



Annual Report

2022-23

Transformation through innovation



**Telecommunications
Industry
Ombudsman**

Acknowledgement of Country

The Telecommunications Industry Ombudsman acknowledges the Traditional Owners of Country throughout Australia, and recognises their enduring connection to land, water, culture and community.

We pay our respects to Elders past and present for they hold the memories, the traditions, the culture, and the hopes of First Nations People.

Sovereignty has never been ceded, this always was and always will be, Aboriginal land.

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Objectives of this report

**The theme
of this year's
annual report is
*Transformation
through
innovation.***

This annual report provides an overview of the Telecommunications Industry Ombudsman's activities from July 2022 to June 2023. We also refer to this period as '2022–23' or 'this financial year'.

In this report, references to 'Telecommunications Industry Ombudsman', 'TIO', 'we', 'us', and 'our' refer to The Telecommunications Industry Ombudsman scheme (TIO Ltd), unless otherwise stated.

Our annual report demonstrates longer-term trends in phone and internet complaints. We are uniquely placed to provide complaint data on phone and internet services and products in Australia.

Our analysis and insights can help improve outcomes for members and consumers. As the telecommunications sector continues to evolve over time, this information is critical to understanding the impacts that new products and services, new retail service providers, and other external factors can have on the industry.

The theme of this year's annual report is 'Transformation through innovation'.

This theme highlights our journey over the year and into the future of adapting the way we work, our processes, structure and systems to ensure we remain agile and relevant in our ever-changing telecommunications environment.

This report covers our year at the TIO:

About us. This chapter outlines who we are and what we do. This includes our purpose and goals, our stakeholders and our roles and responsibilities at the TIO and within the telecommunications sector.

Governance and financials. This section is about how we work and our processes, our legal framework, corporate structure and strategy, the Board of Directors and an overview of our financial performance.

People and culture. Take a deep dive into our people, culture and workplace statistics.

Engaging the community. Read about our engagement with the community through outreach activities such as face-to-face events and education webinars, and our activities in the media and digital space.

Working with our members. This chapter discusses member statistics, how we work with our members, data and insights, education and training.

Contributing to industry improvements. This section discusses our insights and impacts through systemic investigations and policy submissions.

Resolving disputes. Learn about how we resolve disputes, the stages of complaint resolution and our work resolving land access cases.

The year in complaints. In this section, we explore events that shaped the year in telecommunications and present our high-level complaints data and trends. See the appendix for a deep dive into the detailed set of complaints data.

The next three years. In this chapter, we share our strategic goals for the next three financial years and our refreshed organisational values.

Glossary. We define our data and complaints terminology and take you through our complaint categories. This will help you understand some specific wording we use in the report.

Appendix. This is the largest chapter of the report and provides detailed sets of complaints data for 2022–23.

Chair's message



“Blue sky thinking and the imperative to find innovative solutions is vital to helping the TIO refresh and redefine its service for the community we serve.”

We are operating in a dynamic time.

As a Board we are cognisant of the communications, economic and policy environment in which we govern the TIO scheme. In broad terms there have been two trends that have been influential for the TIO over the year. On one hand, the telecommunications sector has witnessed strong performance by providers demonstrated through reduced levels of complaints to our office. On the other hand, Australians have confronted an increasingly uncertain economic environment, with growing but uneven experiences of financial hardship and the need for all industry sectors, including telecommunications, to respond effectively.

Beyond the immediate trends, the further development of public policy governing digital platforms and the design of a consumer protection regime has important implications for external dispute resolution. The Board believes that the TIO should actively participate in this debate by contributing insights from TIO data and our 30 years of experience in external dispute resolution (EDR). EDR has real potential to be a core component in the mix of the consumer protections for this vital industry sector.

Blue sky thinking and the imperative to find innovative solutions is vital to helping the TIO refresh and redefine its service for the community we serve.

‘Transformation through innovation’ is an apt theme for this year’s annual report because it reflects the significant changes in the sector we serve, and the recent changes in our organisation.

The twelve-month period of this annual report covers Ombudsman Cynthia Gebert's first full year as the leader of the TIO. We had input from the 2022 Independent Review which signposted what a modern ombudsman's office should look like. We reset the business case and named a new strategic partner for Project ECHO, our technology transformation project, as a major enabler of the scheme going forward. We also developed a new organisational strategy to guide us through the next three years and restructured the Executive Leadership Team to help us deliver on that strategy.

Our performance over the last three years in achieving our strategic goals leaves us with room to grow and develop. The TIO effectively provided its core dispute resolution function, conducted important systemic investigations and managed the post COVID-19 period including an ongoing model of hybrid working. Getting hybrid working right while building internal engagement and organisation culture remains a work in progress. We know this is a global challenge as many organisations also seek to strike the best balance.

The TIO's services have been measured via regular fairness and satisfaction surveys and yielded good results in terms of consumer satisfaction. However, while the relationship with the regulators and government has been strong over the past 12 months, industry engagement is multifaceted, and the Board recognises there is room for improvement.

The setting of a new strategic plan is often a combination of continuity and the selection of new focus areas. A continuing theme is delivering a valued and valuable service to consumers and industry. Where we want to lift our effort is in being an influential voice through the use of our insights and data, and through sharing these with industry, regulators and the government to contribute to the shaping of policy around telecommunications and communications more broadly.

The new plan naturally reflects the guidance of the 2022 Independent Review of the TIO scheme. The TIO's governing legislation requires that a comprehensive review be undertaken of the scheme every 5 years. The 2022 Independent Review signposted several key improvements which are dependent on the benefits of our technology transformation that is Project ECHO. The delivery of the project will enable better consumer and industry interface with the TIO and assist productivity gains.

Artificial intelligence (AI) is on our agenda over the next twelve to eighteen months as the Board considers its potential role in our organisation. At an operational level we have our eyes on what AI can achieve for complaint handling, always recognising there needs to be multiple channels for consumers to access our services.

The opportunities AI presents in process efficiency and productivity must be balanced with the risks for consumer and provider interactions with our organisation.

There can never be any sense of complacency when it comes to managing risk. We are considering the changing market conditions and lower complaint numbers as positive endorsement of industry initiatives. This means the TIO must be agile, highly cost conscious and able to adapt to shifts in demand. But our people are the TIO's greatest assets. And with a staff attrition rate a touch higher than we would hope for, the Board will have a focus on ensuring staff culture is strong.

Transformation isn't always easy, but the Board and the TIO recognise it is necessary. Our ability to assess, plan, innovate and evolve is our north star. Maintaining this mindset will help us realise our vision of fair and accessible communications for the Australian community.

On behalf of the Board, I thank Cynthia Gebert for her direction, vision and contribution to the organisation in her first year as ombudsman. And I also extend the Board's thanks to all our staff who are dedicated to making the TIO a core and valuable service to the industry and to the wider Australian community.

I thank my fellow directors for their commitment and acknowledge the contributions of Catherine Wolthuizen who resigned from the Board in August 2022, and John Lindsay who retired from the Board in February 2023.

