

ANNUAL PERFORMANCE PLAN

Strengthening trust, accountability and fairness
in the financial sector ombud system

2026 / 27





EXECUTIVE AUTHORITY STATEMENT BY THE MINISTER OF FINANCE

The financial sector ombud system is a vital underpin to South Africa’s market conduct regulatory framework, providing financial customers with an accessible, effective, independent, and fair alternative resolution framework for disputes with financial institutions. Empowered by the Financial Sector Regulation Act, 2017, the Ombud Council is mandated to help ensure that the ombud schemes it oversees, and the ombud system as a whole, achieves this purpose.

I am pleased to acknowledge the commitments made by the Ombud Council in this Annual Performance Plan to maintain focus on the three strategic work programmes set out in its 2025 – 2030 Strategic Plan:

- The Administration programme seeks to further entrench good governance and operational efficiency, shifting from policy and process development to the sustained implementation of the Council’s maturing control framework.
- The Consumer Awareness and Education programme to strengthen the Council’s delivery of its statutory responsibility to promote consumer awareness of the ombud system and its services, by setting more focused targets to enhance understanding of the ombud system for vulnerable customer groups, in support of national financial inclusion priorities. In addition to wide-ranging collaborative delivery of educational materials and expanded outreach, initiatives of this programme include conducting a baseline study of consumer awareness of the ombud system and hosting a conference for stakeholder engagement on ombud system developments and opportunities for improvement.
- Through the Ombud System Reform programme the Ombud Council will continue its invaluable support to implementing the National Treasury’s ombud system reforms, as articulated in its 2024 policy statement, “A simpler, stronger financial sector ombud system”. Alongside ongoing proactive involvement in developing new legislation to give effect to these

reforms, I appreciate the Council's increased focus on using its oversight and information gathering powers to keep me, the National Treasury and the financial sector regulators informed of emerging financial sector conduct risks identified through analysis of ombud complaint data; and working with the regulators to use this information to bolster their own conduct risk mitigation efforts. I also note the Council's proactive plan to assist the National Treasury in managing the transfer of functions of the current Ombud for Financial Services Providers to a future new overarching national financial ombud scheme, in readiness for when the necessary legislative processes are in place, while continuing to foster alignment between the existing ombud schemes. This bodes well for the effectiveness of the future more consolidated ombud system, as required by the Ombud Council's mandate.

I particularly note and welcome the theme of collaboration, coordination and co-operation that forms a common thread through the Ombud Council's strategic and performance planning. This approach will strengthen the smooth operation of the future more

consolidated ombud system and ensure its effective and impactful integration into the broader financial consumer protection fabric.

I wish the Ombud Council, its board, and the ombud schemes it oversees every success in the implementation of this APP.



Hon. Enoch Godongwana
MINISTER OF FINANCE



REMARKS FROM THE CHAIRPERSON OF THE BOARD (ACCOUNTING AUTHORITY)

While these strategic priorities remain consistent, specific five-year targets have been interrogated and adjusted to ensure they remain ambitious yet achievable.

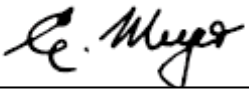
Leanne Jackson, and her team for their dedication and to my fellow Board members for their diligence and active participation in ensuring sound governance.

Looking ahead, the Ombud Council is committed to proactively shaping the future financial ombud system regulatory framework, while continuing to support existing financial ombud schemes, customers, and other stakeholders - including regulatory authorities, policymakers, financial institutions - during the transition. Our stakeholders' cooperation, collaboration, and constructive feedback remain invaluable in ensuring that we collectively safeguard the integrity and effectiveness of the ombud system to serve the public interest. We are building a system that is accessible, trusted, and responsive—one that protects consumers and strengthens confidence in the financial sector.

The Ombud Council's Annual Performance Plan for financial year 2026/2027 continues the Ombud Council's journey in strengthening trust, accountability, and resilience within the financial sector ombud system. It incorporates reflections on and proactive responses to planned developments in the ombud sector, while also building on the steady progress the Ombud Council has been making in strengthening its operational effectiveness.

This Plan also incorporates an update to the Ombud Council's three-pronged Strategic Plan for 2025 – 2030, which prioritises maintaining a well-governed and effective entity that delivers on its mandate; collaboratively leveraging the broader consumer education framework to promote financial consumer rights and awareness of the ombud system; and leveraging our legislative toolkit to coordinate the streamlining, reform, and future direction of the ombud system.

This plan read with the five-year strategy of which it forms a part are more than a roadmap. They are a commitment to shaping the future of financial sector dispute resolution with integrity, collaboration, and innovation!



Ms. Eileen Meyer
CHAIRPERSON
Board of the Ombud Council

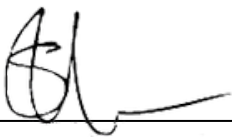
SIGN OFF

It is hereby certified that this Annual Performance Plan:

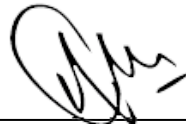
Was developed by the management of the Ombud Council under the guidance of its Board and the Minister of Finance;

Considers all the relevant policies, legislation, and other mandates for which the Ombud Council is responsible, as well as pending regulatory reforms;

Accurately reflects the impact, outcomes, and outputs which the Ombud Council will endeavour to achieve over the period 2026/27.



Mr. Siphwe Dube
Head: Operations



Ms. Avitha Nofal
Head: Regulation and Oversight

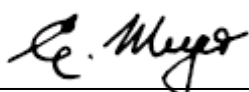


Ms. Devrani Moonsamy
Head: Finance



Ms. Leanne Jackson
Chief Ombud

Approved by:



Ms. Eileen Meyer
Chairperson of the Board and Accounting Authority

TABLE OF CONTENTS

<u>GLOSSARY OF TERMS AND ABBREVIATIONS</u>	7
<u>PART A: OUR MANDATE</u>	8
<u>1. RELEVANT LEGISLATIVE AND POLICY MANDATES</u>	8
<u>2. INSTITUTIONAL POLICIES AND STRATEGIES</u>	9
<u>3. RELEVANT COURT RULINGS</u>	14
<u>PART B: STRATEGIC FOCUS</u>	15
<u>4. UPDATED SITUATIONAL ANALYSIS</u>	15
<u>4.1. EXTERNAL ENVIRONMENT ANALYSIS</u>	15
<u>4.2. INTERNAL ENVIRONMENT</u>	22
<u>PART C: MEASURING OUR PERFORMANCE</u>	29
<u>5. INSTITUTIONAL PROGRAMME PERFORMANCE INFORMATION AND EXPLANATION OF PLANNED PERFORMANCE</u>	29
<u>6. PROGRAMME RESOURCE CONSIDERATIONS</u>	50
<u>7. UPDATED KEY RISKS</u>	53
<u>8. INFRASTRUCTURE PROJECTS</u>	55
<u>9. PUBLIC PRIVATE PARTNERSHIPS</u>	55
<u>PART D: TECHNICAL INDICATOR DESCRIPTIONS</u>	56
<u>ANNEXURE A: AMENDMENTS TO THE STRATEGIC PLAN</u>	68

GLOSSARY OF TERMS AND ABBREVIATIONS

Board	The Board of the Ombud Council, established by s.179 of the FSR Act.
COFI Bill	Conduct of Financial Institutions Bill, expected to be tabled in Parliament during 2026.
Council; or Ombud Council	The Ombud Council, established by s.175 of the FSR Act.
FSCA	Financial Sector Conduct Authority.
FSR Act	Financial Sector Regulation Act, 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 2024-2029.
NDP	National Development Plan.
OCRs	Ombud Council Rules.
Ombud Schemes	Industry ombud schemes and statutory ombud schemes, as defined in the FSR Act.
PFMA	Public Finance Management Act, 1999.
SWOT analysis	Analysis of Strengths, Weaknesses, Opportunities and Threats.

PART A: OUR MANDATE

1. Relevant Legislative and Policy Mandates

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 sections 180 and 188 provide for its Board and Chief Ombud respectively to be appointed by the Minister of Finance.

As required by 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 that Act as from the 2023/24 financial year. Also as from the 2023/2024 financial year, the Council is funded by levies paid by financial institutions 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).

The Council also takes cognisance of the larger body of financial sector laws within which ombud schemes and the financial institutions falling within their scope operate. These include relevant provisions of the FSR Act, and the specific financial sector laws referred to in that Act. As discussed in paragraph 4.1 of this Plan, the pending Conduct of Financial Institutions Bill (COFI Bill) is expected to make far-reaching changes to these laws, although timelines for the passage of the COFI Bill remain unclear.

2. Institutional Policies and Strategies

This Annual Performance Plan is the performance framework for the implementation of the second year of the Ombud Council's Five-year Strategic Plan for 2025/26 – 2029/30.

To deliver on its statutory mandate, the Ombud Council uses its regulatory and supervisory toolkit under the FSR Act to achieve the following strategic commitments in the Strategic Plan:

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.

The Ombud 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). 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.

Note: Please refer to Annexure A, which sets out amendments to certain specific outcome indicators in the Ombud Council’s published 2025 – 2030 Strategic Plan, and explains the reasons for these changes. The strategic priorities set out in Table 1 above remain unchanged.

National priorities in relation to the interests of women, youth and people with disabilities will be supported primarily through the Ombud Council’s strategic priority 2, which focuses on education about and awareness of the ombud system, to enable financial customers to assert their rights to fair treatment by financial institutions. Campaigns specifically targeted at supporting the financial inclusion of women, young people and people with disabilities, by enhancing their awareness and understanding of recourse available to them as financial customers, will be undertaken. In addition, the Ombud Council’s procurement policy includes preference for women-owned businesses.

