

Strategic Plan **2025-2030**



Ensuring an accessible and trusted
financial sector ombud system

STRATEGIC PLAN

2025-2030



STATEMENT BY THE **EXECUTIVE AUTHORITY**

The Ombud Council is mandated by the Financial Sector Regulation Act, 2017, to help ensure an accessible, effective, independent, and fair ombud system for financial customers as the oversight body for the financial sector ombud system.

I have pleasure in acknowledging the Ombud Council's first full five-year Strategic Plan, covering the 2025 to 2030 planning period. Having become listed as a Schedule 3A public entity under the Public Finance Management Act as recently as April 2023, the Council's inaugural Strategic Plan covered a limited two-year period, with a focus on capacitating the entity and establishing its processes. This new Plan builds on the groundwork successfully laid by the Ombud Council during that establishment phase. This included internal milestones of becoming operationally independent and achieving a clean audit for the prior financial year; and, from an ombud system perspective, the major achievement of facilitating the amalgamation of four industry ombud schemes to form the new National Financial Ombud Scheme, greatly simplifying the ombud system for financial customers. These steps now enable the Ombud Council to intensify its focus on enhancing the effectiveness of the ombud system as a key component of the broader financial customer protection framework.

The Strategic Plan identifies three overarching priorities: Leveraging the broader financial education framework to promote awareness of the financial sector ombud system and enable financial customers to understand and assert their rights to fair treatment; using the Council's legislative toolkit to coordinate, streamline, and reform the ombud

system; and in the background, maintaining a well-governed and effective entity that delivers on its mandate, aligned to ombud system reforms. I am pleased to note that these priorities clearly dovetail with the National Treasury's policy positions on ombud system reform, financial inclusion, and financial education, which in turn support the national priority of optimising social protection and coverage. I also welcome the Ombud Council's intention to continue to work collaboratively and proactively with policymakers, fellow regulators, ombud schemes and other stakeholders in performing its functions and supporting regulatory and policy reforms. This approach supports coordinated policy implementation and efficient use of resources, in line with Government's focus on improved public sector efficiency and productivity.

I wish the Ombud Council and its Board success in implementing this Strategic Plan. By achieving the Plan's goals, the Ombud Council will ensure that the financial ombud system plays a meaningful part in improving the financial wellness of all South Africans and boosting their confidence in the financial system.

Hon. Enoch Godongwana
Minister of Finance



STATEMENT BY THE **ACCOUNTING AUTHORITY**

It is with great pleasure that the first five-year Strategic Plan for the Ombud Council is being presented on behalf of my fellow Board members and the executive. This marks a maturing stage in the organisational development of the Ombud Council, enabling it to respond proactively to the ombud system policy reform process articulated in the National Treasury's policy statement of February 2024, 'A Simpler, Stronger Financial Sector Ombud System'.

This reform process was given significant impetus by the Ombud Council's recognition of the new National Financial Ombud (NFO) in March 2024, contributing to the more effective and accessible ombud system the Ombud Council is mandated to promote.

The Ombud Council's Strategic Plan for 2025-2030 is underpinned by three strategic priorities: a) Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to financial ombud system reforms; b) Leverage the broader financial sector education framework and collaborate to promote awareness of the ombud system and enable financial customers to understand and assert their rights to fair treatment and redress; c) Leverage the legislative toolkit (see Financial Sector Regulation Act 2017, Chapter 14) to coordinate the streamlining, reform, and future direction of the financial ombud system.

In particular, the next five years will focus on the Ombud Council's responsibility to promote consumer awareness and education about the ombud system, raising awareness of financial customers' right to fair treatment and access to redress through an ombud if they are prejudiced by unfair financial provider practices. It is important that the public understands that access to an ombud is an automatic, free "add-on" when using licensed financial institutions. This understanding will boost confidence in the financial sector, in the interests of customers and financial institutions alike. The Ombud Council's consumer awareness initiatives will be undertaken together with partners and stakeholders thus strengthening cooperation and collaboration across the ombud system.

The drive to facilitate and heighten consumer awareness is also in support of the National Treasury's financial inclusion policy, 'An Inclusive Financial Sector for All' (November 2023) with a strong focus on financial education to empower financial customers to build resilience when dealing with financial challenges. As broader reforms seek to encourage consumers and communities to make more effective use of the financial system, the Ombud Council will need to assist the ombud system to respond, so that a more inclusive financial sector remains underpinned by appropriate dispute resolution structures.

The pending Conduct of Financial Institutions Bill is also expected to expand the scope of the regulated financial sector. However, even informal financial arrangements, such as stokvels, often have touchpoints with the formal financial sector for example through their bank accounts or other payment services. The Ombud Council's support to legislative reform therefore includes a focus on identifying and closing jurisdictional gaps in the ombud system.

The Ombud Council and its Board also confirms its commitment to fulfilling its other ongoing statutory functions of monitoring performance of all financial ombud schemes; recognising industry ombud schemes and approving their governing rules; and promoting co-operation and co-ordination between ombud schemes and resolving jurisdictional overlaps; as well as its statutory governance objective to ensure appropriate and effective governance systems. On the governance front, achieving a clean audit in its first year as a PFMA listed entity (2023/24 financial year) against a backdrop of capacitating a new entity amid policy reform and ombud system restructuring, was an impressive achievement.

The Board looks forward to the Ombud Council taking its developmental, regulatory and oversight role to the next level, balancing stabilisation of the organisation and innovation to achieve the ambitious aims of this Strategic Plan.

The drive to facilitate and heighten consumer awareness is also in support of the National Treasury's financial inclusion policy, 'An Inclusive Financial Sector for All' (November 2023) with a strong focus on financial education to empower financial customers to build resilience when dealing with financial challenges.

I wish to thank the Chief Ombud, Ms. Leanne Jackson and her team for their hard work, tenacity, and dedication as well as my fellow Board members for their thought leadership and unwavering support in ensuring that the Ombud Council is governed in the best manner possible. I take great pride in the fact that their combined efforts have and will continue to contribute to an accessible, trusted, and known financial ombud system.



Ms. Eileen Meyer
Chairperson: Ombud Council



OFFICIAL SIGN OFF

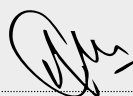
It is hereby certified that this Strategic Plan:

- was developed by the management of the Ombud Council, under the guidance of the Minister of Finance;
- considers all the relevant policies, legislation, and other mandates for which the Ombud Council is responsible; and
- accurately reflects the impact, outcomes, and outputs which the Ombud Council will endeavour to achieve over the period 2025/26 to 2029/30.



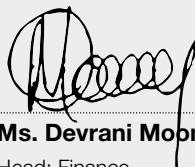
Mr. Sphiwe Dube

Head: Operations



Ms. Avitha Nofal

Head: Regulation and Oversight



Ms. Devrani Moonsamy

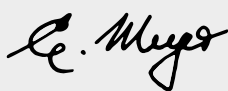
Head: Finance



Ms. Leanne Jackson

Chief Ombud

Approved by:



Ms. Eileen Meyer

Chairperson of the Board and Accounting
Authority

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GLOSSARY OF TERMS **AND ABBREVIATIONS**

Board	The Board of Directors of the Ombud Council
COFI Bill	Conduct of Financial Institutions Bill
Council	The Ombud Council
FAIS Ombud	Ombud for Financial Services Providers
FSCA	Financial Sector Conduct Authority
FSR Act	Financial Sector Regulation Act No. 9 of 2017
Levies Acts	The Financial Sector and Deposit Insurance Levies Act, 2022; and the Financial Sector and Deposit Insurance (Administration) and Deposit Insurance Premiums Act, 2022.
MTDP	Medium-Term Development Plan of the 7th Administration of the Government of South Africa
NDP	National Development Plan: Vision 2030
NFO	National Financial Ombud Scheme, South Africa
Ombud schemes	Industry ombud schemes and statutory ombud schemes, as defined in the FSR Act
PFA	Pension Funds Adjudicator
PFMA	Public Finance Management Act No. 1 of 1999
SWOT	Strengths, weaknesses, opportunities, threats
TCF	Treating Customers Fairly outcomes.
World Bank Diagnostic	Report by the World Bank Group titled "South Africa: Financial Ombud System Diagnostic" (June 2021), commissioned by the National Treasury and the FSCA

PART A OUR MANDATE

1. CONSTITUTIONAL MANDATE

The Constitution of the Republic of South Africa Act 108 of 1996 protects consumer rights through the Bill of Rights. Section 36 guarantees the right to have any dispute that can be resolved by the application of law decided in a fair public hearing before a court or, where appropriate, another independent and impartial tribunal or forum. The Ombud Council is mandated to facilitate the availability of, and access to, independent and fair dispute resolution forums as an alternative to the courts, for customers in the financial sector. Section 33 of the Constitution secures the right to fair administrative action. As a public entity, the Ombud Council is obliged to perform its administrative functions in line with the provisions of the Promotion of Administrative Justice Act 3 of 2000.

2. LEGISLATIVE AND POLICY MANDATES

2.1. THE FINANCIAL SECTOR REGULATION ACT 9 OF 2017

The Ombud Council is created by, and derives its mandate from, the Financial Sector Regulation Act 9 of 2017 (FSR Act). The statutory objective of the Council, per section 176 of the FSR Act, is to assist in ensuring that financial customers have access to, and are able to use, affordable, effective, independent, and fair alternative dispute resolution processes for complaints about financial institutions in relation to financial products, financial services, and services provided by market infrastructures. Chapter 14 of the FSR Act establishes the Council and its oversight, enforcement, and regulatory powers over financial sector statutory and industry ombud schemes. Section 1 of the FSR Act defines the Council as a financial sector body and section 180 and 188 provide for its Board of Directors and Chief Ombud respectively to be appointed by the Minister of Finance.

2.2. OTHER RELEVANT LEGISLATION

The Council takes cognisance of the larger body of financial sector laws within which ombud schemes (and the financial institutions falling within their scope) operate. As required in section 175(3) of the FSR Act, the Council has been listed as a Schedule 3A national public entity for purposes of the Public Finance Management Act 1 of 1999 (PFMA) and has been required to comply with Treasury Regulations made under the PFMA as from financial year 2023/24. Also as from financial year 2023/2024, the Council is funded in terms of the Financial Sector and Deposit Insurance Levies Act 11 of 2022 and the Financial Sector and Deposit Insurance (Administration) and Deposit Insurance Premiums Act 12 of 2022 (Levies Acts).

