An tOmbudsman Seirbhísí Airgeadais agus Pinsean

Financial Services and Pensions Ombudsman

Understanding the Financial Services Industry Levy 2025

The FSPO is funded through two distinct sources – the financial services complaints are funded by a levy on the financial services industry and the pensions complaints are funded by the Exchequer.

This publication provides information on how the levy on the financial services industry is determined, calculated and collected.

April 2025

Mission

Resolve complaints in a fair and timely way leading to better financial and pension services.

Vision

A progressive financial services and pension environment built on trust, fairness and transparency, where complaints are the exception.

Contents

Role of the Financial Services and Pensions Ombudsman

The Financial Services and Pensions Ombudsman (FSPO) was established on 01 January 2018 to resolve complaints from consumers, including small businesses and other organisations, against financial service providers or pension providers.

We provide an independent, fair, impartial, confidential and free service to resolve complaints through either informal mediation, leading to a potential settlement agreed between the parties, or formal investigation and adjudication, leading to a legally binding decision.

When any consumer, whether an individual, a small business or an organisation, is unable to resolve a complaint or dispute with a financial service provider or a pension provider, they can refer their complaint to the FSPO.

We deal with complaints informally at first, by listening to both parties and engaging with them to facilitate a resolution that is acceptable to both parties. Much of this informal engagement takes place by telephone.

Where these early interventions do not resolve the dispute, the FSPO formally investigates the complaint and issues a decision that is legally binding on both parties, subject only to an appeal to the High Court.

The Ombudsman has wide-ranging powers to deal with complaints against financial service providers and can direct a provider to rectify the conduct that is the subject of the complaint. There is no limit to the value of the rectification that can be directed. The Ombudsman can also direct a provider to pay compensation to a complainant of up to €500,000. In addition, the Ombudsman can publish anonymised decisions and can also publish has had at least three complaints against it upheld, substantially upheld, or partially upheld in a year.

In terms of dealing with complaints against pension providers the Ombudsman's powers are more limited. While the Ombudsman can direct rectification, the legislation governing the FSPO sets out that such rectification shall not exceed any actual loss of benefit under the pension scheme concerned.

Furthermore, the Ombudsman cannot direct a pension provider to pay compensation. This Office can only publish case studies in relation to pension decisions (not the full decision), nor can it publish the names of any pension provider irrespective of the number of complaints it may have had upheld, substantially upheld, or partially upheld against it in a year.

Formal investigation of a complaint by the FSPO is a detailed, fair and impartial process carried out in accordance with fair procedures. For this reason documentary and audio evidence and other material, together with submissions from the parties, is gathered by the FSPO from those involved in the dispute, and exchanged between the parties. Unless a decision is appealed to the High Court, the financial service provider or pension provider must implement any direction given by the Ombudsman in a legally binding decision. Decisions appealed to the High Court are not published while they are the subject of an appeal.

Who sets the financial services industry levy?

The Financial Services and Pensions Ombudsman Council (FSPOC) sets the financial services industry levy. The FSPOC consists of a Chairperson and not less than 5 members, all of whom were appointed by the Minister for Finance following a recruitment process by the Public Appointments Service.

Part 4 of the Financial Services and Pensions Ombudsman Act 2017 sets out the role of the FSPO Council. The FSPO Council is responsible under the legislation for setting the levy to be paid by financial service providers.

The Council has other oversight responsibilities in relation to the work of the FSPO, including its responsibilities in relation to:

- Approval of the FSPO's annual budget;
- Approval of the FSPO's strategic plan; and
- Keeping under review the efficiency and effectiveness of the Ombudsman

Determining the overall levy requirement

The FSPO Council (FSPOC) approves the FSPO's annual budget. This annual budget is then funded through two distinct sources; the financial services complaints are funded by a levy on the financial services industry and the pensions complaints are funded by the Exchequer, through the Department of Finance.