The table below illustrates the linkage between the MTDP strategic priorities and those of the Ombud Council.

Table 2: 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
	<p>Promote social justice, redress, and equity, and alleviate poverty.</p> <p>Reduce poverty and tackle the high cost of living. Rapid, inclusive and sustainable economic growth and job creation.</p> <p>Economy and employment.</p>	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).	<p>Programme 1: Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reform.</p> <p>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.</p> <p>Programme 3: Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.</p>

As per guidance from the Department of Planning, Monitoring and Evaluation (circular No.01 of 2025), institutions must consider the following when drafting their 2026/27 Annual Performance Plans. The Ombud Council has considered these elements in the development of this Plan in the following way:

Table 3: DPME Strategic considerations vs Ombud council approach

Strategic consideration	Ombud Council approach
The Medium-Term Development Plan (MTDP) 2024-2029 (which includes the supporting Results Frameworks);	See Table 2 above
Priorities relating to women, youth and persons with disabilities.	Campaigns specifically targeted at supporting the financial inclusion of women, young people and people with disabilities, by enhancing their awareness and understanding of recourse available to them as financial customers, will be undertaken. In addition, the Ombud Council’s procurement policy includes preference for women-owned businesses.
Initiatives that contribute towards gender, climate, Science Technology and Innovation and National Strategic Plan on Plan on Gender Based Violence and Femicide.	No specific initiatives. The Council adopts digital solutions to drive efficiency in its business processes where appropriate to our operational needs.
Audited performance based on the 2025/26 Annual Report.	Clean performance audit achieved for 2025/26 and used as a baseline for this APP.
Initiatives which contribute to the expansion of employment particularly youth employment.	See item above regarding youth-focused awareness campaigns. The Ombud Council will also, subject to the requisite SETA approvals, consider the implementation of one or two internships during the year.

Table 3: DPME Strategic considerations vs Ombud council approach continued

Strategic consideration	Ombud Council approach
<p>Initiatives outlined in the Just Transition Framework for South Africa.</p>	<p>Not directly applicable. The Council considers environmental impacts and standards in its operational decisions around travel, office premises and office equipment.</p>
<p>Infrastructure planning initiatives and projects outlined in the National Infrastructure Plan 2050.</p>	<p>Not directly applicable.</p>
<p>Initiatives which contribute to the implementation of Spatial Transformation as guided by the National Spatial Development Framework (NSDF) and outlined in the MTDP Results Framework under Strategic Priority 3.</p>	<p>Not directly applicable.</p>
<p>Institutions contribution to the District Development Model (DDM) One Plans; ensure that planned catalytic interventions are geo-spatially referenced as per the Geo-Spatial Referencing Guidelines issued by DPME.</p>	<p>Not directly applicable.</p>

Table 3: DPME Strategic considerations vs Ombud council approach continued

Strategic consideration	Ombud Council approach
<p>Science Technology and Innovation (STI) priorities outlined in the Department of Science and Innovation’s Decadal Plan for the period 2022 to 2032.</p>	<p>The Ombud Council’s engagements with ombud schemes and other regulators include a focus on both the opportunities and risks for the ombud system and financial consumers arising from digital innovation, artificial intelligence tools, crypto products, and other “fintech” products and services. Operationally, the Ombud Council adopts digital solutions to drive efficiency in its business processes where appropriate to our operational needs.</p>
<p>Digitalisation considerations according to Regulation 25(1)(e) of the Public Service Regulations, 2016, and the Department of Public Service and Administration’s (DPSA) Corporate Governance of ICT Policy Framework Directive.</p>	<p>These instruments are not directly applicable to the Ombud Council but have been considered as guidance in the formulation of the Council’s ICT governance policies and processes, to the extent appropriate to our size and scale. The Council adopts digital solutions to drive efficiency in its business processes where appropriate to our operational needs.</p>

3. Relevant Court Rulings

The Ombud Council is not aware of any court rulings that impact on its operations.

PART B: STRATEGIC FOCUS

4. Updated Situational Analysis

4.1. External Environmental Analysis

PESTEL analysis

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 key political, economic, social, technological, environmental and legal (PESTEL) developments to ensure that the ombud system remains relevant, resilient, and fit for purpose.

Our PESTEL analysis has not shifted materially over the past year.

Table 4: Summary of PESTEL analysis

<p style="text-align: center;">Politics</p> <p style="text-align: center;"><i>Political stability and policy certainty</i></p>	<p style="text-align: center;">Economy</p> <p style="text-align: center;"><i>Economic hardship and financial exclusion</i></p>
<p>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. For the ombud system in particular, the publication of the National Treasury's policy statement "A simpler, safer financial sector ombud system" in 2024 provided valuable policy direction. This is supported by collaboration among regulatory bodies such as the Financial Sector Conduct Authority, the Prudential Authority, the South African Reserve Bank, the Ombud Council and other stakeholders in advancing the National Treasury's broader financial sector reforms.</p> <p>The Financial Sector Regulation Act and policy frameworks, including the</p>	<p>Low economic growth, inequality, unemployment, and poverty remain pervasive, causing 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 and promoting trust in the financial system by ensuring accessible, affordable, and effective dispute resolution structures is a vital underpin of the customer protection framework.</p>

Table 4: Summary of PESTEL analysis continued

<p>National Financial Education Policy and the Financial Inclusion Strategy (in draft form at date of this Plan) will allow for South Africa to prioritise financial literacy, market conduct reform and access to effective redress mechanisms. These reforms aim to ensure that financial services are stable, accessible, affordable and suitable for all South Africans. The Ombud Council has provided input to these initiatives and its consumer awareness mandate will be supported by clear policy direction in these areas, allowing for long-term planning and policy-aligned progress on reform objectives.</p>	
<p style="text-align: center;">Society</p> <p style="text-align: center;"><i>Societal vulnerability, driven by economic hardship, crime, and technology developments.</i></p>	<p style="text-align: center;">Technology</p> <p style="text-align: center;"><i>Increasing technology innovation with new types of products, services, risks, and complaints</i></p>
<p>The social consequences of economic hardship (e.g. unrest and crime) particularly affect lower income and unsophisticated financial customers. Alarming increases in sophisticated fraud, particularly digital and on-line fraud, affects financial customers,</p>	<p>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</p>

Table 4: Summary of PESTEL analysis continued

<p>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, the Ombud Council has noted a steady increase in the extent to which customers are 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. It is also essential to ensure tailored protection for vulnerable consumers and FSCA and ombud scheme initiatives in this regard are welcome and encouraged.</p>	<p>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 Council must work with the schemes and regulators to ensure the ombud system adapts appropriately to these scope changes, particularly in preparation for the holistic principles-based conduct framework to be introduced through the COFI Bill. Technological advancement also gives rise to new customer risks, with ombud statistics revealing an alarming increase in the 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. The ombud schemes also need to consider the extent to which AI-type tools can enhance their own efficiency, without compromising the quality and integrity of their decision-making. Ombud schemes and the Council also need to develop appropriate strategies to ensure that abuse of AI tools by unreasonable or vexatious complainants does not unduly divert resources.</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Table 4: Summary of PESTEL analysis continued

<p style="text-align: center;">Environment</p> <p style="text-align: center;"><i>Increasing extreme weather damage and business interruption insurance claims</i></p>	<p style="text-align: center;">Legal</p> <p style="text-align: center;"><i>Significant pending regulatory reform</i></p>
<p>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.</p>	<p>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. (See further detail immediately below).</p>

Ombud system reform

As discussed in more detail in our Strategic Plan, the Ombud Council has since its inception operated against a background of legislative and structural reform of the financial sector ombud system, and the broader financial sector regulatory framework as a whole. It is therefore imperative for the Ombud Council's strategy and performance planning to be informed by and support the implementation of these reforms.

The passage of the Conduct of Financial Institutions (COFI) Bill, first published for comment in 2020, has experienced extensive delays and is now expected to be tabled in Parliament in 2026. It will create an overarching legislative framework governing the market conduct of financial institutions, introducing several reforms which will impact the Ombud Council's activities. These include 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, being

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.

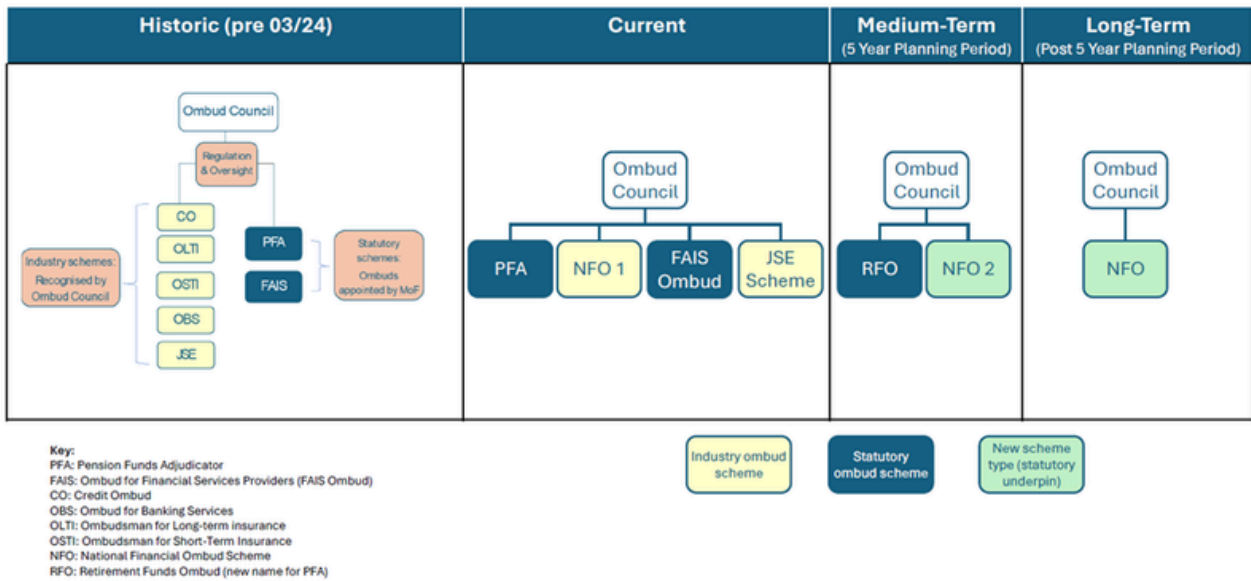
The National Treasury's policy statement 'A simpler, stronger financial sector ombud system (February 2024)' confirms that the final form of the new ombud system will be based on a combination of existing legislation, including the existing rule-making powers of the Ombud Council, together with new primary and subordinate legislation. This new legislation is expected to include the COFI Bill, together 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.

