



Telecommunications
Industry
Ombudsman

Annual Report

2020-21



Embargoed until 12:01am Wednesday 22 September 2021

Acknowledgement of Country

The Telecommunications Industry Ombudsman acknowledges the Traditional Owners of country throughout Australia.

We pay our respects to Elders past, present, and emerging, for they hold the memories, the traditions, the culture, and the hopes of Aboriginal and Torres Strait Islander Peoples across the nation.

We acknowledge sovereignty was never ceded.

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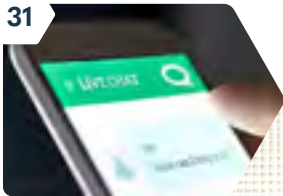
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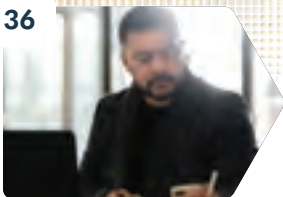
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Jade's provider failed to keep her personal information safe

Steps should have been taken to keep the personal information of this consumer experiencing family violence safe.

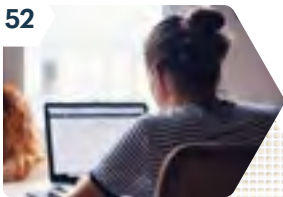
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Fetu was charged for equipment when his service could not be connected

We helped resolve a complaint where a consumer was charged for a modem he couldn't use.

52



A connection delay meant Esther could not work from home

We worked with the provider to get Esther connected to an internet service so she could work from home during COVID-19 lockdowns.

57



Zandros signed up for a service he couldn't afford

We assessed this consumer's financial situation and found he shouldn't have been signed up to services he couldn't afford.

60



Phone issues interrupt takeaway orders at Salma's restaurant

This small business couldn't take phone orders after its phone service stopped working when it transferred to a new provider.

62



Objecting to a carrier accessing land for masts installation

The Ombudsman made directions about the timing of the installation, but made no other directions about the way in which the carrier should engage in the activity.

69



We worked with a provider to improve its account security process

We investigated a provider whose account security process was not always suitable for consumers who were experiencing family violence.

Chair's message



The focus of the last 12 months has unsurprisingly been operating and thriving within the constraints of the COVID-19 pandemic and supporting our members, consumers, and our people.

As the initial adrenalin rush of 2020 faded, a particular concern of the TIO Board has been about our employees and their ability to provide excellent outcomes to our stakeholders. This 'people first' imperative, is an apt theme for this year's annual report.

We are a people organisation. While we need important technological platforms which enable us to innovate and deliver an excellent dispute resolution service, we are nothing without the skill and the value that our people bring to our organisation. Helping to maintain morale, establishing a new hybrid way of working, and continuing to deliver our service have kept the Board busy during these challenging times.

'These challenging times' has been the dominant global narrative of the last financial year. I'm proud of how the organisation has responded. We have maintained our service against the backdrop of a new normal in terms of business operations and the continued elevation of the critical role of the telecommunications network.

Our 2021-2023 strategic plan is designed to help the organisation navigate the changing telecommunications landscape. It outlines what we are doing, what defines us, and how we hope to connect to the community we serve. Our purpose is simple; to provide a fair, independent, and accessible dispute resolution service, and improve outcomes for consumers and members.

A key strategic improvement and principal enabler of the plan is Project Echo, our business transformation project. Project Echo will improve the TIO's focus on accessibility, fairness, and ease of contact for members and consumers. This is the largest technology upgrade the TIO has seen in ten years. Delivering the project against the backdrop of rolling lockdowns and the impact of COVID-19 on our technology partners has not been easy. It is, however, a vital investment and underpins the ability of the TIO to innovate and meet stakeholder expectations.

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“We are in the people business — understanding people, responding to their needs, or helping them sort through problems.”

Along with the successful delivery of Project Echo, the Board's priorities for the coming year include the following.

- Landing the modernised Terms of Reference. The Terms of Reference are a fundamental roadmap for how we operate and the services we provide, and we look forward to its kick-off in 2022.
- Continuing to deliver a great dispute resolution service and providing outcomes for disputes in a timely manner.
- Continuing to improve on accessibility of the service to consumers.
- Finalising an enterprise agreement that drives performance against our strategic goals and prioritises the development of our people.

With the impact of COVID-19 and lockdowns, our spending was lower than anticipated. The Board felt that in the exceptional circumstances it was appropriate to reduce the funding required from membership fees in the fourth quarter.

We are in the people business — understanding people, responding to their needs, or helping them sort through problems. And we do that through the skills, the empathy, and the attitudes of our employees and the leaders supporting them. People first is a very appropriate theme in terms of connecting what we do with the core resource we have, which is the skill and goodwill of our people. I thank the Ombudsman, the Senior Leadership Team, and everyone at the TIO for their continued efforts during this extraordinary time and encourage them to stay the course with all they are achieving.

Finally, I would like to thank my fellow directors and to acknowledge the contribution of Jane van Beelen, who retired as a TIO director during the year. I thank Jane for her service and welcome Mira Bashi as a Director with Industry Experience. Mira's skills and experience with business transformation will be a welcome addition to the Board as we move through the next phase of our three-year strategy. Alongside Mira's appointment, I am pleased Andrew Sheridan has been reappointed as a Director with Industry Experience and Gordon Renouf has been reappointed as a Director with Consumer Experience.

Professor The Hon Michael Lavarch AO
Chair

Ombudsman's message



Our world has irrevocably changed. The COVID-19 pandemic is the greatest generational disruptor of our lifetime, and as its narrative continues to unfold, we remain in a collective cloud of uncertainty.

But every cloud has a silver lining, an opportunity to be reminded about what matters most. In my time in Australia, I have often shared a Māori proverb: 'He aha te mea nui o te ao? He tāngata, he tāngata, he tāngata'. 'At the end of the day, what is the thing that matters most in the world? It is people, it is people, it is people'.

People first is the theme of this year's annual report; a celebration and recognition of the service the Telecommunications Industry Ombudsman provides – by people for people. All our people are actively focused on achieving our purpose of providing fair, independent, and accessible dispute resolution services, and improving outcomes for consumers and members. We put the Australian community at the heart of the work we do, and to this end, it has been a very busy 12 months.

The complaints picture for this year is mixed. Overall complaint volumes are down 6% on last year and we have seen significant reductions in some of the problems faced by consumers. These include reductions in complaints about providers not delivering on agreements, slow data speeds, and delays establishing a service. However, we saw an increase in the proportion of complaints returning to us as unresolved, which challenged our response times.

Our 2021-2023 strategy is the roadmap guiding us to improve outcomes for consumers and members. Reflecting on our progress in 2021, it has been a year of incremental change during a year of extraordinary challenge. We have made progress on our strategic goals and have had small wins that are elevating us towards being more effective in what we do and how we do it.

We have made solid progress working with our members to reduce complaints and improve practices, and we saw improvements resulting from our work on systemic issues. We also worked closely with members throughout the year and pivoted to online engagement and webinars to replace in-person events.

The work we are doing in human centred design places people at the core of our big change initiatives. Our business transformation program, Project Echo, includes a redesign of the online complaint form and member portal and proposes a new consumer portal so consumers can track their own complaint journey.

We are leveraging the power of our people to strengthen capability and performance. Over the past 18 months, we put a huge emphasis on looking after our people and ensuring their safety. I am proud of the Courageous Conversations we held throughout the year, which shone a spotlight on equality, diversity, and inclusion. Raising our people's awareness of the challenges communities and individuals face, helps us improve the way we deliver our service.

Part of creating a great consumer and member experience is continuing to find ways to be more accessible. We launched initiatives such as the natural disasters phone line and proactively identifying and assisting consumers in lockdown areas to make sure they remain connected. These examples demonstrate our efforts to remain alert to the shifting environment and finding ways to respond appropriately.

This year, we launched our Reflect Reconciliation Action Plan (RAP) affirming our commitment to providing a better service for Aboriginal and Torres Strait Islander Peoples. By delivering on our RAP commitments, we will improve the way we provide our services to First Nations consumers by educating our people, reviewing our services, and making changes.

Expanding the services we offer with innovative technology has led us to our commitment to establish a team in Western Australia. This will allow us to expand our hours to better service the whole Australian community.

We continue to use our data and insights to influence policy and shape debate. Our publications this year have showcased some outstanding work. They provide useful insights and tip sheets that make our work more accessible to both consumers and providers. And our policy submission to Part C of the Consumer Safeguards Review boldly called for much needed changes to the telecommunications industry.

The Board is close to approving revised Terms of Reference, which we will implement in early 2022. In developing the revised document, we have had extensive stakeholder consultation and expect the final version will support us in improving outcomes for members and consumers. Next year, the TIO has its independent review and I welcome the assessment of both our revised Terms of Reference and the work of the scheme against the industry benchmarks.

The TIO is part of an ecosystem of stakeholders, and it is working with them that we are able to improve the telecommunications sector. These include our members, the telco industry, consumer organisations, the regulators, and government officials. I thank you all for your support and positive working relationships. I thank the Board and the Chair, Professor the Hon Michael Lavarch AO, for their commitment to ensuring the scheme meets its purpose. And I continue to value the support and shared wisdom from my colleagues in the Australian and New Zealand Ombudsman Association. Special thanks also go to our Consumer Panel who continue to provide rich feedback on issues in telco accessibility and vulnerability.

Finally, I thank our passionate and committed people, our people leaders, and my Senior Leadership Team for their work. Your efforts make our organisation the trusted and reliable service the Australian community can depend on to reach meaningful outcomes when the conversation breaks down. Together we are making a difference.

Judi Jones
Ombudsman

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“We have made solid progress working with our members to reduce complaints and improve practices ...”

Complaints fast facts



119,400

total complaints received

-6.1%

on 2019-20

16,607

escalated complaints

-0.4%

on 2019-20

WHO COMPLAINED



RESIDENTIAL

99,711

83.5%



SMALL BUSINESS

19,689

16.5%

Internet

was the most
complained about
service type with

39,857

complaints

47.1%

of all complaints had a
connection, change of provider
or service quality issue



24.1%

of 1,511 providers
had a complaint
in 2020-21





Embargoed until 12.01am Wednesday 22 September 2021

About us

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Our purpose

Our purpose is to provide fair, independent, and accessible dispute resolution services and improve outcomes for consumers and members.

Now more than ever, telecommunications services are essential for individual consumers and small businesses alike. These services allow consumers to fully participate in the economy and to benefit from the social connectivity that the services offer.

In this environment, the TIO's role has never been more important – providing consumers with an avenue to raise their concerns and an independent mechanism to resolve disputes.

We work with individual consumers and small businesses, scheme members, industry and consumer organisations, regulators, and government.

When a problem occurs, we work with consumers and providers to solve it as efficiently and effectively as possible. We aim to stop a problem from escalating. Our service is free for consumers and complies with the Government [Benchmarks for Industry-Based Customer Dispute Resolution](#).

Our focus in providing dispute resolution services is to manage cases fairly and independently, and to continuously improve the effectiveness of our service. We use the most appropriate means to resolve a complaint – from referral to conciliation and investigation, and then, if necessary, decision. We also fulfil a statutory obligation to determine objections from land owners and occupiers to telecommunication carriers' proposals to access land to inspect, maintain infrastructure or install low impact infrastructure on their land.

Our people are here to support individual consumers and small businesses who can't resolve a problem with their phone or internet provider. We work to ensure people can connect with us easily and seamlessly.

Our 'no wrong door' approach with other ombudsman schemes ensures those having telecommunications problems can connect with us, no matter where their complaint journey began.

An important aspect of our role is contributing to industry improvement and the evolution of the telecommunications regulatory framework. We do this through our systemic investigations, as well as our analysis and insights. We collect and review complaint data to inform and provide analysis to the community, regulators, government, and the telecommunications industry about matters impacting consumers.

We continue to build strong and respectful relationships with stakeholders, including regulators and government, to help support the continued evolution of Australia's dynamic telecommunications industry.



"Leveraging the power of our people to strengthen capability and performance is really the essence of my role. I focus on how we can build up our people's skills and identify areas of development for employees' current and prospective roles.

Being an employer of choice means lots of different things to different people. From a people and culture perspective, we want to make sure we are a place where people want to be. We want our people to have a sense of purpose and know they are contributing to the broader piece. At the same time, we want people to enjoy their work. And we want them to have room to grow and develop within their role.

This past year has been a challenge for everyone. The remoteness of working from home means we've had to change the way we connect with people.

We've had to move our Graduate Certificate of Dispute Resolution Industry online, and we also introduced new employee wellbeing measures, like extending our Employee Assistance Program and offering mindfulness training through an external organisation.

I enjoy putting together all the pieces of the puzzle that help people learn and help them get to where they want to get to – wherever that may be."

Tammie McDonald
HR Business Partner

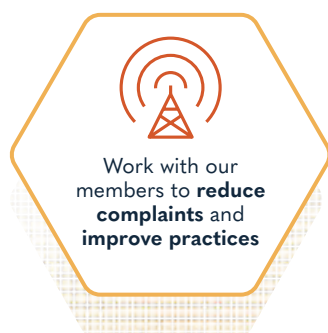
Our goals and values

Performance highlights against our three-year strategy (high level snapshot)

This year was the first in our three-year strategy approved by the Board. The strategy outlines five goals.

Our new goals balance our continuing focus on service quality and our role in influencing positive outcomes in the telecommunications industry.

Below are some highlights of progress against our goals in the first year.



Good complaint handling outcomes and industry improvements are at the heart of this goal.

This year, we were successful in driving improvement in industry practices. We set a target to have members make improvements in response to 70 per cent of systemic issue cases.

We exceeded this target, with members making improvements in 97 per cent of systemic issues cases closed.

We also set case closure targets for our resolution teams.

Our Early Resolution teams met the target of answering 70 per cent of calls within 60 seconds. And 80 per cent of calls were answered within 120 seconds.

So that complaints reach providers promptly for resolution, we measure our referral processing time. This year, we exceeded our target of keeping each contact under 15 minutes. Despite COVID-19 related impacts, where customers were calling us more because they were unable to contact their provider's call centres, the average handling time of each contact was 14.01 minutes.

Our Dispute Resolution teams achieved good turnaround times, with 53 per cent of escalated cases closing within 60 days, and 88 per cent closing within 120 days. Only 12 per cent of escalated cases took longer than 120 days to close. We worked hard to reduce our queue of cases waiting for a case officer, which was larger than usual due to a greater number of complaints coming back from providers unresolved. This affected our ability to meet our closure targets for escalated complaints.



We use an annual pulse check survey to track our progress in realising this goal. We are working to achieve recognition as an Employer of Choice.

This year, 88 per cent of our people participated in the survey. The results delivered an encouraging employee engagement score of 60 per cent.

We aim to deliver world-class dispute resolution services. This year, we exceeded our target for case handling quality, with 92 per cent of cases achieving a 90 per cent standard against quality criteria.



Our goals and values



Create a **great consumer** and **member experience**

We measure consumer and member awareness and satisfaction so that we can check our progress toward this goal.

We commissioned an independent consumer survey, which showed that awareness of our scheme is high and has increased since our last survey in 2019.

The survey results also showed 34 per cent of consumers were able to recall the name of our scheme without a prompt, and when prompted, 75 per cent of consumers were aware of our scheme.

Of consumers surveyed who had a complaint with us, 71 per cent said they were satisfied or very satisfied with the outcome. Our consumer survey showed a 68 per cent accessibility score, significantly outperforming other comparable organisations.

To raise awareness of our service across hard-to-reach communities, we increased social media activity and extended our reach.

This year, we also worked hard on building member awareness and experience. The engagement activities included online member forums, webinars, and regular member newsletters. These initiatives were designed to build awareness of our service and support members through the challenges the year presented.

75% of consumers were aware of our scheme when prompted



Expand services with innovative **solutions** and **technology**

This goal focuses our work on innovating across three areas: technology, new services, and sustainability.

Through this reporting year, we commenced an ambitious and comprehensive refresh of our technology systems. We also laid the foundation to establish a call centre in Western Australia, so we will be able to improve service to consumers in the Australian Western Standard Time zone.

To achieve our sustainability objective, we adopted a cradle-to-cradle production measure for purchasing marketing materials. This approach means marketing merchandise can be recycled, composted, or reused without losing quality.

We exceeded our first-year target of 70 per cent, with 71 per cent of our marketing materials being either compostable or recyclable.

New call centre in Western Australia



Use data and insights to **influence policy** and **shape public debate**



10 significant public policy contributions

This goal focuses our work on identifying emerging trends and continuing to build our reputation as an organisation that supports industry improvement.

We achieved our first-year target by publishing four releases of our complaints data. We also published three systemic reports that highlighted issues we see in complaints and contribute to industry improvement and consumer awareness.

We also met our target for influencing policy debate. We achieved this by contributing to 10 significant public policy consultations, with 13 shorter contributions.

In the second half of the year, we introduced a Media Impact Score. This score helps us assess the impact of our media communications work by measuring media coverage and sentiment. We achieved a positive Media Impact Score of 3.1 with a high proportion of positive media coverage for the second half of the year*.

The data and research we have published can be trusted by our consumer, industry, regulatory, and government stakeholders.

*This Media Impact Score rating is comparable to other industries in terms of positive media impact, and sits just behind sports and tourism.

Our work is underpinned by our **values**. Under the umbrella of **Together we DREAM**, our values guide every aspect of our work.



Our people

Staying connected to phone and internet services has been more important than ever. And through the past year, we continued to deliver our world-class service. We achieved this by putting our people – who deliver our service – first.

Putting our people first

The health, wellbeing, safety, and development of our people has continued to be at the heart of all we do.

As the uncertainty of the pandemic continued, we responded by building confidence and trust with our people.

We focused on providing the best support possible so we could empower our people through uncertain times. We reviewed policies, offered initiatives to support wellbeing, and uplifted learning and development.

