensure both fields accurately summarise the issue and how the complaint was dealt with in light of the fuller understanding of the matter as this will be FMA's summary record of the complaint.

²⁰ Ombudsman's Guide at p 14-15.

Appendix 1: Guidance on apologies

Elements of an effective apology

1. Recognition of the harm or impact to the complainant suffered, which includes:
 - Description of the wrong ie the relevant problem, act or omission to which the apology applies
 - Recognition of the wrong ie recognising the action or inaction was incorrect, wrong, inappropriate, unreasonable, harmful, etc
 - Acknowledgement of the harm or impact to the complainant ie acknowledging the affected person has suffered embarrassment, hurt, pain, damage or loss.
2. An acknowledgement or admission by the organisation of its responsibility for the wrong and the harm caused.
3. An explanation of the cause or reason(s) for the problem, or a promise to investigate the issue.
4. An expression of regret for the harm suffered and an apology.
5. An explanation of actions taken/proposed to be taken to remedy the issue, mitigate further harm and to ensure wrong does not occur again.

Released under the Official Information Act 1982