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COMPARATIVE JURISDICTIONAL SCAN OF POLICY AND OTHER DOCUMENTS REGARDING LLM USE FOR COMPLAINTS AND MORE

1 Task

The task was a desktop search of practice notes, soft law guidance and related materials from ombudsman of selected domestic and comparable international jurisdictions regarding their approach to responding to complaints made with the assistance of AI from individuals. The aim was to identify whether there was existing material in other jurisdictions that could inform the approach of the New South Wales Ombudsman in addressing complaints made with the use of LLMs.

1.1 Summary

There is limited publicly available guidance, practice notes and soft law guidance on how ombudsman and related bodies should respond to AI complaints. The key source identified through the search was material from the UK Information Commissioner's Office providing guidance to other bodies relating to FOI Act requests generated with the support of AI.

Most other material did not provide guidance on responding to complaints, but was instead directed toward instructing and educating the public on how they ought to and ought not to use AI in formulating their complaints. Ombudsman bodies from across jurisdictions, including Australia, the UK, New Zealand, Canada, Denmark and more have public facing webpages and documents providing this guidance. There was some divergence in the approaches pursued with some bodies all but recommending against the use of AI (i.e. NZ Privacy Commissioner), other bodies providing for explicit (i.e. Tasmanian Ombudsman) or implicit limits (i.e. Independent Office for Police Conduct) in respect of length and verbosity of complaints, and other bodies simply referring more generally to accuracy, confidentiality and other issues (i.e. NSW Ombudsman).

Other useful material included guidance provided by a private organisation about law firms in England and Wales responding to AI complaints from clients. Complaints against solicitors must first be directed toward a firm before being escalated to the Legal Ombudsman, so individual law firms deal with similar issues facing ombudsman about long and complicated AI complaints. The guidance usefully referred to principles such as proportionality and fairness which may be relevant in the ombudsman context.

1.2 Methodology

The search for relevant materials proceeded as follows.

First, a set of key jurisdictions (including Australia) was identified on the basis of their comparability with Australia, their general responsiveness to AI developments, and the significance of their ombudsman legacies. These jurisdictions were Australia, the UK, New Zealand, Canada, France, Estonia, Sweden, Denmark, the Netherlands and South Korea (**Selected Jurisdictions**). A general ChatGPT and Google search was used for the selected jurisdictions as well as other major jurisdictions (India, South Africa, Ireland, EU) to identify the existence of any relevant practice notes, soft law guidance and related materials concerning the use of LLMs in complaints to ombudsman bodies in these jurisdictions.

The ChatGPT prompt I used was:

> Please find all practice notes, soft law guidance, press releases, public facing webpages and related materials for [list of ombudsman] in [Name of jurisdiction].

Google searches were narrowed by location to the relevant jurisdiction and temporally to the last 5 years, and included combinations of phrases (in the relevant languages):

> complaint, AI, ombudsman, AI-generated, AI-assisted, LLM

Positive results with a brief description are identified in the table in section 1.3.

Secondly, to validate the effectiveness of the above methodology, ombudsman bodies of the Selected Jurisdictions were identified through a combination of searches using academic literature and LLMs, and their website details listed in an excel document. This turned up 159 results. A simple random sample of 15 ombudsman bodies was selected from these results and a further search was conducted on these bodies through both a site-based Google search (i.e. [AI (translated where necessary)] + site:[name of site]), and internal site-based searches. The 15 selected ombudsman bodies are listed in section 1.4 with the results obtained from searches of their websites. The specific search landed only a single result not captured by the original methodology: a PDF complaints policy from the Independent Police Conduct Office of the UK which provides guidance for individuals submitting AI complaints in a very similar form to guidance from other ombudsman referring to AI complaints. This single result was not considered significant enough as to invalidate the methodology pursued and may be a function of the original search being performed in May, and the document (which is dated for June 2026) only being created afterwards.