Finally, I also welcome new Board members Gerard Brody and Maha Krishnapillai. Gerard joined in December 2022 as a Director with Consumer Experience, and Maha joined in February 2023 as a Director with Industry Experience. I look forward to working with my fellow TIO Board members and the Executive Leadership Team in the coming year.

Michael Lavarch AO
Board Chair

Ombudsman's message



“Our new strategy will ensure we are more responsive to the needs of our stakeholders and Project ECHO will be the enabler of a new way of working that’s more flexible and adaptive to those needs.”

My first full year leading the organisation has given me time to observe the landscape at the TIO, and what I have seen is the people in our organisation have a passion to do their jobs well. I am equally inspired and energised by the enthusiasm they continue bringing to work because this past financial year has been a big time of transition.

We have had restructures resulting in organisational change and process improvement. We have paved the way for a stronger and more direct organisational voice in the external environment. We have continued to make a positive contribution to improving the processes and practices of telcos through our systemic investigation work, and we have used our data and insights to call for much needed policy change.

We have closed out our 2021–23 strategy and DREAM values, making room for a refreshed and renewed focus. The findings of our 2022 Independent Review offered us the opportunity to look closely at what was working, and what wasn’t, and gave us clear direction to make changes to best meet the needs and expectations of our stakeholders in a dynamic communications environment.

The Fairness and Satisfaction Project has collected valuable feedback from consumers and members about our service and given us guidance on where we are doing well, and where we can continue to improve.

We have been open to trialling new ways of working, including the introduction of automated processes and robotics in our complaint handling processes. In response to an uptick in complaints after the Optus data breach in September 2022, the Dispute Resolution Group launched a new pre-conciliation tool that gave us the ability to be flexible and meet higher demand.

The Early Resolution Group also began an exploration into the use of automation and bots to facilitate contacting consumers for follow-up purposes.

We have also been exploring new ways to engage with our members. The 2023 National Member Forum gave us the opportunity to present a refreshed engagement approach, with a panel of experts from the industry alongside organisational updates. This was one of the most successful forums to date, and we will continue to innovate how we engage with all our stakeholders.

Our technology transformation work in Project ECHO was paused in April last year while we assessed its direction and made sure we were going to get the result we wanted. The group leading the project refocused their efforts to ensure we would achieve the full benefit of the transformation and get what we need out of it at its core. The project has catapulted forward in this past financial year, and we're on track to launch this in the coming months.

The success of Project ECHO is critical to our organisation going forward. It is the enabler of a new way of working that's more flexible and adaptive to the needs of our external stakeholders, and it will improve the user experience for our complaint handlers. Another key outcome we're wanting to see is the provision of more options for consumers and members on how they engage with us on the issues that matter to them.

We've seen complaints trend down throughout the year showing the good work being done by telcos to prioritise their customers and adapt processes. It's been fantastic to see the recommendations from our systemic investigation work be taken on board, and seeing telcos make changes that lead to better outcomes for consumers.

But there are still areas for improvement.

Telcos need to continue to focus on ensuring that they are as accessible as possible and recognise that one-size-fits-all processes don't work for everyone. They must look critically at their interpretation of their obligations and ensure their processes are fair and reasonable and reflect the needs of their customers. With the current cost of living crisis, flexibility is essential to adequately support consumers who may be struggling financially.

With the new financial year, we will be bringing in a refreshed TIO Strategy for 2024–26. We will be pursuing a fair and accessible communications market for Australia through the delivery of our new purpose – to resolve complaints fairly and drive improvement in a dynamic communications environment.

Looking forward, the TIO will be focused on ensuring a fit-for-purpose regulatory regime that reflects current consumer expectations of the telecommunications market. We will continue to push for an empowered regulator in the industry which enforces government-made regulation. We are eager to take part in consultation for improved regulation, and to see the establishment of a telco registration scheme that sets minimum requirements for entry into the market.

We will focus on being attuned to changes in the communications market, how people are using different ways to communicate and ensuring there are adequate consumer protections in the digital platforms space.

Transformation inside our office and in the communications market will continue. We welcome this positive movement for the harvest of benefits it brings for telcos and their customers.

I would like to thank our members, industry bodies, consumer organisations, regulators and government officials for their support and productive working relationships. I thank the Board and the Chair, Professor the Hon Michael Lavarch AO, for his ongoing support of, and guidance in, developing the new strategy and supporting the TIO to achieve its vision and purpose. Special thanks to our Consumer Panel members and my colleagues in the Australian and New Zealand Ombudsman Association for their invaluable feedback and shared wisdom.

Finally, a very big thank you to our enthusiastic and dedicated people. Our people are committed to improving the way we serve the Australian public, and I'm grateful to be working with such a devoted group. We aim to make our service better each day, and I cannot wait to see what we achieve together in the year ahead.

Cynthia Gebert
Ombudsman

About us

Our purpose

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

Telecommunications services have become essential for individual consumers and small businesses. These services allow consumers to fully participate in the economy and to benefit from the social connectivity that the services offer.

In this current environment, our role has never been more important. We are 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 telcos to solve it as efficiently and effectively as possible. We aim to stop a problem from escalating.

Our focus in providing dispute resolution services is to manage cases fairly and independently. This means we do not take sides.

Our services comply with the [Government Benchmarks for Industry-Based Customer Dispute Resolution](#) – accessibility, independence, fairness, accountability, efficiency and effectiveness. We aim to continuously improve the effectiveness of our service.

We use the most appropriate means to resolve a complaint. Starting at referral to conciliation and investigation, and if necessary, decision. We also fulfil a statutory obligation to determine objections from landowners 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 cannot resolve a problem with their phone or internet provider. We work to ensure people can connect with us easily and seamlessly.

We aim to be accessible to everyone in Australia no matter where they live, what means they have, what their needs are, or what language they speak. Our service is free for all consumers.

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 work together with stakeholders, including regulators and government, to help support the ongoing evolution of Australia's dynamic telecommunications industry.

Our values

Our work towards our strategic goals and objectives, outlined in the TIO Strategy for 2021–23, has been underpinned by five values. Under the umbrella of 'Together we DREAM', our values guided every aspect of our work and behaviour.

Dare to be great

This means we:

- work well together to go above and beyond
- seek out challenges and take considered risks
- learn from each other and from our failures
- do what we say we will.

Respect and inspire

This means we:

- value our people, consumers and members
- invest in and empower our people to succeed
- challenge with kindness and dignity for all involved
- be accountable for our words and actions.

Evolve and grow

This means we:

- value each other's experiences, skills and knowledge
- be impartial, fair and act with integrity
- collaborate and succeed together
- adapt together when things change.

Appreciate and celebrate

This means we:

- value each other's ideas and opinions
- value our diversity and include all
- have fun and celebrate our achievements
- say thank you.

Make it easy

This means we:

- keep each other informed while being curious
- reduce waste and simplify our processes
- make transparent and clear decisions
- actively collaborate with each other.



Our strategic goals 2021–23

In 2020, we defined our purpose as providing fair, independent and accessible dispute resolution services and improved outcomes for consumers and members. To achieve this purpose, we developed a three-year strategy that encompassed every aspect of our organisation. The closing out of this strategy has given us much to celebrate and areas we can improve in as we continue on in our mission of being a valued and valuable service to the Australian telecommunications industry and the people we serve.

