

Reviewed-source brief: Fair Treatment of Financial Consumers

1. Authorship, authority and limited use

Independent training brief prepared for Contoso Bank Malaysia Berhad at 17 March 2025, 18:00 MYT. All bank facts are fictional. The source is the real Bank Negara Malaysia policy document Fair Treatment of Financial Consumers, reference BNM/RH/PD 028-103, issued 27 March 2024. The explanations below are original authored PARAPHRASES, not quotations, official translations or regulator-endorsed interpretations.

The official PDF has 54 PDF pages; its printed page number is the PDF page number minus one. Each review unit below gives both locators. Lawyers must consult the official PDF for authoritative wording and full context. This brief intentionally does not reproduce the full document, regulator logos or letterhead.

Official source URL (wrapped for reading; join the two lines without spaces):

[https://www.bnm.gov.my/documents/20124/938039/
pd-ftfc-mar24.pdf](https://www.bnm.gov.my/documents/20124/938039/pd-ftfc-mar24.pdf)

2. Dates, standards and predecessor

Paragraph 4.1 provides a default effective date of 27 March 2024, with exceptions 8.1(g), 10.3(f), 10.3(g), 10.4 and 16.1–16.28 effective 1 April 2025. All review units below fall within those exceptions. The document issue date is not their effective date. The internal committee timetable in file 01 is not a BNM reporting deadline.

Paragraph 5.2 distinguishes S standards (mandatory) from G guidance. Paragraph 6.2 supersedes the predecessor issued 6 November 2019. The predecessor text is absent, so clause-by-clause New, Changed or Unchanged classifications cannot be established. Record Unknown rather than assuming all selected S paragraphs introduce new duties.

3. Selected review units: authored paraphrases

These review units are a controlled sample, not an exhaustive legal inventory. Read each question with its source paragraph and the limitations below. The classifications assess the supplied evidence for the question, not the whole bank's compliance with the paragraph.

R01. S 16.2 | printed p.37 | PDF p.38

PARAPHRASE / review question: Have vulnerable-consumer needs been assessed, translated into policy and communicated to relevant personnel?

Focus on identifying relevant needs, translating them into policies and making those policies known to the people who must use them. A communication artifact and the underlying assessment answer different parts of this question. This brief does not prescribe a particular assessment form, numerical survey threshold or bank-wide certification method.

Locator: BNM/RH/PD 028-103, S 16.2; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R02. S 16.5 | printed p.38 | PDF p.39

PARAPHRASE / review question: Does the retail product design and approval process take vulnerable-consumer needs into account?

The design question concerns whether products and services reflect vulnerable-consumer needs rather than treating those needs as a service exception after launch. A signed product decision can be relevant to that question. It does not establish that every product has been reviewed or that later operating outcomes are satisfactory.

Locator: BNM/RH/PD 028-103, S 16.5; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R03. S 16.7 | printed p.38 | PDF p.39

PARAPHRASE / review question: Are pricing and fees assessed for vulnerable consumers and supported by appropriate safeguards?

Review pricing and fee considerations alongside safeguards against adverse consequences for vulnerable consumers. Individual relief activity is not interchangeable with a considered review of price structures. This paraphrase sets no fee cap, waiver quota or automatic entitlement; the reviewer must

keep bank-selected arrangements distinct from the source standard.

Locator: BNM/RH/PD 028-103, S 16.7; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R04. S 16.9 | printed p.40 | PDF p.41

PARAPHRASE / review question: Is prevention of predatory conduct towards vulnerable consumers demonstrated in operating checks?

The concern is preventing predatory treatment, not merely having a reassuring statement in a policy. The review asks for evidence behind an operating assertion. A missing report creates an evidence limitation; it does not establish that predatory conduct occurred or justify an allegation against any real institution.

Locator: BNM/RH/PD 028-103, S 16.9; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R05. S 16.12 | printed p.41 | PDF p.42

PARAPHRASE / review question: Is due care for vulnerable consumers demonstrated in the production machine-learning credit assessment model?

The paragraph addresses due care where machine learning is used for credit assessment in relation to vulnerable consumers. Consider the actual production use, not just a proposed model-governance document. The exercise does not invent a required mathematical fairness metric, pass mark or regulator-approved model-validation technique.

Locator: BNM/RH/PD 028-103, S 16.12; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R06. S 16.15 | printed p.41 | PDF p.42

PARAPHRASE / review question: Does training prepare relevant staff, representatives and agents to assist vulnerable consumers?

Training concerns personnel who deal with vulnerable consumers, including relevant representatives and agents. Ask what the training prepares people to do and which populations it reaches. A bank may require skills assessment as its own control; that internal rule must not be attributed to BNM as a specified examination score.

Locator: BNM/RH/PD 028-103, S 16.15; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R07. S 16.19 | printed p.43 | PDF p.44

PARAPHRASE / review question: Are customer support needs recorded and available to relevant staff at service handoff?