With our values steering our organisational decision making, we focused on:

- **Keeping our people safe:** We continued to invest in technology and helpdesk support so our people could work seamlessly from home. Our values of Dare to be great, Respect and inspire, and Evolve and grow came to life. We saw this as our people adapted to new ways of working, leading, and collaborating in a virtual work environment.

We asked our people about their preferences for returning to the office. Their responses influenced our measured and safe plan to return to the office, which is focused on safety, mental health, and wellbeing. We put people first in developing the plan by considering safety protocols and guidelines, updates to workspace set ups and a desk booking app, technology requirements, and an induction to our COVIDSafe workplace.

- **Caring for the wellbeing of our people:** A series of health and wellbeing initiatives supported the mental and physical wellbeing of our people. This included virtual exercise classes, psychological resilience training, and doubling the number of specialist Mental Health First Aiders. And flexible working hours were available to employees who had children learning from home.

We continued our 10-day special leave policy for unexpected illness along with unlimited access to the Employee Assistance Program. We helped set up our people's home offices. We ran a Wellbeing Wednesday event to get together, acknowledging the wellbeing benefits of connecting. We offered flexibility for taking leave and breaks and adjusted working hours. And we provided a small one-off payment to help with the costs of setting up safe workspaces at home.

Equality, diversity, and inclusion

Equality, diversity, and inclusion (EDI) are pillars on which we build and sustain our culture. EDI is embedded in every facet of our work – in our work practices and policies, in our conversations and performance, and in our learnings and capabilities. We aim to provide a rewarding and psychologically safe workplace for all.

Our dedicated EDI expert created and led organisation-wide programs and events and laid the foundations for further development and growth.

Our people formalised and launched two employee resource groups, Together TIO and Proud @ TIO. These groups provide a platform to encourage ongoing courageous conversations.

Offering initiatives to support learning and growth has helped build awareness of the importance of diversity and inclusion. Our people have responded and shown commitment to diversity and inclusion by taking part in our Courageous Conversation events and completing 588 related training activities.

Our annual report to the Workplace Gender Equality Agency highlighted our work and progress in talent acquisition, leadership, learning, and attrition. We are continuing work to become recognised as an Employer of Choice. We are using our memberships with the Diversity Council of Australia, Equal Employment Opportunity Network, Australia Network of Disability, and Pride in Diversity to continue to embed a culture of belonging.

We were honoured to have our Reflect Reconciliation Action Plan endorsed by Reconciliation Australia and formally launched in November 2020.

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“We are committed to our people. We respect, seek out, and embrace all kinds of diversities and are absolutely dedicated to being inclusive. We recruit, develop, compensate, promote and manage employees regardless of ethnicity, religion, national origin, gender, sex, sexuality, intersex variation, disability, age, and life experience. We encourage our employees to bring their authentic selves to work because we celebrate all our differences, support it, and thrive on it.”

Our EDI Commitment



“I work in the legal team at the TIO. We’re all about supporting the organisation in achieving its goals. We do this by providing advice to the organisation on its legal obligations. But we also use this advice to help our people go above and beyond for consumers and members. As a young lawyer, I’m thrilled to be able to support the TIO and its people through my work every day.

Each person who uses our service gives us their personal information. Every day, that’s several hundred bits of personal information we need to keep safe and get to the right place. It’s part of our job in the legal team to make sure that every single system, policy, and process we develop complies with the Privacy Act and focuses on protecting this valuable personal information.

I’m passionate about making sure we keep up with legal requirements and do our best to continuously improve the way our service helps consumers and members, as well as our people, who are the heart of what we do.”

Aidan Griffiths
Lawyer

Our people

EveryOne Culture

Building strength in our EveryOne Culture means our people feel proud to be a part of our valued TIO community. We are a community where everyone can bring their whole selves to work. Our people are heard, respected, and included. They know our commitment is more than words because we are doing the work together to build the culture as we want it to be.

The numbers showcase our progress and buy-in from our people as we continue to make positive changes.

- Employee attrition rate reached 3.6 per cent, down by 12.4 percentage points from 2019-2020.
- 80 per cent of employees said they are proud to work for the TIO.
- 80 per cent of employees said that the TIO provides a psychologically safe workplace.

Building relationships, capability, and performance

With over a thousand virtual check-ins, the People and Culture Group proactively partnered with all our people leaders during the challenges of COVID-19 and lockdowns in Victoria. Across the organisation, we provided connection, support, and guidance. Conversations with people leaders focused on their wellbeing and that of their teams. Regular conversation gave our Group insight on how to best support our people. With delight, we learned that 87 per cent of employees said their people leader was capable, inclusive, supportive, and competent.

Developing the capability of our people remains a strategic priority. We have expanded development and training opportunities. We have become skilled in pivoting to online delivery as needed, and remotely inducted and onboarded 49 employees throughout the year. Moving online gave us the opportunity to review and streamline our programs to ensure a better employee experience.

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Developing the capability of our people remains a strategic priority. We have expanded development and training opportunities. We have become skilled in pivoting to online delivery as needed, and remotely inducted and onboarded 49 employees throughout the year.



9 employees
graduated with the
**Graduate Certificate in
Dispute Resolution
(Industry)**

16

employees completed
**Enterprise Trainer
Presentation Skill set
qualification**

Our training and development initiatives included:

- **Plain English training:** to ensure our internal and external communication is clear, easy to understand, and demonstrates our value, Make it easy.
- **A targeted organisational coaching program:** with a focus on leading remote teams, for our people leaders.
- **Family violence training:** with the support of subject matter experts, we delivered 441 family violence training activities to our complaint handling teams. An objective was to raise awareness and support our people and consumers who may be experiencing family violence.
- **Aboriginal and Torres Strait Islander inclusion and cultural safety training:** this is a mandatory initiative for our people as part of our commitment to our Reflect Reconciliation Action Plan.
- **LGBTIQ+ workshops:** to raise awareness about LGBTIQ+ in the workplace.
- **A refresher program for consumers experiencing vulnerability:** to assist our people handling complaints to identify behaviours that may indicate a consumer is experiencing vulnerability and how best to support them.

Finally, nine employees graduated with the Graduate Certificate in Dispute Resolution (Industry) and 16 employees completed the Enterprise Trainer Presentation Skill set qualification as part of the Certificate IV in Training and Assessment (TAE).

"I'm so proud of being involved in the Together TIO group. It was formed in August 2020, as an employee-led resource group. It's about supporting diversity in all its forms and making sure we're living our EveryOne Culture, so that anyone who comes into work can be themselves and is accepted for that. The group is also focusing on having, and living up to, diversity and equality benchmarks.

I really love that we have a group of like-minded, motivated and passionate individuals who want to promote diversity in the workplace and ensure people feel comfortable and included at work.

Even though there are so many different departments and levels of the organisation, I do feel like we have a nicely rounded culture at the TIO. Our culture is cultivated bottom-up, top-down and side-to-side. Together TIO is the prime example of that."

Emily Peng
Dispute Resolution Officer



Our senior leadership team



Judi Jones Ombudsman

Judi has been Ombudsman since 2016. She is responsible for bringing to life the Board's vision for the TIO, through the implementation and delivery of the organisational strategy. Under Judi's leadership, the TIO has put delivering fair, independent, and accessible dispute resolution services at the heart of the organisation.

Previously, Judi spent 14 years as the Electricity and Gas Complaints Commissioner in New Zealand. She has held teaching positions focusing on mediation and negotiation at post-graduate level, and has practised law in various settings in New Zealand. Judi is also a member and past Chair of the Australian and New Zealand Ombudsman Association.

In the past year and a half, Judi has successfully guided the organisation through the transition to working from home, while ensuring the TIO continued to deliver its dispute resolution service. She is currently focusing on evolving the TIO's complaint handling processes for the 21st century and overseeing the modernisation of the TIO's Terms of Reference.



Gerard Dell'Oste Executive Director Shared Services, Chief Financial Officer, and Company Secretary

Gerard oversees the financial management of the organisation and supports the TIO Board meeting its governance obligations. He also leads the legal, finance, information technology, and facilities teams that provide support services. These teams ensure the TIO can focus on its core business of complaint resolution.

With more than 30 years' experience as a senior finance professional in the commercial and not-for-profit sectors, Gerard has spent the last seven years at the TIO. He has also served as a Director and Chair for a not-for-profit organisation.

Most recently, Gerard has been heavily involved in delivering the organisation's business transformation program, Project Echo.



James McDonald Assistant Ombudsman, Early Resolution

James' group is the first point of contact for consumers who are unable to resolve a phone or internet problem with their provider. This team refers complaints to a provider, manages the 'fast track' process, and looks after the reclassification function.

Most recently, James worked at Medibank in health program operations and complaint resolution. James' previous experience includes earlier roles at the TIO, along with regulatory and compliance roles at the Australian Communications and Media Authority (ACMA) and the Department of Immigration.

At present, James is working closely on Project Echo, our business transformation program. He is also the sponsor of Proud @ TIO, the TIO's LGBTIQ+ Employee Resource Group.



Mary Russell **Assistant Ombudsman, Dispute Resolution**

Mary leads our work in dispute resolution. Her teams of experienced Dispute Resolution Officers resolve complaints through conciliation and investigation.

Mary previously worked in the health industry, and in a complaint handling role at the Australian Health Practitioner Regulation Agency. She has also participated in professional standards regulation for over 30 years as a decision maker, board member, and chair.

Mary is developing flexible models of dispute resolution, to ensure the dispute resolution team can respond in agile and targeted ways to changes in numbers and types of complaints.



Belinda Taneski **Assistant Ombudsman, Improvement, Policy, and Reporting**

Belinda leads our work on data reporting, improvement and knowledge, policy analysis, and systemic issues investigations. She also leads teams delivering communications and member engagement, outreach, strategy, and regulatory affairs.

Previously, Belinda held senior roles at ASIC, the ACCC, and the Australian Energy Regulator where she led investigation, litigation, and market performance teams. She has 15 years of experience as a lawyer investigating corporate and market misconduct.

Belinda consults regularly with our stakeholders, and her group leads initiatives to help improve the TIO and broader telco industry.



Gaye Wealthy **General Manager People and Culture**

Gaye's group involves the full people and culture suite including learning and development, business partnering, talent acquisition, equality, diversity, inclusion and wellbeing. The business group is also responsible for the design and execution of the people and culture strategy for the TIO.

Gaye has significant experience across numerous industries and geographies, as well as working in partnership with Boards, CEOs, executive teams, employees, and leading teams. Her focus is to ensure that organisational and workforce capacity, capability, safety, inclusive culture, and relationships enable and support the achievement of strategic goals.

Throughout the pandemic, and with a people-first approach, Gaye has implemented health and wellbeing measures for our people. At present, she is working with leadership and employees on a new approach to goal setting and recognising performance excellence. She is also the sponsor of the Employee Resource Group Together TIO, committed to embedding equality, diversity, and inclusion in our workplace.



Freyja McCarthy **Head of Legal**

Freyja leads a small legal team who are responsible for providing legal advice to the organisation and compliance activities.

Freyja has experience in telecommunications regulatory advice, competition and consumer law, intellectual property, privacy, employment, and administrative law. She was previously a Special Counsel in the IP, Technology and Regulatory team at Thomson Geer, and was recognised as In-House Counsel of the Year in the 2019 Law Institute Victoria awards.

Currently, Freyja is supporting the organisation on various projects and assisting in the modernisation of the TIO's Terms of Reference.

Our stakeholders

We work with a wide range of stakeholders to improve consumer experiences and interactions with providers and to ensure standards are maintained within the telecommunications industry. When engaging with our stakeholders, we seek to be accountable, purposeful, timely, relevant, and impactful.

We share outcomes with our stakeholders, seek and act on feedback, and take time and effort to understand their needs and priorities. We engage early with stakeholders and take a 'no surprises' approach. We focus on clarity, transparency, and relevance.

We choose the most effective and efficient methods of communicating with our stakeholders, and we seek to deliver outcomes that are consistent with our goal of contributing to continuous sector improvement.

Figure 1 Roles and responsibilities in the telecommunications industry

Government	<p>Federal Minister responsible for Communications</p> <p>Federal Minister responsible for Regional Communications</p> <p>Department responsible for Communications – sets overarching telecommunications policy and coordinates implementation; administers the mobile blackspot funding program</p> <p>State/Territory Governments – some contribute to mobile black spot funding</p>
Regulators	<p>ACMA – administers the telecommunications licensing and conduct regime; enforces compliance with the TIO scheme membership and Ombudsman decisions; approves industry codes</p> <p>ACCC – regulates the network and market competition; administers the Australian Consumer Law, including ensuring fair market practices</p>
Consumer organisations	<p>TIO's Consumer Panel – providing the TIO with diverse consumer perspectives to inform its work</p> <p>Australian Communications Consumer Action Network (ACCAN) – the telecommunications specific peak body for consumer education, advocacy, and research</p> <p>Financial Counselling Australia – provides consumer case work and advice and contributes to policy debates with a hardship and debt focus</p> <p>Consumer Law Centres and other consumer organisations and advocacy groups</p>
Industry associations	<p>Communications Alliance – the telecommunications specific peak body for industry advocacy; develops industry code, standards and guidelines</p> <p>Communications Compliance – monitors compliance with industry codes</p> <p>Other telecommunications associations</p>
Dispute resolution	<p>TIO – facilitates the resolution of residential and small business consumer complaints; identifies and resolves broader issues; makes determinations on land access objections</p>

Our members and communities

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Embargoed until 12.01am Wednesday 22 September 2021

Events that shaped the year

With the continuing impact of the COVID-19 pandemic, the past year continued to be challenging and unpredictable. Those challenges impacted the telecommunications industry, including members, consumers, and the broader community.

Infrastructure changes and challenges

Minister Fletcher formally declared the roll out of the National Broadband Network (NBN) complete on 23 December 2020. By the end of this financial year, almost 12 million premises were ready to connect and approximately 8.2 million homes and businesses were connected*. As the remaining homes and businesses connect to the NBN, we expect to see fewer complaints about getting connected. However, as the NBN becomes the default network, we will naturally see a greater proportion of fault complaints about a service delivered over the NBN.

In February 2021, NBN Co was required to suspend new Hybrid Fibre Coaxial (HFC) NBN connections due to worldwide chipset shortages, which lasted for several months.

Disruptions to the telecommunications industry

The COVID-19 pandemic continued to impact the telecommunications industry in 2020-21. Residential consumers and small businesses continued to rely on phone and internet services to work, study from home, and stay connected to loved ones at unprecedented levels.

Some providers experienced ongoing disruptions to their business operations, including offshore call centres being impacted by government lockdowns. Consumers reported difficulty in contacting their provider as providers struggled to return to regular operational levels.

Consumers have also continued to feel the impacts of the COVID-19 pandemic. In July 2020, we published a report on the impact of COVID-19 on phone and internet complaints. This report showed that at the height of the pandemic, complaints about financial hardship decreased. However, with the withdrawal of government assistance and providers' financial support policies, we are continuing to receive and monitor complaints from consumers who are struggling to pay their bills.

Changes in the regulatory landscape

In July 2020, the Department of Infrastructure, Transport, Regional Development and Communications started the last part – Part C – of its review of Australia's consumer safeguards. This review considers how safeguards can enable consumers to make informed choices and be treated fairly by their providers in areas such as customer service, contracts, billing, credit/debt management, and switching providers.

The Minister endorsed our response to Part A of the review and the TIO's improved internal complaints processes and engagement with the ACMA.

The Statutory Infrastructure Provider (SIP) regime commenced on 1 July 2020. This supports the implementation of recommendations from Part B of the Consumer Safeguards Review on reliability of services and is part of the new Universal Service Guarantee (USG) covering broadband as well as voice. The regime sets out obligations for SIPs to connect and supply wholesale broadband services at minimum speeds to retail service providers on reasonable request. The ACMA has registered 19 SIPs under the regime.

* Source: nbnco.com.au. 2021. National Broadband Network – Rollout Information. [online] Available at: https://www.nbnco.com.au/content/dam/nbnco2/2019/documents/weekly-progress-report/Public_Progress_data%20-%20150721.pdf

The ACMA updated the NBN Consumer Experience Rules in October 2020 for the final stages of the NBN roll out. These updates should make the rules clearer and more flexible for telco providers, while ensuring consumer safeguards remain in place.

In December 2020, the ACMA consulted on proposed service standards for superfast fixed broadband service and rebate pass-through requirements for missed service levels. The ACMA proposed measures to ensure rebates payable by wholesalers for service level failures are passed through to affected consumers.

From 1 January 2021, the ACMA started administering the Regional Broadband Scheme (RBS). Under the RBS, a carrier or declared nominated carrier is required to pay \$710 per month for each eligible premise on their telecommunications network that has an active fixed line that provides a designated broadband service. Carriers with less than 2,000 premises in a month are exempt from paying the charge for that month.

In March 2021, the Australian Government consulted on amendments to the telecommunications carrier powers and immunities framework. The Government proposed changes to laws which allows carriers to access private land and install and maintain some types of telecommunications facilities with immunity from state and territory laws. Proposed changes included clarifying existing safety conditions and new abilities for carriers to refer disputes to the TIO.

And the ACMA continued to publish data about telco providers with more than 30,000 services in operation collected under its Record Keeping Rules.



"This past year, keeping the office administration running while working from home has been a big challenge for me. But it's also what I'm most proud of. We had to work out what we needed to do to keep our people safe and get our office prepared. We had to create workplace and business-ready documents that had never been created before.

Our 'return to office' working group evolved into an ongoing pandemic response and communication group, and we've narrowed it down to Facilities, Internal Communication, and People and Culture team representatives. We monitor government announcements and how it will impact our people or our office and act quickly to communicate changes internally.

I've really enjoyed working for the TIO. I've been in the role for a very long time – since 2005 – and over that time the job has constantly evolved as the TIO has changed. Working at the TIO has always pushed me professionally, and challenged me, so this past year has been another challenge to grow from."

Leonie Jensen
Administration & Facilities Manager

Working with our members

Our 1,511 members include large telecommunications providers, as well as medium and smaller-sized providers. Some providers only operate in one state or territory or have a business-only clientele.

