RESOLVEX

Banking Intelligence Platform

The Case for Smarter Dispute Resolution in Nigerian Banking

A comprehensive white paper on the growing compliance and customer experience crisis — and how ResolveX solves it.

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Executive Summary

Nigerian banking is at a tipping point. Customer complaints have surged by 143% in a single year. The FCCPC recovered over ₦10 billion for aggrieved bank customers in just six months. The CBN is tightening mandates, shortening refund windows, and naming banks in enforcement actions. Meanwhile, KPMG's own research confirms that complaint resolution remains the weakest pillar of customer experience in Nigerian banks — for the fourth consecutive year.

The question is no longer whether banks need a better system. The question is how long they can afford to operate without one.

ResolveX is a purpose-built dispute management and resolution platform designed specifically for Nigerian financial institutions. It gives banks a structured, digital-first, end-to-end system to receive, assign, track, communicate, and resolve customer complaints — all within CBN-mandated timelines, all from a single platform.

This document presents the full picture: the scale of the problem, the regulatory environment driving urgency, and the precise ways in which ResolveX transforms how banks handle disputes.

Part 1: The Problem — A Crisis Hidden in Plain Sight

1.1 The Numbers Don't Lie

Nigeria's banking sector is drowning in unresolved disputes — and the data makes that impossible to ignore.

Between March and August 2025, the Federal Competition and Consumer Protection Commission (FCCPC) received and resolved over 9,000 complaints across 30 sectors of Nigeria's economy. Banking led the list by a wide margin:

3,173	₦10B+	143%
Banking Complaints	**Recovered for Consumers**	**Surge in Complaints**
Mar–Aug 2025	Across 30 sectors	YoY, H1 2025 vs H1 2024

Banking was not just first on the list — it was first by a staggering margin. The second-highest sector, Fast-Moving Consumer Goods, recorded 1,543 complaints. Banking's 3,173 cases represent more than **double** the volume of any other industry. These are not abstract numbers. They represent real customers who lost money, waited weeks for refunds that never came, visited bank branches only to be turned away, and ultimately escalated their grievances to a government regulator.

The CBN's own data adds even more weight. In just the first half of 2025, complaints received by the apex bank **rose 143.38% to 10,704 cases** — up from 4,398 in the same period the year before. Electronic and card-related disputes alone accounted for 51.50% of all complaints. Fraud-related cases made up another 39.27%.

> **CBN Consumer Protection Report, H1 2025**
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> "The total number of complaints received by the bank rose by 143.38% to 10,704 from 4,398 in the second half of 2024. A total of 9,771 complaints were resolved/closed, indicating an increase of 4.57% from 9,344 complaints resolved in the preceding half-year." — Central Bank of Nigeria

What makes this particularly alarming is the context: these are only the complaints that actually reached a regulator. For every customer who escalated their complaint to the CBN or FCCPC, multiple others gave up, accepted their loss, or quietly moved their business elsewhere.

1.2 Resolution Is the Weakest Link

KPMG's 2024 West Africa Banking Industry Customer Experience Survey is perhaps the most damning single piece of evidence. The research, which gathered data from over 33,000 retail customers, 5,000 SMEs, and 700 corporate organisations across Nigeria and Ghana, evaluated banks across six pillars: Integrity, Resolution, Expectations, Time and Effort, Personalisation, and Empathy.

The finding was unambiguous: resolution — turning a poor customer experience into a good one — ranked last. This was not the first time. It was the fourth consecutive year that resolution finished at the bottom of the survey.

> **KPMG 2024 Banking Industry Customer Experience Survey**
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> "For the fourth consecutive time, resolution remains the weakest experience pillar for retail customers. Ongoing technology challenges, including recent core banking and mobile app upgrades, have hindered banks' ability to address customer complaints effectively. By contrast, fintechs have consistently outperformed commercial banks in this area, with customers praising the speed and quality of their resolution services."

This is not merely a customer satisfaction problem. It is a reputational and existential one. Fintechs — Opay, Kuda, Moniepoint, PalmPay — are winning on service speed. Their customers get resolutions in hours. Bank customers wait days, or weeks, or never hear back at all. As Nigeria's fintech sector continues to grow, every unresolved complaint is an invitation for a customer to switch.