The policy statement confirms a future streamlined structure for the ombud system:

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. The NFO's ambit will include and expand on 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 ombud schemes. The current statutory Pension Funds Adjudicator will remain a separate statutory scheme in the medium-term and be renamed the Retirement Fund 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 1: Progression to future structure of the financial ombud system

Strategic Horizon: A reformed Financial Ombud System



The Ombud Council will be given appropriate powers to recognise, oversee and ensure the future NFO2 scheme’s accountability, in addition to its oversight powers over the RFO.

The Ombud Council continues to work closely with the National Treasury, the FSCA and other key stakeholders to shape the legislative framework that will give effect to this reformed ombud system. A draft Financial Ombud System Amendment Bill (final title to be confirmed) is in the early stages of development. Informal consultation with ombud schemes, affected regulators, and other key stakeholders has commenced and will continue during 2026. Formal consultation can take place once the COFI Bill is finalised. The Bill will propose further amendments to the FSR Act, particularly Chapter 14 of the Act, to give effect to the proposed ombud system redesign.

4.2. Internal Environment

The Ombud Council will focus on consolidating its institutional systems, enhancing regulatory oversight capacity, and embedding performance-driven practices. Priority will be given to improving internal processes, staff development, digital transformation, and stakeholder communication to strengthen overall effectiveness and credibility within the financial sector conduct regulation ecosystem.

Human resources

The targeted eight-person organisational structure was fully capacitated during the 2025/26 financial year, covering functional areas such as governance and administration, regulatory oversight, legal and compliance, stakeholder management, communications, finance, and human resources. The structure comprises the Chief Ombud, supported by a 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 structure is intentionally lean and functionally integrated to promote agility, cost efficiency, and streamlined decision-making. This compact capacity is deemed sufficient in the current context to enable the Council to deliver on its mandate effectively while maintaining fiscal prudence. The structure 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 to align with any future National Treasury initiatives to improve governance and performance of public entities within its remit.

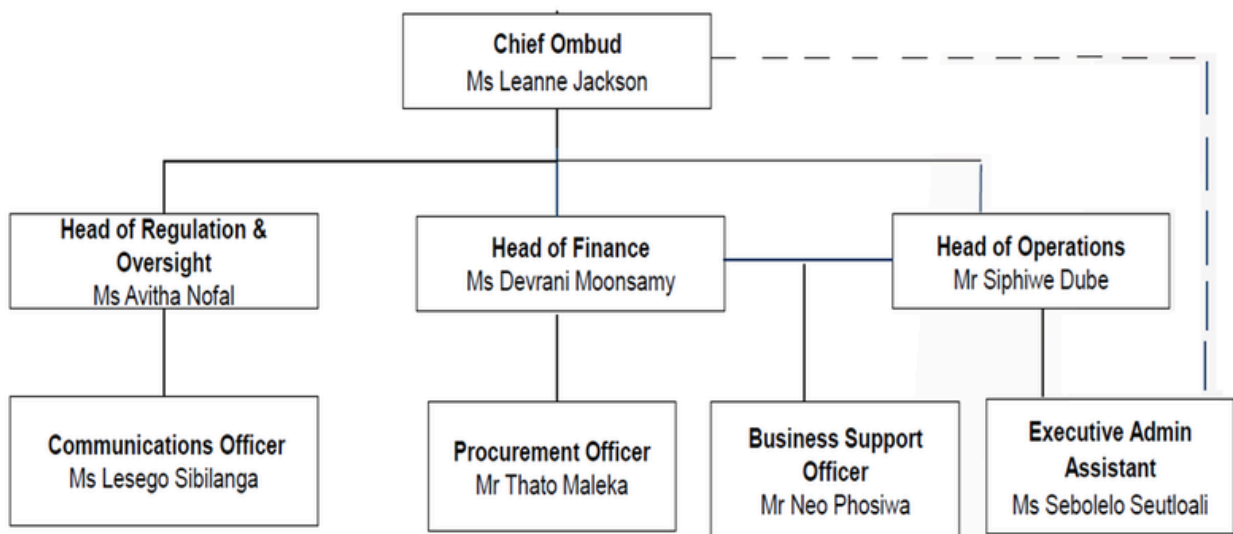
However, the small size also presents operational challenges in managing workload peaks and ensuring adequate redundancy in critical functions, requiring careful prioritisation and reliance on strategic partnerships and outsource services.

small, flat structure also presents unavoidable “key person” risk in the event of loss of any key senior resources, as conventional succession planning is not feasible. This risk is managed through a crisis succession and continuity plan.

The Ombud Council’s human resource strategy prioritises attracting, developing, and retaining skilled professionals to deliver on its oversight and regulatory functions. During the 2025/26 financial year, key HR policies including amended Employee Benefits and Remuneration Policy and Leave Policy provisions, Sexual Harassment Policy, Grievance Procedures, and a revised Employment Equity Plan were implemented to strengthen labour relations, workplace inclusivity, and employee well-being.

A culture of continuous learning and performance excellence is encouraged through training, coaching, and participation in sectoral knowledge-sharing forums. The entity continues to promote a diverse, ethical, and high-performance culture that reflects the organisation’s core values and supports employee wellness and motivation.

Figure 2: Organisational Structure



Governance

A skilled board, appointed by the Minister of Finance, guides the strategic direction of the Council.

The Board of the Ombud Council provides independent oversight, strategic direction, and stewardship, ensuring that operations align with legislative mandates and national policy objectives.

Two governance committees, the Audit and Risk Committee and the Remuneration and Human Resources Committee (which also has a Social and Ethics mandate) support the Board in fulfilling its oversight responsibilities. The governance framework emphasises ethical leadership, transparency, and compliance with all applicable laws and standards. A Code of Conduct, an integrated Governance, Risk and Compliance Framework and a suite of policies and supporting internal controls governing financial, procurement, human resources, ICT and other key operations are in place to promote accountability and good corporate governance. The leadership continues to cultivate a values-driven organisational culture anchored on fairness, independence, integrity, and transparency.

Operational Capacity

Since attaining operational independence from the FSCA in financial year 2024/25 (a corporate services support agreement with the FSCA was in place in prior years), the Ombud Council has operationally implemented a range of systems and frameworks, aligned to Board-approved policies, to enhance efficiency and institutional resilience.

These include:

- Financial Management and Supply Chain procedures
- A full suite of Human Resources policies and procedures to manage recruitment, terminations, performance management, training, leave, discipline and grievances, and remuneration and benefits.

- An ICT Governance and Security Framework, ensuring data protection and compliance with the Protection of Personal Information Act (POPIA) and related prescripts.
- Records Management Policy to ensure transparency and proper information governance.
- Business Continuity Management Policy to ensure operational sustainability in the event of disruptions.
- Organisational performance monitoring and reporting.
- Other internal control and risk management systems integrated into daily operations.

Technology and Infrastructure

The Ombud Council leverages appropriate technology to work smart in performing its functions. Considering the small scale of the staff complement and the nature of the Council's operations, a "virtual" ICT model is in place. ICT arrangements will be continually improved, through an ICT Governance Policy and the phased implementation of a fit for purpose ICT Procedure Manual.

The Council operates in a hybrid physical and remote working model, leveraging digital platforms for remote collaboration, document management, and stakeholder engagement. ICT infrastructure and cybersecurity measures continue to be strengthened to support digital transformation and safeguard sensitive information.

The Ombud Council has to date leased fully furnished and serviced office space under a shared facilities arrangement that includes all occupational health and safety requirements. This arrangement is under review and relocation to dedicated office space is planned. The relocation will be managed in line with prescribed procurement processes and facilities management guidelines.

Transformation and B-BBEE

The Ombud Council has an Employment Equity Plan and a Skills Development Plan in place, as required by the Employment Equity Act, 1998 and the Skills Development Act, 1998. As from 1 April 2026 the Council will submit its first annual report to the Department of Labour on the 5-year EE Plan. The Council will also submit its first Annual Training Report (ATR) based on the Workplace Skills Plan.

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).

The Ombud Council's B-BBEE status in respect of the 2025/26 financial year has been reviewed by a SANAS accredited verification agency and the overall B-BBEE contribution level received was a "level 7" which improved from a "level 8" received in the year before. The Ombud Council will seek to maintain at least this level for 2026/27.

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.

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 2026/27 financial year.