2.3. POLICY MANDATES

2.3.1. NATIONAL GOALS AND PRIORITIES

The Council's strategy supports the Medium-Term Development Plan 2024-2029 (MTDP) of the 7th Administration of the Government of South Africa, as informed by the Government of National Unity's Statement of Intent and Minimum Strategic Priorities as well as the National Development Plan: Vision 2030 (NDP).

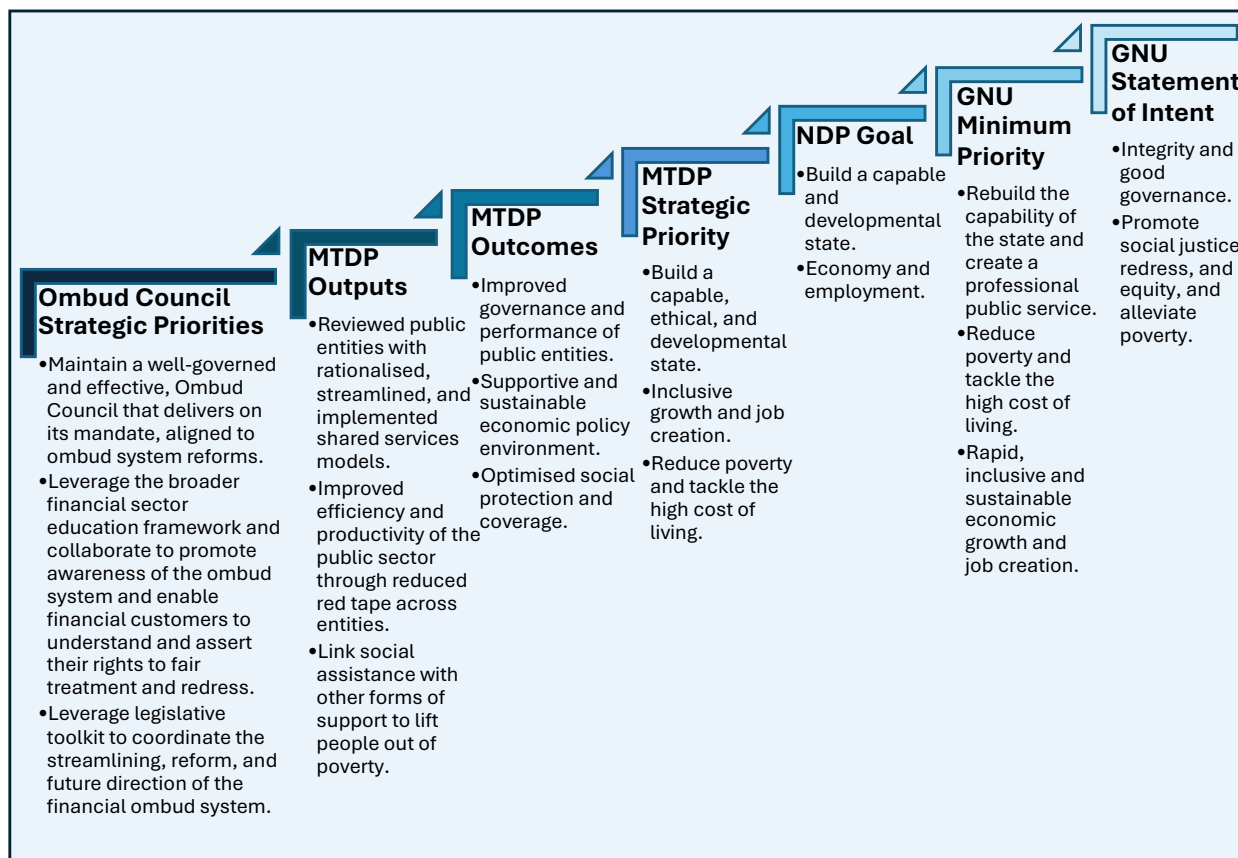


Figure 1: Ombud Council Strategy in Support of National Goals and Priorities

This is achieved by focusing on the Ombud Council's three strategic priorities, each of which is defined as the basis of a dedicated programme of work over the five-year planning period.

2.3.2. TWIN PEAKS FINANCIAL REGULATORY FRAMEWORK

The Ombud Council is a product of the National Treasury's financial sector policy statements such as "A safer financial sector to serve South Africa better" (2011) and "A Known and Trusted Ombud System" (2017). These statements set out the Twin Peaks regulatory framework for the financial sector, including proposals for the role of the financial sector ombud system. In this context, the Council's strategic planning is influenced by the following policy imperatives:

- The National Treasury's policy statement "A simpler, stronger financial sector ombud system" (2024). This policy position is based on recommendations in the independent World Bank report "South Africa: Financial Ombud System Diagnostic" (World Bank Diagnostic: 2021) and will require legislative changes to enhance the financial ombud system to support fair outcomes for customers.
- Ongoing reform of the overall financial customer protection system through the evolution of the Twin Peaks regulatory framework. In particular, the Conduct of Financial Institutions (COFI) Bill, once enacted, will holistically regulate customer protection in the financial sector including, through amendments to the FSR Act, the financial ombud system.

3. INSTITUTIONAL POLICIES AND STRATEGIES OVER THE FIVE-YEAR PLANNING PERIOD

3.1. STRATEGIC PRIORITIES

To deliver on its statutory mandate, the Council uses its regulatory and supervisory toolkit under the FSR Act in line with the following strategic priorities:

Table 1: Ombud Council strategic priorities for 2025 – 2030

1. Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to financial ombud system reforms.
2. Leverage the broader financial sector education framework and collaborate to promote awareness of the ombud system and enable financial customers to understand and assert their rights to fair treatment and redress.
3. Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.

3.2. OPERATING PRINCIPLES

To support its strategic priorities, the following operating principles guide the Council's work:

Table 2: Operating principles

Committed to current mandate	The Council commits to optimally using its existing legislative toolkit under the FSR Act to perform its statutory functions, while remaining cognisant of, and aligned to, the broader regulatory reform initiatives in the financial sector ombud system.
Pragmatic and cost-efficient	The Council oversees financial ombud schemes pragmatically and cost-effectively. It promotes clarity that the direct handling of customer complaints is outside of its mandate and is the purview of the financial ombud schemes and sector regulators.
Flexible and scalable	The Council's people, resources, and business processes respond promptly and effectively to the evolving regulatory framework, cognisant that continual technological advances impact financial ombud schemes and the financial sector regulatory landscape through new products, services, and ways of doing business.
Risk-based	The Council proactively mitigates risks to the effectiveness of the ombud system, including shortcomings identified in the World Bank Diagnostic.
Consultative and collaborative	The Council consults openly and collaboratively with its stakeholders, including relevant financial ombud schemes, regulatory authorities, policymakers, financial institutions, and customers, and ensures that all stakeholders understand its role.
Future focused	The Council proactively participates in shaping the future financial ombud system regulatory framework and supports existing ombud schemes, customers, and other stakeholders during the transition to that framework.

4. RELEVANT COURT RULINGS

The Ombud Council is not aware of any court rulings directly impacting its mandate.

PART B STRATEGIC FOCUS

5. VISION

To ensure that a known, trusted, and easily accessible ombud system exists for all in the financial sector.

6. MISSION

Ensuring that the ombud system works better for financial customers by using existing statutory powers to harmonise the system, improve its coverage and visibility, and track its performance; and by proactively supporting regulatory reforms to improve the system over time.

7. VALUES

The Council is uncompromisingly committed to operate in accordance with the following core values:

Independence and impartiality	We act independently and impartially, without fear, favour, or prejudice and support the independence and impartiality of the ombud schemes we oversee.
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Integrity	We execute our functions with integrity.
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Fairness	We treat all stakeholders fairly.
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Effectiveness and responsiveness	We implement effective and responsive processes to perform our work.
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Transparency and accountability	We act transparently, take accountability for our actions, and hold the ombud schemes we oversee to account. We ensure that financial customers and other stakeholders understand our role and that of the ombud schemes we oversee.
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8. SITUATIONAL ANALYSIS

8.1. STRATEGIC HORIZON: WHERE THE OMBUD COUNCIL COMES FROM AND WHERE IT IS HEADED

The Council has progressed through several overlapping phases since its establishment (phase 1), operationalisation (phase 2), and stabilisation (phase 3), to contribute meaningfully to reforming the financial ombud system (phase 4), as depicted below:

Strategic Horizon: 2020 to 2030

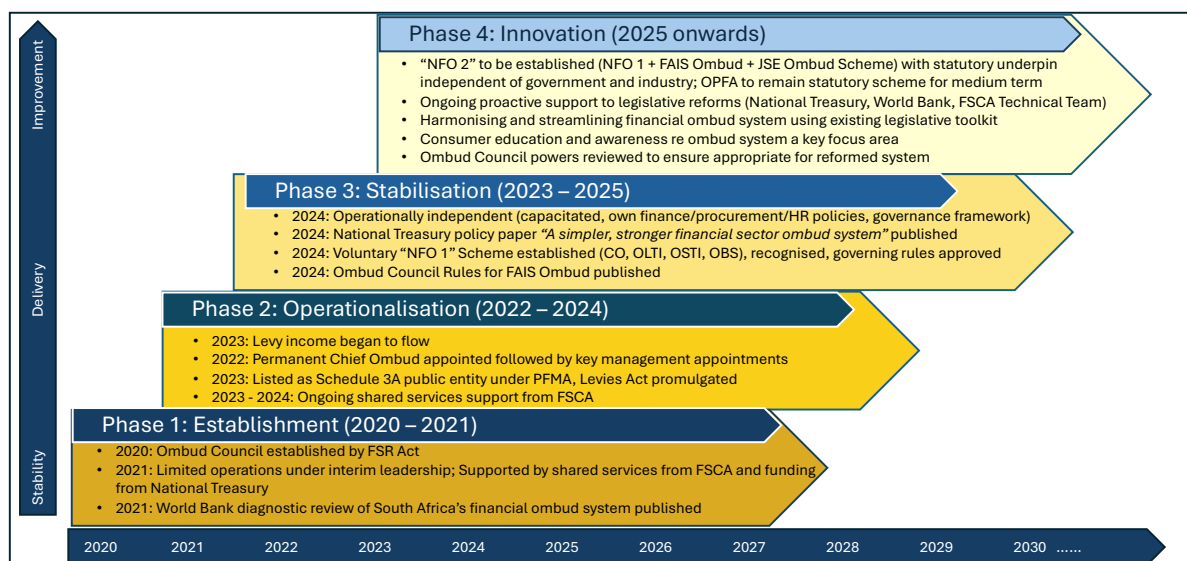


Figure 2: Ombud Council's Progress to date over its Strategic Horizon

8.1.1. PHASE 1: ESTABLISHMENT (2020 – 2021)

The Council was established in late 2020 by the FSR Act and limited operations commenced in 2021 under interim leadership, with financial support from the National Treasury and shared services support from the Financial Sector Conduct Authority (FSCA).