We work with members to help them resolve complaints from individuals and small businesses as quickly as possible. We guide them on best practice in complaint handling procedures and provide information about our service, trends, and insights we see in complaints. We also help with their membership of the TIO.

Data and insights

We collect insights from our complaints data. This information is used to highlight ways in which members may reduce the number of complaints made about them. We meet regularly with larger members to discuss improvements and how we can work better together to resolve complaints.

Our extensive data collection and analysis provides insights into the types of complaints a member is receiving and highlights areas where service improvements can be made. Our systemic investigations flag current and potential issues for members that may adversely affect their customers.

Information and training

All members have access to the TIO member portal. The portal gives members access to a suite of reports, invoicing, events, induction videos, webinars, publications, and information about our complaint handling process. Member use of the portal has continued to increase in 2020-21.

MNews, our monthly email newsletter, provides members with information about our complaint handling processes, updates from the Ombudsman, industry updates, and membership information. In 2020-21 we published 20 editions of MNews, keeping members informed across the year.

The COVID-19 pandemic meant our face-to-face member forums, usually held around Australia, were placed on hold. Instead, we hosted two National Member Forums by webinar in October 2020 and June 2021. At these forums, we updated members on our work, governance, insights into complaints and trends, and looked at the year ahead. Forum attendees heard from TIO Board Chair The Hon. Michael Lavarch AO, Ombudsman Judi Jones, and Assistant Ombudsmen James McDonald and Mary Russell.

We continued to deliver our Let's Talk webinar series. The Ombudsman, Assistant Ombudsmen, and Dispute Resolution Officers presented updates and insights on topics such as responding to financial hardship in telco complaints and case management techniques.

This year, we also extended our webinar series to include sessions on our systemic investigation reports. We held two interactive webinars, Impact of COVID-19 on phone and internet complaints and Meeting the needs of consumers impacted by family violence. Both webinars were well attended by members.

Working together during a pandemic

In 2020-21 we continued working collaboratively with members to help reduce complaints, provide updates on our work or processes, and give insights into emerging trends. In turn, members kept us up to date on changes in their processes, complaint handling times, or assistance packages. This meant our people could share this information when consumers contacted us with a query or issue. Our Member and Community Services team works to build and maintain relationships with members so the benefits can be passed on to consumers.





Case study

Jade's provider failed to keep her personal information safe

Jade told her provider, ScoopTel, she was a victim of family violence and her ex-partner had stolen her two mobile handsets. Jade asked ScoopTel to remotely block the stolen handsets and to add a password to her account to stop her ex-partner accessing her account, which ScoopTel agreed to do.

Two days later, Jade's ex-partner impersonated Jade on online chat on multiple occasions and gained access to her account. The ex-partner changed Jade's passwords, unblocked the stolen handsets, and found out her new mobile number and her new address.

Each time Jade's ex-partner impersonated her online, the ex-partner failed to provide the correct password and driver's licence number but passed the security process by providing other details about Jade.

In the online chats, Jade's ex-partner made several incorrect attempts at guessing the password. ScoopTel sent a verification PIN to Jade via SMS. Jade's ex-partner told ScoopTel "Jade" could not provide the PIN because she had lost her phone and ID.

After gaining access to her personal information, Jade's ex-partner repeatedly harassed her over the phone and went to her house. Jade's ex-partner damaged her property. Jade had to move to a new house to escape her ex-partner.

We investigated Jade's complaint and found ScoopTel had breached its obligations under the Privacy Act by failing to take reasonable steps to protect Jade's privacy after Jade had told it she was the victim of family violence. We found ScoopTel should pay Jade \$12,700 in compensation, which it agreed to do.

Names of all parties have been changed.

.....

Each time Jade's ex-partner impersonated her online, the ex-partner failed to provide the correct password and driver's licence number but passed the security process ...

Working with our communities



The TIO is dedicated to building connections with hard-to-reach communities and the organisations that support those communities.

In 2020-21, despite the challenges of the COVID-19 pandemic, we continued to attend as many in-person events as possible. When this was not possible, we increased our digital presence to ensure our service remained accessible and known.

During the year, we worked hard to engage with communities to let them know who we are and how we can help.



Outreach events

This year, we connected our service with diverse communities affected by natural disasters, and people who may have been left behind during the pandemic.

In April 2021, we attended our first in-person event of the year, Seniors Day at the Royal Sydney Show. Our team assisted over 200 senior consumers on the day.

We also connected with consumers in rural New South Wales towns affected by both floods and bushfires in April 2021. Participating in a community roadshow, we met with over 100 consumers experiencing vulnerability who were struggling with a range of phone and internet problems. We reached a further 10,500 people with a roadshow blog we shared through social media.

Another focus for the year was our work with financial counsellors, consumer law centres, charities, not-for-profits, and organisations dedicated to assisting Australians experiencing vulnerability.

In October 2020, our Ombudsman Judi Jones provided a virtual update to people attending the annual conference of the Financial Counsellors Association of Western Australia. This update covered the challenges and complexity of our complaints work.

In April 2021, Financial Counselling Victoria hosted a special summit to address specific issues financial counsellors experienced with their clients during the pandemic. The Ombudsman spoke about complaint trends and the impacts of COVID-19 on complaints about financial hardship, and our team assisted counsellors at the event.

In May 2021, we launched our new specialised contact line for financial counsellors at the Financial Counsellors Association National conference held in Darwin. Two of our Assistant Ombudsmen also spoke to counsellors about our pandemic response, systemic issues work, and our work with consumers experiencing vulnerability. Our team spoke to over 300 counsellors, providing information to assist their clients.

At a community event also held in May 2021 in Wyndham Vale, Victoria, our team worked with on-site translators to assist the local community to learn how to access our services. Wyndham Vale was one of the hardest-hit Victorian communities by the second wave of the pandemic in 2020.



Working with our communities

Digital outreach

Although we could not participate in all conferences or events in person, we worked closely with organisations to find a way to support their activities. We also invited organisations to post-conference and event webinars about our services. Through these webinars, we could continue important conversations and build relationships.

Our outreach webinars explain the complaint handling process at the TIO, our systemic issues work, and how we help consumers experiencing vulnerability. As lockdowns continued, we streamed into homes and organisations across Australia raising awareness of our service. We strengthened our webinar program by tailoring webinars to suit the needs of our stakeholders.

More generally, we provided pre-recorded or live streamed updates from the Ombudsman and Assistant Ombudsmen. We provided materials such as education resources, on-topic videos, and digital training. We expanded our newly created QR codes resource library giving direct access to our online materials and complaint form.

We also connected with organisations and events that embrace diversity and inclusiveness.

The TIO is proud to have a long-standing relationship with the Yabun Festival, the largest one-day gathering and celebration of Aboriginal and Torres Strait Islander cultures in Australia. This year, we attended the first digital Yabun Festival. We shared information with Yabun's social media accounts and website, which reached over 28,000 people. The Yabun awareness programs were broadcast on Koori Radio and our animated awareness videos were streamed multiple times throughout the Yabun Festival.

We participated in the Midsumma Carnival by being part of an interactive map of services that recreated the famous Midsumma Marketplace. Our virtual store provided consumers with assistance, making it easy to engage with the TIO and start a complaint journey.

At the beginning of the pandemic, we recognised social media would become a vital channel for our engagement work. Our social media engagement increased among younger demographics looking for information about us, and we also had a significant increase in consumers and organisations reaching out to us through social media channels.

This year, we also developed a series of short animated videos featuring mascots, which we used during events and webinars and shared on social media. These videos raise awareness about our complaints process in a fun and accessible way.

We will continue to engage in opportunities in person while developing new ways to enhance our services for a digital audience.



Our mascots



Bob



Esme



Wendy



"One of the best things about my role is bringing people together. I'm drawn to volunteering as I can see how an extra pair of hands and sharing of resources can help empower people during hard times.

My focus is to improve relationships, trust, and brand knowledge of the TIO for any external stakeholder group. This may include consumers and community organisations, other bodies such as financial counselling associations, ombudsman schemes, or our members.

The COVID-19 pandemic significantly impacted how our team runs events, but we adapted quickly. One of the things I'm most proud of is establishing the community and outreach webinars. These were especially needed during this past year when reliance on phone and internet services has become so strong.

Because I don't work in the complaints area, outreach gives me the opportunity to hear what is going on in the telco industry space – how members of the community are being affected and where they need help. The other benefit is being able to meet such amazing, different, and diverse people in all the places in Australia we reach out to."

Eloise Anderson

Member and Community Events
Coordinator

Case study

Fetu was charged for equipment when his service could not be connected

Fetu signed up for a 'risk-free' trial with Octagon Networks. It sent him a modem and made a date to connect the service.

Octagon Networks tried to connect the service but found the infrastructure it needed was not available at Fetu's address.

It referred him to its terms and conditions and charged him for the modem even though it could not connect him.

Fetu complained to us saying he felt it was unfair that he had to pay for the modem when Octagon Networks could not connect the service.

Octagon Networks resolved the complaint by letting Fetu return the modem and refunding the cost.

Names of all parties have been changed.

.....

Fetu complained to us saying he felt it was unfair that he had to pay for the modem when Octagon Networks could not connect the service ...



RAP Chair's message



Artwork by Jasmine Sarin

It is such an honour to be in this role as the Chair of the Reconciliation Action Plan (RAP) Working Group.

I began working at the TIO in August 2020. It was clear from early days in my new role that the organisation has a deep commitment to embrace, respect, and promote inclusion and the cultures, rights, and perspectives of Aboriginal and Torres Strait Islander peoples.

From joining the RAP Working Group, to being appointed Chair in March 2021, I have been on an incredible learning journey. I have a saying that if you know better, you can do better. Learning more means becoming more aware and becoming more aware gives you the ability to make meaningful change. I wanted to know more about how I can respect and promote Aboriginal and Torres Strait Islander culture, so I could do better, both personally and professionally.

With Reflect RAP, we wanted to focus on building the skills, knowledge, and awareness of our people and colleagues. We have adopted and promoted the importance of an Acknowledgement of Country. We have refined and expanded cultural awareness training. And in our commitment to reconciliation, we continuously reach across the whole business to enhance learning and understanding.

In exploring ways to make our workplace a more culturally competent and safe place for First Nations people, we have conducted a review of our dispute resolution processes and how we assess enquiries and complaints. We have also researched best practices in other dispute resolution organisations and are making changes accordingly. We are implementing modules in cultural awareness training for all new recruits, and we are looking at how effective our current service delivery is for Aboriginal and Torres Strait Islander People.

Since the launch of the Reflect RAP during NAIDOC Week 2020, we have actively and purposefully raised awareness of our RAP through internal and external channels.

An internal event celebrated Indigenous culture and formally launched our commitments to reconciliation. The event commenced with a Welcome to Country by Elders from Dja Dja Wurrung and Boon-Wur-Rung. We invited First Nations people for a courageous panel conversation about reconciliation, and Senior RAP Officer from Reconciliation Australia, Christine Dernee shared an address. We also revealed the beautiful Reflect RAP artwork by Indigenous artist Jasmine Sarin, a proud Kamilaroi and Jerrinja woman.

Working remotely had us exploring creative ways to continue promoting Aboriginal and Torres Strait Islander peoples and cultures. During National Reconciliation Week and NAIDOC Week, we connected our people with film and online resources, and encouraged them to share their learnings. And true to the Reconciliation Week theme of #MoreThanAWord, we asked individuals and teams to make personal commitments to reconciliation.

I am committed to delivering on our RAP and passionate about achieving a reconciled Australia. I am really proud of stepping into the role of Chair of the RAP Working Group and leading the organisation on this learning journey.

A big part of this experience is about being vulnerable and transparent in my own journey. I don't know everything. I am still learning and striving to know better, so I can do better.

Reconciliation is more than just a word.

Erin Norman
Contact Centre Business Lead and
Chair of the RAP Working Group



Complaints

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How we work: Our process

Our complaints process begins with individual consumers and small businesses contacting us about complaints within our jurisdiction.

First contact and referral

When a consumer first contacts us, our Early Resolution Officers listen to their complaint and refer it to the provider to respond in the first instance. If the consumer has an urgent complaint including where the problem poses a medical or safety risk, we refer the complaint using our two-step process for urgent complaints:

1. We ask the provider to resolve the urgent issue in two business days.
2. For medical or safety issues, we follow up with consumers to ensure those issues have been resolved.

Most complaints we refer to providers are resolved after our early involvement.

Handling unresolved and escalated complaints

Some complaints are not resolved by the referral process. If the consumer asks for further assistance, we assign the complaint to a Dispute Resolution Officer, whose job it is to assist the consumer and their provider to reach a resolution.

Our Dispute Resolution Officers are skilled in understanding technical and legal issues and in working with the parties to find a resolution to the complaint. Many complaints are resolved by agreement during conciliation and investigation and others are resolved after we reach a preliminary view.

If a consumer does not agree with the preliminary view, our process ends. The consumer is free to take their complaint to another forum, such as a court or a tribunal. If a provider does not agree with the preliminary view, we will make a decision on the fair and reasonable outcome of the complaint. If the consumer accepts the decision, it is binding on the provider. In almost all cases, providers implement the decisions we make. Where a provider does not implement a decision, we refer the matter to the ACMA for enforcement action.

Contacts
received

301,396

162,582

ONLINE



138,814

CALLS



(318,797 in 2019-20)



119,400

total complaints
referred

-6.1%

on 2019-20 (127,151)

16,607

escalated
complaints

-0.4%

on 2019-20 (16,675)

378

escalated
complaints with
a preliminary
view

11

decisions

34 in
2019-20

6

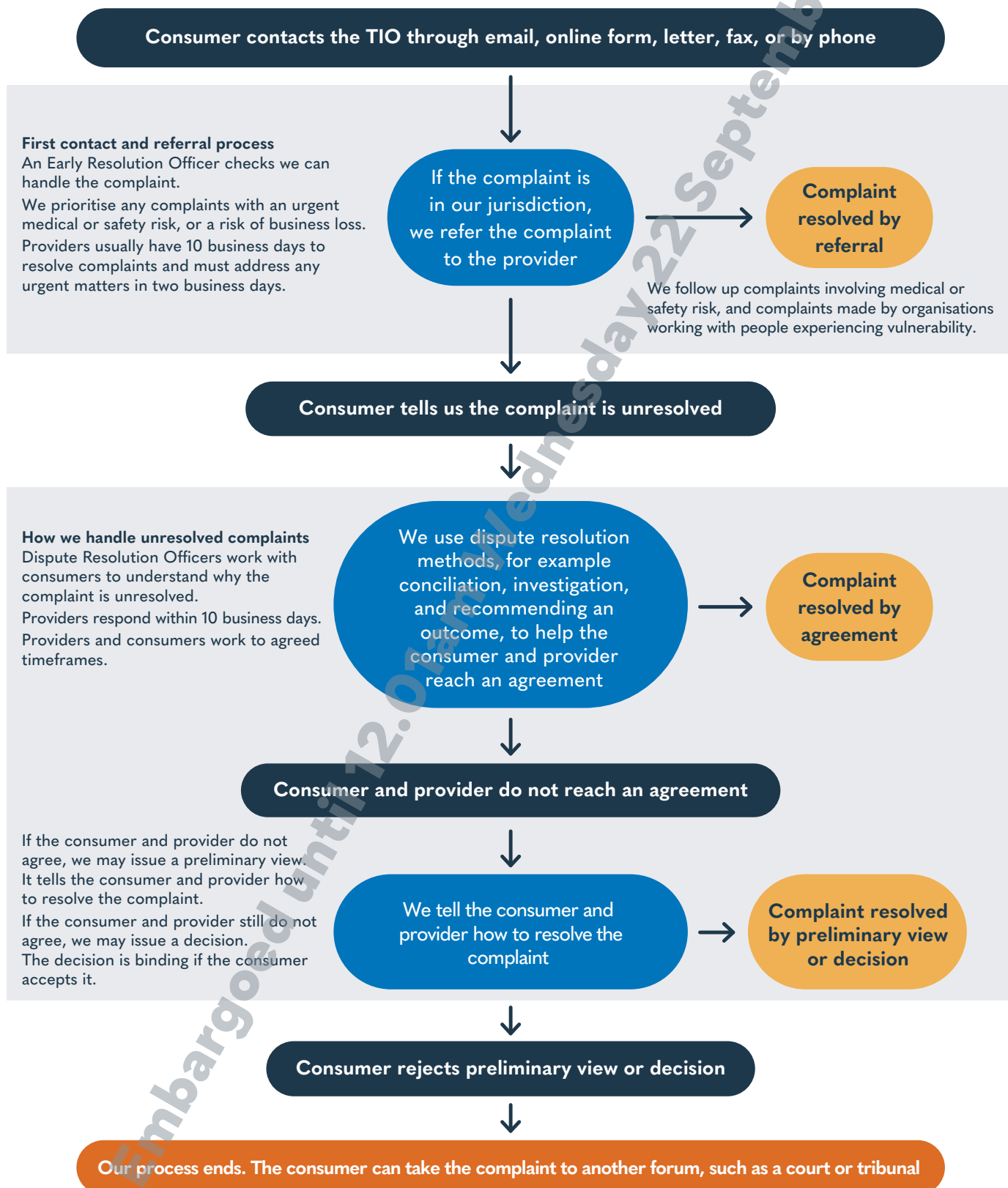
decisions referred
to ACMA for
enforcement

25 in 2019-20

Embargoed until 12.01am Wednesday 22 September 2021

How we work: Our process

Figure 2 Overview of the TIO complaint process



Improving our complaint handling

This year, the total number of escalated complaints remained high at 16,607 during the year, following a rapid increase in 2019-20. This was due to the pandemic's impact on consumers' reliance on telecommunications services and the pressures placed on providers.

In 2020-21 the number of escalated complaints rose sharply at the end of the first quarter and the increase continued into the second quarter. During the peak of Victoria's COVID-19 lockdowns, this resulted in increased waiting times for consumers.

During the third and fourth quarter, we responded by focusing on ways to reduce wait times and resolve the high number of complaints. We built capacity in our teams and enhanced our service delivery to manage high volumes of complaints, while delivering fair and effective services.