The Council has identified a liquidity challenge which is solely attributable to the protracted legislative process for approval of levy proposals, which results in zero cash flow until late in the third quarter, and potentially as late as the fourth quarter, in each financial year. In order to mitigate this cash flow risk and enable the Council to continue operations for the 2026/27 financial year, the entity has applied to and been granted approval by the National Treasury to retain accumulated cash surpluses as a contingency reserve to fund operations until receipt of levies. In terms of section 53(3) of the PFMA, read with National Treasury Instruction No 3 of 2025/26, the Ombud Council was granted approval to retain the R18.599 million reported surplus for the financial year ended 31 March 2025 for this purpose. The Ombud Council is also providing input to National Treasury legislative proposals to improve the longer-term efficiency of the levy approval process.

SWOT

Considering the analyses of the internal and external environment set out above, the Ombud Council has assessed its Strengths, Weaknesses, Opportunities and Threats (SWOT) as follows:

Table 5: SWOT Analysis

<p>Strengths</p> <ul style="list-style-type: none"> • Breadth, depth, diversity of skills/experience • Responsive, agile team by design and appropriate to size and complexity • Reciprocal trust relationships with stakeholders that enable the OC’s mandate • Demonstrable commitment to good governance • Aspirational, realistic team culture to enable financial sector ADR mechanisms in an agile, responsive manner • Robust legislative toolset to drive the mandate 	<p>Weaknesses</p> <ul style="list-style-type: none"> • Limited staff complement (intentional, by design) (key person risk being managed within risk appetite) • Outsourcing (by design) risks managed for dynamic future scenarios through robust internal controls (e.g. target-based SLAs) • Lack of relevant datasets that enables OC decisions
<p>Opportunities</p> <ul style="list-style-type: none"> • 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 mandate • Data gathering/ analysis/ interpretation opportunities to be enabled by legislative toolset • Automation and digitalisation of operational processes to enhance efficiencies 	<p>Threats</p> <ul style="list-style-type: none"> • Attracting and retaining experienced skill combinations to deliver the mandate over the strategic period • Slow implementation of key enabling legislation (financial sector reforms) compromises the OC’s performance and effectiveness of the ombud system • Current legislative levy approval processes threaten the achievement of the OC’s mandate and that of the statutory ombuds; and by extension will impact inclusive financial participation

PART C: MEASURING OUR PERFORMANCE

5. Institutional Programme Performance Information and Explanation of Planned Performance

The performance of the Ombud Council for the 2026/27 financial year will be managed through three programmes: Administration; Consumer Awareness and Education; and Ombud System Reform. The respective purpose of each of these programmes is the achievement of the Ombud Council's three strategic priorities, and their intended outcomes, as set out in our Strategic Plan:

Table 6: Purpose of Ombud Council Institutional Programmes:

No.	Programme	Purpose (Strategic Priority to be achieved)
1.	Administration	To maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reforms.
2.	Consumer Awareness and Education	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.	Ombud System Reform	Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.

As illustrated in Table 2 under Paragraph 2 of this Plan, these Strategic Priorities and their intended outcomes support delivery of identified Government national priorities in terms of the MTDP.

Programme 1: Administration

In addition to the purpose of supporting Strategic Priority 1, the Administration programme enables the Ombud Council to meet its overall governance objective as per section 178 of the FSR Act. The intended Strategic Plan outcome of embedding good governance and operational efficiency, underpinned by effective systems and controls, will be addressed through outcomes aimed at demonstrating the Ombud Council's commitment to continuous improvement of our systems and controls. Targets include maintaining our record of clean audits; implementing all internal audit recommendations; active management of risks in line with the methodology set out in the Board-approved integrated Governance, Risk and Compliance Framework; and meeting human resources commitments in respect of performance management, skills development and employment equity.

ANNUAL PERFORMANCE PLAN
Performance Outcomes, Outputs, Output Indicators and Targets: Programme 1

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
Programme 1: ADMINISTRATION							
Purpose - To support Strategic Priority 1: Maintain a well-governed and effective Council that delivers on its mandate, aligned to the reform of the ombud system.							
1. Good governance and operational efficiency underpinned by effective systems and controls is embedded.	1.1 Effective financial, performance reporting and controls implemented.	1.1.1 External audit report confirming unqualified audit opinion.	Unqualified external audit opinion.	Unqualified external audit opinion.	Unqualified external audit opinion.	Unqualified external audit opinion.	Unqualified external audit opinion.
		1.1.2 All agreed management actions in response to internal and external audit findings implemented.	N/A. New indicator.	No material internal audit findings.	100% implementation of agreed management actions as confirmed by internal audit follow-up review report.	100% implementation of agreed management actions as confirmed by internal audit follow-up review report.	100% implementation of agreed management actions as confirmed by internal audit follow-up review report.

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 1 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
1. Good governance and operational efficiency underpinned by effective systems and controls is embedded.	1.2 Effective implementation of Governance, Risk and Compliance (GRC) framework.	1.2.1 Annual GRC Plan implemented and progress on track.	N/A. New indicator.	N/A. New indicator.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.
		1.2.2 Risks managed in line with approved risk appetite, tolerance, and capacity levels.	N/A. New indicator.	Quarterly risk reports noted by ARC.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.
	1.3 Employment Equity, Performance Management and Training & Development processes implemented	1.3.1 % of employees with signed, reviewed and evaluated performance agreements	N/A. New indicator.	N/A. New indicator.	100% employees with signed agreements and signed evaluations.	Maintain 100% compliance.	Maintain 100% compliance.
		1.3.2 % of Training and Development Plan (TDP) commitments met.	N/A. New indicator.	N/A. New indicator.	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 1 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
1. Good governance and operational efficiency underpinned by effective systems and controls is embedded.	1.3 Employment Equity, Performance Management and Training & Development processes implemented	1.3.3 Percentage achievement of Employment Equity (EE) Plan targets.	Target: 51% Female 49% Male 2% Disability 92% Black representation 8% White representation Actual: 63% Female 37% Male 0% Disability 87% Black representation 13% White representation	EE Plan targets achieved	As per EE Plan targets	As per EE Plan targets	As per EE Plan targets

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 1

Output indicator	Annual Targets				
	2026/27	Q1 Apr – Jun	Q2 July - Sept	Q3 Oct - Dec	Q4 Jan – Mar
Programme 1: ADMINISTRATION					
Purpose - To support Strategic Priority 1: Maintain a well-governed and effective Council that delivers on its mandate, aligned to the reform of the ombud system.					
1.1.1 External audit report confirming unqualified audit opinion.	Unqualified external audit opinion.	N/A	External audit report confirming unqualified external audit opinion for 2025/2026 financial year. (Report for 2026/27 to be received during the following year).	N/A	N/A
1.1.2 All agreed management actions in response to internal and external audit findings implemented.	100% implementation of agreed management actions as confirmed by internal audit follow-up review report.	N/A	N/A	N/A	100% implementation of agreed management actions as confirmed by internal audit follow-up review report.
1.2.1 Annual GRC Plan implemented and progress on track.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.	GRC Plan delivered as agreed by the Board.

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 1 Continued

Output indicator	Annual Targets				
	2026/27	Q1 Apr – Jun	Q2 July - Sept	Q3 Oct - Dec	Q4 Jan – Mar
1.2.2 Risks managed in line with approved risk appetite, tolerance, and capacity levels.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.	Quarterly board submissions and minutes demonstrate management of risks within approved limits.
1.3.1 % of employees with signed, reviewed and evaluated performance agreements.	100% employees with signed agreements and signed evaluations	100% employees with signed agreements and signed prior year evaluations.	N/A	Mid-year reviews conducted and signed records	N/A
1.3.2 % of Training and Development Plan (TDP) commitments met.	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met	80% of aggregate TDP commitments met
1.3.3 Percentage achievement of EE Plan targets	As per EE Plan targets.	As per EE Plan targets.	As per EE Plan targets.	As per EE Plan targets.	As per EE Plan targets.

Programme 2: Consumer Awareness and Education

The purpose of this programme is to support Priority 2, primarily by collaborating with stakeholders in the broader financial education framework to promote consumer awareness and usage of the ombud system and, in so doing, to support financial inclusion, in line with the Ombud Council's statutory responsibility to support these goals^[1].

The programme will focus on achieving our Strategic Plan outcome of increased consumer awareness and usage of ombud schemes and their services, through three targeted outputs:

The Ombud Council's Strategic Plan contemplates the development of a baseline measure of the extent of consumer awareness and usage of the ombud system. The intention had been to publish this measure during 2025/26 (as targeted in our APP for that year), and for it to be re-run toward the end of the five-year planning period to assess whether awareness and usage has improved. However, for reasons explained in Annexure A, publication of the baseline study is now planned for 2026/27. Thereafter, the medium term focus shifts to using the study's findings to identify gaps in consumer awareness and usage of the financial ombud system, and developing and implementing targeted education and awareness initiatives to address these.

The second targeted output for our consumer awareness and education programme is the ongoing delivery of appropriate consumer education materials and awareness activities, in collaboration with consumer education stakeholders. Having exceeded targets for this output in 2025/26, more ambitious targets have been set for 2026/27. In addition, in support of our financial inclusion objectives and national priorities to advance the interests of women, youth and people with disabilities, specific sub-targets have been set for enhancing these groups' awareness of the ombud system, and for awareness initiatives to be conducted across several provinces.

Thirdly, the Ombud Council plans to host a conference for ombud system stakeholders, to deepen awareness and understanding of the system and explore opportunities for enhancing its effectiveness.