As per its founding legislation, Chapter 14 of the FSR Act, the Council's functions include the following:

- FSR Act section 176 sets out our objective: To assist in ensuring that financial customers have access to, and are able to use, affordable, effective, independent, and fair alternative dispute resolution processes for complaints about financial institutions in relation to financial products, financial services, and services provided by market infrastructures.
- FSR Act section 177(1) enables our functions: To –
 - (a) recognise industry ombud schemes;
 - (b) promote co-operation between and co-ordination of ombud activities;
 - (c) protect the independence and impartiality of ombuds;
 - (d) promote public awareness of ombuds, schemes, and their services;
 - (e) facilitate access by financial customers to appropriate ombuds;
 - (f) publicise schemes, including the kinds of complaints that they deal with;
 - (g) resolve overlaps of schemes' jurisdictional coverage;
 - (h) monitor the performance of schemes, including their compliance with relevant financial sector laws; and
 - (i) support financial inclusion.

- FSR Act section 177(2): To perform any other function conferred on it in terms of any other provision of any applicable legislation.
- FSR Act section 177(3): To do anything else reasonably necessary to achieve its objective.
- FSR Act section 177(4): To perform its functions without fear, favour, or prejudice.
- FSR Act section 184(d) and (e): The Ombud Council Board to keep the Minister of Finance informed of schemes' compliance, complaint trends and issues raised and how they are being dealt with; and to keep both the Minister and financial sector regulators informed of the conduct of financial institutions giving rise to complaints.

To perform its functions, the Council has a full suite of regulatory, supervisory, and enforcement powers over financial ombuds and ombud schemes, including to –

- make Ombud Council Rules (binding subordinate legislation);
- gather information and conduct on-site inspections;
- designate certain complaints to ombud schemes where there is a jurisdictional gap; and
- deploy enforcement tools, including issuing directives, suspending or revoking recognition of schemes, entering into enforceable undertakings, imposing administrative penalties (fines), and debarment of individuals in relation to schemes.

During this establishment phase, the World Bank Diagnostic report commissioned by the National Treasury and FSCA was published. It proposed extensive consolidation and restructuring of the financial ombud system, and governance reforms of schemes and the Ombud Council. The Ombud Council has therefore since its inception operated against a backdrop of far-reaching legislative and policy reform, the implementation of which we fully support.

Despite not yet being listed as a public entity under the PFMA, the Ombud Council operated in accordance with an interim Strategic Plan and performance plans during this phase, reporting performance to the National Treasury and the Department of Planning, Monitoring, and Evaluation (DPME) to the extent possible for a start-up organisation.

8.1.2. PHASE 2: OPERATIONALISATION (2022 – 2024)

A permanent Chief Ombud was appointed in late 2022 and key senior management appointments followed. The Council continued to enjoy shared services support from the FSCA during the 2022/23 and 2023/24 financial years.

The Council was listed as a Schedule 3A public entity for purposes of the PFMA in April 2023. Simultaneously, the Council's levy-based funding model came into operation with the commencement of the Levies Acts and the financing provisions in Chapter 16 of the FSR Act. Levy income to the Council began to flow in the third quarter of the 2023/24 financial year. The Council's first formal Strategic Plan, covering the two-year period from 2023/24 to 2024/25, and its first formal Annual Performance Plan for 2023/24, were tabled in Parliament.

The focus during this operationalisation phase was on putting core policies and processes in place to enable the Ombud Council to meet its PFMA commitments from 2023/24 onwards, while delivering on key elements of its mandate and providing proactive input to the evolving regulatory reform of the ombud system.

8.1.3. PHASE 3: STABILISATION (2023-2025)

From financial year 2023/24, the Council has been operating as a PFMA listed public entity, meeting its prescribed financial management and performance reporting obligations. Financial year 2023/24 was also the last year during which the Ombud Council relied on the FSCA for corporate services support under the shared services arrangement, and the last year during which partial contingency funding was received through fiscal transfers from the National Treasury. The internal focus for 2023/24 was therefore on capacitating our organisational structure and developing the necessary policies, processes, and governance frameworks to enable the Ombud Council to operate as an autonomous public entity. This was achieved by the start of the 2024/25 financial year, at which point the Ombud Council started operating in terms of our own finance, supply chain, and human resources policies. Financial year 2024/25 also saw the further stabilisation of the Ombud Council's funding model in terms of the Levies Acts, with the Ombud Council being funded solely by levies and no further fiscal transfers required, and the filling of all key posts in the organisational structure.

From a core mandate perspective, significant initial steps were taken to ready the ombud system for anticipated systemic reforms. In February 2024, the National Treasury published its policy paper "A simpler, stronger financial sector ombud system", confirming its response to the World Bank Diagnostic reform proposals and providing clarity on the overall policy direction for the ombud system. The Ombud Council contributed extensively to the development of this policy response. In March 2024 the Ombud Council granted recognition to the National Financial Ombud Scheme, an overarching industry ombud scheme merging four previous sectoral industry schemes, as an important

step toward further consolidation of the ombud system¹. The Council also developed its first set of binding regulatory instruments in the form of Ombud Council Rules for the FAIS Ombud.

8.1.4. PHASE 4: INNOVATION (2025 ONWARDS – THE PERIOD COVERED BY THIS STRATEGIC PLAN)

Progress made in the stabilisation phase, both from the perspective of strengthening the Ombud Council's internal capabilities and progress toward reshaping the ombud system, lay the foundation for strategic focus on proactive and innovative implementation of our vision: To ensure that a known, trusted, and easily accessible ombud system exists for all in the financial sector.

As the strategic priorities in paragraph 3.1 above reflect, while maintaining and strengthening our independent governance and operational frameworks remains important, the Ombud Council intends to be considerably more externally focused over the upcoming five-year planning

period. During this innovation phase, in addition to performing core oversight functions, attention will shift to promoting and improving awareness of the ombud system; and supporting the implementation of reforms to steer the future direction of the system. This will entail proactive input to the evolving legislative and regulatory frameworks for the ombud system, as well as broader financial sector conduct legislation impacting financial customer outcomes, as summarised in paragraph 8.2.2 below.

8.2. EXTERNAL ENVIRONMENT

8.2.1. PESTEL EVALUATION

External factors, although not always directly impacting the Ombud Council, impact financial customers and institutions. This in turn influences the volume, incidence, and types of customer complaints that the ombud system must deal with. The Council therefore keeps abreast of the developments reflected in the table below to ensure that the ombud system remains relevant and fit for purpose.

Table 3: Summary of PESTEL analysis.

POLITICS POLITICAL STABILITY AND POLICY CERTAINTY The Council's immediate political environment, under the policy direction of the Minister of Finance and the National Treasury, is stable. Notwithstanding regulatory reforms, the overall policy goals and priorities for the financial sector (particularly in relation to the financial customer protection sphere of which the Council forms a part) are clear and have not to date been impacted by the political shift to a Government of National Unity.	ECONOMY ECONOMIC HARDSHIP AND FINANCIAL EXCLUSION Low economic growth, inequality, unemployment, and poverty, cause financial hardship for many. These factors exacerbate financial exclusion and cause over-indebtedness for many individuals and small businesses participating in the formal financial sector, hindering them from fully benefiting from the financial products and services that they pay for. Protecting them against unfair treatment by financial institutions by ensuring accessible, affordable, and effective dispute resolution structures is a key component of the customer protection framework.
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¹ In anticipation of pending reforms, the then four main industry ombud schemes, the Credit Ombud (CO), Ombud for Long Term Insurance (OLTI), Ombud for Short Term Insurance (OSTI), and the Ombud for Banking Services (OBS) proactively and voluntarily amalgamated to form the National Financial Ombud Scheme (NFO). The Council facilitated the process, recognised the NFO, and approved its governing rules in March 2024.

SOCIETY SOCIETAL VULNERABILITY, DRIVEN BY ECONOMIC HARDSHIP, CRIME, AND TECHNOLOGY DEVELOPMENTS. The social consequences of economic hardship (e.g. unrest and crime) particularly affect lower income and unsophisticated financial customers. Increasingly sophisticated fraud affects financial customers, institutions, and ombud schemes. This requires impartial application of equity principles by ombud schemes, to balance financial institutions' duty to protect their customers while limiting their own exposure to criminal activity. Supported by media scrutiny and the use of social media to voice dissatisfaction, customers are more aware and assertive of their rights to fair treatment by financial institutions, exposing systemic sector conduct risks. A well-functioning ombud system (accessible, suitable, and empathetic) enables customer education, proper identification, investigation, and resolution of legitimate complaints, with impartial assessment of underlying causes. Conversely, ineffective handling of cases causes reputational risks for the ombud system and the Council.	TECHNOLOGY INCREASING TECHNOLOGY INNOVATION WITH NEW TYPES OF PRODUCTS, SERVICES, RISKS, AND COMPLAINTS Technological "FinTech" developments, including the growing prevalence of Artificial Intelligence tools, mean ongoing innovation in financial product and service design. The regulatory framework must evolve to effectively regulate these products and services, while recognising their utility. The ombud system must evolve to deal with resultant new ways of doing business and new types of complaints. This impacts the scope of the jurisdiction of schemes and the Ombud Council's jurisdictional rulemaking and designation powers. The current ombud system is not fully equipped to deal with these types of complaints, and the Council must promote appropriate enhancements. Technological advancement also gives rise to new customer risks, with increasing prevalence of "scams", particularly through digital banking and payment transaction tools, as well as relating to crypto assets, online foreign exchange dealing platforms, "phishing", AI-enhanced fraud, and other cyber-crime activities.
ENVIRONMENT INCREASING EXTREME WEATHER DAMAGE AND BUSINESS INTERRUPTION INSURANCE CLAIMS Extreme weather events stemming from climate change lead to increases in insurance claims. National or local water and energy supply challenges lead to equipment damage and business interruption claims, both causing higher complaint volumes and dispute resolution activity.	LEGAL SIGNIFICANT PENDING REGULATORY REFORM The ombud system faces far-reaching regulatory reforms, which will directly impact ombud schemes' roles and processes, and thus the Council's strategy, particularly relating to the pending implementation of the COFI Bill aimed at fully realising the benefits of the Twin Peaks regulatory framework for financial customers. (See further detail in paragraph 8.2.2 below)

