Complaints survey specification

For the 2024 survey to be completed in 2025

December 2024

AFM

Contents

1 Introduction

At the beginning of 2025, insurers are required to provide the AFM with information about any complaints received and handled by them.[1]. This document specifies as a reference work for all content-related technical requirements to be met by this submission. For more information, please go to https://www.afm.nl/complaintssurvey

1.1 Format

The Complaints Survey for Insurers, hereinafter to be referred to as complaints survey or survey, is set up as a granular dataset. This means that the value of a set number of characteristics is requested for each individual complaint. This produces a dataset with an entry per complaint (complaint entry) which can be presented as a table:

Complaint	Reference 1	Reference 2	Etc.
1	Value	Value	Value
2	Value	Value	Value
3	Etc.		

Institutions have to compile the requested dataset according to the specifications set out in this document and submit it as an XML database.

1.2 Method of file creation

It is up to the institutions to decide on how they want to create the required XML database, as long as this database meets the specifications set out in this document. Paragraph 6.1.1 details these specifications. In practical terms, there are basically two ways to go about this. The first variant ('conversion') proceeds from a situation in which the insurer has an automated complaints administration in place in a system designated for that purpose. The necessary data is accessed from this system and converted to the required file. The converter software required for this has to be developed by the institution itself.

The second variant ('Excel') offers the use of an Excel form. This data entry form is made available as part of these specifications. Also see § 3.1. The Excel data entry form lists the required datapoints and quality regulations which the submission needs to meet. You can manually enter the required data in this. Saving the form as an XML database creates the required file. Both ways are shown in the figure to the right.
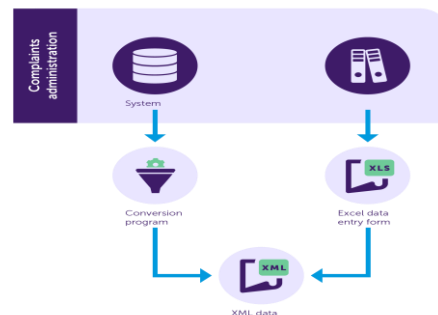
1.3 Composition of the specification

The complete specification of the Complaints Survey for Insurers consists of multiple components, which are listed below. The previous paragraph indicated that the data to be submitted can be created in different ways. The components relevant for both methods described, 'Excel' and 'Conversion' respectively, are indicated below.

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[1] Where this document references 'Insurers', we mean insurance providers.

	Component	Explanation	Relevance for the method of file creation	
			Excel	Conversion
KUV1	This document	Describes the design of the survey, the definition of datapoints, the reporting process to be followed and submission requirements.	X	X
KUV2	Frequently Asked Questions (FAQ)	Listing of frequently asked questions related to this survey.	X	X
KUV3	Definitions and range of values	Definitions of entries for which a value range applies, the values permitted and their individual meaning.	X	X
KUV4	Excel data entry form	The Excel data entry form that may be used to record complaint entries.	X	
KUV5	Taxonomie (XSD)	XML schema of the XML database to be submitted.		X
KUV6	Range and values reference files	ZIP file with ranges of values for datapoints (where applicable).		X

The AFM stresses that the description of these methods of file creation is included as a guideline. It is not a mandatory requirement. Alternative methods of file creation are allowed, provided the resulting XML file meets all requirements.

1.3.1 KUV3 - Definitions and range of values

A range of values is prescribed for some data points (see section 0). In the document KUV3 there is a tab for each data point. Each tab lists the allowed values in the 1st column. The next column(s) give the definition of each value. This document serves as reference for the values used and their definitions. Questions about a definition can be sent to klachtenuitvraagverzekeraars@afm.nl.

1.3.2 KUV4 - Excel data entry form

The Excel data entry form is intended for institutions that do not have a formal or informal in-house complaints register. Complaint entries can be filled in the Excel data entry form as per the requirements specified here. The form needs to be saved as XML data in order to be able to submit it. Please make sure to use the XML data filetype, not the XML spreadsheet.

1.3.3 KUV5 - Taxonomy (XSD)

The KUV5- Taxonomy (XSD) is the XML Schema Definition (XSD) with the specifications of datapoints and quality regulations. Institutions that wish to generate the required XML database by means of conversion can use the XSD to this end.

1.3.4 KUV6 - Range of values reference files

KUV6 is a zip file and consists of separate text files. For each datapoint for which a range of values is prescribed, a separate text file is included with the permitted values in UTF8. These files may be used as a reference when institutions develop conversion software to generate the required dataset from their in-house complaints administration.