[1] See section 177(1)(d)(f) and (i) of the FSR Act.

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 2

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
Programme 2: CONSUMER AWARENESS AND EDUCATION							
Purpose – To support 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.							
2. Increased consumer awareness of ombud schemes and their services	2.1 Consumer awareness baseline measure developed.	2.1.1 Date of publication of initial baseline measure.	N/A. New indicator.	Target: Initial baseline measure published. Estimated: Research service provider appointed. Baseline measure in development, but finalisation deferred to 2026/2027.	Baseline study report published.	N/A	N/A
	2.2 Consumer awareness materials developed, and awareness activities carried out, by Ombud Council or in collaboration with stakeholders.	2.2.1 Number of consumer awareness materials published.	N/A. New indicator.	Target: 24 Estimated: 80	48	48	48
		2.2.2 Number of awareness activities carried out.	N/A. New indicator.	Target: 8 Estimated: 15	16	16	16

ANNUAL PERFORMANCE PLAN
Performance Outcomes, Outputs, Output Indicators and Targets: Programme 2 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
2. Increased consumer awareness of ombud schemes and their services	2.2 Consumer awareness materials developed, and awareness activities carried out, by Ombud Council or in collaboration with stakeholders.	2.2.3 Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting women .	N/A. New indicator.	New indicator.	8	8	8
		2.2.4 Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting youth	N/A. New indicator.	New indicator.	8	8	8
		2.2.5 Number of awareness materials or activities in 2.2.1 or 2.2.2 targeting people with disabilities .	N/A. New indicator.	New indicator.	6	6	6
		2.2.6 Number of consumer awareness activities in 2.2.2 carried out in separate provinces other than Gauteng	N/A. New indicator.	New indicator.	6	6	6

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 2 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
2. Increased consumer awareness of ombud schemes and their services	2.3 Financial Ombud System Stakeholder Conference conducted.	2.3.1 Host one Financial Ombud System Stakeholder Conference.	N/A. New indicator.	New indicator.	1 conference.	N/A	N/A

Programme 2: Consumer Awareness and Education

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 2

Output indicator	Annual Targets				
	2026/27	Q1 April – Jun	Q2 July – Sept	Q3 Oct – Dec	Q4 Jan – Mar
Programme 2: CONSUMER AWARENESS AND EDUCATION					
Purpose - To support 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.					
2.1.1 Date of publication of initial baseline measure (non-cumulative).	Baseline study report published.	N/A	N/A	Baseline study report published by 31 December 2026.	N/A
2.2.1 Number of consumer awareness materials published (cumulative YTD).	48	12	24	36	48
2.2.2 Number of awareness activities carried out (cumulative YTD).	16	4	8	12	16
2.2.3 Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting women (cumulative YTD).	8	2	4	6	8
2.2.4 Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting youth (cumulative YTD).	8	2	4	6	8

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 2 Continued

Output indicator	Annual Targets				
	2026/27	Q1 April – Jun	Q2 July – Sept	Q3 Oct – Dec	Q4 Jan – Mar
Programme 2: CONSUMER AWARENESS AND EDUCATION					
Purpose - To support 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.					
2.2.5 Number of awareness materials or activities in 2.2.1 or 2.2.2 targeting people with disabilities (cumulative YTD).	6	1	3	5	6
2.2.6 Number of consumer awareness activities in 2.2.2 carried out in separate provinces other than Gauteng (cumulative YTD).	6	1	3	5	6
2.3.1 Host one Financial Ombud System stakeholder conference.	1	N/A	N/A	N/A	1 Conference held by 31 March 2027.

Programme 3: Ombud System Reform

In supporting Priority 3, this programme aims to ensure that the Ombud Council performs its regulatory and supervisory functions and uses its legislative toolkit in a manner that will proactively facilitate the ombud system reforms proposed in National Treasury’s policy paper “A simpler, stronger financial sector ombud system” (February 2024). As was the case for our 2025/2026 APP, the programme’s outputs are therefore aimed at achieving three Strategic Plan Outcomes – in summary:

Identifying and sharing conduct risks to enable their mitigation:

The Ombud Council accesses valuable complaints data from the ombud system, which can be leveraged and shared to enable policymakers and financial sector conduct regulators to identify and proactively respond to emerging financial sector conduct risks. These conduct risk insights can enable appropriate risk-based supervisory frameworks and evidence-based regulatory and policy interventions to make the financial system work better for customers.

As per the FSR Act, the Board of the Ombud Council is required 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. The Ombud Council will continue collecting and reviewing complaints data it receives from the ombud schemes, in line with the consistent reporting framework we developed and implemented in the previous year, which will be further refined as the complaints data evolves.

As was the case in 2025/2026, outputs to achieve this outcome include reporting analyses of ombud scheme complaints data and identified conduct risks to the Minister of Finance, the National Treasury, FSCA, and National Credit Regulator; and ongoing recorded engagements with the National Treasury and regulators in relation to conduct risk mitigation efforts.

Implementing the reform proposals in the National Treasury's policy statement:

As discussed in more detail in paragraph 4.1 of this Plan and our Strategic Plan, several aspects of the reform implementation process outlined by the National Treasury will require new primary legislation, new subordinate legislation (including possible Ombud Council Rules), and related technical inputs and engagements with the National Treasury and other affected stakeholders. During 2026/2027 the Ombud Council will continue proactively providing technical inputs into the legislative proposals to create the statutory underpin for the new, consolidated ombud system, through the Ombud Council's participation in a National Treasury, World Bank, FSCA and Ombud Council legislative working group that is drafting these proposals. We will also continue working with the National Treasury, the FSCA and other stakeholders as they develop new market conduct legislation (through the pending COFI Bill and related instruments), to ensure that the ombud system adapts appropriately to these broader changes. The related output entails ongoing recordal of the Ombud Council's technical and regulatory inputs into these developments.

A key element of the ombud system reforms announced by the National Treasury is the intended transfer of the mandate and functions of the current statutory Ombud for Financial Services Providers (FAIS Ombud) to an overarching National Financial Ombud scheme. The timing of this transfer is outside the Ombud Council's control, as it will require new legislation. However, to proactively prepare for this change, a new deliverable will be the submission to National Treasury of a proposal for an appropriate approach to the implementation of the transfer. The proposal will be developed in consultation with the FAIS Ombud and other affected stakeholders.

Improving alignment and co-ordination of ombud scheme complaint handling processes:

In anticipation of the planned new legislative frameworks for the ombud system, and in line with our statutory responsibility to promote co-operation between and co-ordination of the activities of ombuds (section 177(1)(b) of the FSR Act), the Ombud

Council is committed to using our existing legislative toolkit to improve alignment and co-ordination across the complaint handling processes of the existing ombud schemes. This is necessary to ensure readiness and minimal disruption of existing dispute resolution services when the new structures come into operation.

During 2025/2026 the Ombud Council developed and implemented a co-ordination plan agreed between the Ombud Council and the existing ombud schemes, effecting process alignment and co-ordination measures. Focus to date has been primarily on coordination and collaboration between the FAIS Ombud and the NFO. This will continue, together with further engagements with the Pension Funds Adjudicator (OPFA), to identify and implement opportunities to strengthen coordination and cooperation between the OPFA, the NFO and the FAIS Ombud.

In addition, the Ombud Council will use its FSR Act subordinate legislative powers to make Ombud Council Rules for ombud scheme complaint handling processes. Rules for the FAIS Ombud were finalised during 2024/2025, and Rules for the Pension Funds Adjudicator are targeted for completion by the end of 2025/26. Proposed amendments to Chapter 14 of the FSR Act (through the COFI Bill process) to amend and align the founding provisions of the statutory FAIS Ombud and OPFA, are expected to be finalised during 2026. During 2026/2027, the Council will commence a review of the Ombud Council Rules it has made for these schemes, to ensure they remain consistent with the new primary law provisions and to further support process consistency across ombud schemes to the extent appropriate.

ANNUAL PERFORMANCE PLAN
Performance Outcomes, Outputs, Output Indicators and Targets: Programme 3

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
Programme 3: OMBUD SYSTEM REFORM							
Purpose – To Support Strategic Priority 3: Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.							
3. Conduct risks identified through analysis of reported ombud data and shared with relevant stakeholders to enable mitigation through policy or regulatory responses.	3.1. Quarterly reports containing analysis of ombud scheme complaints data and identified conduct risks to Minister of Finance, NT, FSCA, and NCR.	3.1.1 Dates of submission of reports.	Reporting methodology finalised.	4 Quarterly reports, each submitted to MoF, NT, FSCA, NCR	4 Quarterly reports, each submitted to MoF, NT, FSCA, NCR	4 Quarterly reports, each submitted to MoF, NT, FSCA, NCR	4 Quarterly reports, each submitted to MoF, NT, FSCA, NCR
	3.2 Register of engagements with NT and regulators reflecting consideration of identified conduct risks and proposed policy or regulatory responses, updated quarterly.	3.2.1 Dates register updated.	N/A. New indicator	4 Quarterly register updates.	4 Quarterly register updates	4 Quarterly register updates	4 Quarterly register updates
		3.2.2 Number of documented proposals to respond to identified conduct risks.	N/A. New indicator	3 proposals	4 proposals	4 proposals	4 proposals