8.2.2. LEGISLATIVE DEVELOPMENTS IMPACTING OMBUD SYSTEM REFORM

The draft Conduct of Financial Institutions (COFI) Bill was first published for comment in 2020, and an updated draft was provided in 2021. The Bill is expected to be tabled in Parliament in early 2025. The Bill includes the following proposed reforms which will impact the Ombud Council's activities:

- The repeal and consolidation of several existing financial sector laws into an overarching Act to regulate the market conduct of all financial institutions, as the primary vehicle for the consumer protection peak in the Twin Peaks regulatory framework.
- An activity-based licensing framework for financial institutions, broadening the scope of financial products and services that will be subject to oversight by the FSCA (e.g. aspects of credit related services, payment service providers, debt collection, and authorised users of market infrastructures). The ombud system will need to adapt to cover complaints about this wider range of financial products and services.
- Uniform definitions of "complaint" and "complainant" to resolve current inconsistencies across schemes.
- Amending Chapter 14 of the FSR Act to move the provisions establishing the Ombud for Financial Services Providers (FAIS Ombud) and the Pension Funds Adjudicator (PFA), from their founding statutes

(the Financial Advisory and Intermediary Services Act 37 of 2002 and the Pension Funds Act 24 of 1956, respectively) to the FSR Act as well as amendments to the jurisdiction and governance processes of the two schemes aimed at greater alignment between them.

The National Treasury’s policy statement ‘A simpler, stronger financial sector ombud system (February 2024)’ confirms that the final form of the new ombud system will be based on a combination of existing legislation, including the existing rule-making powers of the Ombud Council, together with new primary and subordinate legislation. This new legislation is expected to include the COFI Bill, with consequential amendments to the Financial Sector Regulation Act (FSR Act); followed by additional new primary legislation that will further amend the FSR Act, COFI Bill provisions, and/or other laws; and future Conduct Standards and Ombud Council Rules made under them.

Although the Ombud Council has and will continue to work closely with the National Treasury to shape the detailed provisions of these instruments, the policy statement confirms the future streamlined structure of the ombud system as follows:

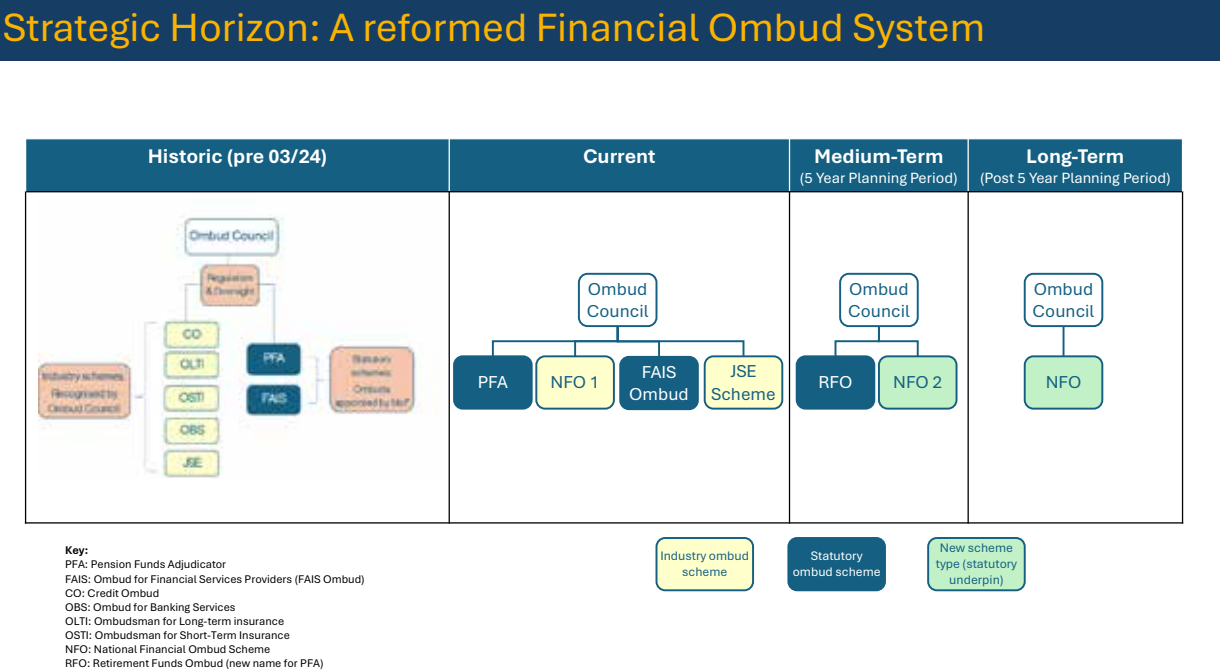
A new, overarching National Financial Ombud (“NFO 2”) will be established, with an appropriate statutory underpin that

will ensure its independence from industry and government. One of the current statutory schemes (the Ombud for Financial Services Providers (FAIS Ombud)) will be included in the new NFO, as and when the necessary legislative changes have been concluded. It is envisioned that the NFO’s ambit will be expanded beyond the combined jurisdiction of the current amalgamated industry ombud scheme (“NFO1”) that was established and recognised by the Ombud Council in March 2024 as an amalgamation of four former industry schemes covering complaints related to banks, credit providers, life insurers and non-life insurers. NFO2 will include complaints about all types of regulated financial institutions, products, and services, excluding retirement funds. As indicated in the implementation plan annexed to the National Treasury policy statement, NFO1 is likely to form the core of the new, statutorily underpinned NFO2.

The current statutory Pension Funds Adjudicator will remain a separate statutory scheme in the medium-term and be renamed the Retirement Funds Ombud (RFO), with jurisdiction over retirement fund related complaints, until such time that it is integrated into NFO2 in the longer term.

Over time, the intended reform of the financial ombud system will therefore progress as follows:

Figure 3: Progression to future structure of the financial ombud system



8.3. INTERNAL ENVIRONMENT

8.3.1. HUMAN RESOURCES

A skilled board, appointed by the Minister of Finance, guides the strategic direction of the Ombud Council. A Chief Ombud is in place, supported by a target staff complement of seven individuals comprising the Head of Regulation and Oversight, Head of Operations, and Head of Finance and support staff reporting to them. Besides functioning as the Chief Executive Officer, the Chief Ombud is vested with the Ombud Council's regulatory, oversight and enforcement powers under the FSR Act, supports the National Treasury's reform of the ombud system, and facilitates related change processes. The current staff establishment is deemed sufficient and appropriate in the current context but can be adapted to –

- respond to future changes to the mandate and functions of the Council that may be brought about by the regulatory reform of the financial ombud system; and
- align with National Treasury's consideration of shared services support for smaller entities in due course.

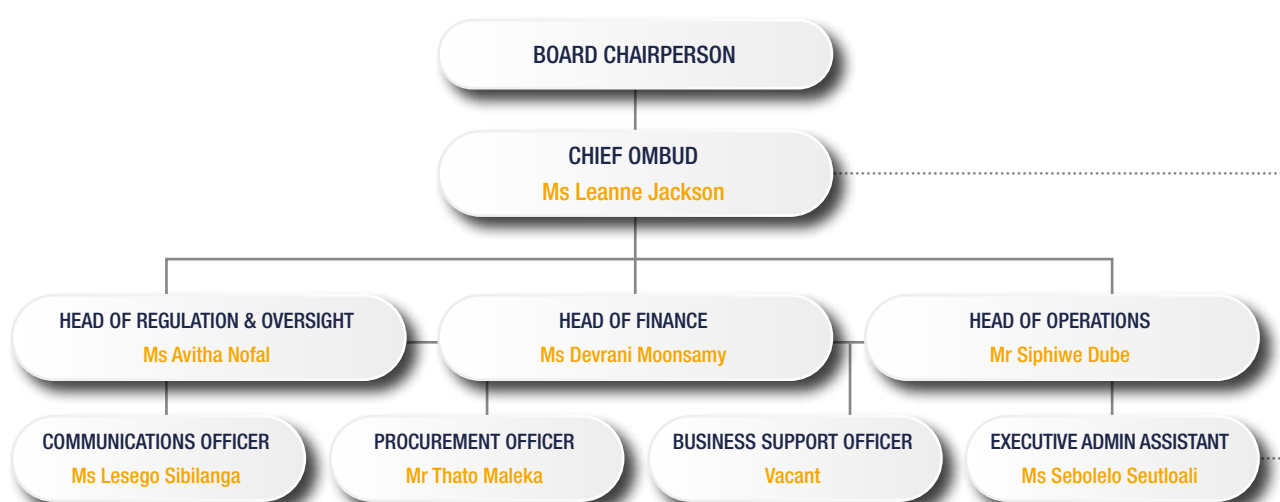


Figure 4: Ombud Council Organisational Structure

8.3.2. TECHNOLOGY AND INFRASTRUCTURE

The Ombud Council leverages appropriate technology to work smart in performing its functions. Considering the small scale of the staff complement, the hybrid physical and remote working model, and the nature of the Council's operations, a "virtual" ICT model is in place. ICT arrangements will be continually improved, including the implementation of a robust ICT Governance Policy.

8.3.3. TRANSFORMATION AND B-BBEE

The Ombud Council contributes to socio-economic transformation by procuring from suppliers that meet the B-BBEE black and/or black woman ownership or exempt micro-enterprise (EME) and qualifying small enterprise criteria. All valid invoices are paid within 30 days as required by the PFMA to ensure the financial sustainability of its service providers (as provided for in the Council's Social and Ethics policy).