As consumers and providers adapt to the telecommunications demands of pandemic working arrangements, we expect complaint numbers to correct. In combination with our service improvements, we expect wait times to decrease to two weeks or less across all escalated cases.

Despite the sustained high numbers of escalated complaints, we closed 53 per cent of escalated cases within 60 days of returning as unresolved, and 88 per cent of cases within 120 days. This was an improvement on last year's result of 86 per cent.

Targeted three-way conciliation conferences

In the final quarter of 2020-21, we trialled a new approach to conciliation conferences, targeting straightforward escalated cases.

This initiative saw us send batches of straightforward cases to providers for review. We then conducted three-way conciliation conferences involving consumers, providers, and TIO officers. In these conferences, the TIO officers facilitated open conversations and problem solving between consumers and providers.

Early indications show this approach can achieve early and successful resolution of suitable complaints. We aim to continue this approach in the coming year.

One size does not fit all

The COVID-19 pandemic posed a variety of challenges to providers in how they responded to consumers. After assessing the different models of service delivery amongst providers, we modified our responses to achieve fairer outcomes for consumers and members.

We maintained a strong focus on identifying complaints about vulnerable consumers and prioritising them for case management. We strengthened our oversight of 'queued' escalated cases while they waited to be allocated to a TIO officer.

Building our dispute resolution capacity

The skills and expertise of our people are key to our ability to provide effective and efficient dispute resolution.

We experienced extra challenges this year with inducting new employees who were working from home. We made changes to our recruitment and onboarding processes to accelerate the development of our new employees. These changes allowed us to have new employees able to manage the most common types of complaints within 12 weeks of commencement at the TIO. We conducted skills training across our Dispute Resolution teams to ensure high standards in dispute resolution.

Complaint outcomes

In most cases where consumers received a remedy, there was both a financial and non-financial outcome. The most common financial outcome was a billing adjustment followed by a payment arrangement. The median financial amount consumers received was \$420. Non-financial outcomes were most often an explanation or assistance, followed by a cancellation or change to a contract, service, or plan.

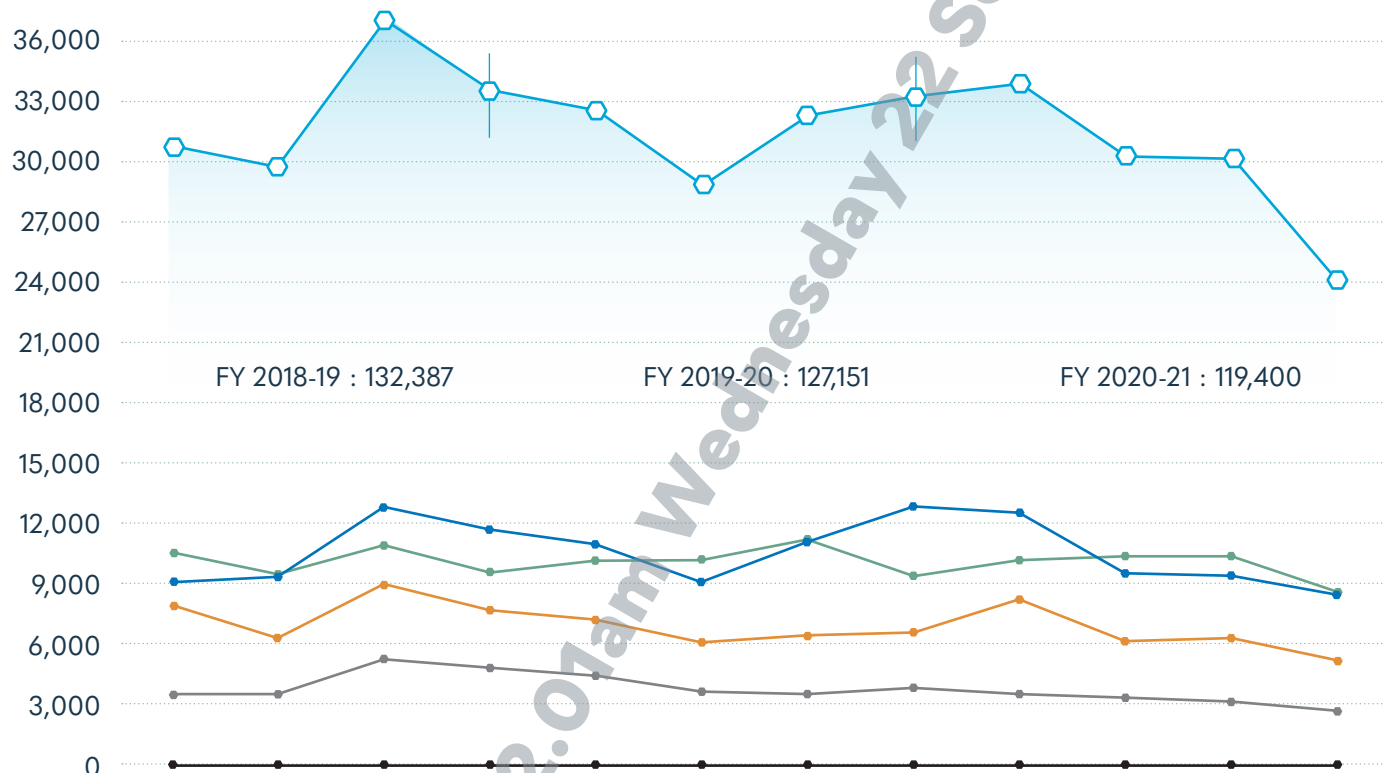
Trends in complaints

We saw a reduction in complaints, contacts, and enquiries this year when compared to the previous year. Despite the challenges provided by the COVID-19 pandemic, the industry overall has responded well to issues, as shown in the reduced complaint and enquiry volumes.

We referred 119,400 complaints to providers in 2020-21, a reduction of 6.1 per cent compared to the previous year.

This was the lowest volume of referrals received by the TIO in three years. Escalations of complaints referred to us have remained high despite the reduction in underlying referrals. This has mainly been driven by known issues with particular providers, in addition to challenges resulting from COVID-19 related shutdowns.

Graph 1 Complaints by service type and quarter: 2018-19 to 2020-21

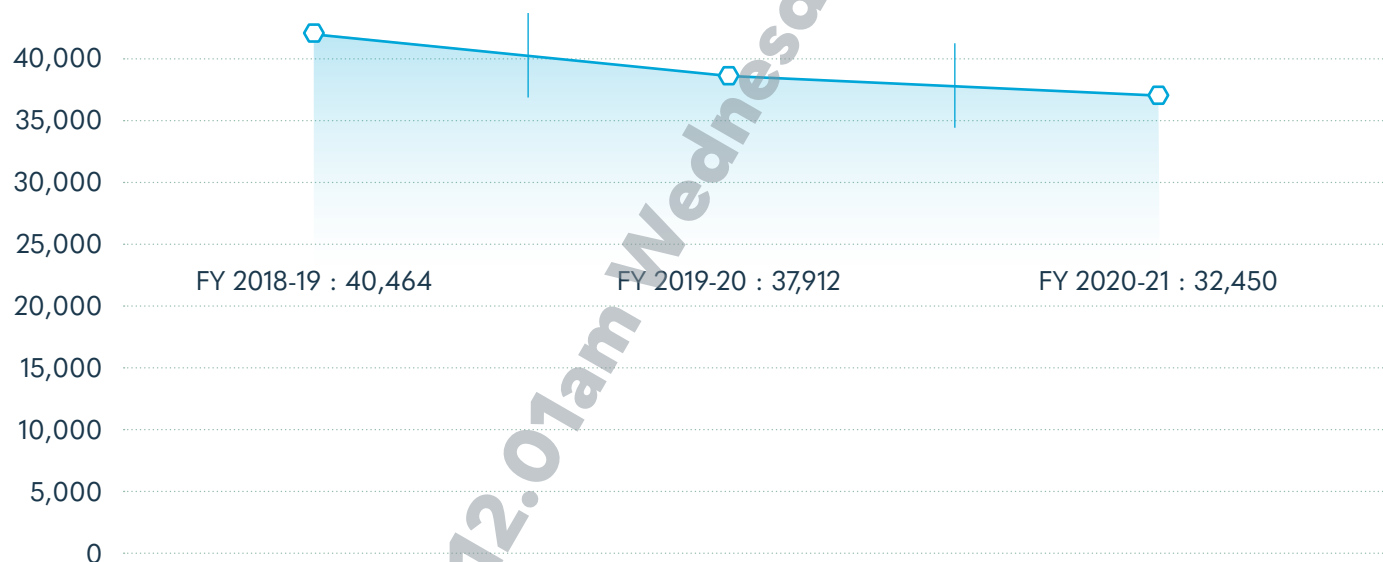
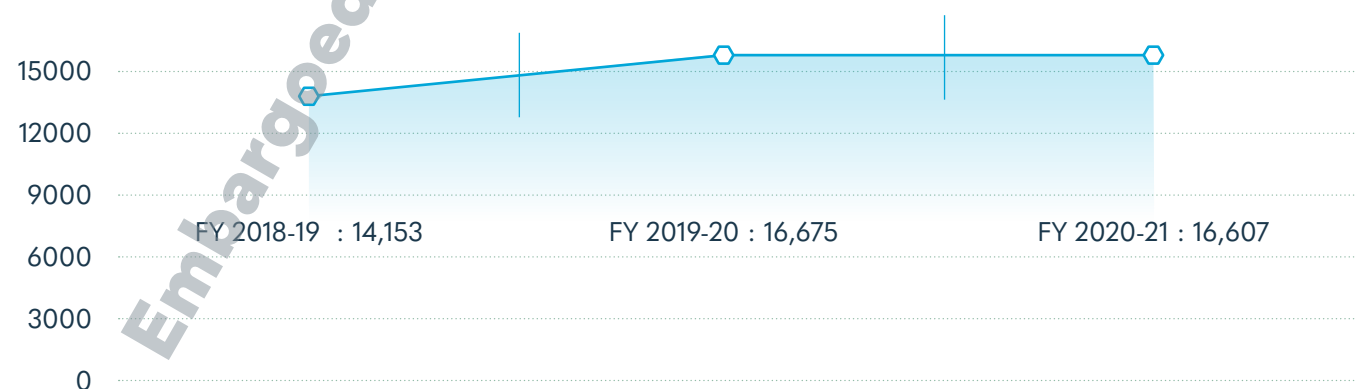


	2018-2019				2019-2020				2020-2021			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Total	30,859	30,035	37,599	33,894	32,737	28,719	32,366	33,329	34,396	30,494	30,315	24,195
Internet	8,999	9,621	12,969	11,575	10,637	8,736	10,659	12,851	12,208	9,659	9,655	8,335
Landline	3,830	3,862	4,812	4,763	4,384	3,663	4,119	3,826	3,680	3,467	3,312	2,601
Mobile	10,305	9,583	10,682	9,533	9,945	9,887	10,451	9,418	10,151	10,098	10,549	8,296
Multiple	7,482	6,734	8,841	7,621	7,390	6,110	6,816	6,988	8,145	7,097	6,606	4,807
Property	243	235	295	402	381	323	321	246	212	173	193	156

Key						
	Internet	Landline	Mobile	Multiple	Property	Total

Table 1 Complaints by service type: 2018-19 to 2020-21

Service type	2018-19	2019-20	2020-21
Internet	32.6%	33.7%	33.4%
Landline	13.0%	12.6%	10.9%
Mobile	30.3%	31.2%	32.7%
Multiple	23.2%	21.5%	22.3%
Property	0.9%	1.0%	0.6%
Total	100%	100%	100%

Graph 2 Enquiries: 2018-19 to 2020-21**Graph 3 Escalated complaints: 2018-19 to 2020-21**

Trends in complaints

Complaints by service type

Complaints about internet services made up the largest proportion of complaints, which is a trend we have seen for the last three years. Complaints about internet services accounted for 33.4 per cent of complaints in 2020-21 compared to 33.7 per cent in 2019-20. However, the overall volume of internet complaints continued the downwards trend from last year and dropped by 7.1 per cent in 2020-21.

In 2020-21, mobile services continued to be the second most complained about service type with 32.7 per cent of complaints compared to 31.2 per cent in the previous year. Mobile complaint volumes reduced by 1.5 per cent compared to the previous year. Mobile services were the most dominant service type in the second and third quarter as complaints about internet services decreased in these periods.

The proportion and volume of complaints relating to landline services reduced this year. The volume dropped by 18.3 per cent and this service type made up 10.9 per cent of all complaints. The proportion of complaints about multiple service types increased from 21.5 per cent to 22.3 per cent, and the volume decreased by 2.4 per cent.

Top 10 issues

No or delayed action by a provider and service and equipment fees were again the most common issues in complaints. While these issues are frequently part of a complaint driven by other issues, complaints involving no or delayed action increased by 11.7 per cent as consumers expressed frustration with their provider's failure to resolve their issues.

Complaints about providers being uncontactable increased by 88.4 per cent. This issue was primarily driven by COVID-19 impacts, although changes by several providers to their consumer contact channels also impacted this issue, as some consumers struggled to navigate these.

Complaints about failure to cancel a service* continued to increase in 2020-21 as a result of both COVID-19 processing delays and problems with porting. Complaints about enhanced or add-on features to a service increased by over 100 per cent and were driven by a known problem with a single provider in the first half of the year.

Table 2 Top 10 issues 2020-21

Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	41,669	46,533	39.0%	11.7%
Service and equipment fees	42,152	39,584	33.2%	-6.1%
No phone or internet service	17,501	15,593	13.1%	-10.9%
Delay establishing a service	17,347	14,170	11.9%	-18.3%
Intermittent service or drop outs	11,789	10,913	9.1%	-7.4%
Resolution agreed but not met	13,259	10,275	8.6%	-22.5%
Provider uncontactable	4,672	8,800	7.4%	88.4%
Failure to cancel a service*	6,753	8,775	7.3%	29.9%
Slow data speed	8,721	7,122	6.0%	-18.3%
Service problem with add-on feature eg email, call waiting, alarm etc failure	2,079	4,344	3.6%	108.9%

*New keyword introduced from September 2019

Complaints about misleading conduct and termination fees have continued to decrease over the last two years and are no longer a top 10 issue.

Complaints about reaching a resolution and the provider not implementing it decreased by 22.5 per cent, and the number of complaints about connection delays and slow data speed both reduced in 2020-21 by 18.3 per cent. Smaller reductions were seen in complaints about service and equipment fees, intermittent services/dropouts and no phone or internet service.

“One of the things I’m most proud of is my team’s willingness to engage with everyone, and to adapt their complaint handling style to people’s different needs in Dispute Resolution.

We’re not just catering for someone who knows how an ombudsman works. My team sits down and guides consumers through the process – they demystify it and turn it into language that’s adapted to that person’s needs.

That might be a person who is non-verbal, or has English as a second language, or it could be a person going through a traumatic life event. We encounter it all. You meet all these different people when handling complaints, and bits of it stick with you.

It can often be really challenging to work through a complaint because you really sympathise, and we’ve got to think about what is fair and what is reasonable. This is a difficult line to balance. We’re not trying to be devoid of emotion, but we need to make sure we give everyone a fair shot. We follow the rules of natural justice, and we are effective and independent.”

Dhamendra Unka
Lead Investigator



Trends in complaints

Issues by service type

Complaints about no or delayed action by provider increased most for mobile services (22.8 per cent), but also increased for multiple (11.1 per cent) and internet (7.2 per cent) services. These complaints were mainly driven by consumers complaining about general delays in providers responding to COVID-19 related issues, delays in transferring their services to another provider, missed appointments, and delays in fixing billing issues.

Complaints about providers being uncontactable and failure to cancel a service* increased across internet, mobile, multiple, and landline services. These two complaints were often related, with consumers complaining about providers not cancelling a service because they were not contactable. Complaints about providers being uncontactable reduced substantially by the fourth quarter, which was a positive development for consumers.

Complaints about missed appointments remained in the top 10 issues for internet services, increasing by 7 per cent when compared to 2019-20. They were more of an issue in the later part of the year due to issues with the scheduling of NBN technician appointments.

Complaints about poor mobile coverage and equipment faults for mobile services increased by 9.3 per cent and 7.3 per cent respectively.

With a reduction in overall complaint volumes, there were also many areas of improvement. We observed a reduction in complaints across all service types about delays connecting a service where a resolution had been agreed but had not been complied with. We saw reductions in complaints about no phone or internet service in landline, multiple, and internet service types. And we saw a reduction in complaints about slow data speed for both internet and multiple service types.

Landline complaints about phone number problems due to connection, disconnection or transfer dropped 26 per cent. Complaints about misleading conduct when entering a contract for a mobile service reduced by 26.1 per cent. We also saw a 15.5 per cent fall in complaints about internet service and equipment fees.