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 3 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
4. Implementation of reforms in National Treasury policy paper (A simpler, stronger financial sector ombud system, Feb 2024) supported.	4.1 Register of technical and regulatory inputs and stakeholder engagements on reform of the ombud system, updated quarterly.	4.1.1 Dates register updated.	Target of 100% response to requested technical and regulatory inputs related to reform process.	100% response targets achieved and registers updated.	4 Quarterly register updates	4 Quarterly register updates	4 Quarterly register updates
	4.2 Transition approach proposal submitted to NT for transfer of FAIS Ombud functions to NFO.	4.2.1 Transition approach proposal submitted to NT.	N/A. New indicator.	N/A. New indicator.	1 Transition approach proposal submitted to NT.	N/A	N/A

ANNUAL PERFORMANCE PLAN

Performance Outcomes, Outputs, Output Indicators and Targets: Programme 3 Continued

Outcome	Output	Output indicator	Annual Targets				
			Audited/Actual Performance	Estimated Performance	MTEF		
			2024/25	2025/26	2026/27	2027/28	2028/29
5. Improved alignment and co-ordination of ombud scheme complaint handling processes.	5.1. Revised co-ordination plan or plans agreed between OC, NFO, FAIS Ombud and OPFA setting out planned initiatives aimed at alignment and co-ordination between schemes.	5.1.1 Percentage of achievement of annual targets in co-ordination plan or plans.	N/A. New indicator.	80% of annual targets achieved.	Co-ordination plan/s revised and 80% of annual targets achieved.	Co-ordination plan/s revised and 80% of annual targets achieved.	Co-ordination plan/s revised and 80% of annual targets achieved.
	5.2. Completed review of Ombud Council Rules (OCRs) for the FAIS Ombud and Pension Funds Adjudicator in light of COFI Bill consequential amendments and proposed ombud system reforms.	5.2.1. Review finalised and draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration.	N/A new indicator	N/A new indicator	Draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration	OCR amendments finalised.	N/A

Programme 3: Ombud System Reform

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 3

Output indicator	Annual Targets				
	2026/27	Q1 April – Jun	Q2 July – Sept	Q3 Oct – Dec	Q4 Jan – Mar
Programme 3: OMBUD SYSTEM REFORM					
Purpose - To Support Strategic Priority 3: Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.					
3.1.1 Dates of submission of reports.	4 Quarterly reports, each submitted to MoF, NT, FSCA, NCR	1 report	1 report	1 report	1 report
3.2.1 Dates register updated.	4 Quarterly register updates	Updated register	Updated register	Updated register	Updated register
3.2.2 Number of documented proposals to respond to identified conduct risks. (YTD cumulative)	4 proposals	1	2	3	4
4.1.1 Dates register updated.	4 Quarterly register updates	Updated register	Updated register	Updated register	Updated register

Performance Indicators: Annual and Quarterly Targets 2026-27 Programme 3 Continued

Output indicator	Annual Targets				
	2026/27	Q1 April – Jun	Q2 July – Sept	Q3 Oct – Dec	Q4 Jan – Mar
Programme 3: OMBUD SYSTEM REFORM					
Purpose - To Support Strategic Priority 3: Leverage legislative toolkit to coordinate the streamlining, reform, and future direction of the financial ombud system.					
4.2.1 Transition approach proposal submitted to NT	1 Transition approach proposal submitted to NT.	N/A	N/A	N/A	1 Transition proposal submitted.
5.1.1 Percentage of achievement of annual targets in co-ordination plan or plans.	Co-ordination plan/s revised and 80% of annual targets achieved.	80%	80%	80%	80%
5.2.1 Review finalised and draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration.	Draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration	N/A	N/A	N/A	Draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration

6. Programme Resource Considerations

In terms of the FSR Act read with the Levies Acts, the Council's operations are primarily funded through the imposition of levies payable by financial institutions. Please see paragraph 4.2 above ("Internal environment analysis") for more detail on the Council's funding position.

The entity has budgeted to receive R29.92 million in revenue (primarily levies) for the 2026/2027 financial year which is 12.52% higher than the prior year approved budget. The reason for the increase in levies from the prior year, is aligned to a corresponding increase proposed by the FSCA, as the Ombud Council's legislated levies are calculated as a percentage of levies payable to the FSCA

Table 7: Annual budget for 2026/27

ANNUAL BUDGET		
Account Description	2025/26	2026/27
REVENUE		
Levies	25 356 618	28 531 068
Interest income	1 307 451	1 390 150
	26 664 069	29 921 218
EXPENDITURE		
Employee cost	12 723 417	13 295 354
Consumer education and awareness	5 715 114	7 932 688
Board and Committee remuneration	438 525	977 380
Audit fees	1 297 349	1 142 779
Professional and consulting fees	1 168 297	1 633 223
Office lease expense	949 882	989 207
IT services	1 696 280	1 662 366
Other operating expense	2 478 771	1 963 087
Depreciation	194 333	321 133
Finance costs	2 100	4 000
	26 664 069	29 921 218
SURPLUS/DEFICIT	-	-

Annual expenditure per programme

The annual expenditure budget for the year is R29.92 million whereby 56% will be spent on Programme 1, 36% on Programme 2, and 8% on Programme 3. The table below shows the annual budgeted expenditure by programme for the year.

Table 8: Annual expenditure budget by programme

Programme	Annual Budget	Annual Budget Percentage
1 - Administration	16,848,767	56%
2 - Consumer education and awareness	10,734,367	36%
3 - Ombud System Reform	2,338,083	8%
	29,921,218	100%

Compensation of Employees

The compensation of employees' budget for the 2026/27 financial year is R13.30 million and includes the funding of eight positions on the budgeted organisational structure and is listed in Table 9 below.

Table 9: Personnel

Personnel Information					
	Total	Programme 1	Programme 2	Programme 3	
Top Management	1	0.333	0.333	0.333	The Chief Ombud is responsible for delivery of all three Programmes.
Senior Management	3	2	0.5	0.5	Head of Operations and Head of Finance to take responsibility for Programme 1; Head of Regulation & Oversight to take responsibility for Programmes 2 and 3.
Skilled technical	4	3	1	-	Commmunications Officer to support the delivery of Programme 2. An Executive Assistant, Business Support Officer and Procurement Officer to primarily support the delivery of Programme 1.
Employee costs	R13,30m	R7,72m	R3.28m	R2,34m	
Percentage of employee costs per programme	100%	58%	24%	18%	

Notes:

Since the Ombud Council is a very small organisation, please note the following:

- Although the above table presents our best estimate of the basis on which resources will be allocated between Programmes 1, 2 and 3, the small scale of the Ombud Council's operations, which requires "multi-tasking" across programmes, makes clear demarcation difficult.
- The Ombud Council aims to maintain a lean permanent staff establishment to ensure flexibility in light of pending regulatory and policy reforms. The size and scale of the Council's operations do not justify the appointment of full-time internal resources for some support functions, which are necessary to meet our statutory governance objective (section 178 of the FSR Act). Outsourcing on an as-needed basis is therefore considered more cost efficient for support functions, including for ICT, Board Secretariat, risk and compliance support, and certain HR functions.

7. Updated Key Risks

In line with the Ombud Council's integrated Governance, Risk and Compliance (GRC) Management framework, the Council has identified, assessed, and put measures in place to reduce the impact and probability of risks to an acceptable level and to bring them within the Ombud Council's approved risk appetite. The Council's risk profile reflects both operational and strategic challenges that could impact the delivery of its mandate.

Table 10: Overview of Ombud Council risks. (As at December 2025)

Outcome	Key risk	Rating	Risk mitigation
Outcome 1: Good governance and operational efficiency underpinned by effective systems and controls is embedded.	Loss of skills and competencies to deliver on mandate (key person).	Medium	Crisis succession/ continuity plan. Appropriate, flexible, and attractive incentives in Remuneration Policy
	Cyber incident, loss (or compromise) of information.	Low	ICT governance policy and controls.
	Non-compliance incidents.	Medium	Compliance framework and policies, including for POPIA compliance
	Insufficient cash flow (liquidity risk).	Low	Retention of surplus approved for establishment of contingency fund. Cost containment measures will remain until FY2025/26, and FY2026/27 levies are received.
Outcome 2: Increased consumer awareness and usage of ombud schemes and their services.	Not delivering fully on consumer awareness mandate.	Low	Risk arises mainly from liquidity risk (see above) which has contributed to a delay in conducting the consumer baseline study. Baseline study to be completed in 2026/27. Consumer education and awareness initiatives continue 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.	Low	Proactive participation in and monitoring of legislative reform process.

8. Infrastructure Projects

The Council does not have any infrastructure projects.

9. Public Private Partnerships

The Council does not have any Public Private Partnerships.

Programme 1: Administration

In addition to the purpose of supporting Strategic Priority 1, the Administration programme enables the Ombud Council to meet its overall governance objective as per section 178 of the FSR Act. The intended Strategic Plan outcome of embedding good governance and operational efficiency, underpinned by effective systems and controls, will be addressed through outcomes aimed at demonstrating the Ombud Council's commitment to continuous improvement of our systems and controls. Targets include maintaining our record of clean audits; implementing all internal audit recommendations; active management of risks in line with the methodology set out in the Board-approved integrated Governance, Risk and Compliance Framework; and meeting human resources commitments in respect of performance management, skills development and employment equity.

