Mr. Andrew R.T. Davies AS
Cadeirydd Pwyllgor Economi, Trafnidiaeth a Materion Gwledig y Senedd
Llywodraeth Cymru
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Drwy e-bost i: SeneddEconomy@senedd.wales

28 Ionawr 2026

**Diweddariad yn dilyn argymhelliad y pwyllgor ar ymdrin â chwynion**

Annwyl Andrew,

Ysgrifennaf i roi'r wybodaeth ddiweddaraf i'r Pwyllgor ar y gwaith a wnaed gan Fanc Datblygu Cymru mewn ymateb i Argymhelliad 10 o adroddiad y Pwyllgor, sy'n ymwneud â thrin cwynion.

Fel y bydd y Pwyllgor yn ymwybodol, comisiynodd Llywodraeth Cymru ei Adolygiad Asesu Prosiect a adroddodd yn 2025 ac yn dilyn hynny rhoddodd Ysgrifennydd y Cabinet dros yr Economi y wybodaeth ddiweddaraf i'r Pwyllgor ar ganlyniadau'r adroddiad hwnnw ym mis Awst gan nodi:

*"Mae'n bleser gennyf nodi bod y Tîm Adolygu wedi canfod bod y trefniadau rhwng Tîm Partneriaeth Llywodraeth Cymru a DBW yn effeithiol, ac mae gan y banc le da i gyflawni ei amcanion a'i dargedau a nodir yn y Cynllun Corfforaethol.*

*Canfu'r Tîm hefyd fod diwydrwydd dyladwy cynhwysfawr a chadarn yn cael ei gynnal mewn perthynas â chwsmeriaid y banc, sy'n lliniaru'r risg ariannol ac enw da, ac mae'r banc yn dilyn prosesau cadarn i ddilyn cwynion, nad oes llawer ohonynt. Yn unol â chanfyddiadau arfer da ar gyfer ymdrin â chwynion a diwydrwydd dyladwy, nid oedd unrhyw argymhellion penodol ar gyfer camau pellach yn ymwneud â'r naill neu'r llall o'r meysydd hyn."*[1]

Ni wnaed unrhyw argymhellion penodol gan y tîm adolygu ynghylch cwynion heblaw am yr angen am fwy o fanylion am y broses i'w dilyn pan fo cwyn i'w chyfeirio ymlaen at dîm Partneriaeth Llywodraeth Cymru. Mae'r pwynt hwn wedi'i egluro ers hynny yn y diweddariad diweddaraf i'r Ddogfen Fframwaith.

1 https://business.senedd.wales/documents/s164692/Letter%20from%20the%20Cabinet%20Secretary%20for%20Economy%20Energy%20and%20Planning%20-%204%20August%202025.pdf

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Er bod yr adolygiad allanol yn rhoi sicrwydd bod ein prosesau cwyno yn gadarn ac yn gymesur, roedd y Bwrdd hefyd yn ystyried argymhelliad y Pwyllgor fel cyfle i gryfhau dealltwriaeth, tryloywder ac atal ymhellach ar draws cylch bywyd y buddsoddiad.

Cynhaliwyd adolygiad ymdrin â chwynion pellach gan archwilwyr mewnol annibynnol, RSM UK Risk Assurance Services LLP (RSM) fel rhan o gynllun archwilio mewnol 2025-2026.

Mae copi o drosolwg canlyniadau archwilio RSM ynghyd â chrynodeb o'r camau rheoledig wedi'i atodi fel Atodiad 1. Fel y nodwyd yn yr atodedig, nododd RSM un cam gweithredol canolig a saith blaenoriaeth isel, pob un ohonynt eisoes wedi'u gweithredu.

Diffinnir y camau blaenoriaeth hyn gan RSM fel a ganlyn:

- Canolig: mae angen sylw rheoli amserol
- Isel: mae lle i wella rheolaeth neu wella effeithlonrwydd.

Mae'r camau gweithredu blaenoriaeth ganolig yn ymwneud ag asesu a chategoreiddio adborth a chwynion cwsmeriaid. Yn y flwyddyn ariannol a ddaeth i ben 31 Mawrth 2025, cofnodwyd cyfanswm o 50 o achosion o adborth cwsmeriaid. Nododd RSM un achos lle roedd ymateb i arolwg cwsmeriaid wedi'i ddosbarthu fel adborth, pan oherwydd bod yr ymateb yn mynegi anfodlonrwydd, dylai fod wedi cael ei ddosbarthu fel cwyn.

Yn olaf, yn dilyn cwyn benodol a dderbyniwyd yn 2024 yn ymwneud â digwyddiadau mewn cwmni buddsoddi yn 2018, ailymwelodd bwrdd cyfarwyddwyr Banc Datblygu Cymru plc ar agweddau allweddol yr achos gyda chefnogaeth adolygiad llywodraethu annibynnol.

Ar ôl ystyried y materion a godwyd yn y gŵyn yn ofalus, mae'r bwrdd yn fodlon bod y Banc Datblygu wedi gweithredu'n briodol ac yn unol ag arferion y farchnad.