The first levy Regulations were promulgated in 2005 following the establishment of the Financial Services Ombudsman Bureau. The structure of the Regulations has been amended a number of times since. In particular, the levy process was subject to review and consultation in 2018.

In September 2018, the FSPOC agreed a methodology whereby the proportion of funding provided by the Exchequer is based on the ratio of pensions-related complaints received to financial services complaints, over a rolling three-year period.

For the 2025 levy, using the data available for the years 2021-2023 (full year data calculated in late 2024, for the 2025 budget), 5% of all complaints received were in relation to pensions meaning 5% of the total budget are then drawn down from the Exchequer directly, with the remaining funding collected through the financial services industry levy.

The table below illustrates the methodology used in calculating the financial services industry levy.

Since the last review, the financial services sector has continued to evolve and another in-depth review and consultation was carried out in 2024.

The objectives of the review were to ensure:

a. Predictability and resilience of funding;

b. Proportionate administration;

c. Equity in the design and application of the Levy; and

d. Appropriate incentivisation.

Following the initial desktop analysis it was proposed that each complaint would be attributed to a Central Bank of Ireland register (based on which register the provider being complained of is included on). Complaints would then be grouped into categories based on the industry funding categories.

In addition, it was proposed that the total levy amount be shared across the industry funding categories based on the number of complaints allocated to the category (on a rolling three year basis), so that, for example, if 50% of complaints relate to credit institutions then 50% of the levy would be funded by providers included on the A1/A2 registers. The aim was that the proportion of levy attributed to each industry funding category will reflect recent experience of complaints received.

Following the consultation the changes were then modelled for impact, and agreed by the FSPOC.

Budget 2025	€	€
Approved funding requirement		16,815,918
Less:		
Carry-over of surplus from 2024	-231,500	
Funding from Department of Finance	-849,274	
Total to be collected by way of financial services industry levy		**15,735,144**

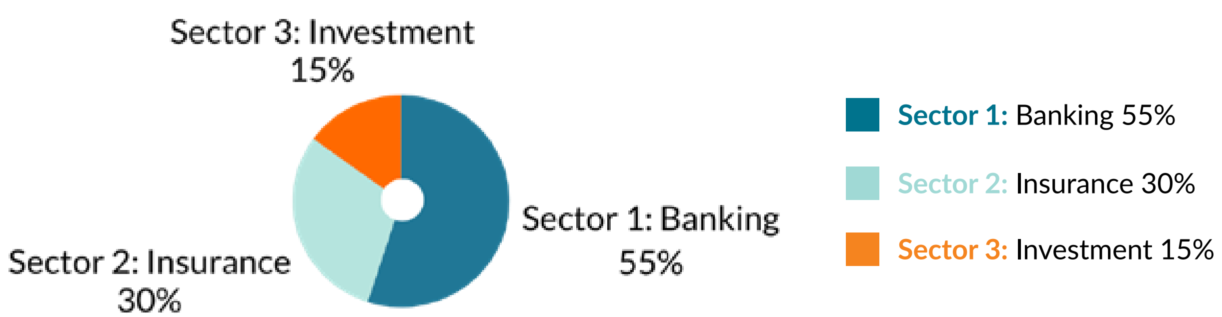
Apportioning the levy by category

The categories of financial service provider subject to a levy by the FSPO are based on authorisations held by each entity with the Central Bank of Ireland and as prescribed in the Financial Services and Pensions Ombudsman Act 2017. The FSPO does not have a role in relation to the authorisation held by financial service providers with the Central Bank of Ireland.

In order to ensure an equitable distribution of the levy among financial service providers, an in-depth review, consultation and modelling exercise was carried out ahead of the issuing of the levy in 2025. This ensured that the proportion of the levy applicable to each category reflects the volume of complaints received by the FSPO in the previous three-year period.

The complaints data for the three-year period from January 2021 to December 2023[1] across the three major sectors of Banking, Insurance and Investments is depicted in the graph below.