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

Goal 1: Work with members to reduce complaints and improve practices

Objectives	Measures	2020–21	2021–22	2022–23
1. Drive industry improvement	70% of systemic issue cases where improvements were made by members	97%	86%	86%
2. Continuously improve our delivery	Call handling and case closure times			
	% of calls answered within 60 and 120 seconds	70:80	66:75	76:82
	Time close (handling time in call centre) (mins)	14.01	15.35	14.31
	Time to close (case handle time and turnaround)			
	% of escalated cases closed within 60 and 120 days (including time in the queue) > 75:90	53:88	56:84	43:84
	% of escalated cases closed within 60 and 120 days (excluding time in the queue) > 75:90	77:93	76:92	76:92

Good complaint handling outcomes and industry improvement are at the heart of this goal. One of the ways we drive improvement in industry practices is through our systemics work, bringing issues we see in our complaints data to our members' attention.

Performance summary 2021–23

Over the past three years we consistently exceeded our target in driving industry improvement. Telcos made improvements to processes and procedures based on our recommendations in over 85 per cent of systemic issues we raised.

Our Early Resolution teams fell just short of achieving their overall call handling targets. Despite this, we answered three in four calls from consumers within two minutes, and the average handling time of each contact met or exceeded our target of 15 minutes. To improve our efficiency and effectiveness, we reviewed our call handling procedures with our people and refocused the teams to strike the right balance of timeliness and fairness in call handling.

The last three years for our Dispute Resolution Group have been challenging. The impact of COVID-19 on people resulted in high staff turnover, under resourcing and time spent building capability in inexperienced staff meant some complaints took longer to be resolved. To address these challenges, in 2022 we made changes to our queues, and created new 'flex DRO' roles for Early Resolution Officers to provide flexible resources between Early Resolution and Dispute Resolution and help meet demand.

As a result of the Optus data breach, we introduced automation to our pre-conciliation process, to improve efficiency and the consumer experience.

Although we continued to experience challenges in our core service delivery, there were significant improvements towards the end of 2022–23. Our innovation and improvement measures meant complaint queue volumes and time complaints spent in the queue have stabilised.

Highlights 2022–23

- Developed a pilot program to increase the number of systemic investigations we conduct each year and drive down the time to complete an investigation.
- Referred four systemic issues to regulators about misleading sales practices, billing practices, mis-selling to vulnerable consumers and for failing to engage with our investigation.
- Assessed 317 systemic alerts and completed 107 assessments (where we do further research before launching an official investigation, closing the matter with no further action or monitoring of cases).
- Reduced the number of our "Unresolved complaint" queues from 27 to 17 to help improve resourcing and reduce consumer wait times to have their complaint resolved.
- Introduced a new Hardship, Extra Care (including domestic and family violence) queue, designed for consumers who are vulnerable, affected by domestic and family violence, in financial hardship or otherwise require that extra care and sensitivity.
- Introduced a revised quality assurance framework with more focus on the identification of areas to improve the consumer experience and grow individual capability. In time, this will deliver richer data to identify improvement and coaching opportunities.
- Introduced pre-conciliation automation processes.

Goal 2: Leverage the power of our people to strengthen our capability and performance

Objectives	Measures	2020–21	2021–22	2022–23
3. Be recognised as an Employer of Choice	Employee engagement score (3-year target 75%)	60%	53%	63%
4. Deliver world class external dispute resolution services	% of cases achieving 90% + of the quality criteria (based on IBCDR Benchmarks)	92%	84%	89%

Our people are our most important asset. To achieve this goal, we let our people measure our success through the Employee Engagement Score. We strengthen our capability and performance by having our case handling independently reviewed against quality measures.

Performance summary 2021–23

In 2022, we recorded an Employee Engagement Score of 53 per cent, well below our target, and the leadership group acknowledged sentiment was lower than it should be. As an organisation we worked hard to turn that result around by listening and acting. This included running collaborative workshops with our people to improve communication and understand what our people needed most to thrive in the hybrid working environment. As a result, we recorded a 63 per cent engagement score in 2023. There will be a sustained effort to deliver the improvement and engagement expected from a leading organisation.

Over the life of the strategy, we consistently delivered a high-quality dispute resolution service. Each year we ask an independent organisation to review our case handling against quality measures. This provides us with an independent assurance that we are delivering high quality work and supplements our internal quality assurance processes.

We exceeded our target for case handling quality, with 89 per cent of escalated cases investigated achieving a 90 per cent standard against quality criteria in line with the [Industry Based Customer Dispute Resolution \(IBCDR\) Benchmarks](#). Some of our areas of high performance included correctly applying TIO's jurisdiction, identifying the outcome sought by the consumer from their provider, and communicating in plain language, being clear, straightforward and respectful to both parties.

Highlights 2022–23

- Created a Capability Framework to provide more learning and development opportunities with clear career pathways.
- Commenced monthly all-staff Community Day.
- Developed a new quality assurance process for our Early Resolution area.
- Commenced exploration into our end-to-end quality assurance processes that balances quality, fairness and efficiency and is focused on the ongoing coaching and development of our team.

Goal 3: Create a great consumer and member experience

Objectives	Measures	2020–21	2021–22	2022–23
5. Improve accessibility and awareness of our services	% of consumers awareness of the TIO	75%	Next measured in FY23	49%
6. Improve consumer satisfaction and demonstrate fairness in our services	Consumer satisfaction score CSAT target 87% Fairness Index target +64	Measure in dev	Measure in dev	CSAT 87% Fairness +65
7. Improve member satisfaction and demonstrate fairness in our services	Member engagement and satisfaction score	Measure in dev	Measure in dev	68%

We measure consumer and member awareness and satisfaction to ensure we are delivering a valued and valuable service.

Performance summary 2021–23

In 2021, we commissioned an independent consumer survey, which showed that awareness of our scheme increased since our last survey in 2019. The recent survey results 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. We expanded on this work in 2022 through a new survey, which showed 49 per cent of consumers were aware of the TIO. This survey used a different method to the survey of 2021, and these results are more in line with the awareness results in other industry surveys.

Over the three years of the strategy, we shifted our awareness raising activities to focus on hard-to-reach communities. We did this by increasing our social media activity and strengthening our outreach program. We established a call centre in Western Australia to service consumers in the Australian Western Standard Time Zone. This allowed us to extend our opening hours to create an even better experience for consumers who need our service. We also made resources available on our website in 37 languages, including Auslan.

For our members, we promoted member awareness and experience programs through online member forums, webinars and regular member newsletters.

In 2022, we launched a survey as part of our complaint handling process which gave us useful insight into factors that influence satisfaction and perception. The survey gave us the opportunity to incorporate questions that explored the impact of our processes and referral pathways. We met our customer satisfaction target of 87 per cent, and our fairness index target of over 64 per cent.

We also surveyed members about fairness and satisfaction. And while we experienced challenges with member participation in the survey, preliminary results indicated a 68 per cent satisfaction rate.

It is important we hear from our members about the educational role we play in improving their complaint handling. The data and insights we share aim to reduce the occurrence of complaints and shine a light on key complaint drivers that need to be addressed and member participation is vital to the success of this process.