Fel rhan o'n hymrwymiad parhaus i welliant parhaus ac i fodloni'r safonau uchel a ddisgwylir gan gorff cyhoeddus, mae'r rheolwyr yn gweithredu'r mesurau canlynol i gryfhau ein llywodraethu ymhellach:

1. Adolygiad gweithredol o'r trefniadau ar gyfer storio a chadw nodiadau o benderfyniadau sy'n ymwneud â buddsoddiadau
2. Ehangu gweithdrefnau presennol i ddarparu ar gyfer y nifer cyfyngedig o sefyllfaoedd lle derbynnir cwynion gan unigolion nad ydynt yn gwsmeriaid yn dechnegol (cwynion nad ydynt yn gwsmeriaid)
3. Eglurhad o'r llwybr cynyddu a'r broses apeliadau sy'n berthnasol i gwynion nad ydynt yn gwsmeriaid
4. Gwella gweithdrefnau presennol i ddarparu argymhelliad clir i sylfaenwyr y dylent gymryd cyngor annibynnol ar gynnwys a goblygiadau dogfennau sy'n gysylltiedig â buddsoddi (megis cytundebau buddsoddi, erthyglau cymdeithasu, a chytundebau gwasanaeth cyfarwyddwyr). Y nod yw arfogi sylfaenwyr yn well i wneud eu penderfyniadau gwybodus eu hunain, i hyrwyddo dealltwriaeth o'r dogfennau sy'n cael eu llofnodi ac i leihau'r risg o anghydfodau yn y dyfodol.

Y tu hwnt i fynd i'r afael â'r camau penodol, mae'r tim rheoli wedi myfyrio ar sut i sicrhau bod dysgu o adborth a chwynion yn llywio'n fwy effeithiol y canllawiau a ddarparwn i sylfaenwyr ar ddechrau'r broses fuddsoddi.

Yn ddiweddar, rydym wedi cyflwyno'r *Llawlyfr sylfaenwyr*, a ddatblygwyd o ymchwil fanwl gyda sylfaenwyr busnesau technoleg ac wedi'i lywio gan themâu sy'n dod i'r amlwg o ymchwiliad y Pwyllgor ac adborth y farchnad. Mae'r Llawlyfr yn darparu canllawiau ymarferol i wella dealltwriaeth sylfaenwyr o strwythurau buddsoddi, cyfrifoldebau llywodraethu a gwneud penderfyniadau ar gamau twf allweddol, gan helpu i leihau'r risg o gamddealltwriaeth ac anghydfodau yn y dyfodol. (Llawlyfr sylfaenwyr)

Mae'r mesurau hyn yn adeiladu ar y ffaith bod ein prosesau wedi parhau i esblygu fel mater o arfer da. Gyda'i gilydd, maent yn adlewyrchu nid yn unig sicrwydd ynghylch cadernid ein trin cwynion, ond ymrwymiad i ddysgu o brofiad ac ymgorffori'r dysgu hwnnw mewn canllawiau a chefnogaeth gliriach i sylfaenwyr ledled Cymru.

Rydym yn hyderus bod hyn yn dangos ymrwymiad y bwrdd i dryloywder, llywodraethu da ac i ymateb yn adeiladol i argymhelliad a goruchwyliaeth y Pwyllgor.

Yn gywir

**Sally Bridgeland**
**Chair, Development Bank of Wales**
**Hon Group Captain Sally Bridgeland BSc ARCS FIA FRSA FSIP**
**601 (County of London) Sqn RAuxAF**

Appendix 1

# AUDIT OUTCOME OVERVIEW

In line with our scope, included at Appendix C, the overview of our findings is detailed below.

**Background:** As part of the 2025-26 internal audit plan for the Development Bank of Wales ('DBW' or 'the Bank'), we reviewed key elements of the control framework in place over complaints.

Complaints is an area where there is currently external focus. This is also an area that RSM has not yet covered since our appointment in 2022-23.

Whilst limited aspects of DBW's operations are subject to Financial Conduct Authority ('FCA') regulation, the Bank intentionally aligns its working practices with regulatory expectations, to offer a consistent standard of service to its borrowers when compared to similar lenders. Our review compared aspects of DBW's processes against regulatory expectations, and to best practice observed within the Bank's cohort of peers across the financial services sector.

The DBW Investments 10 Fund is FCA regulated, and is therefore subject to the FCA's DISP Handbook. As part of this review, we assessed whether the complaints related to this fund have been handled in line with the regulatory requirements. We also reviewed the complaints processes for Help to Buy Wales Limited ('HtBW'), and FW Capital, whilst also testing adherence to procedures for these complaints.

**Conclusion:** We observed that DBW operates a well-developed control framework over complaints. There are policies and procedures in place, and management information (MI) is regularly presented through the governance structure. From our sample testing, we found that complaint cases are handled in line with policies, procedures and regulatory requirements. There is a process in place for undertaking root cause analysis over complaints received, which includes the sharing of lessons learnt.

However, we did identify a number of areas where the framework can be improved. Most notably, we identified a case that met with the FCA's definition of a complaint, but which was categorised as customer feedback. Misclassification of complaints as feedback can result in complaints not being properly investigated, escalated, or reported, leading to regulatory non-compliance, missed opportunities to address customer concerns and poor customer outcomes.