1.3 Results Table

Jurisdiction	Body	Specific Guidance?	Document	Relevant extracts/comments
United Kingdom	Parliamentary and Health Service Ombudsman	No	N/A	Does have a general policy on AI: Artificial Intelligence (AI) ethics and transparency policy and guidance on individuals using AI in formulating their complaints: Useful prompts for Artificial Intelligence (AI) tools to help with your complaint
	Local Government and Social Care	No	N/A	Does have a general AI policy: AI strategy
	Ombudsman Wales	No	N/A	Does provide guidance on using AI to formulate complaints: Communication about your complaint
	Financial Ombudsman Service	No	N/A	Did have a press release about embracing AI which refers to AI complaints: Embracing AI's transformational impact on consumer complaints
	Legal Ombudsman	No	N/A	There is a long document relating to a 'strategic approach' to digital technology and AI. **There is also useful third-party (i.e. by law firms) analysis of AI complaint handling (given complaints often go to law firms first, based on existing principles: AI-generated complaints: responding without losing control**
	Independent Office for Police Conduct	No	N/A	Some recent news articles identifying the issue: https://www.resultsense.com/news/2026-05-26-iopc-ai-assisted-complaints-rise/

	Information Commissioner's Office	Yes	FOI and Artificial Intelligence	Provides general information for government bodies in responding to FOI requests with AI. Much of the information is relevant e.g. the below: "Does using AI make a request invalid? Not necessarily. Using AI to assist in writing a request is like using other kinds of technology. That includes generating a request from a prompt. You must respond to these requests unless they are invalid because they don't meet the requirements in section 8 of FOIA. The FOIA was drafted over 25 years ago, and there have been many changes in the way we use technology since then. For example, requests made through social media were not envisioned when FOIA came into effect in 2005 but are generally valid requests, provided that the requirements of section 8 of FOIA are met. If you have concerns that someone is using AI to send pseudonymous requests, review our guidance on recognising a request made under FOIA (section 8). The guidance on section 8 can also apply if you have concerns that a bot has been targeted at your organisation and is making requests without human involvement."
New Zealand	Privacy Commissioner	No	N/A	The Privacy Commissioner website includes a page which recommends against individuals using AI to formulate complaints: Using AI to contact us?

	Banking Ombudsman Scheme	No	N/A	Includes a page for guidance on individuals in using AI when raising complaints: Using artificial intelligence to help make your complaint
	Insurance and Financial Services Ombudsman	No	N/A	Some third-party and private commentary on AI complaints including by Minter Ellison NZ: Obsessive claimants
Denmark	Datatilsynet	No	N/A	Includes a press release with guidance for individuals using AI: More complaints to the Danish Data Protection Agency are prepared with AI tools
Estonia	-	-	-	No relevant findings except from the Prosecutor's Office on forming a clear position on using AI tools to deal with voluminous AI-generated criminal complaints: News Article
Australia	Victorian Ombudsman	No	N/A	Includes a guidance on making complaints recommending against the use of AI: Using AI tools to make a complaint
	South Australian Ombudsman	No	N/A	Includes guidance on making complaints that refers to using AI tools: Using AI tools for complaints
	Queensland Ombudsman	No	N/A	Includes guidance on making complaints with AI tools: Using AI tools for complaints
	Ombudsman New South Wales	No	N/A	Includes guidance on making complaints with AI tools: Using AI tools for complaints
	Ombudsman Tasmania	No	N/A	Provides information about submitting a complaint using AI: Complaints. It states that there is a limit of 3 pages or 1000 words for the complaint, and that a complaint

				written with AI over 3 pages may be rejected. The information is replicated by its Energy Ombudsman.
	Fair Work Commission	No	N/A	N.B. Not an ombudsman body but a tribunal. It provides a detailed draft guidance document on AI complaints: Using Generative Intelligence in Commission Cases
Canada	British Columbia Ombudsperson	No	N/A	Provides guidance for AI complaint submission in its FAQs: FAQs
	Manitoba Ombudsman	No	N/A	Provides guidance on making complaints with AI tools: Using AI tools for your complaints
	Office of Information and Privacy Commission British Columbia	No	N/A	Includes in its guidance documents advice on making complaints with AI tools: OIPC processes
Netherlands	Kifid (Financial Regulator)	No	N/A	Kifid has several materials relating to AI generated or supported complaints, including: A press-release with guidance on how individuals should use AI in complaint formation **2 No chatbots** Kifid deliberately does not use chatbots yet. People who call on Kifid attach great importance to personal contact, according to the customer surveys that Kifid has carried out. In addition, the complaints often relate to major personal and financial situations, where direct contact from person to person is often preferred. Personal contact contributes to careful treatment and people appreciate this. **3 Tips for making a complaint**