Table 3 Top 10 issues for internet services 2020-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	13,729	14,721	36.9%	7.2%
Service and equipment fees	14,079	11,901	29.9%	-15.5%
Delay establishing a service	8,265	7,085	17.8%	-14.3%
No phone or internet service	6,803	6,639	16.7%	-2.4%
Intermittent service or drop outs	6,875	6,590	16.5%	-4.1%
Slow data speed	6,852	5,402	13.6%	-21.2%
Failure to cancel a service*	3,075	3,469	8.7%	12.8%
Provider uncontactable	2,007	2,863	7.2%	42.7%
Resolution agreed but not met	3,767	2,775	7.0%	-26.3%
Missed appointment	2,474	2,647	6.6%	7.0%

*New keyword introduced from September 2019

Table 4 Top 10 issues for mobile services 2020-21

Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	13,053	16,034	41.0%	22.8%
Service and equipment fees	14,482	14,787	37.8%	2.1%
Resolution agreed but not met	4,842	4,067	10.4%	-16.0%
Poor mobile coverage	2,926	3,197	8.2%	9.3%
Equipment Fault	2,418	2,594	6.6%	7.3%
Misleading conduct when making a contract	3,300	2,438	6.2%	-26.1%
Provider uncontactable	1,154	2,437	6.2%	111.2%
Variation to contract or plan by provider	1,484	2,146	5.5%	44.6%
Failure to cancel a service*	1,245	1,656	4.2%	33.0%
Delay establishing a service	1,901	1,505	3.8%	-20.8%

Table 5 Top 10 issues for multiple services 2020-21

Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	9,612	10,676	40.1%	11.1%
Service and equipment fees	9,817	9,873	37.0%	0.6%
No phone or internet service	5,561	4,553	17.1%	-18.1%
Delay establishing a service	5,026	3,969	14.9%	-21.0%
Failure to cancel a service*	1,663	2,694	10.1%	62.0%
Intermittent service or drop outs	2,991	2,567	9.6%	-14.2%
Provider uncontactable	1,020	2,447	9.2%	139.9%
Resolution agreed but not met	3,201	2,408	9.0%	-24.8%
Bill unclear or not received	1,292	1,380	5.2%	6.8%
Slow data speed	1,483	1,222	4.6%	-17.6%

*New keyword introduced from September 2019

Trends in complaints

Table 6 Top 10 issues for landline services 2020-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	5,206	5,052	38.7%	-3.0%
No phone or internet service	4,408	3,364	25.8%	-23.7%
Service and equipment fees	3,750	3,012	23.1%	-19.7%
Delay establishing a service	2,148	1,610	12.3%	-25.0%
Number problem due to connection, disconnection or transfer	1,555	1,151	8.8%	-26.0%
Provider uncontactable	487	1,047	8.0%	115.0%
Resolution agreed but not met	1,427	1,013	7.8%	-29.0%
Failure to cancel a service*	770	955	7.3%	24.0%
Partially restricted service	1,187	940	7.2%	-20.8%
Disconnection in error	837	840	6.4%	0.4%

*New keyword introduced from September 2019

Fault and connection complaints

Complaints involving fault and connection issues continue to make up a significant proportion of our complaints at 47.1 per cent. This was slightly lower than last year's 49.2 per cent.

Fault and connection complaints reduced by 10.1 per cent across all service types, with noticeable volume reductions for internet services (9.1 per cent), multiple services (13.8 per cent), and landline services (22.3 per cent) when compared to the previous year. Complaints about fault and connection problems for mobile services increased by 8 per cent. Complaints about internet services delivered over the NBN also increased by 4.9 per cent.

The main driver of the increase in fault and connection complaints about mobile services was an increase in complaints about poor mobile coverage. We also saw large increases in complaints about many other faults and connections keywords. However these did not reach the top 10 issues for mobile services.

There was an increase in the proportion of fault and connection complaints about internet, landline, and multiple services delivered over the NBN, but this is to be expected with most services moving to the NBN.

In 2020-21, 933,007 premises were connected on the NBN, with 8,200,403 premises active on the NBN at the end of this year. By comparison, in 2019-20, 1,735,309 premises were connected on the NBN, with 7,267,396 premises active on the NBN at the end of that year*.

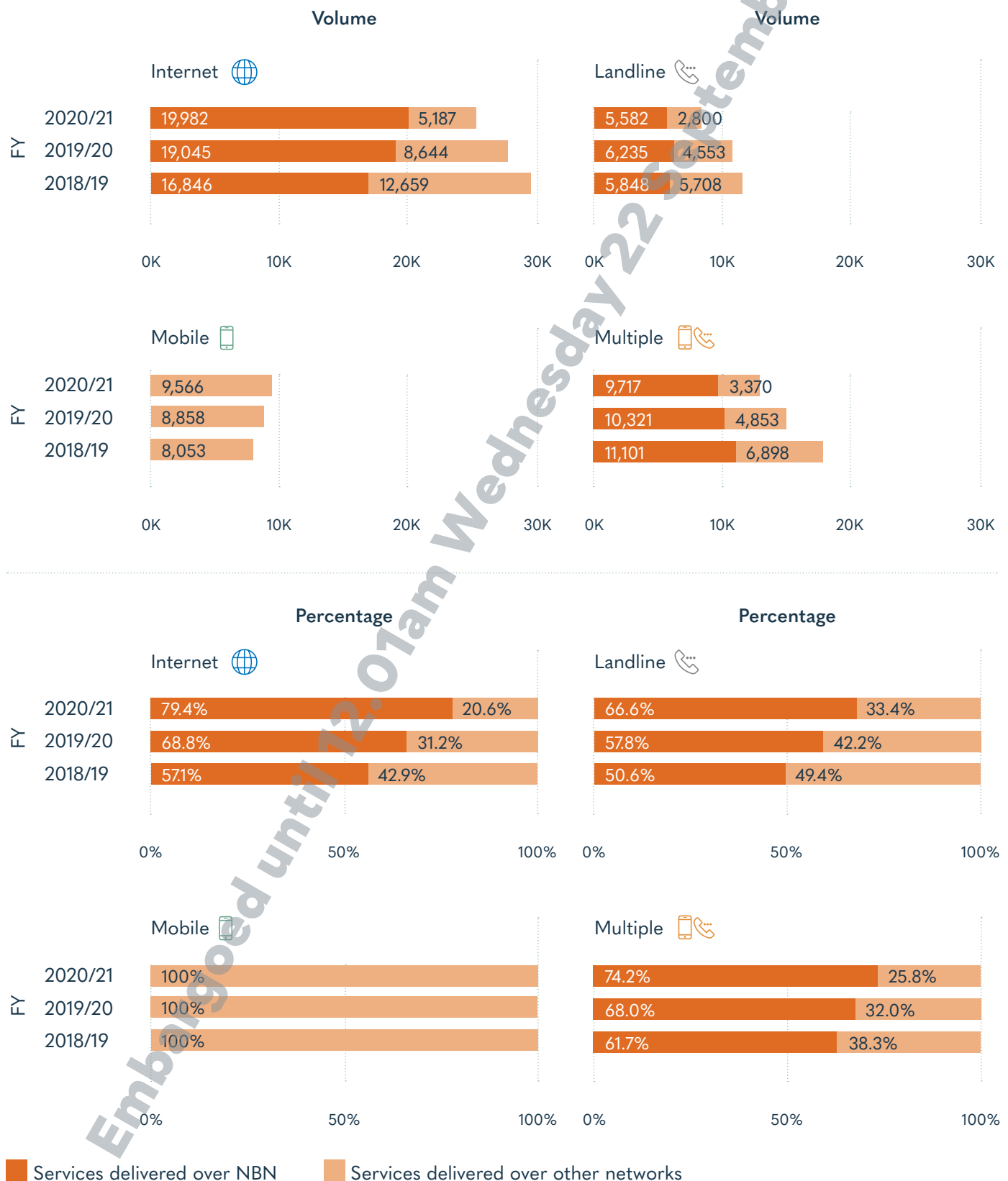
The experience of connecting to or receiving a service delivered over the NBN is influenced by a range of factors. These include the actions of retail internet service providers, wholesalers, and NBN Co, and factors within consumers' premises.

Complaints about connection delays reduced across all services, with occasional problems relating to porting presenting issues for consumers in the year.

While the experience of most consumers improved in 2020-21, complaints from small business consumers about having no phone or internet service increased by 6.5 per cent. In 17.7 per cent of small business complaints, the small business reported having no phone or internet service. We also saw a 27.4 per cent increase in complaints about disconnection in error from small businesses.

* Source: Nbnco.com.au. 2021. National Broadband Network – Rollout Information. [online] Available at: https://www.nbnco.com.au/content/dam/nbnco2/2019/documents/weekly-progress-report/Public_Progress_data%20-%20150721.pdf

Graph 4 Fault and connection complaints by service type and network: 2018-19 to 2020-21





“The past year has been a challenge for everyone. During the pandemic, consumers have been more stressed when they come to us, because they have needed their telecommunications services more. For me, my job is about listening, hearing their concerns, giving them a bit of relief, and letting them know they’re not alone.

People really do feel better after lodging a complaint with us. They appreciate that we’re free, and just a phone call away. It may be a very simple thing to listen to someone and hear them out, but it can change someone’s whole outlook on their problem.

I’ve been an Early Resolution Officer for four years, and I really enjoy my job. I get to use my interest in telco technologies and services to help people. It doesn’t matter how complex the matters are, I’m here to listen and assist the consumers as best as I can. And that keeps me motivated.”

Daniel Lee
Early Resolution Officer

Case study

A connection delay meant Esther could not work from home

During COVID-19 lockdowns, Esther had to work from home, which she had never done before. She asked her provider, Pink Tel, to connect her to a faster internet and landline service, but was told there would be a one-month delay. When Pink Tel sent a technician to connect her service, the technician said there was a problem with the service, and they could not connect her.

Each time Esther called Pink Tel to complain, they said they would send another technician to connect her, but each technician said they did not know what was wrong with her service and they could not connect her.

While Esther was waiting for a connection, she had to rely on her mobile data which was not fast enough for her to work from home.

After Esther made a complaint to our office, we asked Pink Tel and the network wholesaler to work together to find out what was stopping Esther from getting a connection. The provider and wholesaler worked together to find the problem and successfully connected the service. We also found Esther was entitled to a Customer Service Guarantee payment of over \$1,900 in compensation for the time she was waiting for a connection.

Names of all parties have been changed.

.....

While Esther was waiting for a connection, she had to rely on her mobile data which was not fast enough for her to work from home.



Embargoed until 12.01am Wednesday 22 September 2021

Trends in complaints

Complaints by provider

Complaints about the top 10 providers accounted for 92.9 per cent of all complaints received, which is a slight increase from 92.2 per cent last year. We received complaints about 364 providers in 2020-21**.

Complaints about Telstra Corporation accounted for 62.1 per cent of all complaints, increasing from 52.4 per cent in the previous year. Telstra Corporation's complaint volumes increased by 11.3 per cent in the year.

Optus Group* accounted for 15.8 per cent of complaints. Optus Group complaint numbers fell by 27.9 per cent in 2020-21 following a decrease of 17.1 per cent in 2019-20.

Complaints about TPG Group* fell by 39.5 per cent, iiNet by 48.8 per cent, and Dodo Services Pty Ltd by 32.5 per cent.

Complaints increased for Southern Phone Company Ltd, Aussie Broadband Limited, Boost Tel Ptd Ltd, and Foxtel Management Pty Ltd. The latter three members are recent entrants into the top 10, displacing M2 Commander Pty Ltd, Exetel Pty Ltd, and MyRepublic Pty Ltd from the 2019-20 list.

**This number counts distinct memberships and does not group members together.

*Refer to the glossary for details of member groupings

Table 7 Top 10 service providers by complaints 2020-21

Provider	2019-20	2020-21	2020-21 % of total	Change from 2019-20
Telstra Corporation	66,612	74,135	62.1%	11.3%
Optus Group*	26,205	18,900	15.8%	-27.9%
Vodafone Australia Limited	6,412	5,668	4.7%	-11.6%
TPG Group*	6,471	3,913	3.3%	-39.5%
iiNet Ltd	5,723	2,929	2.5%	-48.8%
Southern Phone Company Ltd	1,300	1,561	1.3%	20.1%
Dodo Services Pty Ltd	1,573	1,062	0.9%	-32.5%
Aussie Broadband Limited**	763	1,047	0.9%	37.2%
Boost Tel Pty Ltd	751	964	0.8%	28.4%
Foxtel Management Pty Limited	524	693	0.6%	32.3%

*Refer to the glossary for details of member groupings

**Aussie Broadband Limited was previously reported as Aussie Broadband Pty Ltd.

Residential complaints

We received a total of 99,711 complaints from residential consumers, which is an 8.2 per cent decrease from the previous year. Complaints from residential consumers accounted for 83.5 per cent of all complaints received this year which is down from last year's 85.5 per cent of the total.

Residential complaints by service type

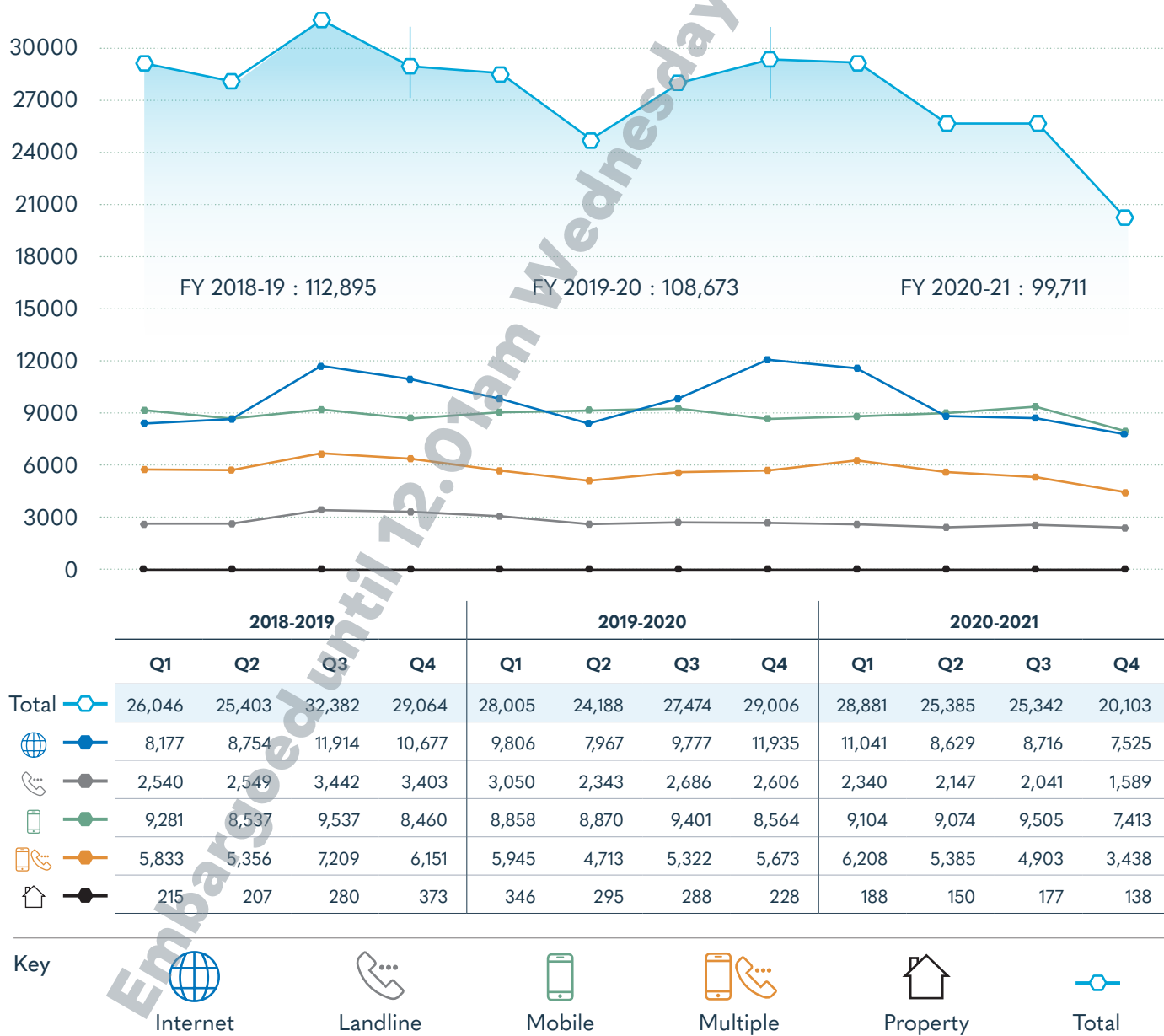
Most complaints received from residential consumers were about their internet and mobile phone services. Complaints about internet services made up the highest proportion of residential complaints at 36 per cent, which is very similar to last year's proportion.

Complaints about mobile services made up 35.2 per cent of residential complaints, which is the highest in the last three years. Complaints about landline services reduced from 9.8 per cent in 2019-20 to 8.1 per cent in 2020-21, which is to be expected as consumers move away from a reliance on fixed telephone services. This is the lowest proportion of landline complaints from residential consumers in the last three years.

Residential complaints by top 10 issues

No or delayed action and service and equipment fees continued to be the two biggest issues reported by residential consumers this year. Most issues in the top 10 decreased when compared to 2019-20. The largest decreases relative to 2019-20 in the top 10 were for complaints about resolution agreed but not met (25 per cent), delay establishing a service (21.6 per cent), and slow data speed (19.4 per cent).

Graph 5 Residential complaints by service type and quarter: 2018-19 to 2020-21



Trends in complaints

Table 8 Residential complaints by service type: 2018-19 to 2020-21


Service type	2018-19	2019-20	2020-21
Internet	35.0%	36.3%	36.0%
Landline	10.6%	9.8%	8.1%
Mobile	31.7%	32.8%	35.2%
Multiple	21.7%	19.9%	20.0%
Property	1.0%	1.1%	0.7%
Total	100%	100%	100%

Table 9 Top 10 issues in residential complaints 2020-21


Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	35,347	38,431	38.5%	8.7%
Service and equipment fees	36,576	33,517	33.6%	-8.4%
No phone or internet service	14,229	12,108	12.1%	-14.9%
Delay establishing a service	14,577	11,428	11.5%	-21.6%
Intermittent service or drop outs	10,225	9,526	9.6%	-6.8%
Resolution agreed but not met	11,569	8,671	8.7%	-25.0%
Provider uncontactable	4,282	7,704	7.7%	79.9%
Failure to cancel a service*	5,820	7,211	7.2%	23.9%
Slow data speed	7,982	6,430	6.4%	-19.4%
Missed appointment	3,926	3,658	3.7%	-6.8%

*New keyword introduced from September 2019

Case study

Zandros signed up for a service he couldn't afford

Zandros is a student and works as a part time cleaner. He signed up for two mobile services with Monsoon Mobile, which cost over \$400 per month.

Zandros quickly fell behind on his monthly payments, which he could not afford. When he tried to speak to Monsoon Mobile about his contract, Monsoon Mobile said he could either pay a cancellation fee or keep paying for the services. The total cost of the cancellation fee was over \$5,800.