Highlights 2022–23

- Commenced work on measuring member satisfaction and fairness.
- Ran paid digital campaigns on Facebook and Google to extend our reach.
- Improved search engine optimisation to increase our visibility in Google search and make it easier for people to find relevant information about our service.
- Redesigned our website homepage to make it easier for consumers to access the information they need.

Goal 4: Expand services with innovative solutions and technology

Objectives	Measures	2020–21	2021–22	2022–23
8. Ensure the sustainability of the organisation	85% of marketing materials and merchandise using the cradle-to-cradle approach	Met	Met	Met
9. Refresh our technology for the 21st century	Technology Refresh Program achievement against approved success and quality measures	Project delays	Project delays	Met revised targets
10. Expand our dispute resolution services	% of complaints from new channel and/or services	New channel (WA) in progress	New channel (WA) established	Partly met

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

Performance summary 2021–23

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 consistently met and exceeded our targets by converting our marketing materials to being compostable, recyclable or digitised.

Over the past three years we have been working to deliver Project ECHO, an ambitious and comprehensive refresh of our technology systems. The project encountered delays and hiccups resulting in a pause to reassess and validate our requirements and determine the right path to progress the project. We appointed a new strategic partner to the project and we're now back on track and progressing in line with agreed measures.

We anticipate that we will deliver phase 1 of the complaints management solution in mid November. This phase will improve the experience of the TIO team, provide greater data, insights and process efficiencies and provide a necessary foundation for continuous improvement of our complaints handling service. Subsequent phases, including the consumer and member portals, are planned for later in FY24.

We continued to make the case for being the Digital Platforms Ombudsman, an initiative that would better protect consumers in the new communications landscape. We are waiting to hear the outcome of Commonwealth Treasury's consultation process on the Australian Competition and Consumer Commission (ACCC)'s recommendations in the ACCC's fifth Digital Platform Services Inquiry's interim report.

Highlights 2022-23

- Implemented AUSLAN video complaints to increase accessibility.
- Contributed to the policy environment related to digital platforms dispute resolution and consumer protections.
- Developed a digital library of assets for the community to download on demand.
- Resumed Project ECHO, our technology refresh project, with enhanced resources and a clear delivery date for completion of phase 1.
- Launched a new finance system that streamlines administration and productivity.

Goal 5: Use data and insights to influence policy and shape public debate

Objectives	Measures	2020–21	2021–22	2022–23
11. Identify emerging trends and build our reputation	4 data releases, 3 systemic reports and 10 contributions to public debate	Met	Met	Met
12. Maximise our profile	Media Impact Score	3.1	4.0	4.15

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

Performance summary 2021–23

Over the past three years, we built our systemic investigation work in identifying trends and reducing complaints. We released regular quarterly data releases each year, as well as an annual report.

We published eight systemic investigation reports that highlighted issues we see in complaints and contributed to industry improvement and consumer awareness of our service. For each of these systemic investigation reports, we delivered webinars for members and the community and allowed time at the end for debate and questions. These webinars had strong attendance numbers and engagement and provided robust conversation about the issues our Systemics Team identified.

We met our targets for influencing policy debate through significant contributions to public policy consultations. In 2023, our systemic investigations report of the past three years and our Telecommunications Consumer Protection (TCP) Code submission have been cited by key stakeholders as important and impactful pieces of work. The TIO is in the unique position of being able to bring independent data and case studies to policy dialogue. We will continue to participate in the TCP Code review process as we pursue improved regulation of key consumer protections to reduce further complaints.

At the beginning of the three-year strategy, we introduced a Media Impact Score. This score helps us assess the impact of our media communications work by measuring media coverage and sentiment. In 2023, we achieved Media Impact Score of 4.15 by focusing our media messaging on providing data, research and insights that can be trusted by consumer, industry, regulatory and government stakeholders.

Highlights 2022–23

- Called for direct regulation of consumer protections.
- Pushed for telecommunications to be recognised as an essential service.
- Undertook a three-year review of our systemic work to highlight recurring trends and issues that drive complaints.

The next three years

Our strategic goals 2024–26

With the closing out of our 2021–23 strategy, we are bringing in a refreshed vision and purpose. Our new 2024–26 Strategy is focused on ensuring that we are adapting our systems, processes and ways of working so that we can effectively deliver on our vision and purpose. The work we do to influence policy and lead the discussion on the issues facing phone and internet consumers and providers will help prevent complaints to our office. We will ensure accessible and adaptive processes that respond to fluctuations in demand and industry change and continue our collaborative working relationships that support efficient and fair resolution of complaints.

Vision







Fair and accessible communications market for Australia.

Purpose

We resolve complaints fairly and drive improvement in a dynamic communications environment.



Strategic Goals

-  A flexible, high-performance culture in which we thrive.
-  An operating model that is dynamic and fit for purpose.
-  Deliver a valued and valuable service to consumers and community.
-  Deliver a valued and valuable service to industry.
-  Influential and trusted voice shaping the dispute resolution environment in a changing communications market.
-  Future ready systems and processes to ensure we remain relevant, accessible and effective.

Our core values 2024–26

Our core values – Fairness, Integrity, Collaboration and Excellence – represent the principles and behaviours we aim to uphold in our daily work.

We embrace fairness, integrity, collaboration and excellence as guiding principles that shape our decisions, interactions and achievements. By living these values, we can build a stronger, more united team that thrives.



Improving our service

The telecommunications industry is constantly evolving. New products, services, technologies and providers constantly appear in the market. We are always looking at ways to improve our service delivery, and ensure we are keeping up with the rapidly changing industry.

COVID-19 further accelerated the need for modernisation of our services and the shift to more responsive and action-based operating models. We are investing in digital-era purpose-built initiatives so we can better calibrate our services to consumer behaviour and market forces. Our aim is to unleash our organisation's potential and support our people to deliver even higher-impact services that adapt and scale with resilience.

In order to carry out this process effectively we have focused on some key strategic project areas to establish more agile systems. We are also focused on innovative tactics to improve our complaint handling and reduce wait times.

Strategic projects

Project ECHO

Project ECHO is enabling us to innovate and improve our services to providers and consumers now and into the future. With the introduction of modern technology, the operational benefits of Project ECHO will enable us to support members and consumers more effectively through:

- more flexible technology to enable ongoing improvement
- new automation tools to deliver better customer experiences
- improved case management
- less administration
- improved customer accessibility to meet customer needs in real time
- improved reporting, forecasting and resourcing
- better security and auditing capabilities
- cheaper licensing fees and ongoing operational costs.

In July 2023, we reset the focus, expectations and outcomes of the project after a brief pause, to ensure we continued to deliver on our purpose in a more sustainable and agile manner. This resulted in the appointment of a new strategic partner to deliver Project ECHO. To further ensure the project's success, we also onboarded an in-house delivery team and embedded structured governance processes.

The impact of the reset meant we did not complete the project in 2022 as envisaged. However, we are in a much stronger position to deliver a solution that will meet our needs now and into the future because we invested the time to re-establish the parameters of the project’s desired outcomes.