1.3 What Is Actually Going Wrong

The breakdown in dispute resolution is not a technology problem in isolation. It is a structural and operational one. After speaking with bank customers, branch staff, and reviewing publicly available complaint data, the core issues are consistent:

- No centralised complaint system — complaints come through phone calls, branch visits, emails, social media, and paper forms, with no unified tracking.
- No accountability mechanism — once a complaint is lodged, there is no clear owner, no deadline, and no visibility for the customer.
- Branch queues as the only resolution channel — customers are still required to physically visit branches for matters that could be resolved digitally, creating congestion and wasted time for both customer and staff.
- No proactive communication — customers are rarely updated on the status of their complaint, forcing them to follow up repeatedly.
- Manual task assignment — in many banks, a branch manager or customer service supervisor manually assigns complaint tickets, with no system ensuring balanced workloads or coverage.
- CBN deadline blindness — without automated countdown tracking, banks frequently miss the 14-day resolution window, triggering escalations that could have been avoided.

The result is a broken loop: customer is frustrated, staff is overwhelmed, manager has no visibility, regulator receives an escalation, and the bank pays a fine. Every single link in this chain is a failure that ResolveX is designed to prevent.

Part 2: The Regulatory Environment — Compliance Is No Longer Optional

2.1 The CBN's Tightening Grip

The Central Bank of Nigeria has been systematically raising the bar for complaint resolution since 2011, when it directed all banks to establish dedicated consumer complaint handling desks. In 2019, the CBN Consumer Protection Regulation formalised the obligations. But recent years have seen a pronounced escalation in enforcement.

The 14-Day Resolution Mandate

Under the CBN's framework, every complaint lodged with a bank must be resolved within 14 days. If a resolution cannot be reached in that window, the bank must communicate this to the customer and provide a timeline for resolution. Failure to resolve the complaint allows the customer to escalate directly to the CBN's Consumer Protection Department. Banks that fail to resolve complaints are subject to sanctions that can include financial penalties and public naming.

The 48-Hour ATM Refund Directive

In October 2025, the CBN issued **Draft Guidelines on the Operations of ATMs in Nigeria** — a sweeping reform mandating that banks refund customers for failed ATM transactions within 48 hours. For "on-us" transactions (where a customer uses their own bank's ATM), the reversal must be instant. If a technical issue prevents this, the bank has 24 hours to process a manual refund.

> **CBN Draft ATM Guidelines — October 2025**
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> "On-us transactions, where customers use their own bank's ATM, must be automatically reversed. If technical constraints prevent immediate reversal, banks are required to process refunds manually within 24 hours. Failed transactions on third-party ATMs must be resolved within 48 hours. The CBN will enforce compliance through routine audits, physical inspections, and monthly reporting. Defaulting institutions risk sanctions." — CBN Payments System Policy Department

This directive did not emerge in isolation. It was a direct response to the FCCPC's September 2025 Complaints Data Report, which identified failed transactions and delayed refunds as among the most persistent and financially damaging consumer issues in Nigeria. The FCCPC, which recovered over ₦10 billion for consumers in just six months, welcomed the directive and committed to working with the CBN to establish joint compliance monitoring mechanisms.

For banks, this means a new operational standard: every failed ATM transaction must now have a logged complaint, a tracked resolution timeline, and a documented refund. There is no longer any room for manual, informal handling of these cases.

The 30-Minute Fraud Response Requirement

In a further sign of tightening regulatory expectations, the CBN issued a circular requiring banks to respond to fraud complaints within 30 minutes — an extraordinary standard designed to help recover stolen funds before they are moved out of the system. This requirement alone demands that banks have real-time complaint monitoring infrastructure in place.

2.2 The Cost of Non-Compliance Is Accelerating

The penalty landscape for Nigerian banks has transformed dramatically in recent years. The shift from occasional small fines to nine-figure sanctions is now well documented.

- **Zenith Bank** — paid the highest fine of ₦427 million in the first half of 2024 alone, with violations including late resolution of customer complaints, non-compliance with customer charge reconciliation directives, and cybersecurity infractions.
- **Guaranty Trust Bank (GTB)** — saw its total penalties rise from ₦73 million in 2023 to ₦1.6 billion in 2024 — a staggering 2,100% increase in a single year — with infractions including issues flagged during a CBN mystery shopping exercise on customer service.
- **Access Bank** — penalties rose from ₦38 million in 2023 to ₦1.21 billion in 2024, with multiple CBN and SEC violations cited.
- **FBN Holdings** — sanctioned for unresolved customer complaints, failure to act on external audit recommendations, and unauthorised senior staff appointments.
- **CBN vs 29 banks** — ₦15 billion ($9.3 million) in combined AML and compliance penalties levied in October 2024, involving virtually every major commercial bank.