2 Selection Criteria

Institutions have to report their complaint entries over a specified period. This chapter defines the criteria that determine which complaint entries need to be selected for the reporting.

2.1 Reporting period & Reporting moment

The reporting period is the period over which institutions have to report their complaint entries. A period is defined as a time period with a start and end date.

> **This survey relates to the reporting period 2024.**
> This period is defined by the range between 1 January 2024, this being the start date of the reporting period, and 31 December 2024, which is the end date of the reporting period.

The reporting moment is the moment in time on which the complaint entries to be reported and their data values are determined. Also see § 4.3.

2.2 Selection rules

Complaints covered by the reporting period have to be reported within the framework of this survey. In order to arrive at a correct selection of complaint entries, institutions must apply the following selection rules:

Selection rule 1:
'Complaints closed within reporting period'

> *End date of the complaint >= Start date of the Reporting period AND the End date of the Complaint <= End date of the Reporting period*

Based on this selection, all complaint entries that were closed during the reporting period are selected.

Selection rule 2:
'Outstanding complaints at the end date of the reporting period'

> *Date the Complaint was received >= End date of the Reporting period AND (the End date of the Complaint is empty OR the End date of the Complaint >= End date of the Reporting period)*

This selects complaint entries that were still pending at the time of the end date of the reporting period.

Appendix 1 provides a schematic explanation of how the selection rules work.

2.3 Situation at the reporting moment

Institutions may report the values of the requested datapoints as these are at the time of the reporting moment. This approach was chosen to ease the reporting burden.

As an alternative, the values could also be reported at the end of the reporting period. Given that the characteristics of a complaint may still change between the end date of the reporting period and the reporting moment, this alternative would mean that institutions have to historically reconstruct from their records the state of a complaint to the time of the end of the reporting period. The AFM expects that this may not always be possible for technical reasons. The figure below illustrates the meaning:
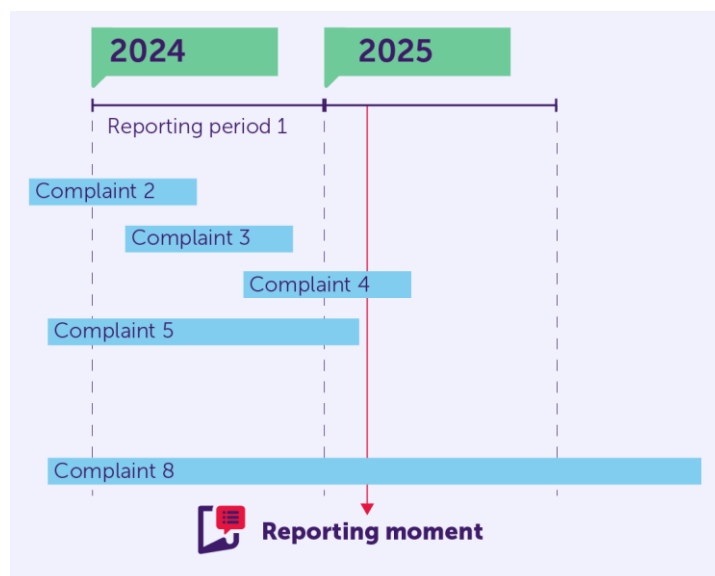
The figure above shows the situation in which complaint entries need to be reported over 2024. Since, in the context of this survey, reporting is done retrospectively, the moment at which institutions compile the dataset (i.e. the reporting moment) principally lies after the end of the reporting period. In this situation, it is permitted to use the state of a complaint entry at the time of the reporting. For example, complaint 5 will have the status 'Open' at the end of the reporting period but 'Closed' at the reporting moment. In this situation, it is thus allowed to report the last known status, i.e. Closed.

3 Submission requirements

The following requirements apply to the submission of the respective complaint entries:

No.	Requirement	Explanation
1	Submission via XML	Institutions have to submit the requested complaint entries in an XML data format according to the prescribed XSD. Make sure that you opt for XML data and not XML spreadsheet.
2	One file for each licensee	In the request for information, you will receive the licence number for your company. A separate XML file must be submitted for each licence number.
3	Application of the selection rules	The complaint entries that are reported have to comply with the selection rules applicable for this reporting period. Please note that any outstanding complaint numbers from the previous year need to be resubmitted with the same complaint number and a possible new status.
4	No complaint entries to be reported	Licensees do not need to submit a file if there are no complaint entries that match the selection rules in the reporting period. If this situation applies to a licensee, the licensee can indicate such in the AFM Portal.
5	Use of the Excel data entry form	Parties may use the Excel data entry form "Excel data entry form" to compile the required XML file.
6	File name	The file name of the XML database to be submitted must meet the following syntax, in the form of XML data: • Ownnamereporting.xml

3.1 Use of the Excel data entry form

If you make use of the Excel data entry form, you need to consider the following.