The full implementation of Project ECHO will complete by June 2024 with continuous improvement and introduction of new functionalities over the course of the next 18 months.

Project ECHO phases

Phase 1 Foundation Phase	Phase 2 Portals and Channels
Complaints management Rolled out between November 2023 and March 2024	New member and consumer portals Rolled out between May and June 2024

Fairness Project

This financial year, our Fairness Project saw consumers, providers and our organisation come together to create a definition and metric for fairness at the TIO.

Using what consumers told us, we established our three fairness qualities – impartial, just and inclusive. These are the qualities our customers said we demonstrate when providing a dispute resolution service that is fair.

Impartial means we stay in the middle and don’t take sides.

Just means we make fair and reasonable decisions based on all available information.

Inclusive means we provide a helpful, efficient and easy service for everyone.

As part of the project, we also established consumer and provider surveys. The surveys measure our fairness using scores and feedback from our key stakeholders. The survey responses we received to date have highlighted the importance of providing accessible processes, clear communication and timely resolutions.

Feedback from providers highlighted that the value of our role isn’t always clear to them. We need to demonstrate more clearly that we provide a fair service by reconnecting telcos with their customers, rebalancing the conversation as an impartial party, resolving complaints quickly and helping them retain their provider-customer relationship.

By focusing on these qualities, our aim is to improve fairness for everyone who uses our service and ensure we are responding to both community and industry expectations.

Independent Review

Legislation and our Constitution require us to commission an independent review of the TIO scheme every five years. In August 2022, Queen Margaret University in Edinburgh published an [Independent Review](#) of the TIO's compliance against the [IBCDR Benchmarks](#).

The review considers our organisation's role and success in managing disputes between consumers, small businesses and providers in the telecommunications sector, and the improvements made since the last Independent Review in 2017. The report also highlights 26 recommendations for the TIO to improve our accessibility, independence, fairness, accountability, efficiency and effectiveness.

To implement these recommendations, we embedded an innovative and iterative approach to rapidly deploy results. In only eight months the TIO has:

1. reduced by more than 50 per cent the average length and time unresolved complaints wait in queues
2. defined reporting protocols with regulatory bodies (ACCC and ACMA)
3. launched process pilots to improve internal processes.

We have seen strong results from implementing these recommendations to date, and will continue to focus on implementing further improvements.

Intranet Migration

With the vision to become a modern digital Ombudsman, 2022–23 has seen the TIO improve internal processes, promote a culture of continuous improvement and better react to internal and external trends. As a result, the TIO identified an opportunity to leverage the Microsoft ecosystem and transform its intranet.

The purpose of this strategic project is to implement an internal online site where employees can create content, communicate, collaborate, and manage tasks and events. The new TIO intranet is an important asset to reinvigorate, support and develop our company culture further – providing the TIO with a simplified, integrated, cloud-enabled and sustainable solution.

Complaint handling improvements

In 2022–23, the overall number of unresolved complaints coming back from providers decreased compared to the previous year. The volume of unresolved complaints was relatively consistent in the first quarter, followed by a sudden increase towards the end of the second quarter resulting from the Optus data breach.

The breach had a ripple effect across the industry. In our office, we saw an increase in complaints relating to contracts, transfers and privacy and those complaints peaked between October and December 2022, prompting us to develop tactics to manage the unexpected demand.

These tactics included meeting with Optus on a regular basis to discuss complaint trends and develop an approach to prioritising complaints from consumers affected by the data breach. This had an effect on the time it took to work on complaints about other providers. We made sure we kept other providers informed and worked collaboratively using new approaches to reduce the time consumers were waiting for a complaint to be resolved.

Our efforts paid off and by April 2023, we reduced the wait time for unresolved complaints to be allocated to a case manager. Our unresolved complaint volume dropped 50 per cent compared to last year.

Pre-conciliation automation process

In the second quarter, we launched a pre-conciliation automation process to target five of our high-volume complaints queues and collect critical information using automation. The automation saw consumers with complaints in these queues receiving questionnaires automatically.

The questions asked were tailored to get the information we need before we progress a complaint to case management. To support this automation, we created an Automation Team. The Automation Team assess the information provided and assign the complaint to a Dispute Resolution Officer (DRO). This process enabled us to significantly reduce the wait times for unresolved complaints to be allocated to a case manager, and the time taken to close a complaint.

We can now process suitable complaints within one to two weeks after they enter our unresolved complaint queue with approximately 50 per cent of those cases closed in less than 21 days.

Flexible Dispute Resolution Officers

In 2022–23, the Operational Excellence group upskilled five of our Early Resolution Officers to create a cross-functional team that works between our Early Resolution and Dispute Resolution teams. This new team helped us with processing the Optus data breach cases and other types of complaints using our new pre-conciliation automation process.

Flexible Dispute Resolution Officers have allowed us to be agile and gain additional insights on complaints when consumers contact us. These officers have also enabled our case managers to focus on other types of unresolved cases.

Providing a service with Extra Care

In the last quarter, as well as reducing the number of our unresolved complaint queues, we also introduced a new Hardship, Extra Care queue which includes complaints where a consumer is experiencing domestic and family violence.

The new Extra Care queue is designed for cases from consumers who are experiencing vulnerability, affected by domestic and family violence, in financial hardship or otherwise require extra care and sensitivity from us. This process will help us improve our queue resourcing and assist us to better train and upskill our people across various complaint types.

Our structure

Our corporate structure consists of a board of directors and a management team that contribute to the company's overall mission and goals.

Our Board

Nine Directors sit on our Board, with equal numbers of industry, consumer, and independent directors. The Chair is required to be one of the independent directors.



Board Chair (Independent)

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 Interim Truth and Treaty Body. In 2012, Michael was appointed an Officer of the Order of Australia for distinguished service to law, education, and human rights.



Director with Industry Experience

Mira Bashi – BBM (Marketing) & GAICD

Mira is the Customer Experience 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.



Director with Consumer Experience

Dana Beiglari – BlnSt, LLB (Hons I)

Dana is the manager of Legal Aid NSW's Consumer Law practice group. As a social justice lawyer, she helps the most vulnerable people in NSW access their consumer protection rights in credit, insurance, and general consumer protection matters. Dana currently represents Legal Aid NSW on forums including the Australian Securities & Investments Commission's Consumer Advisory Panel and the Australian Law Council's Consumer Law Committee.



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 Boards of AVI and Maluk Timor Australia and is an independent Board member of the Royal Australian and New Zealand College of Obstetricians and Gynaecologists. 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 and governance having worked on projects relating to public health and HIV/AIDS across Asia, the Pacific, Africa, and Eastern Europe.



Director with Industry Experience
Maha Krishnapillai – BSc Mathematics & GAICD

Maha has had a career-long history promoting competition and the benefits of technology to deliver better results for all consumers in the telecommunications industry. This has been over 30 years, firstly as a Government regulator, then via a new entrant (Macquarie Telecom) and then to drive competition through the NBN campaign at Optus.