After Zandros made a complaint to our office, we found Monsoon Mobile didn't undertake a credit assessment to see if Zandros could afford to pay for the services before signing him up.

We conducted a retrospective credit assessment, which found that Zandros would only have been left with less than \$150 a week for all his living expenses after paying for the services. Monsoon Mobile agreed it should never have approved the contract. Monsoon Mobile cancelled the contract and waived all charges.

Names of all parties have been changed.



Trends in complaints

Small business complaints

We received 19,689 complaints from small businesses, which was a 6.6 per cent increase on the previous year and the highest volume of small business complaints in the last three years.

This is both the highest proportion and volume of internet complaints for small business in the last three years. Complaints about multiple services accounted for 34.1 per cent of complaints, an increase from 30.6 per cent last year with multiple services remaining the dominant service type for small business complaints.

Complaints by service type

Complaints about landline services accounted for 25.1 per cent of small business complaints, which was a reduction from 28.7 per cent last year. There were 3,946 complaints about internet services, which made up 20 per cent of small business complaints.

Graph 6 Small business complaints by service type and quarter: 2018-19 to 2020-21

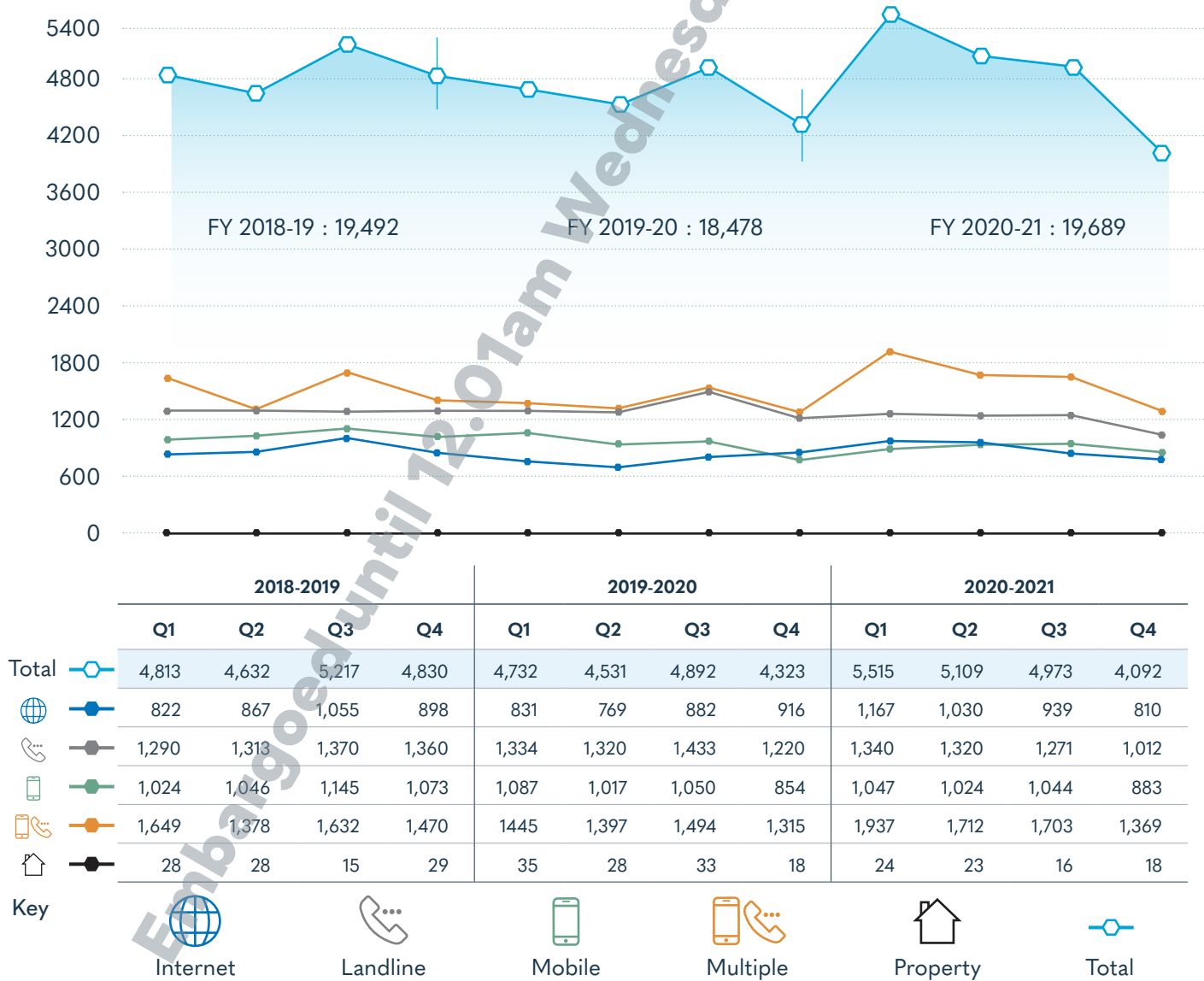


Table 10 Small business complaints by service type: 2018-19 to 2020-21

Service type	2018-19	2019-20	2020-21
Internet	18.7%	18.4%	20.0%
Landline	27.4%	28.7%	25.1%
Mobile	22.0%	21.7%	20.3%
Multiple	31.4%	30.6%	34.1%
Property	0.5%	0.6%	0.4%
Total	100%	100%	100%

Complaints by top 10 issues

As complaint volumes increased, we saw increases in seven of the top 10 complaint issues for small businesses compared to last year. Complaints about no or delayed action increased by 28.2 per cent, failure to cancel a service increased by 67.6 per cent and provider uncontactable increased by 181 per cent.

Complaints about number problems reduced in 2020-21 and are no longer part of the top 10 issues, in a

positive development for small businesses. We also saw a continuation of the reduction in complaints about intermittent services and dropouts (11.3 per cent) that we had observed last year and in complaints where a resolution was agreed but not met (5.1 per cent).

Complaints about business loss continue to be an issue for small businesses and grew by 13.3 per cent compared to 2019-20, reflecting the impact that service problems can have on the performance of a small business.

Table 11 Top 10 issues in small business complaints 2020-21

Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	6,322	8,102	41.1%	28.2%
Service and equipment fees	5,576	6,067	30.8%	8.8%
No phone or internet service	3,272	3,485	17.7%	6.5%
Delay establishing a service	2,770	2,742	13.9%	-1.0%
Business loss	1,563	1,771	9.0%	13.3%
Resolution agreed but not met	1,690	1,604	8.1%	-5.1%
Failure to cancel a service*	933	1,564	7.9%	67.6%
Intermittent service or drop outs	1,564	1,387	7.0%	-11.3%
Disconnection in error	875	1,115	5.7%	27.4%
Provider uncontactable	390	1,096	5.6%	181.0%

*New keyword introduced from September 2019

Case study

Phone issues interrupt takeaway orders at Salma's restaurant

Due to COVID-19 restrictions, Salma's restaurant business was relying on takeaway orders received by phone or online.

Salma applied to transfer her restaurant's landline and internet service to a new provider. Her new provider said her services would not be interrupted during the transfer.

However, several days later, the landline service stopped working. She reported this to her new provider, and it confirmed there was a delay in the transfer of her phone number. Salma explained that it was a busy time of week for her restaurant and asked it to redirect calls to her mobile number. The provider agreed to do this, but the redirection did not work.

After Salma made a complaint to our office, we asked her new provider to connect her service as a matter of urgency. The provider connected her service, but it took two weeks to do so. The provider agreed to refund Salma the cost of the service for the time she could not use it.

Names of all parties have been changed.



Land access objections

Telecommunications carriers build infrastructure to serve the current and future needs of consumers and the community. To help them do this, telecommunications legislation gives carriers powers and immunities to access land to inspect, maintain facilities, and install low impact facilities without obtaining the landowner's or occupier's permission, or planning approval.

The powers and immunities are part of a broader regulatory framework to ensure the long-term interests of end-users of telecommunications services. They also ensure the availability of accessible and affordable services that enhance the welfare of Australians.

When exercising these powers, carriers must comply with several laws and codes.

Under the Telecommunications Act 1997, a landowner or occupier may object to the carrier's proposed inspection, maintenance or placement of 'low-impact facilities', like antennas or cabling, on their land. The legislation requires carriers to refer unresolved land access objections to the Telecommunications Industry Ombudsman when requested by the landowner or occupier, and carriers must comply with any resulting directions.

- This year, carriers referred 26 land access objections to us – seven more objections than last year.
- 22 of the 26 objections were dealt with during the year and we closed a further six objections received in 2020-21.
- 12 of the new objections were about land in Queensland
- Eight of the new objections were about land in New South Wales
- Six of the new objections were about land in Victoria

Table 12 Land access objection activity 2020-21

Type of activity	Count of Number
Installation	9
Installation and inspection	1
Installation and maintenance	8
Installation, inspection and maintenance	1
Maintenance	7
Grand Total	26

Installation = installing a facility Inspection = inspecting land Maintenance = Maintaining a facility

Case study

Objecting to a carrier accessing land for masts installation

Deer Telco issued a notice to Lando Group proposing to install three masts, each with eight antennas attached, to the top of Lando Group's water tower.

Under Schedule 3 of the Telecommunications Act 1997, a carrier such as Deer Telco, can enter private land to install low impact facilities. This includes the type of antenna Deer Telco proposed to install on the water tower. Deer Telco can do this without the landowner's agreement if it follows the procedure in Schedule 3.

An owner or occupier of the land has the right to object to the carrier on limited grounds. Strict timeframes can apply.

Lando Group objected to Deer Telco's proposal for a number of reasons. Some of its objections were made within the prescribed time for objections, some were not. After trying to resolve the dispute directly with Lando Group and at Lando Group's request, Deer Telco referred the objection to the Ombudsman.

The Ombudsman can consider objections to proposed installations under Schedule 3 if the parties have substantially complied with the land access procedure, and the equipment identified in the notice meets the definition of low-impact facility, which this equipment did.

Lando Group objected to the proposed installation because it said it was considering plans to demolish the water tower. It also said the installation would interfere with other equipment installed at the site, and Deer Telco had not offered to pay any rent to occupy the site.

These points were not considered by the Ombudsman because Lando Group raised them after the time for objecting had passed.

The Ombudsman considered Lando Group's objection to the carrier accessing the site, but found it was not substantiated.

In its notice, Deer Telco had set out the steps it would take to minimise harm and inconvenience to Lando Group. It also explained how it proposed to install the antennas while doing as little damage as possible.

The Ombudsman was satisfied Deer Telco's obligations under the Act sufficiently protected Lando Group's interests. The Act includes obligations on carriers to:

- cause as little detriment and inconvenience and do as little damage as practicable
- ensure land is restored to a condition similar to its condition before the activity
- act in accordance with good engineering practice
- protect the safety of persons and property and to ensure the activity interferes as little as practicable with the use of the land.

The Ombudsman pointed to Lando Group's entitlement to seek financial loss if appropriate.

The Ombudsman made directions about the timing of Deer Telco installing the masts to Lando Group's water tower. But the Ombudsman found no reason to make any other directions about the way in which Deer Telco should undertake the installation.

Names of all parties have been changed.

The Ombudsman considered Lando Group's objection to the carrier accessing the site, but found it was not substantiated.



Industry Improvements

Systemic investigations
Contributing to public policy

65-66

70-71

Embargoed until 12.01am Wednesday 22 September 2021

Systemic investigations

We drive industry improvement by identifying, investigating, and resolving systemic issues.

A systemic issue is a concern about a system, process, or practice of a member or members that may or does affect a number or a particular type of consumers. A systemic issue may involve repeated non-compliance with the law, regulatory requirements, or good industry practice. It can also involve a widespread issue that is driving complaints.

We don't always know the full impact of a systemic issue as complaints to the TIO can be the tip of the iceberg. When we engage with members about a systemic issue, this is an opportunity to fix problems that have led to unfair outcomes for consumers. Working with members in this way prevents the same problems from occurring in the future, so other consumers are not affected by the same issues.

Members agreed to:

- 30 systemic improvements
- 29 systemic issues identified and investigated.

30
systemic
improvements



29
systemic issues
identified and
investigated

In 2020-21, we identified and investigated 29 systemic issues this year about a broad range of issues, including:

- consumers being unable to contact their provider via phone, online webchat, or app
- misleading advertising
- poor sales practices
- account security and privacy breaches
- unfair contract terms
- internet, landline, or mobile faults
- network service outages.

In 2020-21, we closed 30 systemic investigations where members agreed to make improvements.

We referred two systemic issues to regulators. The issues were about:

- consumers being unable to contact their provider to report service disconnections and disputed charges
- non-compliance with telecommunications complaint handling standards.

Regulators took enforcement action on four systemic issues we referred in previous years.

Systemic investigations

Systemic publications

We conduct systemic investigations and raise public awareness about key issues that affect consumers. Systemic investigation publications serve the dual purpose of recommending improvements in industry practice and advising consumers of steps they can take to avoid common issues.

This year, we published three systemic investigation reports including the report [Impact of COVID-19 on phone and internet complaints](#).

We published this report in July 2020, and it covered the period commencing 2019-20.

Meeting the needs of consumers impacted by family violence

Phone or internet problems can be exacerbated or caused by family violence. While the number of complaints from consumers experiencing family violence is relatively low, the detriment suffered is often disproportionately high.

After examining insights gained from our complaints and systemic investigations, we found a concerning trend of complaints where the needs of consumers experiencing family violence were not being met by providers' standard systems and process.

In December 2020, we published a systemic investigation report, [Meeting the needs of consumers impacted by family violence](#). We found consumers impacted by family violence experience significant harm when providers do not have the processes or systems to adequately respond to their unique needs.

Helping telco consumers sign up for the right phone and internet products

Over a period of two years, we conducted a number of systemic investigations that showed consumers do not always understand what they are signing up for. Our complaints revealed problems with the way providers were advertising or selling products or services. Consumers rely on information from providers, and information that is unclear or misleading can lead to problems for both providers and consumers.

In the systemic investigations we conducted, we worked with each provider to improve their selling practices. Improvements included updating advertising, increased staff training, and compensating affected consumers where appropriate.

In May 2021, we published a systemic investigation report [Helping telco consumers sign up for the right phone and internet products](#). The report explores our key findings and offers recommendations for providers and tips for consumers.



"Continuous improvement is not short term. It's a long-term approach to building capability and structure in the business, so our people can deliver on their projects and core responsibilities. In any role, we come across problems every day. It's my job to assess, guide, and equip our people to solve these problems efficiently and self-sufficiently.

In line with the organisation's current strategic goals and objectives, my team is implementing a five-year strategy using the 'Lean' improvement framework.

'Lean' is a philosophy and approach that engages everyone in the business to improve the way we work, finding and eliminating waste every day. It ensures we develop principles and behaviours about how we work that result in a cultural shift and focus on everyday improvement.

The next two years for us is about moving into a continuous improvement phase of our Lean journey. We will start to look at training and educating our people on the principles and tools of Lean. I am excited because I know the benefits of the work we are doing will ensure that together we can all work smarter, not harder."

Peter Willoughby
Improvement Lead





Embargoed until 12.01am Wednesday 22 September 2021

Case study

We worked with a provider to improve its account security process

In September 2019, we notified Sparrow Net about a possible systemic issue with its account security process for consumers experiencing family violence.

During our investigation we found Sparrow Net's existing account security process was not always suitable for consumers who were experiencing family violence. Many consumers said the perpetrator was able to access their account using Sparrow Net's standard verification processes, both over the phone and online. This was because the perpetrator was able to pass the security checks using information they already knew about the consumer.

Consumers also complained Sparrow Net:

- inadvertently sent emails and letters containing personal information about the consumer to the perpetrator
- did not remove a perpetrator's authority on the consumer's account when requested
- did not transfer ownership of a service to or from the consumer's account when requested
- agreed to add a password to the consumer's account but did not request it in later interactions.

We worked with Sparrow Net over the course of a year to improve its account security processes to prevent consumers' personal information being accessed or disclosed without authority. Sparrow Net stopped using the consumer's personal information as its main authentication method. Sparrow Net now sends a One Time PIN to the mobile number listed on the account.

Names of all parties have been changed.

.....

We worked with Sparrow Net over the course of a year to improve its account security processes to prevent consumers' personal information being accessed or disclosed without authority.

Contribution to public policy

We made 23 submissions to policy consultations this year. Of the 23 submissions, 10 were significant contributions to public policy consultations and 13 were shorter submissions or comments. Our submissions are based on our insights from handling complaints and systemic investigations, as well as our analysis of complaint trends.

Of those 23 submissions, the regulatory or government agency has concluded 14 of the consultation processes. Of the concluded policy consultations, all 14 of our submissions influenced change with our recommendations either been adopted or the outcome was consistent with our position.

We made submissions across a wide range of areas, including the three below.

Consumer Safeguards Review

In late 2020, the Government consulted on the final part of its review of consumer safeguards in the telecommunications industry. We made a submission to the final consultation, Part C, which focused on choice and fairness. We also made submissions to the earlier consultations: Part A on redress and complaints handling, and Part B on the reliability of telecommunications services.

In our submission to Part C of the Consumer Safeguards Review, we welcomed proposed enhancements to the way consumer protection rules are made and enforced. Our submission also noted it is important for choice and fairness rules to reflect the current state of the market, its participants, and the continuously evolving nature of telecommunications products and services.

We made recommendations in three key areas. We suggested that self-regulation of the telecommunications industry can still play an important role in a well-functioning market. We also noted that moving to direct regulation of essential consumer protections would ensure and enhance choice and fairness. Lastly, we recommended that an expanded regulatory toolkit should be designed to drive better consumer outcomes.

NBN rules

We put forward several submissions to consultations about changes to NBN rules and regulations.

As more phone and internet services are delivered over the NBN, the number of complaints about those services continues to increase. We work closely with NBN Co and providers to identify emerging issues and resolve complaints. We are well placed to share complaints data, insights, and case studies about consumers' experience of the NBN and the challenges faced by both consumers and providers.