> **The Penalty Trajectory**
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> In 2023, the nine largest Nigerian banks paid a combined ₦678 million in CBN and SEC penalties. By the first half of 2024, the figure had already exceeded ₦1.5 billion — with enforcement only intensifying into 2025 and 2026. The CBN has made clear: compliance is non-negotiable, and the era of casual regulatory breaches being treated as cost-of-business is over.

It bears emphasising that customer complaint resolution is explicitly listed among the CBN's grounds for sanctions. This is not a theoretical risk. Zenith Bank was fined for late resolution of customer complaints. FBN Holdings was sanctioned for unresolved complaints. GTB was hit after a CBN mystery shopping exercise — where regulators pretended to be customers and tested the banks' resolution quality.

The CBN is watching. And increasingly, it is naming names.

Part 3: The Solution — How ResolveX Transforms Dispute Management

ResolveX is not a chatbot. It is not a call centre software. It is a complete dispute management and resolution operating system, purpose-built for Nigerian banks. It brings together complaint intake, intelligent task assignment, real-time tracking, in-platform communication, regulatory deadline management, physical appointment coordination, and multi-level dashboard visibility — all in a single platform.

3.1 Structured Complaint Intake

The process begins the moment a customer lodges a complaint on the ResolveX client platform. Through a clean, mobile-optimised interface, the customer:

- Selects their bank and the specific branch closest to them
- Chooses the category of dispute — failed transaction, unauthorised debit, excess charges, fraud, account management issues, and more
- Attaches supporting evidence — screenshots, transaction receipts, bank statements
- Submits the complaint, which is immediately registered in the system and acknowledged

Every complaint gets a unique ticket number. Every piece of evidence is stored against that ticket. The customer has a complete record of everything they submitted, and the bank has everything it needs to begin resolution without requesting the same information twice.

This alone eliminates one of the most common frustrations cited by Nigerian bank customers: having to re-explain their situation to multiple staff members, re-upload documents, and re-describe a transaction that already has a clear digital trail.

3.2 Multi-Level Dashboard Architecture

ResolveX operates across three levels of the bank's organisational structure — each with its own dashboard and its own accountability framework.

Master Admin Dashboard

The bank's senior operations or compliance team has full visibility across every complaint lodged against the institution — across all branches, all regions, and all dispute categories. The Master Admin dashboard provides aggregate data, complaint status across the network, pending escalation risks, and performance analytics by branch and staff. This is the strategic overview that compliance teams and senior management need to report internally and to the CBN.

Branch Dashboard

Each branch receives every complaint directed to it — those lodged by customers who selected that branch as their nearest location. The branch manager can see all open tickets, their status, assigned staff, and remaining resolution time. Branches can also create staff accounts and manage their team's capacity directly from the dashboard.

Staff Dashboard

Individual customer-facing staff members each have their own dedicated space where their assigned tickets appear. Their dashboard shows their current caseload, the status of each ticket, any pending customer messages, and their resolution deadlines. This is where the actual work of dispute resolution happens — and ResolveX ensures it happens with clarity, accountability, and structure.

3.3 Automatic Round-Robin Ticket Assignment

One of the most important operational features of ResolveX is its intelligent automatic ticket assignment system. When a complaint is lodged and directed to a specific branch, the system automatically assigns the ticket to a staff member using a round-robin algorithm.

This means tickets are distributed evenly across the branch's customer service team. No single staff member becomes a bottleneck. No complaint sits unassigned in a queue. The workload is balanced automatically, without a manager needing to manually allocate each case.

In practice, this eliminates one of the most common failure modes in bank complaint handling: the informal, ad-hoc assignment of complaints to whoever happens to be available, resulting in uneven workloads, missed tickets, and no accountability for who was supposed to handle what.

3.4 The 14-Day Countdown — Built Into Every Ticket

The moment a complaint is lodged on ResolveX, a 14-day countdown begins. This is not a calendar reminder. It is a live, visible, urgent indicator embedded in every ticket — visible to the assigned staff member, to the branch manager, and to the Master Admin.