3.1.1 Saving as an XML data file

To save the data in the Excel data entry form as a valid XML file, you need choose 'Save As' and select the 'XML Data' type. Make sure you do not select XML spreadsheet.

Ownnamereport	
XML Data(*.xml)	▼

3.1.2 Validation

When saving as XML, the data is automatically validated if the option 'Validate data against schema for import and export' is checked in the Data / Properties menu:
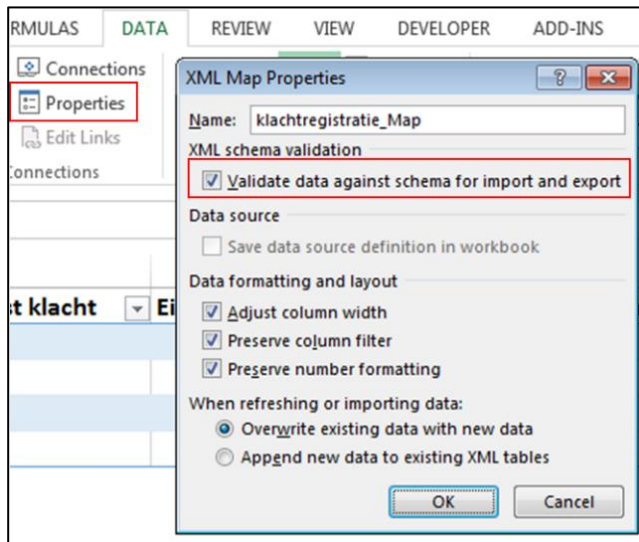
This validation checks to see whether:

- All fields have been completed. The initial tab contains the licence number.
- The values entered meet specified value ranges. See KUV3 Definitions and range of values.
- Values meet other technical requirements.

If the data does not meet these requirements, a notification will pop up on the screen, but the file will still be saved. You should then ensure that the deficiencies identified are resolved in the data. You can do so by making the appropriate corrections in the Excel data entry form and resaving the data, and thus revalidating it.

Saving as XML Data automatically ensures the application of correct data types.

4 Substantive requirements

This chapter describes the requested datapoints. These datapoints are listed below and further specified in Paragraphs 4.1 and 4.2. A number of conventions:

- *X-path* refers to the location in the XSD.
- *Range of values* indicates whether a value range is required for the datapoint in question.
- *Functional requirements* describes further requirements with which the datapoint needs to comply functionally.
- *Technical requirements* describes additional requirements with which the datapoint needs to comply technically.

Upon submission, an XML file is validated against the XSD. If the XML submission does not comply with the XSD, the submission will be refused. The XSD is used to validate whether:

- The datapoints reported meet the technical requirements.
- All fields are reported per complaint entry.
- The correct data type per element is applied.
- Stated values meet the range of values where applicable.

NB: when using the Excel data entry form provided, the validations are performed automatically when the data is saved as an XML file.

4.1 File header
In the file header, the licence number and the reporting period, are included once.

4.1.1 Licence number

Datapoint	Licence Number
X-path	Complaint registration / licensee / licence number
Definition	The licence number listed in the request for information which the Dutch Authority for the Financial Markets sent you. You enter your licence number on the initial tab of the Excel data entry form.
Functional requirements	
Technical requirements	
Mandatory Y/N	Y
Data type	Integer (8) [0-9]
Range of values	N

4.1.2 Reporting period

Datapoint	Reporting period
X-path	Complaint registration / licensee / reporting period
Definition	See § 2.1
Functional requirements	
Technical requirements	
Mandatory Y/N	Y
Data type	Integer (4)
Range of values	Needs to be value '2024' (no quotations)

4.2 Detailed rules
The datapoints below are recorded for each complaint entry. The indication of the X-path location is relative to the element complaint registration/licensee/complaint.