Independent Director with Commercial Governance Experience
Geoff Nicholson – BEc, MBA, FCA, GAICD, CSEP

Geoff is a Trustee of the R E Ross Trust and Chair of its subsidiary, Hillview Quarries. He is a non executive director of United Energy Distribution, a consultant to Endeavour Energy, as well as well as Chairing Endeavour Energy's Audit and Risk Committee. Geoff's former positions include Vice President of Athletics Australia, Chairman of Hanover Welfare Services; non-executive director of Launch Housing, 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 Consumer Experience
Gordon Renouf – BA, LLB

Gordon is Deputy Chair of the Consumers' Federation of Australia and Chair of the Australian Securities and Investments Commission's Consumer Consultative Panel. He is CEO and co-founder of Good On You Pty Ltd. He has been a consumer advocate for more than 30 years in roles at CHOICE, the North Australian Aboriginal Legal Service, and as Deputy Chair of Justice Connect. Gordon recently completed nine years as a member of the Banking Code Compliance Committee.



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 the ACMA and the media. The group also develops Optus' position on industry structural issues, competition, and compliance policies.



Director with Consumer Experience

Gerard Brody – BA (Hons), LLB (Hons), MPPM, GAICD

Gerard is a consumer advocate, having worked as a lawyer, policy officer, and advocate for 20 years. Gerard was the CEO of the Consumer Action Law Centre, a leading consumer advocacy organisation that provides legal assistance and financial counselling, for ten years until February 2023. Gerard was a board director of the Energy and Water Ombudsman (Victoria) from 2014 to June 2023, is also a director of the Australian Financial Complaints Authority as well as Community Legal Centres Australia, the peak body for community legal centres nationally. Gerard is also the Chair of Consumers' Federation of Australia, the peak body for consumer organisations in Australia, representing a diverse range of consumer groups, including most national consumer organisations.

There are three Board Committees that assist the Board in carrying out its functions and responsibilities. These are the Audit, Finance, Risk and Compliance Committee, People Committee, and Nominations Committee.

The role of the Audit, Finance, Risk and Compliance Committee is to assist and advise the Board on the Company's internal and external audit, risk, finance, and compliance management frameworks.

The role of the People Committee is to assist and advise the Board of Directors to fulfil its corporate governance and strategic oversight responsibilities in relation to Board remuneration, performance evaluation, people and culture strategy, people-related policies, and workplace health and safety.

The role of the Nominations Committee is to identify and recommend candidates to fill vacant Board positions in accordance with the TIO Constitution.

For more information on our Board Committees and their activities please see the [2022–23 Directors Report](#).

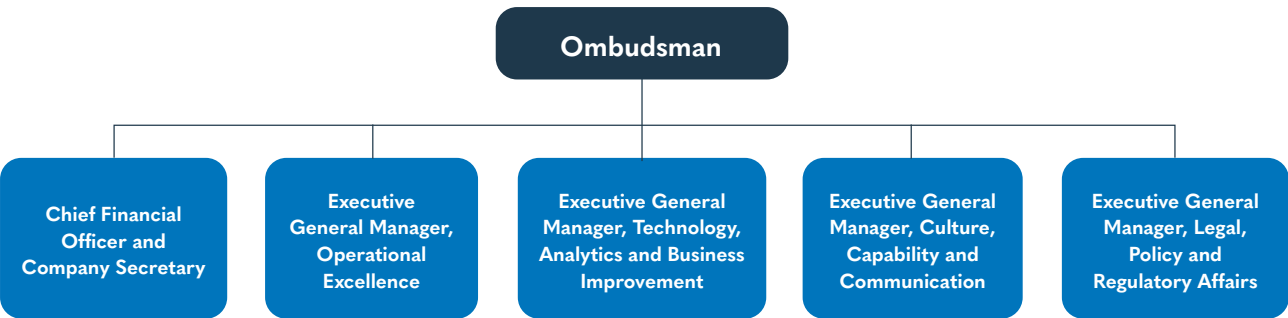
Our Executive Leadership Team

We are managed by an independent Ombudsman in accordance with the TIO Constitution and Terms of Reference. The Ombudsman is responsible for delivering the corporate strategy and managing our day-to-day operations.

In April 2023 we restructured our Executive Leadership Team to better support our Ombudsman and to reflect our current direction. This restructuring enabled us to continue delivering on our purpose, while ensuring we remain future-ready.

The new Executive Leadership Team, led by the Ombudsman, consists of:

- Executive General Manager, Operational Excellence
- Executive General Manager, Technology, Analytics and Business Improvement
- Executive General Manager, Legal, Policy and Regulatory Affairs
- Executive General Manager, Culture, Capability and Communication
- Chief Financial Officer and Company Secretary



Our groups, leaders and responsibilities

The Ombudsman

The Ombudsman is our Chief Executive Officer and is responsible for the operation and future sustainability of the TIO. With direction from the Board, the Ombudsman is accountable for leading the Executive Leadership Team to develop, implement and evaluate the TIO's strategy, plans and budgets in line with our purpose, culture and values.

The Ombudsman makes decisions on complex matters such as land access objections and complaints involving high value claims or compensation for non-financial loss. The Ombudsman also liaises with key stakeholders, including ministers, government departments, industry and consumer groups, and members.



Ombudsman **Cynthia Gebert**

Cynthia Gebert commenced in the role of Telecommunications Industry Ombudsman in May 2022. She is responsible for bringing to life the Board's vision for the TIO, through the implementation and delivery of the organisational strategy.

Prior to joining the TIO, Cynthia held the position of Victoria's Energy and Water Ombudsman for ten years. She has a master's degree in Dispute Resolution from the University of Technology, Sydney and bachelor's degrees in Law and Political Science from the University of Sydney.

Cynthia is the Chair of the Australian and New Zealand Ombudsman Association (ANZOA) and is a 2011 alumni of Leadership Victoria's highly respected Williamson Community Leadership Program. She is also a member of Chief Executive Women.

As a graduate of the Australian Institute of Company Directors, Cynthia is currently a Director of the Thriving Communities Partnership, Thriving Communities Foundation, and Eltham College Limited.

Operational Excellence

The Operational Excellence Group is made up of our Early Resolution and Dispute Resolution teams. These teams are responsible for the end-to-end complaints handling process for consumers and small businesses that have been unable to resolve their phone or internet complaint with their telecommunications service provider.

The group is also responsible for identifying and implementing service, process and individual improvement initiatives to support the delivery on the TIO purpose.



Executive General Manager, Operational Excellence **Bernie Wise**

Bernie leads the Early Resolution and Dispute Resolution Group. From her previous roles at TAL and AMP, Bernie brings a wealth of complaint-handling and operational management experience. She has also previously worked at the TIO from 1997 to 2012 and successfully helped lead the organisation through immense growth. She has a strong foundation in alternative dispute resolution methodologies, investigation techniques, decision-making, and ethics. Bernie is particularly committed to assisting vulnerable consumers.

Technology, Analytics and Business Improvement

The Technology, Analytics and Business Improvement group is responsible for the TIO's information technology infrastructure, systems and solutions, data and analytics, transformation delivery, and driving a continuous business improvement mindset. The purpose of the group is to transform TIO performance through advanced technology solutions, data-driven analytics, and continuous process improvement to support better outcomes for employees, members, and consumers.

In FY24 the group is focused on delivering the following strategic projects, Project ECHO, Independent Review and Intranet Migration.