As deadlines approach, the system escalates visibility. Staff with expiring tickets are alerted. Branch managers see their at-risk cases. And if a ticket expires without resolution, the client is automatically notified that they are now eligible to escalate their complaint to the Central Bank of Nigeria.

> **Why This Matters for Compliance**
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> The CBN's 14-day mandate is not just a guideline — it is an enforceable standard. Banks that allow complaints to sit unresolved past the deadline are not just failing their customers; they are exposing themselves to regulatory sanctions. ResolveX makes it structurally impossible to lose track of a deadline. Every ticket has a clock. Every clock is visible to every level of management.

This feature alone could prevent the type of regulatory infractions that cost Zenith Bank, FBN Holdings, and others tens of millions of naira in fines. When complaint deadlines are tracked automatically and escalated proactively, banks no longer have to rely on individual staff members to remember and prioritise compliance obligations.

3.5 In-Ticket Communication Channel

Every complaint ticket on ResolveX opens a dedicated, in-platform communication window between the bank staff and the customer. This is not a general chat service. It is a context-specific channel tied directly to the complaint, keeping all communication organised within the relevant case.

Through this channel, bank staff can:

- Request additional documentation — government-issued IDs, further screenshots, transaction references
- Share progress updates with the customer
- Communicate the outcome of an investigation

- Coordinate any next steps, including physical presence requirements

The channel is activated only for the duration of the active ticket. Once a complaint is resolved or closed, the conversation is archived with the case record. This gives banks a clean, auditable trail of every communication — exactly what is needed in the event of a CBN audit or escalation dispute.

For customers, this is transformative. Instead of calling a contact centre and explaining their situation from scratch to a different agent each time, they have a single thread, a single reference number, and direct access to the staff member handling their case.

3.6 Physical Presence Booking — The Queue Killer

Not every dispute can be fully resolved digitally. Some complaints require the customer to physically present a document, sign a form, or provide a biometric verification. In the current system, this means the customer visits the branch, joins a general queue, and waits — sometimes for hours — to see someone who may or may not be prepared to handle their specific case.

ResolveX eliminates this entirely through its Physical Presence Booking module.

How It Works

When a staff member determines that a customer's physical presence is needed, they change the status of the ticket to "Physical Presence Required." This instantly triggers the delivery of a booking button within the in-ticket chat window. The customer taps the button and is taken to a booking interface where they can:

- See available appointment slots at their chosen branch, in real time
- Select a date and time that is convenient for them
- Receive a QR-coded appointment pass immediately upon booking

The QR pass functions as a VIP ticket. It contains the customer's name, the date and time of their appointment, the address of the branch, and a unique identifier linked to their open complaint. When the customer arrives at the branch, they present the QR code. They are directed immediately to the relevant staff member — bypassing the general queue entirely.

Real-Time Availability, Branch by Branch

Availability in the booking system is calculated dynamically for each individual branch, based on the number of active staff members at that location. As appointments are booked, slots are removed from availability in real time. No two customers are allocated to the same staff member at the same time. And just as with complaint tickets, appointment assignments follow the same round-robin logic — ensuring that no single staff member is overloaded with back-to-back appointment bookings while others remain free.

This is not just a convenience feature. It is a capacity management system. For a busy branch in Lagos Island or Abuja's Central Business District, the difference between coordinated appointment scheduling and walk-in chaos is the difference between a functional branch and an overwhelmed one.

Part 4: The Business Case for ResolveX

4.1 Regulatory Compliance — By Design, Not by Chance

ResolveX was built with the CBN's regulatory framework as a foundation, not an afterthought. The platform's architecture directly mirrors the compliance obligations banks face:

- 14-day resolution countdowns are automatically triggered and managed on every ticket
- The complaint intake system captures all the information the CBN requires — dispute category, supporting evidence, bank and branch details, submission timestamp
- In-ticket communication creates the documented paper trail that regulators look for during inspections
- Master Admin dashboards provide the aggregate reporting data needed for CBN compliance submissions
- Automatic escalation notifications ensure that customers are informed of their right to contact the CBN when deadlines are missed — demonstrating good faith to regulators

Banks that deploy ResolveX are not simply managing complaints more efficiently. They are proactively building the compliance infrastructure that the CBN is increasingly mandating — and they are doing it before the next audit, before the next mystery shopping exercise, and before the next round of penalties.