				Filing a complaint with Kifid can very well be done without AI. You can do it in your own words. Do you want to use AI? Then use the following tips: • Formulate your complaint as much as possible in your own words: what happened, what are you dissatisfied with, and how would you like to see it resolved? • Use AI as a tool to prepare your complaint, to organize your information. □ Do you refer to rulings of Kifid or of the Judiciary? Check whether these rulings can actually be found in the ruling register of Kifid or on rechtspraak.nl. Also check whether the ruling you are referring to is about the same subject as your own complaint and state why the judgment cited is important for the assessment of your complaint. □ Do you refer to laws or regulations? Check for yourself whether these laws and rules actually exist and can be found in reliable sources and whether they are still up-to-date. For Dutch legislation,wetten.overheid.nl is the reliable source. □ Don't just rely on what AI says about the feasibility of your complaint; it doesn't say anything about the legal accuracy. □ Keep your complaint clear, factual and verifiable. A clear and well-founded complaint without AI hallucinations helps to ensure that the complaint handling is carried out carefully and as efficiently as possible. This is in the interest of both the complainant and the financial service provider concerned.

				An interview with its managers of legal affairs which refers to the problem (and simply acknowledges that it takes a lot more time to check everything) The annual report which simply refers to the problem and the longer time it takes to respond to these complaints (p 16)
France	-	-	-	-
Sweden	Riksdagens ombudsmän	No	N/A	There is a brief reference to making sure the event itself is being properly described when making a complaint despite the use of AI tools in complaint guidance: Report to JO
	Medieombudsmannen	No	N/A	A report simply refers to the problem, observing that AI-assisted complaints can be less straightforward and direct and lower people's thresholds for filing a complaint: Årsberättelse 2025
South Korea	-	-	-	-
European Union	European Commission Directorate-General for Financial Stability, Financial Services and Capital Markets Union	No	N/A	A meeting minutes states that the Finnish Financial Ombudsman Bureau reported on the results of a short survey on AI-generated complaints. It noted that AI-generated complaints were processed in the same manner as other complaints and no dedicated guidance currently exists.
Ireland	Office of the Ombudsman	No	N/A	Provides a policy on individuals using AI to support their complaints to the ombudsman: Use of AI tools to prepare material for correspondence with the Office of the Ombudsman

	Ombudsman for Children	No	N/A	Includes a page with guidance on using AI for complaints: AI use for complaints

3.1 Validation of results

The numbers were generated using an online random number generator. They correspond to the number on each row of the Excel data document.

No	Ombudsman Body	Results
146	Le Médiateur Tourisme et Voyage (France)	No AI complaints related information found.
33	Ankestyrelsen (Denmark)	No AI complaints related information found.
143	Médiateur des Relations commerciales agricoles (France)	No AI complaints related information found.
145	La Médiatrice de la RATP (France)	No AI complaints related information found.
58	Telecommunications Industry Ombudsman (Australia)	No AI complaints related information found.
43	ACT Ombudsman (Australia)	No AI complaints related information found.
17	British Columbia Ombudsperson (Canada)	The search surfaced the FAQs, which included brief guidance on the use of AI in submitting complaints.
55	Energy Ombudsman Tasmania (Australia)	The search surfaced the guidance replicating the information provided by the Tasmanian Ombudsman.
15	Federal Ombudsman for Victims of Crime (Canada)	No AI complaints related information found.
149	Financial Ombudsman (South Korea)	No AI complaints related information found.
96	Independent Office for Police Conduct (UK)	The search surfaced a document which included a brief guidance on how individuals should use AI in formulating their complaints found here: IOPC Complaints and Feedback Policy
92	Ombudsman Services (UK)	No AI complaints related information found.
32	Ankeforsikring (Denmark)	No AI complaints related information found.
156	Korean Fair Trade Commission (South Korea)	No AI complaints related information found.
34	Datatilsynet (Denmark)	The search surfaced the press release referring to guidance on formulating complaints with AI.