Aggregated Total of Complaints Received (2021, 2022 and 2023)



For those categories of financial service providers which cannot be readily categorised under Sectors 1, 2 or 3, or which may fall across sectors, arrangements in relation to the appropriate allocation base are set out per category in the schedule to the relevant Statutory Instrument.

The share-out of the total levy among the categories of regulated entities being charged is set out in the table below:

Financial services industry by sector	
Sector 1: Banking	€ 8,557,302
Sector 2: Insurance	€4,439,644
Sector 3: Investment	€ 665,124
All other categories of financial service provider	€2,073,074
	€ 15,735,144

Within each sector, the funding required is apportioned across the categories of financial service provider included in each sector as regulated by the Central Bank of Ireland.

1 2024 complaints were not included in the 2025 levy exercise as the calculation of the levy was completed before year end. As such, complete data for 2024 was not available.

Funding breakdown per sector 2025

Sector 1: Banking	% of complaints	Levy
Credit Institutions	94%	€8,017,917
Credit Unions	2%	€352,539
Moneylenders	2%	€186,846
		€8,557,302

Sector 2: Insurance	% of Complaints	Levy
Life Assurance	23%	€ 1,272,667
Non-Life Insurance	62%	€2,491,277
Accident and Health Insurance	15%	€675,700
		€4,439,644

Sector 3: Investment	% of Complaints	Levy
Firms regulated under the provisions of either the Investment Intermediaries Act 1995, that are not captured in any other category for the purposes of these Regulations, or European Union (Markets in Financial Instruments) Regulations 2017 [S.I. No. 375 of 2017] or any amending or replacing legislation including: designated fund managers; entities engaged in the receipt and transmission of orders and/or the provision of investment advice; entities engaged in portfolio management and the execution of orders; entities engaged in own account trading and underwriting. Stock Exchange Member Firms: Member Firms of the Irish Stock Exchange which have been authorised or deemed authorised as an Investment Firm under the European Union (Markets in Financial Instruments) Regulations 2017 or any amending or replacing legislation. Firms authorised under the Investment Intermediaries Act 1995 that are not captured in any other levy category for the purposes of these Regulations. High Volume Algorithmic Trading Firms.	100%	€665,124
		€665,124

All other financial service providers	Levy
Category C - Intermediaries and Debt Management Firms	€797,208
Category M - Retail Credit Firms, Home Reversion Firms and Credit Servicing Firms	€1,045,866
Category N - Payment Institutions and E-Money Institutions	€230,000
	€2,073,074

Calculating the levy for each financial service provider

The calculation of the financial industry levy for each category of financial service provider is specific to that category and the table below details the specific basis for assessment under each category.

Category	Basis for Assessment
A - Credit Institutions	Consumer Numbers
B - Insurance Undertakings	Gross Premiums Earned
C - Intermediaries and Debt Management Firms	Central Bank Levy
D - Investment Firms	Central Bank Levy
F - Credit Unions	Flat Rate
G - Money Lenders	Central Bank Levy
M - Retail Credit Firms, Home Reversion Firms and Credit Servicing Firms	Central Bank Levy
N - Payment Institutions and E-Money Institutions	Flat Rate

Financial service providers under Category A are issued a self-declaration form, which they must complete and return by a prescribed date, which confirms their consumer numbers, and this declaration is used to calculate the relevant levy.

A similar process is undertaken in relation to Category B to collect details of their gross premiums earned. The declarations for Category B are used to calculate the relevant levy, and are subsequently cross-checked against published data contained in the relevant Solvency and Financial Condition Report (SFCR) submitted to the Central Bank of Ireland.

For all other categories, the levy for individual financial service providers can be readily calculated based on information available in the public domain, or provided by the Central Bank of Ireland.

Preparing a Statutory Instrument

Each year, a statutory instrument is prepared by Council with the consent of the Minister for Finance and laid on the statute book. This is a very detailed document which governs the collection of the financial services industry levy. The accompanying schedule to this statutory instrument, S.I. 133 of 2025, has been reproduced as Appendix A and details the specifics of the levy to be collected from each category of financial service provider.