4.2.1 Complaint number

Datapoint	Complaint number
X-path	Complaint number
Definition	A unique and anonymous number that uniquely identifies a complaint.
Functional requirements	• A complaint number needs to be able to uniquely identify a complaint. When the same complaint is reported in successive reporting periods, the same unique complaint number should be used each time it is reported to identify the complaint in question. Please note that if you still had any outstanding complaints from 2023 or before at the beginning of 2024, you will have to report them under the same complaint number in 2024 as well. • The complaint number has to be a unique number. A complaint number may never be reused to identify another complaint. This means you cannot each year reuse complaint numbers that have already been closed in previous years, for example, for new complaints. • The complaint number has to be anonymous for the AFM. It should not be possible for the AFM to identify the concerned parties in person based on the complaint number. The AFM therefore does not want the complaint numbers from your administration, but anonymous complaint numbers linked to them. • Institutions may apply a numbering system by their own choosing provided the system meets the aforementioned functional requirements and the prescribed data type.
Technical requirements	Complaint numbers have to be unique.
Mandatory Y/N	Y
Data type	Varchar (64)
Range of values	N

4.2.2 Date of the complaint

Datapoint	Date of the complaint
X-path	Receipt of the complaint
Definition	The date on which the insurer received the complaint.
Functional requirements	• The date on which the complaint was first registered in the insurer's records may be used for this datapoint. • The specified date must be greater than or equal to 1 January 2013[2].
Technical requirements	• Date format consistent with ISO 8601, YYYY-MM-DD • Date >= 1-1-2013
Mandatory Y/N	Y
Data type	Date
Range of values	N

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[2] This start date follows the date the EIOPA Guidelines came into force (November 2012).

4.2.3 Closing date of the complaint

Datapoint	Closing date of the complaint
X-path	Conclusion of the complaint
Definition	The date on which the insurer closes the complaint in its internal complaint registration.
Functional requirements	If the end date of the complaint is entered, the Status of the complaint may not have the 'Open' value.
Technical requirements	• Date format consistent with ISO 8601, YYYY-MM-DD • Date >= 1-1-2024[3]
Mandatory Y/N	Y if the complaint status is closed.
Data type	Date
Range of values	N

4.2.4 Status of the complaint

Datapoint	Status of the complaint
X-path	Status of the complaint
Definition	The handling status of the complaint at the time of reporting.
Functional requirements	The reported value must contain one of the values from the range of values.
Technical requirements	The reported value must contain one of the values from the range of values.
Mandatory Y/N	Y
Data type	Varchar
Range of values	Y

4.2.5 Kifid

Datapoint	Kifid
X-path	Kifid or SKGZ status for a complaint
Definition	Indication of whether the complaint has also been reported to Kifid or the Health Insurance Industry Disputes Committee (SKGZ). Kifid and SKGZ are two dispute resolution bodies in the Netherlands (this means an Ombudsman).
Functional requirements	The reported value must contain one of the values from the range of values.
Technical requirements	The reported value must contain one of the values from the range of values.
Mandatory Y/N	Y
Data type	Varchar
Range of values	Y

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[3] This requirement stems from the application of the selection rules (see § 2.2).

4.2.6 Type of complainant

Datapoint	Type of complainant
X-path	Type of complainant involved in a complaint
Definition	Characterisation of the party that filed the respective complaint.
Functional requirements	The reported value must contain one of the values from the range of values.
Technical requirements	The reported value must contain one of the values from the range of values.
Mandatory Y/N	Y
Data type	Varchar
Range of values	Y

4.2.7 Product

Datapoint	Product
X-path	Productcode
Definition	The type of product to which a complaint relates.
Functional requirements	The reported value must contain one of the values from the range of values.
Technical requirements	The reported value must contain one of the values from the range of values.
Mandatory Y/N	Y
Data type	Varchar
Range of values	Y