8.3.4. FUNDING

In terms of the FSR Act read with the Levies Acts, the Ombud Council's operations are funded through the imposition of levies payable by financial institutions and collected on its behalf by the FSCA. The Ombud Council is also empowered to charge fees for the performance of specific functions, but has not opted to do so to date. Delayed commencement of the Levies Acts resulted in the operationalisation of the Council being funded from a ringfenced component of FSCA funds derived from administrative penalties during financial years 2021/22 (R10m) and 2022/23 (R10m), and a transfer from the National Treasury in 2023/24 (R13m). Chapter 16 of the FSR Act which enables the Ombud Council's financial processes, came into operation on 1 April 2024 coinciding with the commencement of the Levies Acts (which was a prerequisite for the Ombud Council to be formally listed as a national public entity under Schedule 3A of the PFMA). This enabled effective budgeting and execution with effect from the 2024/25 financial year onwards.

In terms of the current Schedules to the Levies Acts, the quantum of levies payable to the Ombud Council is set as equal to a fixed percentage (2.5%) of levies payable by financial institutions to the FSCA. Legislation permits the Ombud Council to submit a proposal to the Minister of Finance for an amendment to the applicable Schedule to the Levies Act for subsequent financial years, should it believe an adjustment to its levy formula is appropriate. In the absence of such an amendment to the Schedule, the Levies Act contemplates levy increases linked to the CPI unless the Minister determines a lower increase. A decision regarding the need for any levy formula adjustment will be taken as part of standard future budget review processes, but no such adjustment is proposed for the 2025/26 financial year.

8.4. SWOT ANALYSIS

Considering the analyses of its strategic horizon, external and internal environments, the Council has assessed its strengths, weaknesses, opportunities (SWOT), and threats as follows:

Table 4: SWOT Analysis

STRENGTHS - Breadth, depth and diversity of skills and experience of Board and senior management. - Reciprocal trust relationship with stakeholders who enable the Council's mandate. - Demonstrable commitment to good governance and performance. - Aspirational, realistic team culture that enables delivery of mandate in an agile, responsive manner. - Robust legislative toolkit to drive the mandate.	WEAKNESSES - Limited staff complement (intentional, by design) resulting in key person risk, for which crisis succession / continuity planning is being developed. - Inherent outsourcing risks need to be managed for dynamic future scenarios (including potential National Treasury shared services model and possible longer term mandate changes). - Lack of relevant data sets to enable the Ombud Council's decisions.
OPPORTUNITIES - Leverage consolidation of ombud schemes to continuously align mandate and ways of working to be future-fit and relevant. - Strengthen collaborative operating model and leverage broader financial education framework to deliver own consumer awareness mandate. - Explore data gathering/ analysis/ interpretation opportunities and leverage legislative toolkit to achieve better data results.	THREATS - Difficulty in attracting and retaining experienced skill combinations to deliver the mandate over the strategic period. - Five-year contracts of senior staff are misaligned to the strategic planning period (continuity options to be explored). - Unexpected mandate changes over longer term in light of ombud system reforms.

PART C

MEASURING OUR PERFORMANCE

9. INSTITUTIONAL PERFORMANCE INFORMATION

The performance, outcomes, and targets for the Ombud Council's three strategic priorities, and the indicators to measure their achievement, aim to implement the statutory functions of the Council to fulfil its statutory mandate, in line with national priorities and goals, as per the table below:

Table 5: Institutional Performance in Support of National Goals and Policies

Vision & Mission in Context of Mandate	GNU SOI	GNU Priority	NDP Goal	MTDP 2024-29 Strategic Priority	MTDP 2024-29 Outcome	Ombud Council Strategic Priority	FSR Act Mandate	
	Integrity and good governance	Rebuild the capability of the state and create a professional public service	Build a capable and developmental state	Build a capable, ethical, and developmental state	Improved governance and performance of public entities (Reviewed public entities with rationalised, streamlined, and implemented shared services models)	Programme 1: Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reform.	To assist in ensuring that financial customers have access to, and are able to use, affordable, effective, independent, and fair alternative dispute resolution processes for complaints about financial institutions in relation to financial products, financial services, and services provided by market infrastructures.	FSR Act s178: The Ombud Council must- (a) manage its affairs in an efficient and effective way; and (b) establish and implement appropriate and effective governance systems and processes.
	Promote social justice, redress, and equity, and alleviate poverty.	Reduce poverty and tackle the high cost of living.	Rapid, inclusive and sustainable economic growth and job creation	Inclusive growth and job creation. Reduce poverty and tackle the high cost of living	Supportive and sustainable economic policy environment.	Programme 2: Leverage the broader financial sector education framework and collaborate to promote awareness of the ombud system and enable financial customers to understand and assert their rights to fair treatment and redress.		FSR Act s177(1)(d): Promote public awareness of schemes and their services. FSR Act s177(1)(e): Facilitate access by financial customers to appropriate ombuds. FSR Act s177(1)(f): Publicise schemes, including the kinds of complaints that they deal with.
	Economy and employment				Optimised social protection and coverage.	Programme 3: Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.		FSR Act s177(1)(i): Support financial inclusion. FSR Act s184 (d) and (e): Board must keep the Minister informed of trends in nature of complaints dealt with by ombud schemes and keep the Minister and financial sector regulators informed of the conduct of financial schemes that is giving rise to complaints.
								FSR Act s177(1)(a): Recognise industry schemes. FSR Act s177(1)(b): Promote co-operation between and co-ordination of activities of ombuds. FSR Act s177(1)(c): Protect independence and impartiality of ombuds. FSR Act s177(1)(g): Resolve overlaps of schemes' jurisdictional coverage. FSR Act s177(1)(h): Monitor the performance of schemes, including their compliance with relevant financial sector laws.

9.1. MEASURING THE IMPACT

Underpinned by its statutory mandate, the Council's intended impact, aligned to our Vision and Mission, is to ensure that a known, trusted, and easily accessible ombud system exists for all in the financial sector.

Impact Statement

Ensuring that the ombud system works better for financial customers by using existing statutory powers to harmonise the system, improve its coverage and visibility, and track its performance; and by proactively supporting regulatory reforms to improve the system over time.

9.2. MEASURING OUTCOMES

Table 6: Priorities, outcomes, and indicators

MTDP Priority 3:	Build a capable, ethical, and developmental state.
MTDP Outcome	Improve governance and performance of public entities: Reviewed public entities with rationalised, streamlined, and implemented shared services models.
Ombud Council Strategic Priority 1:	Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reforms.

Outcome	Outcome indicator	Baseline	Five-year target
1. Good governance and operational efficiency underpinned by effective systems and controls is embedded.	Unqualified external audit opinion.	Unqualified audit opinion for the 2023/24 financial year.	Annual unqualified audit opinion.
	No material internal audit findings.	One material finding.	No material findings, audit recommendations implemented on an annual basis.
	Risk management and compliance frameworks in place and implemented.	Strategic risk framework in place. Compliance framework in development.	Risk management and compliance frameworks in place, implemented and reviewed annually.
MTDP Priority 1:	Inclusive growth and job creation.		
MDTP Outcome	Supportive and sustainable economic policy environment.		
MDP Priority 2:	Reduce poverty and tackle the high cost of living.		
MDTP Outcome	Optimised social protection and coverage.		
Ombud Council Strategic Priority 2:	Leverage the broader financial sector education framework and collaborate to promote awareness and usage of the ombud system and enable financial customers to understand and assert their rights to fair treatment and redress.		
Outcome	Outcome indicator	Baseline	Five-year target
2. Increased consumer awareness and usage of ombud schemes and their services.	Consumer awareness and usage baseline measurement developed and % increase in awareness and usage against baseline by end of five-year period.	None. New initiative.	Baseline measurement re-run and shows evidence of increased consumer awareness and usage.
	Number of consumer awareness materials published, and awareness activities carried out.	Activities performed as per Ombud Council 2023/24 stakeholder engagement plan.	Annual targets to be set and achieved.
MTDP Priority 1:	Inclusive growth and job creation.		
MDTP Outcome	Supportive and sustainable economic policy environment.		
MDP Priority 2:	Reduce poverty and tackle the high cost of living.		
MDTP Outcome	Optimised social protection and coverage.		
Ombud Council Strategic Priority 3:	Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.		
Outcome	Outcome indicator	Baseline	Five-year target
3. Conduct risks identified through analysis of reported ombud data and shared with relevant stakeholders to enable mitigation through policy or regulatory responses.	Engagements with regulators and National Treasury to share identified conduct risks and develop appropriate policy or regulatory responses.	None. New initiative.	Demonstrable Ombud Council support to policy or regulatory responses to identified conduct risks.
4. Implementation of reforms in National Treasury policy paper (A Simpler, Stronger, Financial Sector Ombud System, Feb 2024) supported.	Records of technical and regulatory inputs to reform process.	100% achievement of requested technical and regulatory inputs leading up to publication of NT policy paper and related legislation (e.g. COFI Bill).	Demonstrable progress in implementation of NT reform proposals, including legislative proposals finalised, and Ombud Council and schemes prepared for implementation.
5. Improved alignment and co-ordination of ombud scheme complaint handling processes.	Records of ombud scheme process changes aimed at alignment and co-ordination between schemes. Finalised Ombud Council Rules (OCRs) for the Pension Funds Adjudicator, appropriately aligned with existing OCRs for the FAIS Ombud and governing rules of the NFO.	None. New indicator.	Simplified consumer access points to ombuds, reduced overlap and simplified referrals between ombud schemes (notably between NFO and FAIS Ombud), and improved alignment of complaint handling processes. OCRs for the Pension Funds Adjudicator implemented.

9.3. EXPLANATION OF PLANNED PERFORMANCE

9.3.1. OUTCOME 1: GOOD GOVERNANCE AND OPERATIONAL EFFICIENCY UNDERPINNED BY EFFECTIVE SYSTEMS AND CONTROLS IS EMBEDDED.

This outcome aligns to the MTDP priority to build a capable, ethical, and developmental state, and the related MTDP outcome targeting improved governance and performance of public entities. It also addresses the Ombud Council's statutory governance objective to manage its affairs in an efficient and effective way and establish and implement appropriate and effective governance systems and processes (section 178 of the FSR Act). Importantly, the Ombud Council is committed to reaching this objective in a risk-based manner, implementing systems and controls that are proportional to our mandate, size, and scale and mindful of the need to respond with agility to pending structural reforms of the ombud system. This approach is consistent with the MTDP drive toward public entities with rationalised, streamlined, and implemented shared services models, and the Ombud Council will proactively participate in National Treasury initiatives in this regard.