Collecting payment

The FSPO aims to be as efficient and cost effective as possible in the collection of its levies. Invoices are issued once the regulations come into effect. Payment is to be made within the 30 days allowed and this greatly facilitates the work and minimises the cost incurred in debt collection. Payments not received within the 30-day period will be subject to the FSPO's Levy Debtors Policy, outlined below.

The FSPO requests that all payments are made directly to the following bank account:

Bank Name Bank of Ireland, College Green, Dublin 2
Bank Account 86443442
Sort Code 90 00 17
IBAN IE89BOFI90001786443442
BIC BOFIIE2D

Appealing the levy

A financial service provider who receives a levy notice may, within 21 days, appeal to the Ombudsman to change the amount of the levy assessed for that financial service provider where it considers that the amount assessed is incorrect.

Any such appeals must be in writing to the Ombudsman, setting out the grounds of the appeal in detail and must be accompanied by the amount of required levy contribution that is not in dispute. Where relevant the appeal should include any supporting documentation or representations. Such a written appeal must be addressed to the Ombudsman.

The Ombudsman, after considering any such appeal, shall advise the appellant and the Office in writing of his decision and his reasoning for that decision. Where appropriate, any amount of required levy contribution not already paid, shall be payable by the financial service provider to this Office within 21 working days after the date of issue of the notification of the decision of the Ombudsman to the appellant.

Levy Debtors Policy

The FSPO Council approved a Levy Debtors Policy in October 2020, which gives effect to the legislative provision outlined in Section 43 of the Financial Services and Pensions Ombudsman Act 2017 ('the Act') that the Council regulations may prescribe –

(a) having had regard to one or more of the following:

(i) the amount of the outstanding levy or annual charge;

(ii) the length of delay in payment of the outstanding levy or charge;

(iii) a pattern, if any, of failure to pay, or to pay on time, the levy or charge,

the penalties that shall be payable in cases of failure to pay the financial services industry levy or failure to pay the annual charge on time.

The Financial Services Industry Levy Regulations 2025 state:

'Where an amount of required levy contribution as specified in a levy notice that has been sent to a financial service provider under these Regulations becomes payable and is not paid by the due date specified in the levy notice, the financial service provider shall become liable to a penalty of interest on the amount of the required levy contribution outstanding, to be calculated on a simple interest basis. Such interest shall be calculated from the date on which the outstanding amount became payable in accordance with the Prompt Payment of Accounts Act 1997 as amended by the European Communities (Late Payment in Commercial Transactions) Regulations 2012 - S.I. 580 of 2012, for each day or part of a day during which the outstanding amount remains unpaid.'

The FSPO Levy Debtors Policy sets out how the FSPO will apply the proportionate penalties prescribed in the 2025 Council regulations and the escalation procedures that will be implemented in respect of 2025 levies that are not paid within the 30 days payment term.

In cases where the amount of an invoice is disputed or if a financial services firm disputes the application of the levy regulations, these procedures will not be implemented until such time as the matters have been clarified and a decision is reached by the FSPO in relation to the amount of the levy that is due to be paid. Once this has been clarified to the firm in question, the 30-days payment term will begin.

Note that where a firm appeals the levy, a separate set of procedures applies and is outlined above.

Calculation of penalties:

The calculation of penalties shall be in accordance with the Prompt Payment of Accounts Act, 1997 as amended by the European Communities (Late Payment in Commercial Transactions) Regulations 2012 - S.I. 580 of 2012:

- The Regulations provide that the interest rate will be the European Central Bank main refinancing rate (as at 1 January and 1 July in each year) plus 8 percentage points.
- The ECB rate in force on 1 January and 1 July apply for the following six months in each year.
- Penalty interest due for late payments should be calculated at a daily rate.
- With effect from 1 January 2025, the late payment interest rate is 11.15% per annum (that is based on the ECB rate as at 1 January 2025 of 3.15% plus the margin of 8%). This rate equates to a daily rate of 0.031%.