Executive General Manager, **Technology, Analytics and Business Improvement** **Cathy Thomas**

Cathy Thomas is our Executive General Manager of the Technology, Analytics and Business Improvement Group. Cathy has over 24 years' experience working across all phases of IT planning and delivery and has held a variety of leadership roles across essential services including telecommunications, utilities, and banking. She has worked in consulting roles for well-known brands and has experience with a consulting start-up.

Cathy's passion lies in leveraging technology to drive operational excellence, enhancing customer experience and creating a culture of collaboration and innovation across her team.

Legal, Policy and Regulatory Affairs

The Legal, Policy and Regulatory Affairs Group is a multi-functional group responsible for providing legal advice to the organisation and driving industry improvement.

A key function of this group is working with regulators, the telecommunications industry and other stakeholders to drive improvements across the communications environment through systemic issue investigations and public consultation processes. The legal work of the group includes advice about privacy matters and complaint handling and working closely with the Ombudsman on land access matters.



**Executive General Manager,
Legal, Policy and Regulatory Affairs**
Freyja McCarthy

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 Intellectual Property, Technology and Regulatory team at Thomson Geer, and was recognised as In-House Counsel of the Year in the 2019 Law Institute Victoria awards.

Culture, Capability and Communication

The Culture, Capability and Communication (CCC) Group provides strategic and operational support to the TIO team to ensure that the culture, capability, performance and organisational design supports the TIO team to meet the TIO's strategic priorities.

This group is also responsible for our internal and external communications strategy, engagement with the TIO community and its members, and outreach strategy, as well as the effective management of TIO's facilities and administration.



**Executive General Manager,
Culture, Capability and Communication**
Amanda Armstrong

Combining pragmatic, impactful approaches and strategic thinking, Amanda heads the work of the Culture, Capability and Communications team. She focuses on enabling an environment for our people to thrive, while promoting our brand, the reputation of the TIO and engaging with the wider telecommunication community. Amanda brings with her a wealth of experience from the not-for-profit and commercial sectors having worked across education, health and community organisations.

Executive Director Shared Services, Chief Financial Officer and Company Secretary

The Chief Financial Officer and Company Secretary leads the Finance Team and is responsible for the TIO's corporate and financial governance. This includes managing the financial actions of our organisation including overseeing all aspects of our financial success and providing strategic leadership for the TIO's corporate and financial governance.



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

Gerard oversees the financial management of the organisation. As Company Secretary, he provides support to the Board in their governance of the organisation and ensures compliance and regulatory requirements are met.

With more than 35 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 nonprofit organisation.

Gerard continued in this role into July 2023, helping with the transition to a new Executive Leadership Team structure. The role has since been adjusted to Chief Financial Officer, leading the finance team.

Governance

Governance overview

The Telecommunications Industry Ombudsman is a public company, limited by guarantee and a not-for-profit, governed by a Board of Directors. Its objectives are:

- (a) to operate the TIO scheme
- (b) to appoint an Ombudsman with power to receive, investigate, and make decisions relating to and facilitate the resolution of complaints by residential and small business consumers of telecommunications services.

The Board sets the TIO's strategic direction, and oversees management of the business, affairs, and property of the TIO in accordance with the Company Constitution and the Terms of Reference. It is responsible for ensuring funding is available, it monitors the organisation's performance, and it oversees processes to comply with legal and regulatory requirements. It also oversees a risk management framework, reports on progress, and aligns the collective interest of members, stakeholders, the Board, management and employees.

To ensure the integrity of the Board's operations, several Board policies set out the ethical, behavioural, and compliance standards expected of directors, and the Board as a whole, in undertaking their duties.

The Board preserves independence from the Ombudsman, who has day-to-day responsibility for the management and operation of the TIO scheme. It does not have a role in handling complaints lodged to the TIO.

Legal framework

We operate the TIO scheme, which is established by the [Telecommunications \(Consumer Protection and Service Standards\) Act 1999](#) (the TCPSS Act). The TCPSS Act requires all Carriers and Eligible Carriage Service Providers to be members of and comply with the TIO scheme.

Our purpose under the TCPSS Act is to appoint an Ombudsman with power to receive, investigate, make decisions relating to, and facilitate the resolution of, complaints by residential and small business consumers of telecommunications services. We also make decisions related to objections to a carrier's exercise of power to access land under Schedule 3 of the [Telecommunications Act 1997](#).

As a not-for-profit company limited by guarantee, we must comply with relevant requirements under the **Corporations Act 2001**. Under Victorian tax law, we are considered to serve a charitable purpose.

There are three key non-legislative documents fundamental to understanding how we operate and make decisions. Those documents are our:

1. [Constitution of Telecommunications Industry Ombudsman Limited](#)
2. [Terms of Reference](#)
3. [Complaint Handling Procedures](#)

Members of the TIO scheme are bound by the Constitution of TIO Limited, which governs the company.

The Terms of Reference explain:

- what we do
- the types of complaints the Ombudsman handles
- how complaints are handled
- rules about complaints
- other functions we perform.

TIO members are bound by the terms of the Terms of Reference.

The Ombudsman or the Board may propose changes to our Terms of Reference. Before changing the Terms of Reference, the Board must inform the Federal government ministers responsible for telecommunications and consumer affairs policy about the change and consider any comments the ministers make.

The Complaint Handling Procedures explain how the Terms of Reference are applied in handling complaints. The Complaint Handling Procedures explain:

- We accept complaints from individuals and small business consumers about telecommunications providers who are Members of the TIO scheme
- How we facilitate the resolution of complaints through our referral process
- The process for handling unresolved complaints
- Our dispute resolution process.

Our Complaint Handling Procedures are not binding but reflect our dispute resolution process.

We are also expected to meet the Benchmarks and Key Practices for Industry-Based Customer Dispute resolution published by Federal Department of the Treasury. The Benchmarks and Key Practices for Industry-Based Customer Dispute Resolution set out the six benchmarks of dispute resolution services: accessibility, independence, fairness, accountability, efficiency and effectiveness.

Privacy

We are an Organisation subject to obligations under the **Privacy Act 1988** (Privacy Act). In accordance with the Privacy Act and the TIO Privacy Policy, we collect, use, and disclose personal information to handle telecommunications complaints, land access objections and to support our work as an independent voice in the telecommunications industry.

We train all our employees in best practice privacy and data protection compliance. Each change in our processes related to personal information undergoes a Privacy Impact Assessment to identify privacy risks and provide recommendations to ensure any changes to our processes are compliant with the Privacy Act.

The Office of the Australian Information Commissioner (OAIC) recognises the TIO as an EDR scheme to handle privacy complaints from individual consumers under the Privacy Act. As an EDR scheme recognised by the OAIC, we must follow guidelines of the OAIC when making decisions about privacy complaints. We also report to the OAIC on a quarterly and annual basis about the privacy complaints we handle.

Corporate strategy

The Board of Directors is responsible for setting our strategic direction, and overseeing management of the business, affairs and property of the TIO in accordance with the Constitution of TIO Ltd and the Terms of Reference.