Recording a customer's needs and making useful information available to relevant service personnel are connected but separate considerations. A proposed system field is not an operating record, and a stored record is not necessarily accessible at handoff. Apply appropriate information handling rather than assuming unrestricted access is required.

Locator: BNM/RH/PD 028-103, S 16.19; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R08. S 16.21 | printed p.43 | PDF p.44

PARAPHRASE / review question: Do staff, representatives and agents have sufficient flexibility to respond to vulnerable-consumer needs?

Personnel need sufficient flexibility to respond sensibly to customer circumstances rather than being constrained by an inflexible standard process. Consider the authority available to staff, representatives and agents and whether its use is demonstrated. Flexibility does not remove accountability or authorise bypassing identity, security or other applicable safeguards.

Locator: BNM/RH/PD 028-103, S 16.21; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R09. S 16.22 | printed p.43 | PDF p.44

PARAPHRASE / review question: Can customer service adapt to the needs of vulnerable consumers?

Adaptability concerns how service is delivered for the customer's needs. More time, an appropriate callback or a suitable explanation may illustrate the bank's response, without being an exhaustive

prescribed menu. Distinguish a genuinely deployed service adaptation from unrelated technology plans described in the same programme.

Locator: BNM/RH/PD 028-103, S 16.22; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R10. S 16.23 | printed p.43 | PDF p.44

PARAPHRASE / review question: Is accurate, accessible information about assistance available to vulnerable consumers?

Consumers need accessible information about where and how to obtain assistance. Availability and accuracy matter together: a leaflet can reach customers yet advertise a route that does not exist. This review does not assume that a particular digital platform is mandatory or that web publication alone satisfies all needs.

Locator: BNM/RH/PD 028-103, S 16.23; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R11. S 16.26 | printed p.44 | PDF p.45

PARAPHRASE / review question: Are lifecycle communications clear, periodically tested for effectiveness and accurate about available channels?

Look across the customer lifecycle at communication clarity, periodic evaluation of effectiveness and awareness of available channels. Approved wording is different from evidence that communications work. Do not create a regulator-specified testing frequency or claim a future comprehension exercise has already occurred at the evidence cutoff.

Locator: BNM/RH/PD 028-103, S 16.26; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R12. S 16.27 | printed p.45 | PDF p.46

PARAPHRASE / review question: Are vulnerable-consumer outcomes monitored and evaluated, with improvements informed by results?

Monitoring and evaluation should inform improvements in outcomes for vulnerable consumers. A list of proposed measures is not an operating return, and a funding request is not a completed improvement. This scoped question does not prescribe a dashboard vendor, expenditure amount or regulator-mandated number of indicators.

Locator: BNM/RH/PD 028-103, S 16.27; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R13. S 16.28 | printed p.45 | PDF p.46

PARAPHRASE / review question: Has the bank reviewed this policy document together with relevant related policy requirements?

Review this policy document in conjunction with relevant related requirements. This creates an important source dependency: a work plan or list of titles cannot establish the content of absent texts. The exercise supplies no complete related-policy set, so the reviewer must preserve that limitation rather than inventing a cross-policy legal conclusion.

Locator: BNM/RH/PD 028-103, S 16.28; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R14. S 10.3(g) | printed p.11 | PDF p.12

PARAPHRASE / review question: Are accountability, policies and support for personnel assisting vulnerable consumers established?

The governance question concerns clear accountability, appropriate policies and arrangements that support people assisting vulnerable consumers. Governance authority can be evidenced independently of every operating control. Do not treat a Board policy approval as blanket approval of excluded annexes, future expenditure or the quality of later customer outcomes.

Locator: BNM/RH/PD 028-103, S 10.3(g); effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R15. G 16.25 | printed p.44 | PDF p.45

PARAPHRASE / review question: What would multiple communication channels contribute to support for

vulnerable consumers?

This guidance invites consideration of multiple communication channels in supporting vulnerable consumers. Treat it as a discussion of suitable approaches, not a mandatory requirement to launch WhatsApp, video relay or every possible channel. Published availability claims should still be accurate under the separate communication review questions.

Locator: BNM/RH/PD 028-103, G 16.25; effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

R16. G 16.8(g) | printed p.40 | PDF p.41

PARAPHRASE / review question: Does the longer free-look guidance for insurers and takaful operators apply to the bank as an underwriter?

This guidance concerns a longer free-look arrangement for insurers and takaful operators. The fictional bank is a distributor, not the underwriter. Keep the underwriting applicability decision separate from a distribution handoff to the responsible partner for Legal confirmation; do not erase the customer-support interface or invent a free-look period.

Locator: BNM/RH/PD 028-103, G 16.8(g); effective 1 April 2025 under paragraph 4.1; issued 27 March 2024.

4. Limits on legal and geographical conclusions

No related-policy texts for the paragraph 16.28 cross-review are bundled. No Indonesian legal conclusion follows from this source. The OJK title supplied in the sister-entity SOP is contextual only. This Monday 17 March 2025 snapshot makes no assertion about subsequent amendments, present-day law, holiday calendars or regulatory filing obligations outside its stated scope.