As the NBN rollout moves into its later stages, we are seeing more complaints about connections that were postponed due to their complexity. Complaints from small businesses about technical issues on the NBN are amongst our most complex to resolve.

We made recommendations on the need for clear guidance for both consumers and providers, current pricing structures, network coverage issues, and the need for all consumers to have reliable access to the NBN.

Our submissions were in response to consultations on:

- NBN Consumer Experience Rules
- [Inquiry into NBN access pricing](#)
- NBN Pricing Review (Round 1)
- [Inquiry into the business case for the NBN and the experiences of small businesses](#)

Emerging area: Digital app marketplaces

In October 2020, the Australian Competition and Consumer Commission (ACCC) ran a consultation on app marketplaces. The ACCC investigated the experiences of consumers, developers, suppliers, and others in a new report scrutinising mobile app stores. This consultation is part of the ACCC's wider Digital Platform Services Inquiry.

The ACCC's report is focused on the competitiveness, efficiency, transparency, and effectiveness of app stores. These factors contribute to the extent to which app stores provide value to consumers and prevent potential harm (for example, from scam apps).

In [our submission](#), we offered our observations on the complaint mechanisms available to consumers of app marketplaces. We noted that currently there is no single, formalised pathway for resolving complaints where the digital platform's internal dispute resolution pathways have failed.

We recommended that consumers would benefit from a unified, industry-based redress scheme for complaints. Our submission was acknowledged in the ACCC's final report. They agreed that the lack of robust internal complaints handling processes by major app marketplaces reinforces the merits of an external dispute resolution body for digital platforms.



"I usually work as a Data Integrity Officer, but I recently took on a secondment as a Technology Projects Officer in the Project Echo team. In my new role, I get to use my skills in system analysis and design to help build new systems and processes in Early Resolution.

Project Echo will impact the whole business, but in particular, it will simplify things for Early Resolution Officers. Their job will stay the same, but the way they record and process complaints will change for the better. The system will be less prescriptive, which allows people to make a decision about the information they've recorded and move on to the next complaint.

Project Echo will make it so much easier for people across the whole business to do their job. And that means consumers and members are going to have a better experience with us too."

Fabian Morris
Technology Projects Officer

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Overview and governance

Overview and governance

Telecommunications Industry Ombudsman Limited (TIO Ltd) was established in 1993 to provide a free and independent dispute resolution service for individual consumers and small businesses with unresolved complaints about their telephone or internet service in Australia.

Under Sections 128 and 132 of the Telecommunications (Consumer Protection and Services Standards) Act 1999, carriers and eligible service providers are required to be members and to fund the scheme.

The Ombudsman has jurisdiction to deal with complaints about telephone and internet services and has authority to make decisions up to \$50,000 that are binding on the service provider, and to make recommendations up to \$100,000.

The TIO Ltd is a not-for-profit company, limited by guarantee and governed by a Board of Directors with equal numbers of industry, consumer, and independent directors, with one of the independent directors as Chair.

Under the Terms of Reference, the Board is responsible for maintaining the independence of the Ombudsman, and delegates complaint handling to the Ombudsman. The Ombudsman leads the organisation and is responsible for implementing the TIO strategy and providing a fair, independent, and accessible service.

The TIO Ltd's financial report for the year ending 30 June 2021 will be available to download from www.tio.com.au following the Annual General Meeting.

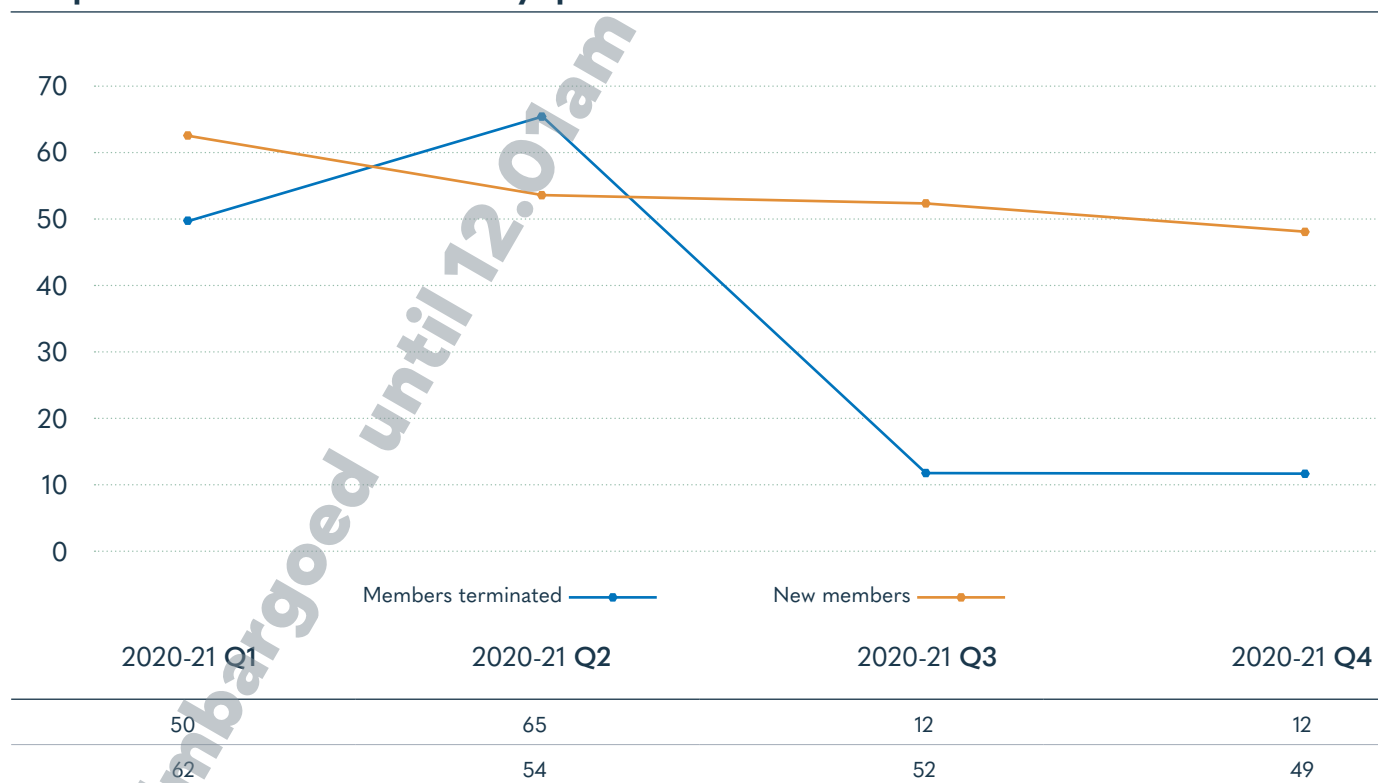
Our members

The number of members increased this year, and we now have 1,511 members. 139 members left* and 217 providers joined during the year. Members leaving the scheme either stopped trading as a telecommunications provider or stopped trading altogether.

In 2020-21, we referred 11 providers to the ACMA for failing to join the scheme. Since referral to ACMA, five entities have since joined, four were deemed not required to join, and two are under investigation.

*This includes members who were within the cessation period at the end of financial year 2020, which were not included in the financial year 2020 active membership count.

Graph 7 Member statistics by quarter 2020-21



[Click on the link above](#)

Our Board

To ensure our independence, our Board is chaired by an independent Director and contains a balance of Directors with industry and consumer experience and two independent Directors. The Board governs the business affairs and property of Telecommunications Industry Ombudsman Ltd in accordance with the Company Constitution, Terms of Reference, and corporate law.



Independent Chair

Independent Director with Not-For-Profit Governance Experience

Professor The Hon. Michael Lavarch — AO, LLB

Michael has held senior roles in government, including serving as Australia's Attorney-General (1993-1996). He has also held the roles of Secretary-General of the Law Council of Australia and Commissioner for the Australian Skills Quality Authority. He is an Emeritus Professor of Law at the Queensland University of Technology and Chief Adjudicator on the Alcohol Beverages Advertising Code adjudication panel. Michael is Chair of Way Forward Debt Solutions and Australian Catholic Safeguarding Limited. He is also a Member of the Queensland Treaty Advancement Committee. In 2012, Michael was appointed an Officer of the Order of Australia for distinguished service to law, education, and human rights.



Director with Consumer Experience

Dr Paul Harrison — PhD, GAICD, MAM

Paul is the Unit Chair and Senior Lecturer of Marketing and Consumer Behaviour (MBA), Deakin University, and Deputy Director of Deakin Business School's MBA Program. He is also Adjunct Professor of HR and Governance at Università Cattolica del Sacro Cuore, Milan. Paul is also a member of the Consumer Advisory Committee of Consumer Affairs Victoria and an Advisory Board Member for The Nourish Network. He researches and writes in the fields of consumer behaviour, behavioural economics, and consumer policy, and his work is published widely, both nationally and internationally.



Director with Industry Experience

Mr John Lindsay — GAICD

John is a company director and consultant. He is a director of Jtwo Solutions Pty Ltd, UltraCommerce Internet Pty Ltd, Redflow Ltd, and Uniti Group Ltd. John has over 25 years' experience building and managing internet service providers including Chariot, Internode, and iiNet Ltd. He is a graduate member of the Australian Institute of Company Directors.



Independent Director with Commercial Governance Experience

Geoff Nicholson — BEc, MBA, FCA, GAICD, CSEP

Geoff is a Director of United Energy Distribution Holdings Limited and Athletics Australia Limited. He is Trustee of the R E Ross Trust and Chair of its fully owned subsidiary Hillview Quarries Pty Ltd. He is a consultant to Endeavour Energy, New South Wales, as well as being a member of Endeavour Energy's Audit and Risk Committee. Geoff's former positions include the Chairman of Hanover Welfare Services, non-executive director of Sensis, the KAZ Computing Group and Marchmont Hill Consulting Pty Ltd, Chief Financial Officer at AusNet Services, and Executive Director, Finance at Telstra Corporation Limited. He was also Foxtel's first Chief Financial Officer.



Director with Not-For-Profit Governance Experience

Julie Hamblin — BA LLB (Hons) (Syd), LLM (McGill), FAICD

Julie has more than 25 years' experience as a lawyer and policy consultant in the health, disability, and not-for-profit sectors, specialising in governance and risk. She currently chairs the Board of Maluk Timor Australia and is an independent Board member of the Royal Australian and New Zealand College of Obstetricians and Gynaecologists. She is also Deputy Chair of the Australian Research Integrity Committee. Previous Board roles have included Chair of Autism Spectrum Australia and Deputy Chair of Plan International Australia. She has a particular interest in global health having worked with the United Nations Development Programme and other organisations on projects relating to public health and HIV/AIDS in more than 20 countries in Asia, the Pacific, Africa, and Eastern Europe.



Director with Consumer Experience

Gordon Renouf — BA, LLB

Gordon is Deputy Chair of the Consumers' Federation of Australia, Chair of the Australian Securities and Investments Commission's Consumer Advisory Panel, and CEO of Good On You Pty Ltd. He has been a consumer advocate for more than 30 years working at CHOICE, the North Australian Aboriginal Legal Service and several community legal centres. Gordon recently completed nine years as Deputy Chair of Justice Connect.



Director with Consumer Experience

Catherine Wolthuizen — BA (Hons), LLB

Catherine is an independent consumer representative to the Australian Financial Complaints Authority and is Chair of the Consumer Policy Research Centre. She is a Member of the Economic Abuse Reference Group and also NAB Customer Advocate. Catherine is a Director of the Victorian Legal Services Board and is Chair of that organisation's Consumer Advisory Panel. She was an Ombudsman and Head of Market Affairs at the UK's Financial Ombudsman Service and is a former CEO of the Consumer Law Centre Victoria. Her overseas experience includes running an international human rights NGO, Fair Trials, and the UK's whistleblower NGO as well as helping establish the UK's consumer financial capability service.



Director with Industry Experience

Andrew Sheridan — CA, MA (Hons)

Andrew is the Vice President of Regulatory and Public Affairs for Optus with responsibility for managing Optus' relationship with key external stakeholders from the Government, regulatory bodies such as the ACCC and ACMA, and the media. The group also develops Optus' position on industry structural issues, competition, and compliance policies.



Director with Industry Experience

Mira Bashi — BBM (Marketing), GAICD

Mira is the Customer Experience Designs and Insights Executive for Telstra Corporation Limited. Mira has worked in the telecommunications industry for over 25 years, across several major international brands, with experience in product management, development, designing, and improving end-to-end customer experiences.

Glossary

Data and complaints terminology

This section explains the finer points of our data and complaints terminology.

Case

A case is an escalated complaint. An escalated complaint is a subset of an unresolved complaint that proceeds to dispute resolution.

Complaints

Where we talk about complaints, these:

- are expressions of dissatisfaction about a provider when the consumer has contacted the provider and is not satisfied with the outcome. We send complaints to specialist teams at providers for another attempt at resolution. Most complaints are resolved in this process
- may include more than one issue
- do not include enquiries, enquiry referrals or withdrawn complaints.

Conciliation

We help the consumer and provider reach a mutually acceptable resolution to the complaint.

Contacts

Where we talk about contacts, these:

- include calls, emails, and online forms that come through our public portals
- exclude calls and emails to individual staff members and abandoned calls
- exclude identified data anomalies within the financial year
- include all contact up until a complaint is classified as unresolved.

Data updates

If a complaint or enquiry is withdrawn or cancelled before the end of the financial year, we remove it from the annual report. If a complaint is reclassified before the end of the financial year, we reflect this in the annual report.

Decision

The Telecommunications Industry Ombudsman decides how the complaint should be resolved. The decision is binding on the provider if the consumer accepts it.

Dispute resolution is where we work with providers and consumers to resolve escalated complaints.

Early resolution is where we take initial contacts from consumers and log them as enquiries or refer complaints to providers.

Enquiries includes enquiries and enquiry referrals.

Enquiry referrals are complaints that have not been raised with the provider before a consumer contacts us. We send these complaints to providers but give providers a longer time to try to resolve these.

Escalated complaints are a subset of unresolved complaints that proceed to dispute resolution.

Some unresolved complaints are not escalated – this can be because the issue is resolved before escalation, the issue that remains unresolved is not a matter we can assist with, or the consumer decides not to proceed with the complaint.

Complaints that are reclassified before the end of the financial year will be removed from the total count of escalated complaints. Complaints can be reclassified if they are escalated in error (for instance, the issue was already resolved).

Fault and connection complaints are complaints that include a fault or connection issue. These are only counted once, regardless of the number of issues raised in the complaint. These complaints may have other issues that do not relate to faults or connections. Faults and connections include issues from the connection, no service, and poor service quality issue sub-categories.

Internet complaints relate to services delivered over fixed-line or fixed wireless internet connections.

These complaints do not include internet services delivered by mobile devices or Voice over Internet Protocol (VoIP) services delivered over the internet.

Investigation

We collect and analyse information from the consumer and provider to identify a fair resolution to the complaint.

Issues A single complaint can have more than one issue. Where we talk about complaint numbers, we only count complaints once. Where we talk about issues, we count all the issues.

Issues in complaints are recorded based on six broad categories that follow the lifecycle of a consumer's relationship with their phone or internet provider. From September 2019, we introduced new keywords to better capture the emerging issues in complaints. For a complete list of issues in complaints see pages 78 and 79.

Landline complaints includes complaints about voice services delivered over the Public Switched Telephone Network (PSTN) and voice services delivered over the National Broadband Network (VoIP services delivered over fixed-line internet connections are also included).

Member groupings Optus group includes "Optus Internet Pty Ltd", "Optus Mobile Migrations Pty Ltd", "Optus Mobile Pty Ltd", and "Optus Networks Pty Ltd". TPG group includes "TPG internet Pty Ltd" and "TPG Network Pty Ltd".

Member status If members are currently undergoing cessation to terminate their membership, they are not included in the count of active members.

Mobile complaints are complaints relating to a mobile telephone device or service, including complaints about internet accessed through a mobile telephone service.

Multiple complaints relate to complaints about more than one service type with the same provider.

Online includes all web forms and emails.

Percentages within the report have been rounded, so totals may not add to 100%.

Preliminary view

If the consumer and provider can't resolve the complaint together, the Telecommunications Industry Ombudsman or the Ombudsman's delegates suggests a resolution. The preliminary view takes into account the law, good industry practice, and what is fair and reasonable.

Property complaints includes complaints about damage to a provider's or landowner's property, or a dispute about use of property by a carrier.

Referral describes the process of sending an enquiry or complaint to the provider after the consumer's first contact with us. The provider has different timeframes to try to resolve the issues, depending on whether it is a complaint or enquiry referral.

Residential complaints include complaints from individual consumers.

Small business includes small businesses, not-for-profits, and charities.

Top 10 providers Where we talk about the Top 10 providers, we mean those we received the most complaints about in the quarter. The data does not reflect the number of customers or services in operation. A consumer making a complaint does not necessarily mean a provider or network operator is at fault.

Unresolved complaints An unresolved complaint is a complaint or enquiry referral that the consumer tells us was not resolved after we referred it to the provider. Most unresolved complaints proceed to dispute resolution and are called escalated complaints.

Complaint issue categories

Establishing a service

Category	Keyword
Making a contract	Product unsuitable
	Inadequate documentation
	Inadequate credit assessment
	Inadequate explanation of product*
	Refused a service
	Cooling off
	Unable to contract
	Misleading conduct
	Unconscionable conduct
In contract	Variation by provider
	Request to change account holder
	Not liable for contract
	Unfair contract terms
	Equipment finance agreement
	Mishandling of business information
	Failure to cancel*
Connection	Delay
	Number problem
	Changing provider*
	Unauthorised transfer

Service delivery

Category	Keyword
No service	No service
	Disconnection in error
	Network outage
Poor service quality	Intermittent/drop outs
	Poor mobile coverage
	Noise/interference
	Slow data speed
	Restricted service
Equipment	Unsuitable
	Fault
Special services	Priority assistance
	Disability equipment
	Enhanced/add-on feature
	Directory listing - business

*New keyword introduced from September 2019.

