

Date 20 February 2024
Our reference NiJn-24011916
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Subject Demand for information concerning the
complaints survey 2024

Dear Members of the Board,

This letter contains the demand for information concerning the complaints survey which the Dutch Authority for the Financial Markets (AFM) conducts each year among insurance providers. As the market conduct authority for the financial markets in the Netherlands, the AFM is interested in complaints raised by Dutch clients. This survey is being sent to you because your company operates in the Netherlands.

The AFM requests you to report to the AFM all complaints received from Dutch customers and/or third parties throughout the year 2023. This should encompass complaints that were received, resolved, or are still pending as of 2023. As of this year, the AFM will ask you to report these complaints annually. The AFM has informed the market conduct authority in your country in advance about this survey.

In section 1 of this demand for information, the AFM explains the background of this survey. Section 2 sets out how you can compile the complaint reporting. Section 3 explains how to submit your reporting to the AFM. Section 4 provides information on the required data quality of the reporting.

You can find all the information you need to compile and submit the complaints survey at <https://www.afm.nl/complaintssurvey>. We recommend that you start with the file 'KUV 1 Complaints survey specification'.

The submission period for the reporting has now commenced. The deadline for uploading your complaint reporting via the AFM Portal is 30 May 2024. If you are unable to meet this deadline, please notify the AFM as soon as possible. If your company has not received any complaints, this can also be indicated in the reporting environment.

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1. Background to the complaints survey

Insurers in Europe are required to ensure the proper handling of complaints they receive from clients. This also means that you need to keep a complaints administration. Given that complaints serve as a key indicator of the quality and diligence of your service provision, the AFM is interested in the complaints you receive from Dutch clients.¹

This is why the AFM has set up an annual complaints survey for insurers. It is set up in a way that contributes substantively to our objectives. The survey annually provides the AFM with a market-wide understanding of trends and developments in relation to complaints that insurers receive from Dutch clients.²

2. How to compile your complaint reporting

You should report all complaints received, pending and closed from 2023 as well as the complaints still pending from all previous years which have not yet been closed. You can compile the reporting in two ways:

1. You make use of the data entry form provided by the AFM. This form is available as an Excel file on the AFM website; or
2. You compile the required file from your in-house complaints administration, based on the technical specification provided by the AFM for this purpose (conversion). This specification is also available on the AFM website.

You will need your licence number when compiling your complaint reporting. Your licence number is <licence number>. You enter your licence number on the initial tab of the Excel data entry form.

You can then validate your reporting and save it as XML data. You can find more information on saving and validating the reporting at <https://www.afm.nl/complaintssurvey>, under “KUV 1 Complaints survey specification” and “KUV 2 Frequently asked questions”.

You can find the above mentioned documents, as well as further information on how the complaints survey is set up, at <https://www.afm.nl/complaintssurvey>. This website includes the following documents:

¹ See “Guidelines on Complaints-Handling by Insurance Undertakings (EIOPA-BoS-12/069)” and Sections 4:17, 4:19, 4:20 and 4:23 of the Dutch Financial Supervision Act ‘Wet financieel toezicht’ (Wft).

² See Guideline 4 of the “Guidelines on Complaints-Handling by Insurance Undertakings (EIOPA-BoS-12/069)”.

ID#	Name	Explanation	Relevance for the method of file creation	
			Excel	Conversion
KUV1	Complaints survey specification	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 the complaints 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	Taxonomy (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

3. Submitting the reporting via the AFM portal

After compiling and validating your reporting, you can upload it to the AFM Portal by logging in to your Portal Account. Once having logged in, you can submit your report under 'reporting obligations'.

Please note: The complaint reporting can only be submitted via the AFM Portal. The AFM Portal is the central resource area for services and forms of the AFM, where files can be sent via a secure environment. You can find the AFM Portal at <https://portaal.afm.nl>. You need an account to log in to the AFM Portal. If your company does not yet have an account for the AFM Portal, you are requested to create one as soon as possible. The AFM Portal's login page has a manual explaining the registration procedure for the AFM Portal and how to authorise staff to submit a reporting. If you have any questions about creating an account or authorising staff, please contact the Business Desk by email: ondernemersloket@afm.nl. Registration is restricted to a legal representative of your company.³ To complete the registration, you will need to upload an up-to-date extract of your company from the Commercial Register of the Chamber of Commerce.⁴ Once an account has been created, the legal representative may grant multiple individuals authorisation to access the portal. They can then submit the reporting via the portal. The manual contains further information on this topic.

³ A legal representative is an executive director of the company.

⁴ If your company is not registered with the Chamber of Commerce, you can indicate this when linking your company. The availability of documents that prove that the applying person is authorised to represent the company is a minimum requirement for accessing all portal services. This could, for example, be an extract from the trade registry or corporate registry in the country of origin, or a certificate of incumbency.

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4. Validation and data quality of reporting

The reporting is validated by the AFM while it is being uploaded. If the reporting meets the technical requirements, a green tick will appear. The green tick shows you that the reporting was submitted successfully.

The AFM then performs data-quality checks on every reporting that is received. If a data-quality check reveals any findings, the AFM will contact you and you may need to re-submit a reporting after it has been amended. The AFM performs these additional checks to obtain the most accurate and reliable understanding of the market. Commonly occurring issues include:

- When compiling your reporting, make sure that you enter data in all the fields in accordance with the field's range of values.
- If you report complaints as 'Open', make sure that the date on which the complaint was concluded is not entered.
- If you report complaints as 'Closed', make sure that the date on which the complaint was concluded comes after the date on which the complaint was received.

Further information

The AFM will handle the data you provide confidentially. This means, among other things, that when the AFM publishes its yearly report, this will be at market level and in such a way that the data cannot be used to identify your company. For example see in our Dutch section of the website our annual report⁵. You can find the most frequently asked questions about the complaints survey on our website <https://www.afm.nl/complaintssurvey>. If your question is not listed there, please contact the Business Desk by email: ondernemersloket@afm.nl.

Yours sincerely,
The Dutch Authority for the Financial Markets

⁵ <https://www.afm.nl/nl-nl/sector/banken-en-verzekeraars/verzekeraars/rapportage-over-klachten>