PART D: TECHNICAL INDICATOR DESCRIPTIONS

Programme 1: Administration

Indicator Title	1.1.1. External audit report confirming unqualified audit opinion
Definition	Achievement of an unqualified audit opinion.
Source of data	External auditor's report and management letter.
Method of calculation / assessment	Review of the final audit report
Means of verification	Signed audit report opinion
Assumptions	Audit process completed as per PFMA timelines; no material misstatements or non-compliance identified
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative, once-off
Reporting cycle	Annual
Desired performance	Unqualified audit opinion for the 2026/27 financial year (per external auditor's report to be received during following financial year). Unqualified audit opinion for the 2025/26 financial year to be received in Q2 of 2026/27.
Indicator responsibility	Head of Finance

Indicator Title	1.1.2. All agreed management actions in response to internal and external audit findings implemented.
Definition	100% implementation of agreed management actions against internal and external audit findings as confirmed by internal audit follow-up review report.
Source of data	Internal audit follow up review report.
Method of calculation / assessment	Number of agreed management actions that have been implemented ÷ total number of agreed management actions x 100%.
Means of verification	Internal audit follow up review report
Assumptions	Management commits to implementing agreed actions; resources are available.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative, once-off
Reporting cycle	Annual
Desired performance	Internal audit follow-up review report confirms that 100% of agreed management actions in response to internal and external audit findings have been implemented.
Indicator responsibility	Head of Finance.

Indicator Title	1.2.1. Annual GRC Plan implemented and progress on track.
Definition	Implementation of the Annual Governance, Risk and Compliance (GRC) Plan as approved by the Board, with progress reported quarterly.
Source of data	Approved GRC Plan, quarterly GRC progress reports, Board and Audit & Risk Committee minutes.
Method of calculation / assessment	Quarterly review of progress against GRC Plan milestones.
Means of verification	Board submissions, GRC progress reports. Committee minutes, documentary evidence of implementation.
Assumptions	GRC Plan approved by Board; adequate resources allocated.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	GRC Plan delivered as agreed by the Board.
Indicator responsibility	Head of Operations.

Indicator Title	1.2.2. Risks managed in line with approved risk appetite, tolerance, and capacity levels.
Definition	Evidence that risks are actively managed within approved risk appetite, tolerance, and capacity limits as per the GRC framework.
Source of Data	Risk register, quarterly GRC reports, Board and ARC minutes.
Method of calculation / assessment	Review of quarterly GRC reports and Board minutes indicating risk levels are within approved limits.
Means of verification	Submitted GRC reports, Board minutes, ARC minutes.
Assumptions	Risk management framework is operational and understood.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	Quarterly Board submissions and minutes demonstrate management of risks within approved limits.
Indicator responsibility	Head of Operations.

Indicator Title	1.3.1. % of employees with signed, reviewed and evaluated performance agreements
Definition	Percentage of permanent employees with signed performance agreements and completed mid-year reviews and annual evaluations.
Source of data	Signed performance agreements, review records, evaluation records. Either signed manual documents or captured as approved on HR ESS system.
Method of calculation / assessment	Number of employees with signed, reviewed agreements and evaluations ÷ Total employees × 100%.
Means of verification	HR records, signed agreements, performance review and evaluation records.
Assumptions	Performance management cycle adhered to; employees and managers cooperate.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly (only in quarters where delivery required, i.e. prior year evaluations and PA in Q1 and mid-year review in Q3)
Desired performance	100% of employees with PAs, reviews and evaluations signed.
Indicator responsibility	Head of Operations.

Indicator Title	1.3.2. % of Training and Development Plan (TDP) commitments met.
Definition	Percentage of aggregate TDP commitments met.
Source of data	TDP, reports to Remuneration & Human Resources Committee of progress against TDP, individual staff members' training records or attendance registers.
Method of calculation / assessment	Number of aggregate (for Ombud Council as a whole) training commitments per the TDP that have been met ÷ Total aggregate training commitments for all staff per TDP × 100%.
Means of verification	Individual staff members' training records or attendance registers
Assumptions	Training budget available; relevant training opportunities accessible.
Disaggregation of beneficiaries	By race, gender, disability (aligned with EE Plan).
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	80% of aggregated TDP commitments met.
Indicator responsibility	Head of Operations.

Indicator Title	1.3.3. Percentage achievement of Employment Equity (EE) Plan targets
Definition	The Ombud Council's commitment to Employment Equity is reflected in the targets set out in its Employment Equity Plan. Extent to which employment equity targets as per the approved EE Plan are achieved.
Source of data	EE Plan; annual EE report to Department of Labour, quarterly reports to Remuneration & Human Resources Committee of progress against TDP; HR employment records.
Method of calculation / assessment	Actual representation ÷ Target representation × 100% per EE category.
Means of verification	HR employment records.
Assumptions	Recruitment and retention strategies support EE targets.
Disaggregation of beneficiaries	By race, gender, disability.
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	Achieve EE Plan targets for 2026/27.
Indicator Responsibility	Head of Operations.

Programme 2: Consumer Awareness and Education

Indicator Title	2.1.1. Date of publication of initial baseline measure
Definition	Date on which the baseline study report on consumer awareness and usage of the ombud system is published on the OC website.
Source of data	Final baseline study Research report from service provider, publication notice, website upload.
Method of calculation / assessment	Confirmation of publication date.
Means of verification	Published report, website link, media release.
Assumptions	Baseline study completed; procurement and cash flow constraints resolved.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative, once-off.
Reporting cycle	Annual (2026/27).
Desired performance	Report published by 31 December 2026.
Indicator responsibility	Head of Regulation & Oversight.

Programme 2: Consumer Awareness and Education

Indicator Title	2.2.1. Number of consumer awareness materials published
Definition	Total number of consumer awareness materials (e.g., brochures, guides, videos, articles, social media content) developed and published during the financial year.
Source of Data	Publication register, website / social media analytics.
Method of calculation / assessment	Count of materials published.
Means of verification	Records of published items, website content.
Assumptions	Adequate budget and capacity for content development.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	48 materials published.
Indicator responsibility	Communications Officer.

Indicator Title	2.2.2 Number of consumer awareness activities carried out
Definition	Total number of awareness activities (e.g., workshops, webinars, roadshows, media engagements, conference presentations, outreach activities) conducted during the financial year.
Source of data	Activity reports, event registers, stakeholder feedback.
Method of calculation / assessment	Count of activities conducted.
Means of verification	Event records, attendance registers.
Assumptions	Stakeholder collaboration enables outreach.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	16 activities conducted.
Indicator responsibility	Communications Officer.

Indicator Title	2.2.3. Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting women
Definition	Subset of materials or activities specifically designed for or targeted at women.
Source of Data	As per 2.2.1 and 2.2.2 (as applicable), with target group tagging.
Method of calculation / assessment	Count of materials/activities tagged for women.
Means of verification	As per 2.2.1 and 2.2.2 (as applicable), with women-focused content.
Assumptions	Needs of women as financial customers are identified.
Disaggregation of beneficiaries	Women.
Spatial transformation	N/A.
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	8 materials/activities targeting women.
Indicator responsibility	Communications Officer.

Indicator Title	2.2.4. Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting youth
Definition	Subset of materials or activities specifically designed for or targeted at youth (ages 18-35).
Source of Data	As per 2.2.1 and 2.2.2, with target group tagging.
Method of calculation / assessment	Count of materials/activities tagged for youth.
Means of verification	As per 2.2.1 and 2.2.2 (as applicable), with youth-focused content and / or on youth-focused platforms / events.
Assumptions	Youth are reachable through digital and educational platforms.
Disaggregation of beneficiaries	Youth, students, young professionals.
Spatial transformation	N/A
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	8 materials/activities targeting youth.
Indicator responsibility	Communications Officer.

Programme 2: Consumer Awareness and Education

Indicator Title	2.2.5. Number of consumer awareness materials or activities referred to in 2.2.1 or 2.2.2 targeting people with disabilities
Definition	Subset of materials or activities specifically designed for or targeted at people with disabilities.
Source of Data	As per 2.2.1 and 2.2.2, with target group tagging.
Method of calculation / assessment	Count of materials/activities tagged for PWD.
Means of verification	As per 2.2.1 and 2.2.2, with PWD-focused content and / or through PWD accessible formats (for e.g. Audio, sign language) or PWD-focused platforms / events.
Assumptions	Accessible formats are budgeted for and available, or accessible through stakeholder partnerships.
Disaggregation of beneficiaries	People with disabilities including but not limited to visual, hearing, mobility, or cognitive disabilities.
Spatial transformation	N/A
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	6 materials/activities targeting PWD.
Indicator responsibility	Communications Officer.

Indicator Title	2.2.6. Number of consumer awareness activities in 2.2.2 carried out in separate provinces other than Gauteng
Definition	Subset of awareness activities conducted in provinces outside Gauteng to ensure geographic spread.
Source of Data	As per 2.2.2 with evidence of location.
Method of calculation / assessment	Count of activities held in non-Gauteng provinces.
Means of verification	As per 2.2.2 with evidence of location.
Assumptions	Travel and logistics budget available.
Disaggregation of beneficiaries	By province.
Spatial transformation	Activities in at least 6 non-Gauteng provinces.
Calculation type	Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	6 activities in non-Gauteng provinces.
Indicator responsibility	Communications Officer.

Indicator Title	2.3.1. Host one Financial Ombud System stakeholder conference.
Definition	Hosting of one national conference for Financial Ombud System stakeholders (ombud schemes, regulators, industry, consumer groups) to deepen awareness and collaboration.
Source of Data	Conference plan, attendance records, feedback reports.
Method of calculation / assessment	Confirmation of conference held by 31 March 2027.
Means of verification	Event report, attendance register, presentations, outcomes document.
Assumptions	Stakeholder availability; budget and venue secured.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Once-off. Non-cumulative
Reporting cycle	Annual.
Desired performance	1 conference held by 31 March 2027.
Indicator responsibility	Head of Regulation & Oversight.