4.2.8 Reason for the complaint

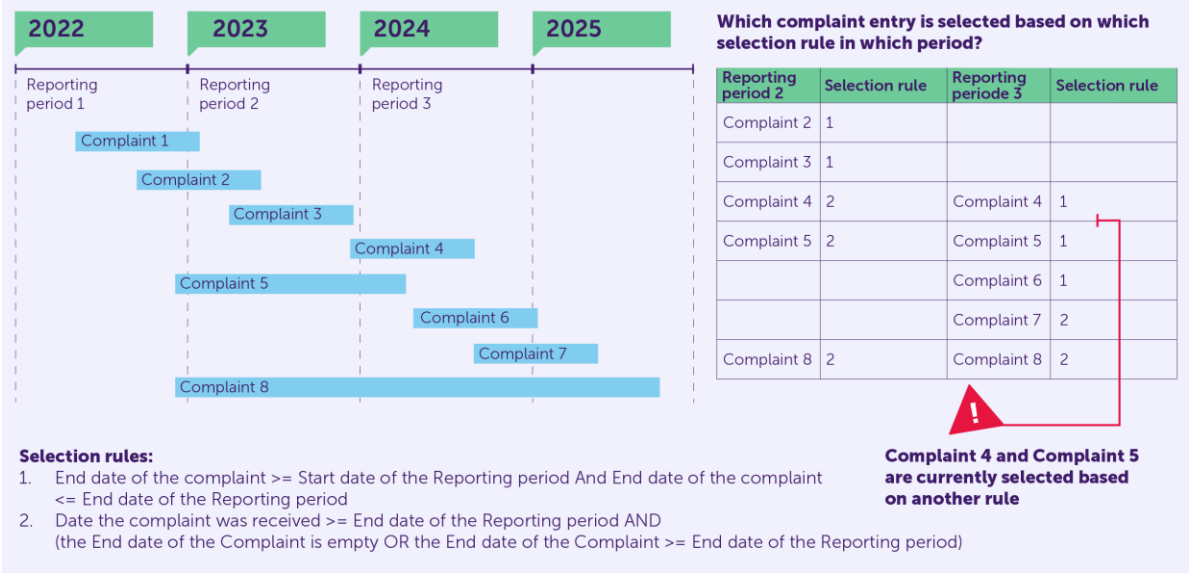| Datapoint	Reason for the complaint
X-path	Reason for the complaint
Definition	Characterisation of the cause underlying the complaint.
Functional requirements	The reported value must contain one of the values from the range of values.
Technical requirements	The reported value must contain one of the values from the range of values.
Mandatory Y/N	Y
Data type	Varchar
Range of values	Y

4.2.9 Product name

Datapoint	Product name
X-path	Commercial product name involved in the complaint
Definition	The commercial product name as known by your customers and in use by the insurer to which the complaint relates. The product name by which your client knows the product.
Functional requirements	n/a
Technical requirements	n/a
Mandatory Y/N	Y
Data type	Varchar (255)
Range of values	N

Appendix 1 – Illustration of the operation of the selection rules

Which complaint entry is selected based on which selection rule in which period?

Reporting period 2	Selection rule	Reporting periode 3	Selection rule
Complaint 2	1		
Complaint 3	1		
Complaint 4	2	Complaint 4	1
Complaint 5	2	Complaint 5	1
		Complaint 6	1
		Complaint 7	2
Complaint 8	2	Complaint 8	2

Complaint 4 and Complaint 5 are currently selected based on another rule

Selection rules:
1. End date of the complaint >= Start date of the Reporting period And End date of the complaint <= End date of the Reporting period
2. Date the complaint was received >= End date of the Reporting period AND (the End date of the Complaint is empty OR the End date of the Complaint >= End date of the Reporting period)

Appendix 2 – Definition of terms

"Insurer" This is a life insurer, a funeral expenses and benefits in kind insurer or non-life insurer; not a reinsurer.

"Complaint" This is a statement of dissatisfaction addressed to an insurance undertaking by a person or legal entity relating to the insurance contract or service he/she has been provided with. Complaints-handling should be differentiated from claims-handling as well as from simple requests for execution of the contract, information or clarification. This latter part (claims-handling and simple requests) is not covered by the definition of a complaint.

"Complainant" This is a natural person or legal entity who has filed a complaint with an insurance company. The natural person or legal entity could, for example, be a (potential) policyholder, insured party, beneficiary, intermediary or an aggrieved third party.

"Insurance" This is life insurance, funeral expenses and benefits in kind insurance or non-life insurance (including income protection insurance and healthcare insurance); not a reinsurance.

"Policy or group insurance scheme" This is a 'category policy or package policy' that may include coverage for more than one type of insurance or object, consider homeowner's insurance with separate awning insurance cover or car insurance with accidental occupant insurance or legal expenses cover, which counts as one policy for the category to which the main policy belongs. A package policy consists of various products, meaning that a complaint about one of these products needs to be registered in the category to which the product or specific cover belongs. In the case of group insurance schemes with underlying participants, the group insurance always amounts to one policy, except for fleets: in that case one policy applies to each car.

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