The Auditor-General of South Africa (AGSA) opted not to conduct the Ombud Council's external audit in respect of the 2023/24 financial year, and the Council was therefore audited by an external audit firm approved by the AGSA, achieving an unqualified audit opinion. The AGSA will similarly not perform the external audit for the 2024/25 financial year and our assumption is that this will remain the case over the five-year strategic planning period. The Ombud Council will continue to target unqualified external audit opinions throughout the period. It should be noted that the 2023/24 audit was largely based on the Ombud Council's use of FSCA financial, supply chain, human resources, and other corporate service functions, due to the shared services arrangement in place at the time. Audits in respect of financial year 2024/25 onward will consider the Ombud Council's own policies and processes.

The Ombud Council will enhance its existing risk management framework and build on current basic compliance monitoring processes (which include a PFMA compliance monitoring process) to develop a more comprehensive compliance framework covering the Council's key responsibilities across a range of relevant laws. All required financial and non-financial reporting obligations will continue to be met. Operational efficiency will be targeted through ensuring fit-for-purpose processes for corporate functions including human resources, ICT, Board secretariat, and performance monitoring and evaluation processes.

Aside from the external audit, the effectiveness of these frameworks will be assessed through a robust outsourced internal audit system and overseen by the Ombud Council's Audit & Risk Committee and Board.

9.3.2. OUTCOME 2: INCREASED CONSUMER AWARENESS AND USAGE OF OMBUD SCHEMES AND THEIR SERVICES

The Ombud Council's targeted outcomes 2 to 5 are all aimed at achieving the Ombud Council's core statutory mandate to ensure that financial customers have access to, and are able to use, affordable, effective, independent, and fair alternative dispute resolution processes for complaints about financial institutions. They also support the Ombud Council function of supporting financial inclusion², which is defined in the FSR Act to mean that all persons have timely and fair access to appropriate, fair, and affordable financial products and services.

As such, these outcomes all align broadly to the MTDP priorities for inclusive growth and job creation and reducing poverty and tackling the high cost of living. More particularly, they seek to ultimately contribute to the respective MTDP outcomes of a supportive and sustainable economic environment and optimised social protection and coverage.

Inclusive growth requires enhanced financial inclusion as defined above. Greater inclusion in turn empowers financial customers with access to products and services that, with necessary education and supportive frameworks, can be used to protect them from financial vulnerabilities and shocks and help combat poverty. Meaningful participation in the financial system can therefore work alongside social protection measures for individuals and households, as envisaged in the MTDP aim of linking social assistance with other forms of support to lift people out of poverty.

However, participation in the financial system inevitably comes with the risk of unfair customer outcomes from time to time, particularly for financially unsophisticated or otherwise vulnerable financial customers. Access to fair alternative (out of court) dispute resolution is therefore an important underpin to other financial consumer protection frameworks, making the ombud system a valuable enabler for confident participation in and trust in the financial system.

Financial customers cannot benefit from the protection of the financial ombud system unless they know about it and how to use it. The Ombud Council therefore has an explicit responsibility to promote public awareness of and

² Section 177(1)(i) of the FSR Act.

publicise ombud schemes, their services and the kinds of complaints they deal with³. Over the five-year planning period, the Council will therefore prioritise the development of materials to increase consumer awareness of their right to fair treatment by financial institutions; the right to complain when they are treated unfairly; and how to assert these rights through the ombud system to secure redress. To optimise reach and consistency of this messaging, this will be done largely in collaboration with identified stakeholders who are also committed to financial education, including but not limited to conduct regulators such as the FSCA and the National Credit Regulator, and the ombud schemes themselves.

To ensure that the effectiveness of these education and awareness measures is measurable, the Ombud Council will appoint a credible service provider to assist us in conducting a baseline measurement study of the current levels of consumer awareness and usage of the financial ombud system. This measurement will be re-run toward the end of the five-year planning period to determine whether awareness and education actions have yielded positive results, which would be demonstrated by evidence of increased awareness and usage of the ombud system since the initial baseline was determined.

The Ombud Council will also continue its current active participation in the National Consumer Financial Education

Committee chaired by the National Treasury, and support to the development and implementation of national financial education policy.

9.3.3. OUTCOME 3: CONDUCT RISKS IDENTIFIED THROUGH ANALYSIS OF REPORTED OMBUD DATA AND SHARED WITH RELEVANT STAKEHOLDERS TO ENABLE MITIGATION THROUGH POLICY AND REGULATORY RESPONSES.

In addition to its primary purpose of resolving financial customer complaints against financial institutions, the ombud system is a valuable source of data (both quantitative and qualitative) to enable policymakers and financial sector conduct regulators to identify and proactively respond to emerging financial sector conduct risks. These conduct risk insights enable appropriate risk-based supervisory frameworks and evidence-based regulatory and policy interventions to make the financial system work better for customers, in support of the MTDP policy aims summarised above.

In this context, “conduct risks” refers primarily to the conduct of financial institutions that is giving rise to customer complaints, and may therefore be compromising fair outcomes for financial customers. A particular focus is on risks to the achievement of the six targeted customer outcomes of the Treating Customers Fairly (TCF) consumer protection framework:

Table 7: TCF outcomes.

TCF Outcome 1	Customers are confident that they are dealing with firms where the fair treatment of customers is central to the firm culture.
TCF Outcome 2	Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly.
TCF Outcome 3	Customers are given clear information and are kept appropriately informed before, during and after the time of contracting.
TCF Outcome 4	Where customers receive advice, the advice is suitable and takes account of their circumstances.
TCF Outcome 5	Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and what they have been led to expect.
TCF Outcome 6	Customers do not face unreasonable post-sale barriers to change product, switch provider, submit a claim or make a complaint.

3 Section 177(1)(d) and (f) of the FSR Act.

Sections 184(d) and (e) of the FSR Act require the Board of the Ombud Council to keep the Minister of Finance informed of ombud scheme complaint trends and how they are being dealt with, and to keep both the Minister and financial sector regulators informed of the conduct of financial institutions giving rise to complaints. Ombud schemes are in turn obliged to report corresponding complaints related information to the Ombud Council⁴. The Ombud Council has therefore developed a consistent reporting framework setting out the types and structure of complaint related information to be reported to the Ombud Council by ombud schemes. Over the planning period, the Ombud Council will focus on effective analysis of this reported information, and agree with the National Treasury and the regulators on mutually beneficial information sharing processes. The Ombud Council will engage with these stakeholders to identify appropriate regulatory and policy responses to the risks identified, and use our legislative toolkit (such as Ombud Council Rules on how to deal with complaints, information gathering powers, and the power to designate schemes to deal with complaints where there are jurisdictional gaps) to support such interventions where appropriate.

9.3.4. OUTCOME 4: IMPLEMENTATION OF REFORMS IN NATIONAL TREASURY POLICY PAPER (A SIMPLER, STRONGER, FINANCIAL SECTOR OMBUD SYSTEM, FEBRUARY 2024) SUPPORTED.

Since its inception, the Ombud Council has worked closely with the National Treasury to provide input to help shape the policy response to the World Bank Diagnostic recommendations for reform of the ombud system. This culminated in the publication of the National Treasury policy statement “A simpler, stronger, financial sector ombud system” in February 2024. The Ombud Council strongly supports the policy response articulated by the National Treasury.

Over the five-year planning period, the Ombud Council will therefore prioritise support to and facilitation of the implementation steps outlined in the National Treasury statement. During 2025/26 a key focus area will be providing technical inputs into the legislative proposals to create the statutory underpin for the new, consolidated ombud system. This will be achieved through the Ombud Council's participation in a National Treasury, World Bank, FSCA and Ombud Council legislative working group that is drafting these proposals.

9.3.5. OUTCOME 5: IMPROVED ALIGNMENT AND CO-ORDINATION OF OMBUD SCHEME COMPLAINT HANDLING PROCESSES.

Although several aspects of the reform of the ombud system require new primary legislation, as discussed elsewhere in this Plan, the Ombud Council has the opportunity to use our existing legislative toolkit to improve alignment and co-ordination across the complaint handling processes of the existing ombud schemes in the interim. This process has had a valuable kick-start through the 2024 merger of four previous industry ombud schemes to form the NFO. Further streamlining of processes within the existing ombud system will minimise the potential disruption of implementing the structural changes to be made when reform legislation is ready – particularly the absorption of the FAIS Ombud into an overarching scheme.

In parallel with supporting the evolving legislative framework, the Ombud Council will therefore also focus on facilitating simplification of the existing system, including simplified customer access points, reducing overlaps, simplifying referrals between schemes, and aligning terminology and complaint handling processes across schemes wherever sensible.

The Ombud Council will also use its FSR Act powers to make Ombud Council Rules governing complaint handling processes for the Pension Funds Adjudicator, ensuring that these Rules are aligned to the extent appropriate with corresponding Rules for the FAIS Ombud and the approved governing rules of the National Financial Ombud. This is consistent with the Council's responsibility, when making Ombud Council Rules, to seek a consistent approach for all ombud schemes⁵.

⁴ Section 217(1)(a) of the FSR Act.

⁵ Section 201(5)(a) of the FSR Act.

10. KEY RISKS

The Ombud Council's risk management process is in place in accordance with the risk management framework approved by the Audit and Risk Committee and the Board. One risk, the "key person" risk, is in breach of risk appetite, but within risk tolerance. This risk arises from the fact that business continuity would be impacted in the event of the departure of the Chief Ombud or one or more other members of the executive team. Crisis succession and business continuity plans are being developed to address this risk and bring it within risk tolerance, although long-term succession remains problematic in view of the Council's intentionally small staff complement and the need for Ministerial appointment of the Chief Ombud. All other risks are residually within risk appetite.

Table 8: Overview of Ombud Council strategic risks.