Customer service

Category	Keyword
Personal information	Object to collection
	Unauthorised disclosure
	Information inaccurate
	Access denied
	Silent number/directory listing
Compensation sought*	Business loss*
	Customer Service Guarantee*
	Other financial loss*
	Non-financial loss*
Provider response	Uncontactable
	Refusal to deal with representative
	Missed appointment
	No or delayed action
	Resolution agreed but not met
	Rudeness
	Unwelcome/life threatening communications
	Inadequate fault testing*

Payment for a service

Category	Keyword
Charges and fees	Bill unclear/not received
	Excess data
	Excess call/sms/mms
	Roaming
	3rd party*
	Fee for a bill
	Connection/reconnection
	Late payment/dishonour
	Termination
	Service and equipment
	Technician
Payments	Direct debit
	Missing payment
	Unsuitable payment options
	Payment extension
Debt management	Financial hardship/repayment arrangement
	Barring/suspension/disconnection
	Credit default report
	Sold debt
	Debtor harassment
	Statute barred debt/bankrupt
	Not liable for debt

Property

Category	Keyword
Infrastructure	Hazardous, non-compliant or temporary infrastructure
	Location of equipment
Damage	By consumer
	By provider
	By 3rd party

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Complaint distribution



A1 Complaints by service type change: 2019-20 to 2020-21

Year	 Internet	 Landline	 Mobile	 Multiple	 Property	Total
2020-21	39,857	13,060	39,094	26,655	734	119,400
2019-20	42,883	15,992	39,701	27,304	1,271	127,151
YoY Change %	-7.1%	-18.3%	-1.5%	-2.4%	-42.3%	-6.1%

A2 Complaints by service type: 2018-19 to 2020-21

Year	 Internet	%	 Landline	%	 Mobile	%	 Multiple	%	 Property	%	Total	%
2020-21	39,857	33.4%	13,060	10.9%	39,094	32.7%	26,655	22.3%	734	0.6%	119,400	100
2019-20	42,883	33.7%	15,992	12.6%	39,701	31.2%	27,304	21.5%	1,271	1.0%	127,151	100
2018-19	43,164	32.6%	17,267	13.0%	40,103	30.3%	30,678	23.2%	1,175	0.9%	132,387	100

A3 Complaints by consumer type: 2018-19 to 2020-21

Year	 Residential	%	 Small Business	%	Total	%
2020-21	99,711	83.5%	19,689	16.5%	119,400	100
2019-20	108,673	85.5%	18,478	14.5%	127,151	100
2018-19	112,895	85.3%	19,492	14.7%	132,387	100

A4 Enquiries: 2018-19 to 2020-21

FY	Enquiries
2020-21	32,450
2019-20	37,912
2018-19	40,464

A5 Top 10 issues 2020-21






Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	41,669	46,533	39.0%	11.7%
Service and equipment fees	42,152	39,584	33.2%	-6.1%
No phone or internet service	17,501	15,593	13.1%	-10.9%
Delay establishing a service	17,347	14,170	11.9%	-18.3%
Intermittent service or drop outs	11,789	10,913	9.1%	-7.4%
Resolution agreed but not met	13,259	10,275	8.6%	-22.5%
Provider uncontactable	4,672	8,800	7.4%	88.4%
Failure to cancel a service*	6,753	8,775	7.3%	29.9%
Slow data speed	8,721	7,122	6.0%	-18.3%
Service problem with add-on feature eg email, call waiting, alarm etc failure	2,079	4,344	3.6%	108.9%

*New keyword introduced from September 2019

Residential complaints

A6 Residential complaints by service type: 2018-19 to 2020-21



Year	 Internet	%	 Landline	%	 Mobile	%	 Multiple	%	 Property	%	Total
2020-21	35,911	36.0%	8,117	8.1%	35,096	35.2%	19,934	20.0%	653	0.7%	99,711
2019-20	39,485	36.3%	10,685	9.8%	35,693	32.8%	21,653	19.9%	1,157	1.1%	108,673
2018-19	39,522	35.0%	11,934	10.6%	35,815	31.7%	24,549	21.7%	1,075	1.0%	112,895

A7 Top 10 issues in residential complaints 2020-21








Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	35,347	38,431	38.5%	8.7%
Service and equipment fees	36,576	33,517	33.6%	-8.4%
No phone or internet service	14,229	12,108	12.1%	-14.9%
Delay establishing a service	14,577	11,428	11.5%	-21.6%
Intermittent service or drop outs	10,225	9,526	9.6%	-6.8%
Resolution agreed but not met	11,569	8,671	8.7%	-25.0%
Provider uncontactable	4,282	7,704	7.7%	79.9%
Failure to cancel a service*	5,820	7,211	7.2%	23.9%
Slow data speed	7,982	6,430	6.4%	-19.4%
Missed appointment	3,926	3,658	3.7%	-6.8%

*New keyword introduced from September 2019

Small business complaints

A8 Small business complaints by service type: 2018-19 to 2020-21



Year	 Internet	%	 Landline	%	 Mobile	%	 Multiple	%	 Property	%	Total
2020-21	3,946	20.0%	4,943	25.1%	3,998	20.3%	6,721	34.1%	81	0.4%	19,689
2019-20	3,398	18.4%	5,307	28.7%	4,008	21.7%	5,651	30.6%	114	0.6%	18,478
2018-19	3,642	18.7%	5,333	27.4%	4,288	22.0%	6,129	31.4%	100	0.5%	19,492

A9 Top 10 issues in small business complaints 2020-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	6,322	8,102	41.1%	28.2%
Service and equipment fees	5,576	6,067	30.8%	8.8%
No phone or internet service	3,272	3,485	17.7%	6.5%
Delay establishing a service	2,770	2,742	13.9%	-1.0%
Business loss	1,563	1,771	9.0%	13.3%
Resolution agreed but not met	1,690	1,604	8.1%	-5.1%
Failure to cancel a service*	933	1,564	7.9%	67.6%
Intermittent service or drop outs	1,564	1,387	7.0%	-11.3%
Disconnection in error	875	1,115	5.7%	27.4%
Provider uncontactable	390	1,096	5.6%	181.0%

*New keyword introduced from September 2019

Complaints about internet services



A10 Internet complaints by year: 2018-19 to 2020-21



Year	Complaints	Proportion of complaints
2020-21	39,857	33.4%
2019-20	42,883	33.7%
2018-19	43,164	32.6%

A11 Internet complaints by consumer type: 2018-19 to 2020-21



Year	 Residential	%	 Small Business	%	Total
2020-21	35,911	90.1%	3,946	9.9%	39,857
2019-20	39,485	92.1%	3,398	7.9%	42,883
2018-19	39,522	91.6%	3,642	8.4%	43,164

A12 Top 10 issues for internet services 2021-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	13,729	14,721	36.9%	7.2%
Service and equipment fees	14,079	11,901	29.9%	-15.5%
Delay establishing a service	8,265	7,085	17.8%	-14.3%
No phone or internet service	6,803	6,639	16.7%	-2.4%
Intermittent service or drop outs	6,875	6,590	16.5%	-4.1%
Slow data speed	6,852	5,402	13.6%	-21.2%
Failure to cancel a service*	3,075	3,469	8.7%	12.8%
Provider uncontactable	2,007	2,863	7.2%	42.7%
Resolution agreed but not met	3,767	2,775	7.0%	-26.3%
Missed appointment	2,474	2,647	6.6%	7.0%

*New keyword introduced from September 2019

A13 Internet fault and connection complaints by network: 2019-20 to 2020-21

Year	Services delivered over the NBN	Services delivered over other networks
2020-21	19,982	5,187
2019-20	19,045	8,644

Complaints about mobile services



A14 Mobile complaints by year: 2018-19 to 2020-21



Year	Complaints	Proportion of complaints
2020-21	39,094	32.7%
2019-20	39,701	31.2%
2018-19	40,103	30.3%

A15 Mobile complaints by consumer type: 2018-19 to 2020-21



Year	 Residential	%	 Small Business	%	Total
2020-21	35,096	89.8%	3,998	10.2%	39,094
2019-20	35,693	89.9%	4,008	10.1%	39,701
2018-19	35,815	89.3%	4,288	10.7%	40,103

A16 Top 10 issues for mobile services 2021-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	13,053	16,034	41.0%	22.8%
Service and equipment fees	14,482	14,787	37.8%	2.1%
Resolution agreed but not met	4,842	4,067	10.4%	-16.0%
Poor mobile coverage	2,926	3,197	8.2%	9.3%
Equipment Fault	2,418	2,594	6.6%	7.3%
Misleading conduct when making a contract	3,300	2,438	6.2%	-26.1%
Provider uncontactable	1,154	2,437	6.2%	111.2%
Variation to contract or plan by provider	1,484	2,146	5.5%	44.6%
Failure to cancel a service*	1,245	1,656	4.2%	33.0%
Delay establishing a service	1,901	1,505	3.8%	-20.8%

*New keyword introduced from September 2019

A17 Mobile fault and connection complaints by network: 2019-20 to 2020-21

Year	Services delivered over the NBN	Services delivered over other networks
2020-21	-	9,566
2019-20	-	8,858

Complaints about multiple services



A18 Multiple complaints by year: 2018-19 to 2020-21



Year	Complaints	Proportion of complaints
2020-21	26,655	22.3%
2019-20	27,304	21.5%
2018-19	30,678	23.2%

A19 Multiple complaints by consumer type: 2018-19 to 2020-21



Year	 Residential	%	 Small Business	%	Total
2020-21	19,934	74.8%	6,721	25.2%	26,655
2019-20	21,653	79.3%	5,651	20.7%	27,304
2018-19	24,549	80.0%	6,129	20.0%	30,678

A20 Top 10 issues for multiple services 2021-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	9,612	10,676	40.1%	11.1%
Service and equipment fees	9,817	9,873	37.0%	0.6%
No phone or internet service	5,561	4,553	17.1%	-18.1%
Delay establishing a service	5,026	3,969	14.9%	-21.0%
Failure to cancel a service*	1,663	2,694	10.1%	62.0%
Intermittent service or drop outs	2,991	2,567	9.6%	-14.2%
Provider uncontactable	1,020	2,447	9.2%	139.9%
Resolution agreed but not met	3,201	2,408	9.0%	-24.8%
Bill unclear or not received	1,292	1,380	5.2%	6.8%
Slow data speed	1,483	1,222	4.6%	-17.6%

*New keyword introduced from September 2019

A21 Multiple fault and connection complaints by network: 2019-20 to 2020-21

Year	Services delivered over the NBN	Services delivered over other networks
2020-21	9,717	3,370
2019-20	10,321	4,853

Complaints about landline services



A22 Landline complaints by year: 2018-19 to 2020-21



Year	Complaints	Proportion of complaints
2020-21	13,060	10.9%
2019-20	15,992	12.6%
2018-19	17,267	13.0%

A23 Landline complaints by consumer type: 2018-19 to 2020-21



Year	 Residential	%	 Small Business	%	Total
2020-21	8,117	62.2%	4,943	37.8%	13,060
2019-20	10,685	66.8%	5,307	33.2%	15,992
2018-19	11,934	69.1%	5,333	30.9%	17,267

A24 Top 10 issues for landline services 2020-21



Complaint Issue	2019-20	2020-21	2020-21 % of total	Change from 2019-20
No or delayed action by provider	5,206	5,052	38.7%	-3.0%
No phone or internet service	4,408	3,364	25.8%	-23.7%
Service and equipment fees	3,750	3,012	23.1%	-19.7%
Delay establishing a service	2,148	1,610	12.3%	-25.0%
Number problem due to connection, disconnection or transfer	1,555	1,151	8.8%	-26.0%
Provider uncontactable	487	1,047	8.0%	115.0%
Resolution agreed but not met	1,427	1,013	7.8%	-29.0%
Failure to cancel a service*	770	955	7.3%	24.0%
Partially restricted service	1,187	940	7.2%	-20.8%
Disconnection in error	837	840	6.4%	0.4%

*New keyword introduced from September 2019

A25 Landline fault and connection complaints by network: 2019-20 to 2020-21






Year	Services delivered over the NBN	Services delivered over other networks
2020-21	5,582	2,800
2019-20	6,235	4,553

Complaints by provider

A26 Top 10 service providers by complaints 2020-21

Provider	2019-20	2020-21	2020-21 % of total	Change from 2019-20
Telstra Corporation	66,612	74,135	62.1%	11.3%
Optus Group*	26,205	18,900	15.8%	-27.9%
Vodafone Australia Limited	6,412	5,668	4.7%	-11.6%
TPG Group*	6,471	3,913	3.3%	-39.5%
iiNet Ltd	5,723	2,929	2.5%	-48.8%
Southern Phone Company Ltd	1,300	1,561	1.3%	20.1%
Dodo Services Pty Ltd	1,573	1,062	0.9%	-32.5%
Aussie Broadband Limited**	763	1,047	0.9%	37.2%
Boost Tel Pty Ltd	751	964	0.8%	28.4%
Foxtel Management Pty Limited	524	693	0.6%	32.3%

A27 Top 10 service providers by service type 2020-21

Provider	 Internet	%	 Landline	%	 Mobile	%	 Multiple	%	 Property	%	Total
Telstra Corporation	23,841	32.2%	9,567	12.9%	21,134	28.5%	19,307	26.0%	286	0.4%	74,135
Optus Group*	4,557	24.1%	1,127	6.0%	9,803	51.9%	3,364	17.8%	49	0.3%	18,900
Vodafone Australia Limited	782	13.8%	9	0.2%	4,466	78.8%	407	7.2%	4	0.1%	5,668
TPG Group*	2,601	66.5%	327	8.4%	244	6.2%	729	18.6%	12	0.3%	3,913
iiNet Ltd	1,869	63.8%	350	11.9%	158	5.4%	544	18.6%	8	0.3%	2,929
Southern Phone Company Ltd	401	25.7%	280	17.9%	585	37.5%	294	18.8%	1	0.1%	1,561
Dodo Services Pty Ltd	601	56.6%	85	8.0%	135	12.7%	235	22.1%	6	0.6%	1,062
Aussie Broadband Limited**	786	75.1%	92	8.8%	18	1.7%	146	13.9%	5	0.5%	1,047
Boost Tel Pty Ltd	–	–	–	–	964	100.0%	–	–	–	–	964
Foxtel Management Pty Limited	428	61.8%	50	7.2%	–	–	210	30.3%	5	0.7%	693

*Refer to the glossary for details of member groupings

**Aussie Broadband Limited was previously reported as Aussie Broadband Pty Ltd.

Complaints by state






A28 Complaints by state: 2018-19 to 2020-21

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2020-21	1,545	40,011	707	22,423	8,118	1,905	35,818	8,735
2019-20	1,685	42,594	671	23,427	8,744	1,820	37,679	10,269
2018-19	1,989	42,868	696	25,102	9,828	2,068	37,926	11,845

A29 Percentage of complaints by state: 2018-19 to 2020-21

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2020-21	1.3%	33.5%	0.6%	18.8%	6.8%	1.6%	30.0%	7.3%
2019-20	1.3%	33.5%	0.5%	18.4%	6.9%	1.4%	29.6%	8.1%
2018-19	1.5%	32.4%	0.5%	19.0%	7.4%	1.6%	28.6%	8.9%

A30 Complaints by state and service type 2020-21

State	 Internet	%	 Landline	%	 Mobile	%	 Multiple	%	 Property	%	Total
ACT	522	33.8%	158	10.2%	590	38.2%	267	17.3%	8	0.5%	1,545
NSW	13,600	34.0%	4,661	11.6%	12,204	30.5%	9,282	23.2%	264	0.7%	40,011
NT	234	33.1%	65	9.2%	250	35.4%	154	21.8%	4	0.6%	707
QLD	7,506	33.5%	2,375	10.6%	7,234	32.3%	5,196	23.2%	112	0.5%	22,423
SA	2,408	29.7%	1,059	13.0%	2,864	35.3%	1,738	21.4%	49	0.6%	8,118
TAS	546	28.7%	221	11.6%	723	38.0%	398	20.9%	17	0.9%	1,905
VIC	12,308	34.4%	3,638	10.2%	11,842	33.1%	7,785	21.7%	245	0.7%	35,818
WA	2,718	31.1%	867	9.9%	3,310	37.9%	1,805	20.7%	35	0.4%	8,735

Unresolved and escalated complaints

A31 Top 10 issues in unresolved complaints 2020-21

Unresolved complaint issue	Complaints with issue 2019-20	2020-21	2020-21 % of total	Change from 2019-20
Service and equipment fees	7,719	8,805	36.4%	14.1%
No or delayed action by provider	3,707	4,818	19.9%	30.0%
No phone or internet service	2,592	2,721	11.2%	5.0%
Delay establishing a service	3,025	2,708	11.2%	-10.5%
Intermittent service or drop outs	2,280	2,441	10.1%	7.1%
Failure to cancel a service*	929	1,705	7.0%	83.5%
Resolution agreed but not met	1,786	1,639	6.8%	-8.2%
Slow data speed	1,602	1,611	6.7%	0.6%
Poor mobile coverage	822	1,211	5.0%	47.3%
Problem with add-on feature eg.email, call waiting, alarm etc	418	976	4.0%	133.5%

A32 Time to close escalated complaints: 2018-19 to 2020-21

Days to close	2018-19	2019-20	2020-21	2020-21 closures
<=60	47%	56%	53%	8,714
<=120	85%	86%	88%	14,581
>120	15%	14%	12%	1,969
Total escalated complaints	14,153	16,675	16,607	16,550

A33 Outcome type for closed escalated complaints 2020-21

Type of outcome	Proportion of closed complaints
Financial and non financial outcome	43.8%
Financial outcome only	28.4%
Non financial outcome only	17.2%
No compensation or action by provider	5.5%
Another unknown outcome	5.0%

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You can post a letter to
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VIC 8007** or fax it to **1800 630 614**.

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You can also ask someone else to complain for you or your business, such as a friend, family member or financial counsellor. Ask for our authorisation forms over the phone or find them on our website.



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