31 days from the date of invoice, an invoice becomes **1 day overdue**. Thereafter, the FSPO will make contact with the firm by telephone and with a follow-up email, informing them that their payment is outstanding and outlining that late payment interest will be incurred from 91 days from the date of the invoice.

61 days from the date of invoice, an invoice becomes **31 days overdue**. Thereafter, an escalation letter will be issued by the FSPO, reminding the firm of penalties for late payment.

If payment remains outstanding after 91 days from the date of invoice, and therefore becomes **61 days overdue**, the Director of Corporate and Communication Services will write to the firm outlining that late payment interest is accruing from that date.

Thereafter, monthly communications will be issued to the firm, outlining the revised invoice amount, taking into account the interest accruing.

Following 90 days of interest accruing, interest will cease to accrue and a decision will be taken as to the next steps to be taken in relation to the debt. Debts considered collectable will be collected using one of the following methods:

(a) As permitted under Section 43(8) of the Act, "The financial services industry levy shall be recoverable by the Office as a simple contract debt in any court of competent jurisdiction".

(b) using the services of a debt collection agency

A debt will be only considered to be not collectable in very limited circumstances and the decision to determine a debt as being not collectable will be taken by the Financial Services and Pensions Ombudsman Council, the Council's Finance Committee, or the FSPO Senior Management team, in accordance with certain financial thresholds.

Queries

Specific queries in relation to the financial services industry levy should be directed to levy@fspo.ie or by telephone to (01) 567 7000.

APPENDIX A

Schedule to Statutory Instrument 133 of 2025

Category A - Credit Institutions	
(i)	Each credit institution as registered under section 1 of the Credit Institutions Register — Authorisations issued to Credit Institutions to carry on banking business in the State under Irish Legislation or section 2 (a) of the Credit Institutions Register European Credit Institutions authorised in another Member State of the European Economic Area (EEA) and operating in the State either on a branch or a cross-border basis, shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated at the rate of €0.834 per consumer, where the underlying contract between the Credit Institution and the consumer is based on Irish law, as at 31 December 2023.
(ii)	Each credit institution as registered under section 2 (b) of the Credit Institutions Register — Credit Institutions from other Member States of the European Economic Area (EEA) which has notified the Bank of its intention to provide services in the State on a cross-border basis, in respect of its liability for the year ended 31 December 2025, shall pay a levy calculated at the rate of €0.834 per consumer, where the underlying contract between the Credit Institution and the consumer is based on Irish law, as at 31 December 2023.

Category B - Insurance Undertakings	
(i)	B1: Each life insurance undertaking shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum no greater than 0.0058% of its total gross premiums earned from Irish risk business, and where the underlying contract between the Life Insurance Undertaking and the consumer is based on Irish law, for the year ended 31 December 2023.
(ii)	B4(a): Each non-life insurance undertaking with the exception of captive insurance undertakings shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum no greater than 0.0527% of its total gross premiums earned from Irish risk business other than private health insurance contracts where the underlying contract between the Non-Life Insurance Undertaking and the consumer is based on Irish law for the year ended 31 December 2023. Levy in respect of private health insurance shall be calculated in accordance with paragraph (iii) below.
(iii)	B4(b): Each non-life insurance undertaking, shall pay, in respect of its liability for private health insurance for the year ended 31 December 2025, a levy calculated on the basis of a sum no greater than 0.0215% of its total gross premiums derived from Irish private health insurance business where the underlying contract between the Non-Life Insurance Undertaking and the consumer is based on Irish law for the year ended 31 December 2023.