Risk Profile versus Risk Appetite, Tolerance, and Capacity			Within Risk Appetite		Risk Appetite Breached Within Risk Tolerance	Risk Tolerance Breached Within Risk Bearing Capacity	Risk Capacity Breached
			Impact / Severity				Breach of risk capacity
			Minor 1	Moderate 2	Material 3	Catastrophic 4	
Likelihood / Probability	Likely	4	Medium	High ③	Very High ①	Very High	Breach of risk capacity
	Probable	3	Medium	Medium	High	Very High	
	Possible	2	Low	④ Medium ②	Medium	High	
	Unlikely	1	Low	Low ⑤	Low	Medium	
Decision Maker			Management (Executives)	Chief Executive Officer	Chief Executive Officer & Board	Board & Executive Authority	Executive Authority & Parliament
Decision Framework			Delegation of Authority Performance Contract	Delegation of Authority Performance Contract	Board Charter/Committee ToR Performance Contract	FSRA Mandate & Responsibilities Board Charter	FSRA Mandate & Responsibilities
King IV Principle 11			- Actively manage risk - Improve controls - Monitor/audit	- Actively manage risk - Improve controls - Report progress quarterly (CEO)	- Actively manage risk - Improve controls and crisis plan - Report progress fortnightly (CE) - Report progress monthly (Board)	- Actively manage risk - Improve controls and crisis plan - Report control progress weekly	Not a going concern
Strategic Priority				#	Risk Description		Risk Rating
1. Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reforms.				1	Difficulty attracting and (especially) retaining staff with appropriate skills mix: key person risk.		Very High
				2	Cyber incident, loss (or compromise) of information.		Medium
				3	Non-compliance with information protection obligations.		High
2. Leverage the broader financial sector education framework and collaborate to promote awareness and usage of the ombud system to enable financial customers to understand and assert their rights to fair treatment and redress.				4	Sub optimal usage of ombud system by financial customers.		Low
				5	Unexpected changes in mandate or delivery expectations.		Low
3. Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.							

Table 9: Key risks linked to targeted outcomes

Outcome	Key risk	Risk mitigation
Outcome 1: Good governance and operational efficiency underpinned by effective systems and controls is embedded.	Difficulty attracting and (especially) retaining staff with appropriate skills mix: Key-person risk.	Crisis succession / continuity plan.
	Cyber incident, loss (or compromise) of information.	ICT governance policy and controls.
	Non-compliance with information protection obligations.	POPIA policy and compliance framework developed.
Outcome 2: Increased consumer awareness and usage of ombud schemes and their services.	Sub-optimal usage of alternative dispute resolution mechanisms by financial customers.	Consumer education and awareness initiatives in collaboration with key stakeholders.
Outcome 4: Implementation of reforms in National Treasury policy paper (A simpler, stronger, financial sector ombud system, February 2024) supported.	Unexpected changes in mandate or delivery expectations.	Proactive participation in and monitoring of legislative reform process.

The Council's reason for existence, as well as its ability to deliver on its mandate, is intrinsically linked to its key stakeholders. Although these stakeholders are well aligned from a policy and operational collaboration perspective, the Council is cognisant that stakeholder relations are a key source of risk, which must be consciously managed at all times. The Council therefore builds and maintains meaningful, constructive relations and trust through ongoing effective stakeholder communication and delivering on its commitments.

A particular focus of the Ombud Council's stakeholder relationships is to support financial inclusion. The FSR Act

defines financial inclusion to mean "that all persons have timely and fair access to appropriate, fair and affordable financial products". The Council supports financial inclusion by promoting the ombud system's accessibility for financial customers and supporting and facilitating customer outreach and education initiatives by ombud schemes, the FSCA, and other key stakeholders. To this end, the Ombud Council appointed the Government Technical Advisory Centre (GTAC) to develop a business model for collaborative delivery of our consumer awareness and education mandate, which will form the basis of our approach to delivering this part of our mandate (in accordance with our Strategic Priority 2).

The Table below sets out the Ombud Council's key stakeholders, key relationship drivers, the Council's

Table 10: Key stakeholders and relationship drivers

Key Stakeholders	Risk to Ombud Council from relationship with this stakeholder	Key Expectations
Parliament (SCOF)	Low residual risk	Oversight to ensure accountability and performance
National Treasury	Medium inherent risk, but residually low	Sector policy formulation, ombud scheme reform policy direction, support to mobilise resources
Board	Medium inherent risk, residually low	Strategic direction, oversight to ensure good governance, strategy implementation and mandate delivery
Auditor General SA	Low risk, positive internal control environment	Guidance in respect of PFMA compliance, approval of external auditor appointments
FSCA	Low residual risk	Collaborative support for initiatives, efficient levy collection
NCR	Low residual risk	Collaborative support for initiatives
Other Regulators	Low residual risk	Collaborative support for initiatives
FAIS Ombud	Low residual risk	Collaboration, compliance, and performance
NFO	Medium inherent risk, residually low	Collaboration, compliance, and performance
JSE Ombud	Medium inherent risk, residually low	Collaboration, compliance, and performance
Pension Funds Adjudicator	Medium inherent risk, residually low	Collaboration, compliance, and performance
Professional Bodies	Low residual risk	Collaboration, facilitation of member support to ombud system
Industry Associations	Low residual risk	Collaboration, facilitation of member support to ombud system
Users of Financial Services	Medium inherent risk, residually low	Beneficiaries of the work of the Council
Media (As partner)	Medium inherent risk, residually low	Collaborative support for consumer awareness initiatives; Exposure of unfair treatment of customers
Media (As public commentary)	Medium inherent risk, residually medium	Exposure of ombud system failings and thus of Ombud Council ineffectiveness
Public at Large	Medium inherent risk, residually low	Potential beneficiaries of the work of the Council
Education Institutions	Low residual risk	Potential collaborative support for education initiatives

PART D TECHNICAL INDICATOR DESCRIPTIONS

The indicator numbers in Part D are aligned with the strategic priorities and related outcomes set out in paragraph 9 of this Strategic Plan.

STRATEGIC PRIORITY 1

Maintain a well-governed and effective Ombud Council that delivers its mandate, aligned to financial ombud system reforms.

TARGETED OUTCOME FOR STRATEGIC PRIORITY 1:

Outcome 1: Good governance and operational efficiency underpinned by effective systems and controls is embedded.

Indicator title	1.1. Unqualified external audit opinion.
Definition	Achievement of unqualified audit opinions
Source of data	External auditors' audit reports
Method of calculation / assessment	Review of audit opinions.
Assumptions	Efficient audit and financial management systems are maintained.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Annual unqualified audit opinions.
Indicator responsibility	Head of Finance

Indicator title	1.2. No material internal audit findings.
Definition	Achievement of internal audit reports by appointed outsourced internal auditors with no material findings.
Source of data	Internal audit reports
Method of calculation / assessment	Simple count of number of material findings.
Assumptions	Adequate internal controls are maintained.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	No material internal audit findings and audit recommendations implemented on an annual basis.
Indicator responsibility	Head of Finance

Indicator title	1.3. Risk management and compliance frameworks in place and implemented.
Definition	Develop and maintain effective frameworks to manage risk and compliance with legislation
Source of data	Documented and regularly updated risk and compliance frameworks.
Method of calculation / assessment	Updated risk registers and compliance reports tabled at Committees and Board
Assumptions	N/A
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Risk management and compliance frameworks in place, Implemented and reviewed annually.
Indicator responsibility	Head of Operations

STRATEGIC PRIORITY 2

Leverage the broader financial sector education framework and collaborate to promote awareness of the ombud system and enable financial customers to understand and assert their rights to fair treatment and redress.

TARGETED OUTCOME FOR STRATEGIC PRIORITY 2:

Outcome 2: Increased consumer awareness and usage of ombud services.

Indicator title	2.1. Consumer awareness baseline measurement developed and % increase in awareness against baseline by end of five-year period.
Definition	The Ombud Council will conduct and publish a baseline study of consumer awareness and usage of the financial ombud system, and use it as the basis to measure changes in awareness and usage by the end of the five-year period.
Source of data	Published baseline studies (initial study year 1; subsequent study year 5)
Method of calculation / assessment	Comparison of findings of initial and subsequent baseline study.
Assumptions	Availability of relevant service provider expertise to conduct studies.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Baseline measurement re-run (year 5) and shows evidence of increased consumer awareness and usage of ombud system since publication of initial study (year 1).
Indicator responsibility	Head of Regulation & Oversight

Indicator title	2.2. Number of consumer awareness materials published, and awareness activities carried out.
Definition	The Ombud Council will publish consumer awareness articles through appropriate media and other channels, and carry out outreach communication activities, in line with its function to publicise and promote awareness of ombud schemes.
Source of data	Records of published items and activities.
Method of calculation / assessment	Number of materials published and activities carried out.
Assumptions	Reasonable co-operation of stakeholders in the financial education environment. No change in Ombud Council statutory function in relation to consumer awareness.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Targeted numbers of publications and activities achieved as per Annual Performance Plans throughout the five-year period.
Indicator responsibility	Head of Regulation & Oversight

STRATEGIC PRIORITY 3

Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system

TARGETED OUTCOMES FOR STRATEGIC PRIORITY 3:

- Outcome 3: Conduct risks identified through analysis of reported ombud data and shared with relevant stakeholders to enable mitigation through policy and regulatory responses.
- Outcome 4: Implementation of reforms in National Treasury policy statement (A Simpler, Stronger, Financial Sector Ombud System, Feb 2024) supported.
- Outcome 5: Improved alignment and co-ordination of ombud scheme complaint handling processes.