Additional areas for enhancement of the framework included formally evidencing review and approval of the policy for complaints, introducing standard templates for customer communications, and including additional areas in the MI.

Overall, we raised one medium and seven low priority actions.

**Internal audit opinion:**

Based on this, we have provided the following opinion:

Minimal Assurance | Partial Assurance | **Reasonable Assurance** | Substantial Assurance

Taking account of the issues identified, the board can take reasonable assurance that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied and effective.

However, we have identified issues that need to be addressed in order to ensure that the control framework is effective in managing the identified risk(s).

**Audit themes:**

Whilst the majority of actions raised from this review were deemed low priority, the main theme arising was the comprehensiveness of policies, procedures and MI. For example, the provision of additional guidance within procedures, or the inclusion of additional insights within MI for Board level oversight purposes.

Making the recommended enhancements will strengthen the framework around complaints further.

# SUMMARY OF MANAGEMENT ACTIONS

## The action priorities are defined as*:

| High | Medium | Low |
|---|---|---|
| Immediate management attention is necessary. | Timely management attention is necessary. | There is scope for enhancing control or improving efficiency. |

| Ref | Action | Priority | Responsible Owner | Date |
|---|---|---|---|---|
| **Complaints Processing** | | | | |
| 1 | A process will be implemented to systematically assess all customer feedback submissions, regardless of the channel received, to determine whether they meet the FCA's definition of a complaint.<br>Where feedback expresses dissatisfaction relating to the firm's provision of, or failure to provide, a financial service, it will be re-categorised as a complaint. | Medium | [redacted] | 30 September 2025 |
| 2 | Relevant staff will be reminded of the requirement to log complaints in the Complaints Register as soon as they are received. | Low | [redacted] | 30 September 2025 |
| **Policy and Procedures** | | | | |
| 3 | To formally evidence the annual review and approval of the current version of the 'Complaints Policy & Procedures', the approval email chain will be shared with the Compliance team in order that the approval can be recorded on the policy register.<br>Going forward, the approval will be documented within the version control table of the policy itself, clearly indicating the names, roles, and dates of review and approval for each version. | Low | [redacted] | 30 September 2025 |
| 4 | Once approved, the new 'Customer Feedback Resolved' email template will be implemented. This will be saved within the Complaints folder, with links within the Procedure. document). Older versions will be deleted. A communication to the team will be made to make them aware of the new version, and that this will be the standard for all relevant client communications going forward. | Low | [redacted] | 30 September 2025 |

| Ref | Action | Priority | Responsible Owner | Date |
|---|---|---|---|---|
| 5 | The Complaints Policy & Procedures will be updated to fully align with the FCA DISP 1.2.1R requirements for consumer awareness and accessibility of complaints procedures.<br><br>Specifically, the policy will:<br>• clearly state where and how customers can access information about the complaints process, including providing details on the DBW website and in customer-facing documents. (DISP 1.2.1 R2);<br>• confirm that information about the complaints process is made available to customers upon request, and that a copy is provided automatically when a complaint is received (unless resolved by close of the next business day). (DISP 1.2.1 R3); and<br>• ensure the policy explicitly requires that information about the Financial Ombudsman Service (FOS), including the FOS website address, is published on the DBW website and included in the general conditions of customer contracts, in addition to being provided directly to eligible complainants in response letters. (DISP 1.2.1 R4). | Low | [redacted] | 30 September 2025 |
| 6 | The HtBW Complaints Procedure will be updated to fully align with the relevant FCA DISP requirements.<br><br>Specifically, the policy will:<br>• clearly state that information about the Financial Ombudsman Service (FOS), including the FOS website address, is published on the HtBW website and included in the general conditions of contract with eligible complainants, as required by DISP 1.2.1R;<br>• include a clear statement that HtBW will cooperate fully with the FOS and comply promptly with any settlements or awards made by it, in line with DISP 1.4.4R;<br>• add a section describing the process for forwarding complaints to another respondent when that party may be solely or jointly responsible, as set out in DISP 1.7.1R;<br>• address the procedure for handling complaints received from another respondent under DISP 1.7.2R, including a statement that such complaints are treated as if made directly to HtBW and that DISP time limits apply from the date the forwarded complaint is received; and<br>• include guidance for handling complaints received outside the time limits for referral to the FOS, in accordance with DISP 1.8.1R. | Low | [redacted] | 30 September 2025 |

| Ref | Action | Priority | Responsible Owner | Date |
|---|---|---|---|---|
| **Root Cause Analysis** | | | | |
| 7 | Actions and outcomes for any relevant issues raised within MI will be documented in all future quarterly MI packs. | Low | [redacted] | 30 September 2025 |
| **Management Information** | | | | |
| 8 | The MI packs will be updated for all entities (DBW, FWC, and HtBW) to include a clear summary and breakdown of:<br>• the number and percentage of complaints resolved within three business days of receipt (early resolution); and<br>• the number and percentage of complaints where the eight-week final response deadline was met or missed. | Low | [redacted] | 31 July 2025 |