4.2 A Direct Defence Against Financial Penalties

The financial case for ResolveX is straightforward. Consider the penalty profile of Nigeria's major banks in recent years. GTB went from ₦73 million in penalties in 2023 to ₦1.6 billion in 2024. Access Bank went from ₦38 million to ₦1.21 billion. Zenith Bank paid ₦427 million in a single half-year period, with late complaint resolution explicitly cited among the violations.

These are not isolated incidents. They are the predictable outcome of a system where complaint resolution is managed informally, inconsistently, and without the operational infrastructure to keep pace with growing complaint volumes.

ResolveX turns this risk profile upside down. When every complaint has a visible deadline, when every ticket is assigned and tracked, when every communication is documented — the structural conditions that lead to regulatory penalties are eliminated.

4.3 Winning Back Customers From Fintechs

The competitive threat from fintechs is real and immediate. KPMG's research notes that fintechs have consistently outperformed commercial banks on resolution for multiple consecutive years. Customers who have experienced the speed and clarity of a fintech's dispute resolution process return to their commercial bank and find the contrast jarring.

ResolveX does not give banks a fintech's cost structure. But it gives them a fintech's resolution experience — structured, fast, transparent, and digital. When a customer lodges a complaint and receives a ticket number, real-time updates, and a clear communication channel, their experience of the bank fundamentally changes. They feel seen, tracked, and taken seriously.

In the Nigerian banking market, where trust has been significantly eroded by years of poor complaint handling, this is not a small thing. It is the foundation of loyalty.

4.4 Operational Efficiency at Scale

The operational gains from ResolveX compound as the bank grows. Consider what happens to a branch that processes 200 complaints per month without a structured system: staff time is consumed in manual follow-ups, managers spend hours re-assigning cases, and the compliance team scrambles to produce accurate reporting.

With ResolveX, those 200 complaints are automatically received, categorised, assigned, tracked, and communicated — without a single manual intervention in the distribution process. Staff spend their time on resolution, not on administration. Managers spend their time on oversight, not on firefighting. Compliance teams pull reports from a dashboard instead of manually compiling data from spreadsheets and email threads.

This efficiency gain is not marginal. In large banks handling thousands of complaints per month across dozens of branches, the time savings translate directly into faster resolution rates, lower staff costs per complaint, and measurable improvements in the metrics the CBN tracks.

4.5 Branch Decongestion — A Tangible Impact on NPS

Long banking hall queues are one of the most consistent grievances among Nigerian bank customers. A significant portion of those queues are made up of people who came to resolve a dispute — a failed transaction, an excess charge, an account issue — that could have been handled digitally.

ResolveX removes these customers from the physical queue. When disputes are managed digitally from submission to resolution, the only people who need to visit the branch are those whose cases genuinely require it — and even then, they arrive with an appointment, a QR pass, and a prepared staff member waiting for them.

The result is a branch that runs more smoothly for everyone. Customers who need basic transactions are no longer stuck behind complainants. Complainants are no longer wasting a full day in a queue. Staff are no longer trying to manage both the queue and their complaint caseload simultaneously. The branch, in effect, becomes a better-functioning institution.

Part 5: The Window of Opportunity

The trajectory of regulatory enforcement in Nigeria is clear: it is moving in only one direction. The CBN's enforcement actions are growing larger and more frequent. The FCCPC is actively naming and recovering funds from banks on behalf of consumers. Joint monitoring mechanisms between the two regulators are being established. Mystery shopping exercises are ongoing.

Banks that move now — before the next enforcement cycle, before the next round of fines, before the next KPMG survey — gain something valuable beyond mere compliance: they gain a competitive reputation. In a market where resolution is the weakest pillar, being the bank known for excellent complaint handling is a genuine differentiator.

The technology to make this possible exists. ResolveX has been built specifically for this moment, for this market, and for this regulatory environment. It is not a generic CRM. It is not a third-party helpdesk with a Nigerian flag appended. It is a ground-up solution that understands the CBN's mandates, the operational realities of Nigerian branches, and the expectations of Nigerian bank customers.

The Final Word

In the words of the FCCPC's Executive Vice Chairman, Tunji Bello: "These numbers are not just statistics; they tell the story of consumer frustration and the daily challenges Nigerians face in essential services." ResolveX gives Nigerian banks the tools to change that story — one resolved complaint at a time.