Programme 3: Ombud System Reform

Indicator Title	3.1.1 Dates of submission of reports.
Definition	Dates on which quarterly reports containing analysis of ombud scheme complaints data and identified conduct risks are submitted to the Minister of Finance, National Treasury, FSCA, and NCR.
Source of data	Quarterly reports, submission records.
Method of calculation / assessment	Record of submission dates per quarter.
Means of verification	Email trails of meetings, as applicable.
Assumptions	Ombud schemes submit data timeously; analysis capacity in place.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative
Reporting cycle	Quarterly.
Desired Performance	4 reports (1 per quarter) each submitted to MoF, NT, FSCA, NCR respectively.
Indicator responsibility	Head of Regulation & Oversight.

Indicator Title	3.2.1 Dates register updated.
Definition	Dates on which the register of engagements with NT and regulators (reflecting consideration of identified conduct risks and proposed responses) is updated.
Source of data	Engagement register, meeting records, correspondence.
Method of calculation / assessment	Quarterly update of the register.
Means of verification	Register version control, meeting records and / or correspondence evidencing engagements.
Assumptions	NT and regulators available for engagements to occur at least quarterly.
Disaggregation of beneficiaries	N/A.
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	Register updated quarterly.
Indicator responsibility	Head of Regulation & Oversight.

Indicator Title	3.2.2 Number of documented proposals to respond to identified conduct risks.
Definition	Number of proposals documented and submitted to NT and / or regulators (any of FSCA, NCR or other relevant regulatory bodies) recommending policy or regulatory responses to identified conduct risks.
Source of Data	Proposal documents, submission records, feedback / response records.
Method of calculation / assessment	Count of proposals submitted.
Means of verification	Proposal documents, submission records.
Assumptions	Risks are analysable and actionable; regulators are receptive.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Count of proposals submitted. Cumulative annually (YTD).
Reporting cycle	Quarterly.
Desired performance	4 proposals submitted.
Indicator responsibility	Head of Regulation & Oversight.

Indicator Title	4.1.1 Dates register updated.
Definition	Dates on which the register of technical and regulatory inputs and stakeholder engagements on ombud system reform is updated.
Source of data	Reform engagement register, meeting working group minutes, input logs.
Method of calculation / assessment	Quarterly update of the register.
Means of verification	Register version control, meeting records and / or correspondence evidencing engagements
Assumptions	Reform process (led by National Treasury) continues.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cummulative.
Reporting cycle	Quarterly.
Desired performance	Register updated quarterly.
Indicator responsibility	Head of Regulation & Oversight.

Indicator Title	4.2.1. Transition approach proposal submitted to NT
Definition	Submission to National Treasury of a documented proposal outlining the recommended approach for transferring FAIS Ombud functions to the National Financial Ombud (NFO).
Source of data	Proposal document, submission records, NT acknowledgment.
Method of calculation / assessment	Confirmation of submission by 31 March 2027.
Means of verification	Submission letter, email trail, NT acknowledgment.
Assumptions	FAIS Ombud, NFO, NT and other stakeholder's co-operative and open to consultation.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative, once-off.
Reporting cycle	Annual.
Desired performance	1 proposal submitted by 31 March 2027.
Indicator responsibility	Chief Ombud.

Indicator Title	5.1.1 Percentage of achievement of annual targets in co-ordination plan or plans.
Definition	Percentage of annual targets set out in the revised co-ordination plan or plans between OC, NFO, FAIS Ombud and OPFA that are achieved.
Source of Data	One or more co-ordination plans (separate co-ordination plans may include different combinations of the three schemes); progress reports; meeting records.
Method of calculation / assessment	Number of targets achieved ÷ Total targets × 100% (based on aggregate number of targets in the relevant quarter in the event of more than one plan).
Means of verification	Progress reports, records of agreed deliverables.
Assumptions	All schemes cooperate; resources are available.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative.
Reporting cycle	Quarterly.
Desired performance	80% of targets achieved per quarter
Indicator responsibility	Head of Regulation & Oversight.

Indicator Title	5.2.1 Review finalised and draft proposed OCR amendments submitted to FAIS Ombud and OPFA for consideration.
Definition	Completion of the review by the Ombud Council of Ombud Council Rules for FAIS Ombud and OPFA, and submitted to FAIS Ombud and OPFA for consideration.
Source of data	Review report, draft proposed rules amendments, submission to OPFA and FAIS Ombud.
Method of calculation / assessment	Records of submission to OPFA and FAIS Ombud by 31 March 2027.
Means of verification	E-mail records, submission letters to schemes.
Assumptions	COFI Bill amendments are clear; schemes are open to consultation.
Disaggregation of beneficiaries	N/A
Spatial transformation	N/A
Calculation type	Non-cumulative, once-off.
Reporting cycle	Annual.
Desired performance	Draft proposed OCR amendments submitted to FAIS Ombud and OPFA by 31 March 2027.
Indicator responsibility	Head of Regulation & Oversight.

ANNEXURE A: AMENDMENTS TO THE STRATEGIC PLAN

The following amendments to the approved 2025-2030 Strategic Plan relate to section 9.2 (Measuring Outcomes) under Part C of the Strategic Plan (Measuring our performance.)

The changes relate to outcome indicators and five-year targets in respect of two outcomes, for the reasons set out below:

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

·Details of amendment (shown in “track changes” against previous version):

MTDP Priority 3:	Build a capable, ethical, and developmental state.		
MTDP Outcome	<i>Improve governance and performance of public entities: Reviewed public entities with rationalised, streamlined, and implemented shared services models.</i>		
Ombud Council Strategic Priority 1:	<i>Maintain a well-governed and effective Ombud Council that delivers on its mandate, aligned to ombud system reforms.</i>		
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. Governance and operational efficiency improved through implementation of audit recommendations	One material finding. None, new indicator.	No material findings. All agreed management actions in response to internal and external audit recommendations implemented on an annual basis.
	Risk management and compliance frameworks in place and implemented. Risks managed in line with approved risk appetite, tolerance, and capacity levels.	Strategic risk framework in place. Compliance framework in development. None, new indicator.	Risk management and compliance frameworks in place, implemented and reviewed annually. Board submissions indicating risk levels against appetite, tolerance, and capacity levels, and accountability for implementation of risk response strategies.

Reasons for amendment:

Since publication of the 2025-2030 Strategic Plan, the Ombud Council has developed and implemented an integrated Governance, Risk, and Compliance (GRC) Framework. Based on guidance from the Audit and Risk Committee and the Board, the outcome indicators are amended to shift from a compliance-based approach to a more outcomes-based focus on continuous improvement and demonstrable management of risks in line with the principles of the GRC Framework.

Accordingly, the previous indicator and target aimed at avoiding negative audit outcomes has been replaced with an indicator and annual target aimed at improvements informed by internal audit outcomes; and the indicator and target aimed at implementing frameworks has been replaced with a focus on demonstrating ongoing active management of risks in line with the methodology set out in the approved GRC framework.

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

Details of amendment:

MTDP Priority 1:	Inclusive growth and job creation.		
MDTP Outcome	<i>Supportive and sustainable economic policy environment.</i>		
MDP Priority 2:	Reduce poverty and tackle the high cost of living.		
MDTP Outcome	<i>Optimised social protection and coverage.</i>		
Ombud Council Strategic Priority 2:	<i>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.</i>		
Outcome	Outcome indicator	Baseline	Five-year target
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. Gaps in consumer awareness and usage of the ombud system identified and addressed through a baseline study and development of a baseline measurement.	None. New initiative.	Baseline measurement re-run and shows evidence of increased consumer awareness and usage. Identify and commence implementing consumer awareness and education initiatives to address gaps identified in the baseline study. (Longer term target, for next strategic planning period, will be to re-run the baseline measurement to assess increases in consumer awareness and usage).
	Number of consumer awareness materials published, and awareness activities carried out.	Activities performed as per Ombud Council 2023/24-2024/2025 stakeholder engagement plan.	Annual targets to be set and achieved.

Reasons for amendment:

The Strategic Plan envisaged establishing a baseline measure of consumer awareness and usage of the ombud system and targeted the re-running of the measurement by the end of the five-year strategy period, to assess a percentage increase in consumer awareness and usage. This target assumed that the initial baseline measure would be finalised during the first year of the planning period (financial year 2025/2026).

However, as a result of procurement delays mainly due to cash flow constraints^[2], it will no longer be possible to finalise the initial baseline measure during 2025/26 and completion of this initiative has been deferred to financial year 2026/27. As a result, it will no longer be feasible to re-run the measure within the five-year period, as the intervening period is likely to be too short to yield meaningful results. Re-running the measure therefore needs to be deferred to after the completion of the five-year planning period.

The outcome indicator and five-year target for this outcome have therefore been changed to focus on using the findings of the baseline study to identify gaps in consumer awareness and usage of the financial ombud system and developing and implementing targeted education and awareness initiatives to address these.

A typographical error referring to the incorrect baseline year for the outcome related to consumer awareness materials has also been corrected.

[2] These cash flow constraints are solely attributable to the protracted legislated levy approval process, which means that the Ombud Council only expects to start receiving revenue for financial year 2025/26 and 2026/27 in the third or fourth quarter of the financial year. This risk will be mitigated for future financial years through the establishment of an appropriate contingency cash reserve.

Ombud Council

Ensuring an accessible and trusted
financial sector ombud system

Physical/Postal Address

Ground Floor Mac Mac Building 4
Maxwell Office Park
Magwa Crescent
Midrand
2090

Email Address

admin@ombudcouncil.org.za
enquiries@ombudcouncil.org.za