Category C - Intermediaries and Debt Management Firms	
	Intermediaries (including Investment Product Intermediaries and Mortgage Intermediaries who hold authorisations under the Consumer Credit Act 1995 and Mortgage Credit Intermediaries who hold authorisations under the European Union (Consumer Mortgage Credit Agreements) Regulations 2016); Insurance/Reinsurance Intermediaries registered under the European Communities (Insurance Mediation) Regulations 2005; Debt Management Firms authorised under the Central Bank Act, 1997. Each intermediary and Debt Management Firm, shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum equal to 15% of the levy payable to the Bank for 2023. Intermediary and Debt Management Firms which were levied the minimum amount by the Bank for 2023 under S.I. No. 493/2024 - Central Bank Act 1942 (Section 32D) Regulations 2024, are exempt from the levy for the year ended 31 December 2025.

Category D - Investment Business Firms (other than Investment Product Intermediaries)	
	Firms regulated under the provisions of either the Investment Intermediaries Act 1995, that are not captured in any other category for the purposes of these Regulations, or European Union (Markets in Financial Instruments) Regulations 2017 [S.I. No. 375 of 2017] or any amending or replacing legislation including: designated fund managers; entities engaged in the receipt and transmission of orders and/or the provision of investment advice; entities engaged in portfolio management and the execution of orders; entities engaged in own account trading and underwriting. Stock Exchange Member Firms: Member Firms of the Irish Stock Exchange which have been authorised or deemed authorised as an Investment Firm under the European Union (Markets in Financial Instruments) Regulations 2017 or any amending or replacing legislation. Firms authorised under the Investment Intermediaries Act 1995 that are not captured in any other levy category for the purposes of these Regulations. High Volume Algorithmic Trading Firms. Each of the financial service providers in Category D shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum equal to 4.3306% of the annual industry funding levy payable to the Bank by the financial service provider for 2023.

Category F - Credit Unions	
	Register of Credit Unions - Credit Union Act, 1997 (as amended). Registered by the Central Bank of Ireland as credit unions pursuant to the Credit Union Act, 1997 (as amended). Each Credit Union shall pay, in respect of its liability for the year ended 31 December 2025, a levy of €1,905.

Category G - High Cost Credit Providers Approved by the Bank ("Approved High Cost Credit Providers")	
	High Cost Credit Provider Register - High Cost Credit Providers were previously known as Moneylenders prior to the commencement of the Consumer Credit (Amendment) Act 2022. High Cost Credit Providers are licensed by the Central Bank of Ireland to engage in the business of High Cost Credit Provision under Part VIII of the Consumer Credit Act, 1995 (as amended). Each Approved High Cost Credit Provider shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum equal to 48.63% of the annual industry funding levy payable to the Bank by the entity for 2023.

Category M - Retail Credit Firms, Home Reversion Firms and Credit Servicing Firms	
	Retail Credit Firms/Home Reversion Firms - Authorised under Part V of the Central Bank Act, 1997 as amended to carry out retail credit firm and/or home reversion firm business. Or Who have notified the Central Bank that they wish to avail of the transitional provisions provided for under Section 34EA of the Central Bank Act, 1997 as a retail credit firm as at 16 August 2022. *Credit Servicing Firms - Authorised under Part V of the Central Bank Act, 1997 (as amended) to provide credit servicing. Or Who have notified the Central Bank that they wish to avail of the transitional provisions provided for under Section 34FA or Section 34FB of the Central Bank Act, 1997 (as amended).* Each Retail Credit firm, Home Reversion firm and Credit Servicing firm shall pay, in respect of its liability for the year ended 31 December 2025, a levy calculated on the basis of a sum equal to 24.96% of the annual industry funding levy payable to the Bank by the entity for 2023.

Category N - Payment Institutions and E-Money Institutions	
	Register of Payment Institutions who have been authorised by the Central Bank of Ireland pursuant to Regulation 18 of the European Union (Payment Services) Regulations 2018. *Register of Electronic Money Institutions who have been authorised by the Central Bank of Ireland pursuant to Regulation 9 of the European Communities (Electronic Money) Regulations 2011 (as amended).* Each Payment and E-Money institution shall pay, in respect of its liability for the year ended 31 December 2025, a levy of €5,000.

An tOmbudsman Seirbhísí Airgeadais agus Pinsean

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