Indicator title	3.1. Engagements with regulators and National Treasury to share identified conduct risks and develop appropriate policy or regulatory responses.
Definition	The Council will use its information gathering powers under the FSR Act (s.217) to develop aligned reporting requirements for schemes and analyse this data to identify and communicate conduct risks and support the development of appropriate policy and regulatory responses.
Source of data	Records of Council participation in engagements with, and reports to, the Minister of Finance, National Treasury, FSCA and other relevant stakeholders.
Method of calculation / assessment	Review of complaint trend reports, records of engagements and documented proposals for regulatory or policy responses
Assumptions	Regulators, NT and other relevant stakeholders are reasonably consultative.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Regular meaningful reports to Minister, NT and regulators in agreed formats and frequency; and ongoing constructive policy and regulatory proposals demonstrating demonstrable support to mitigate conduct risks (as per Annual Performance Plan targets).
Indicator responsibility	Chief Ombud and Head of Regulation & Oversight

Indicator title	4.1 Records of technical and regulatory inputs to reform processes.
Definition	The Ombud Council will make ongoing proactive technical and regulatory inputs into stakeholder engagements on regulatory, policy and structural reform of the ombud system.
Source of data	Records of Council participation in stakeholder engagements; records of inputs.
Method of calculation / assessment	Number of stakeholder requests for input complied with within requested deadlines.
Assumptions	Stakeholders are reasonably consultative. National Treasury work on ombud system policy sand legislative reforms progresses, in line with policy statement "a simpler, safer financial sector ombud system. (National Treasury: Feb 2024).
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	100% of requests for input responded to within requested deadlines; Demonstrable progress in implementation of in implementation of NT reform proposals, including legislative proposals finalised, and Ombud Council and schemes prepared for implementation..
Indicator responsibility	Chief Ombud

Indicator title	5.1. Records of ombud scheme process changes aimed at alignment and co-ordination between schemes, including records of finalised Ombud Council Rules for Pension Funds Adjudicator.
Definition	The Council will use its regulatory powers under the FSR Act , in collaboration with ombud schemes, to effect ombud scheme complaint handling process changes aimed at improved alignment between schemes.
Source of data	Documented co-ordination plan between Ombud Council and ombud schemes. Published Ombud Council Rules.
Method of calculation / assessment	Extent of achievement of targeted deliverables in co-ordination plan; Records of consultation with schemes; Ombud Council Rules published on website.
Assumptions	Reasonable co-operation from ombud schemes.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Desired performance	Achievement of co-ordination plan targets; resulting in simplified consumer access points to ombuds, reduced overlap and simplified referrals between ombud schemes (notably between NFO and FAIS Ombud), and improved alignment of complaint handling processes. OCRs for the Pension Funds Adjudicator implemented.
Indicator responsibility	Head of Regulation & Oversight

PART E ANNEXURES

ANNEXURE A: MATERIALITY AND SIGNIFICANCE FRAMEWORK

expectations of them, and the potential risk in the relationship.

1. PURPOSE

In accordance with legislative requirements set out in paragraph 2 below, the Accounting Authority of the Ombud Council, being the Chairperson of its Board, is required to develop and implement a Materiality and Significance Framework for the organisation.

The framework must be agreed with the Minister of Finance and will need to be incorporated in the Council's Strategic Plan.⁶

2. RELEVANT LEGISLATIVE PROVISIONS.

- Regulation 28.3.1 of the Treasury Regulations (NT Regulations) made under the Public Finance Management Act, 1999 (PFMA), provides as follows:

"For purposes of material [section 55(2) of the Act] and significant [section 54(2) of the Act], the accounting authority must develop and agree a framework of acceptable levels of materiality and significance with the relevant executive authority".

In the case of the Ombud Council, the accounting authority is the Chairperson of the Board⁷ and the executive authority is the Minister of Finance.

- Regulation 30.1.3(e) of the NT Regulations:
"The strategic plan must –
(e) include the materiality / significant framework, referred to in Treasury Regulation 28.3.1."
The framework must apply for purposes of the following specific provisions of the PFMA:
- Section 54.2 of the PFMA (relevant extracts, emphasis added):
"(2) Before a public entity concludes any of the following transactions, the accounting authority for the public entity must promptly and in writing inform the relevant treasury of the transaction and

submit relevant particulars of the transaction to its executive authority for approval of the transaction:

- (a)
- (b) participation in a significant partnership, trust, unincorporated joint venture or similar arrangement;
- (c) acquisition or disposal of a significant shareholding in a company;
- (d) acquisition or disposal of a significant asset;
- (e) commencement or cessation of a significant business activity; and
- (f) a significant change in the nature or extent of its interest in a significant partnership, trust, unincorporated joint venture or similar arrangement.

- Section 55.2 of the PFMA (relevant extracts, emphasis added):

"(2) The annual report and financial statements [of a public entity] must –

- (a)
- (b) include particulars of –
 - (i) any material losses through criminal conduct and any irregular expenditure and fruitless and wasteful expenditure that occurred during the financial year"

3. DEFINITIONS

A) MATERIAL

Information is material if its omission or misstatement could influence the economic decisions of users taken on the basis of the financial statements. Materiality depends on the size of the item or error judged in the particular circumstances of its omission or misstatement. This materiality provides a threshold or cut-off point, rather than being a primary qualitative characteristic which information must have if it is to be useful.

⁶ The Ombud Council's first formal Strategic Plan for 2023/24 to 2024/25 did not include this framework. Management proposes that it be inserted in the final draft of the 2025 – 2030 Strategic Plan when submitted.

⁷ Section 175(3) of the Financial sector Regulation Act, 2017.

B) SIGNIFICANT

A matter is significant if it is extensive or important enough to merit attention". This is determined considering its relative importance to the entity as a whole – regarding a significant transaction, for example, a significant transaction would be one which is vitally important to fulfil the Ombud Council's mandate and for it to operate effectively.

4. DETERMINING THE MATERIALITY / SIGNIFICANCE LEVEL FOR THE OMBUD COUNCIL.

(A) BASIS FOR QUANTITATIVE MATERIALITY / SIGNIFICANCE MEASURE: 1% OF TOTAL BUDGETED REVENUE.

The Ombud Council has considered the following factors in arriving at the above quantitative measure:

- The Auditor General uses the following materiality levels as a guideline:

Materiality Basis	Guideline %
Gross income	0.25 - 1
Gross expenditure	0.25 - 1
Total assets	0.25 - 2
Net income	2.5 - 10
Fixed assets	2 - 5

- The National Treasury Practice Note on "Applications under section 54 of the PFMA by Public Entities" (2006) uses the following set of parameters to determine significance for that purpose:

Element	%age range to be applied against R value
Total assets	1% - 2%
Total revenue	0.5% - 1%
Profit after tax	2% - 5%

The Ombud Council is mainly funded by levies⁸ payable by financial institutions and is required to ensure that its levy income covers its expenses, and may not budget for a surplus. Total budgeted revenue (i.e. total levy income calculated in accordance with the Financial Sector and Deposit Insurance Levies Act, 2022, plus interest income) is therefore proposed as a basis. Assets are not an appropriate measure for the Ombud Council given its very small asset base.

The percentage to be applied is proposed as 1%, being the upper Auditor General range.

Based on the revenue budget of approximately R26,95 million, this results in a materiality Rand value (rounded up) of R270 000 for the 2024/25 financial year.

(B) QUALITATIVE FACTORS INFLUENCING PERCENTAGE:

The nature of the Ombud Council's business is such that it has public accountability for its actions, and its activities and performance are therefore of public interest - including of particular interest to the financial institutions that fund its performance, and financial customers who are the ultimate beneficiaries of its mandate. However, in absolute terms the Ombud Council is a small organisation and does not handle large sums of money. Both its operations and its statutory functions are subject to strict legislative requirements.

The Council's DOA framework also allows for limited delegation of financial decision-making. With limited exceptions, delegation is currently only to the Heads of Finance and Operations respectively up to a value of R200,000 and to the Chief Ombud up to a value of R1 million.

The Chief Ombud is expected to exercise professional judgment in performing the Council's statutory functions, and there is therefore a risk of error. This is however mitigated by the fact that functions are carried out within a clear legislative framework, and all regulatory / supervisory decisions are currently taken directly by the Chief Ombud (not delegated), who has appropriate skills and experience.

Due to the control environment and DOA framework described above, the risk of fraudulent activity is low. The risk of bribery to influence decisions is further mitigated by the nature of the regulated entities, being public entities in their own right (the statutory ombud schemes) or non-profit ombud schemes (the recognised industry ombud schemes), as opposed to individuals or commercial enterprises.

On balance, therefore, the above qualitative factors in combination do not warrant a lower level of materiality than the 1% proposed.

(C) NON-FINANCIAL MATERIALITY / SIGNIFICANCE:

Due to the small staff complement of the Ombud Council, together with the nature of the Ombud Council's accountability in relation to overseeing conduct in the financial sector, it is proposed that all losses due to criminal

⁸ Although the Ombud Council is also empowered by the FSR Act to charge fees, it currently has no plans to do so.

conduct are regarded as material.

Section 55(2) requires disclosure of any irregular and any fruitless and wasteful expenditure, regardless of value. All such expenditure will be managed, reported on and disclosed in accordance with National Treasury Instruction No. 4 of 2022/2023: PFMA Compliance and reporting Framework.

In the normal course of its statutory functions, the Ombud Council is not expected to conclude the types of transactions referred to in section 54(2) of the PFMA. As such, any such transaction would be strategic, unusual and non-repetitive. It is therefore proposed that, subject to the exception noted below, any transaction referred to in s.54(2) is regarded as significant.

Exception: In respect of the acquisition or disposal of a significant asset (s.54(2)(d)) or the commencement or cessation of a significant business activity (s.54(2)(e)) disclosure and approval will be required in the circumstances set out in the Table under paragraph 5 below.⁹

5. PROPOSED FRAMEWORK

	PROVISION	MATERIAL / SIGNIFICANT MATTER
s.54(2)	(1) Before a public entity concludes any of the following transactions, the accounting authority for the public entity must promptly and in writing inform the relevant treasury of the transaction and submit relevant particulars of the transaction to its executive authority for approval of the transaction:	
	(a) establishment or participation in the establishment of a company;	Approval required for all transactions.
	(b) participation in a significant partnership, trust, unincorporated joint venture or similar arrangement;	Approval required for all transactions.
	(c) acquisition or disposal of a significant shareholding in a company;	Approval required for all transactions.
	(d) acquisition or disposal of a significant asset	Approval required where the Rand asset value of a non-current asset exceeds the level determined per paragraph 4(a) above; or where the acquisition / disposal, regardless of value, would result in a change of the Ombud Council's operations outside its Strategic Plan or budget.
	(e) commencement or cessation of a significant business activity; and	Approval required where the activity falls outside the Ombud Council's core business or Strategic Plan, and its Rand value exceeds the level determined per paragraph 4(a) above.
	(f) a significant change in the nature or extent of its interest in a significant partnership, trust, unincorporated joint venture or similar arrangement.	Approval required for all transactions.
s.55(2)	(b) include particulars of – (i) any material losses through criminal conduct and any irregular expenditure and fruitless and wasteful expenditure that occurred during the financial year;	Reporting required of: - all losses due to criminal conduct of any employee. - all losses due to irregular and fruitless & wasteful expenditure (to be managed, disclosed and reported on in accordance with NT Instruction Note 4 of 2022/23.)

6. FUTURE REVIEWS

The Ombud Council's Board will review this framework on an annual basis.

⁹ These circumstances are informed by the applicable provisions of National Treasury Practice Note on "Applications under section 54 of the PFMA by Public Entities" (2006)

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