The Board holds annual strategic planning days where it reviews in-depth the three-year corporate strategy. The Board looks at how the TIO can keep ahead of the ever-changing telecommunications sector and regulatory environment, exceed consumer expectations and deliver a world-class external dispute resolution service.

These deliberations determine our strategic plan. The Ombudsman and the Executive Leadership Team formulates the key strategic measures and goals to achieve that plan.

The Board formally reviews performance against the strategic measures on a six-monthly basis. The Ombudsman also provides regular updates on strategic activities as part of the Board reporting framework.

Public policies

We are governed by an independent Board of Directors with a balanced mix of industry and consumer experience. Our Board is supported by the Audit, Finance, Risk, Compliance Committee, People Committee and the Nominations Committee.

The TIO has the following publicly available policies, which outline how the TIO is operated and how it provides its dispute resolution service:

- [Company Constitution of Telecommunications Industry Ombudsman](#)
- [Terms of Reference](#)
- [Complaint handling procedures](#)
- [Privacy Policy](#)
- [Board Charter](#)
- [Whistleblowing Policy](#)

Our stakeholders

We work with a wide range of stakeholders to improve consumer experiences and interactions with providers. Together, we 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. 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	Federal Minister responsible for Communications Federal Minister responsible for Regional Communications Department responsible for Communications – sets overarching telecommunications policy and coordinates implementation; administers the mobile black spot funding program. State/Territory Governments – some contribute to mobile black spot funding.
Regulators	Australian Communications and Media Authority (ACMA) – administers the telecommunications licensing and conduct regime; enforces compliance with the TIO scheme membership and Ombudsman decisions; approves industry codes. Australian Competition & Consumer Commission (ACCC) – regulates the network and market competition; administers the Australian Consumer Law, including ensuring fair market practices. The Office of the Australian Information Commissioner (OAIC) – an independent agency within the Attorney-General's portfolio, whose primary functions are privacy, freedom of information and government information policy; with responsibilities including conducting investigations, reviewing decisions, handling complaints, and providing guidance and advice.
Consumer organisation	TIO's Consumer Panel – provides the TIO with diverse consumer perspectives to inform its work. Australian Communications Consumer Action Network (ACCAN) – the telecommunications specific peak body for consumer education, advocacy and research. Financial Counselling Australia – provides consumer case work and advice and contributes to policy debates with a hardship and debt focus. Consumer Law Centres and other consumer organisations and advocacy groups
Industry associates	Communications Alliance – the telecommunications specific peak body for industry advocacy; develops industry codes, standards and guidelines. Communications Compliance – monitors compliance with the TCP Code. Other telecommunications associations
Dispute resolution	TIO – facilitates the resolution of residential and small business consumer complaints; identifies and resolves systemic issues; makes determinations on land access objections; offers insights into industry trends.

Working with the community

Engaging the community



We are dedicated to building connections with hard-to-reach communities and the organisations supporting them. To connect with these communities, our Outreach Team attended a range of events, festivals and roadshows across Australia.

This year, we also focused on reaching out to Australians with a disability or special needs and the organisations that support them. We have attended disability expos in Victoria and Queensland with more planned in other states in the new financial year.



We also continue to grow our online training and engagement by delivering webinars to organisations such as financial counsellors, community volunteer groups and local councils. These webinars aim to educate organisations about our service, how we can assist and gather insights about the challenges facing vulnerable consumers.

In total, our Outreach Team hosted and attended over 40 events during the year.

In January, we attended Yabun Festival, the largest one-day gathering and recognition of Aboriginal and Torres Strait Islander cultures in Australia, held annually upon the traditional lands of the Gadigal people in Sydney. This event attracted around 40,000 attendees. This was a great opportunity to connect and offer support and guidance to the community, helping them with their telco experiences.



We were a part of Mardi Gras Fair Day, an event that attracts more than 70,000 people, to connect with the LGBTIQ+ community. This was followed by Seniors' Day at the Sydney Royal Easter Show, where seniors were able to visit many support organisations, including us.



Working together

Our Outreach Team connected with rural communities by partnering with other ombudsman schemes such as the Australian Financial Complaints Authority (AFCA), Energy and Water Ombudsman NSW (EWON) and Energy and Water Ombudsman Queensland (EWOQ). By partnering with other ombudsman offices, we can reach larger audiences and work with each other by sharing insights, resources and experiences that benefit all consumers.

These events included:

- the PRIMEX event, in Casino Northern NSW – an agricultural and commercial exhibition that's created for farmers in regional and rural areas. The three-day event attracted over 300 exhibitors and more than 25,000 attendees. Here we spoke with a wide range of people facing telco and internet issues such as slow internet to no coverage, whilst paying for premium products
- in partnership with AFCA, a series of events run by the Council on the Ageing (COTA) in Northern Territory. We also set up in a local café in Katherine, where word soon spread to locals far and wide to join us for a chat. Our team made sure to connect with community members while investigating ways to collaborate with local organisations
- State conferences for financial counsellors in Queensland, New South Wales, Victoria, and Western Australia and the National Financial Counsellors Conference held in Canberra. These conferences were a fantastic opportunity to connect with financial counsellors from across Australia who work with vulnerable consumers.



Ombudsman out and about

Our Ombudsman Cynthia Gebert also attended events throughout the year. She participated in panel discussions, presentations, and speeches. These events included:

- the Australian Communications Consumer Action Network (ACCAN) Conference to discuss how our organisation is responding to consumer needs
- the Australian Competition and Consumer Commission (ACCC) National Consumer Congress to speak about the comparison between the highly regulated energy industry, and the co-regulatory model in telecommunications
- the CommsDay Policy Forum about the need for consumer protections and a regulatory framework for digital platforms
- the Financial Counsellors' Association of NSW (FCAN) Conference, about our systemic work on essential mobile services and the impacts of miss-selling products to consumers
- the Financial Counselling Victoria (FCVic) Conference about 'Recovery. Resilience. Reconnection'
- the National Financial Counsellors Conference, where our Ombudsman presented at the External Dispute Resolution Forum. The Forum focused on ombudsman services and explored what financial counsellors can do to help vulnerable Australians connect to ombudsman schemes.

From small rural cafés to large exhibition halls and conference centres attended by thousands of people, these events and outreach activities enable us to connect with all Australians. We continue to look for new ways to reach and raise awareness of our services for consumers, small businesses and communities who need our help.



Reaching new audiences

Digital and social media

This year we continued to grow our presence on social and digital channels. We focused on tailoring content across our social platforms. We began regular 'Telco Tip' posts on Facebook, aimed at educating consumers with handy tips from our systemic investigation reports while creating consistency with our content posting. On LinkedIn we promoted our people as experts in their field through a series of 'Employee Spotlight videos', giving consumers an inside look at the different personalities within the organisation. We also regularly publish LinkedIn Newsletters to share the Ombudsman's thought-pieces and speeches.

Social media platforms continue to be an important channel for us to promote our educational webinars for community groups, organisations and the general public, as well as demonstrate our outreach work.

As part of our website improvement efforts, we have been focusing on improving its accessibility, readability and search engine optimisation (SEO). Part of these efforts include a redesign of our website homepage, the installation of an SEO plug-in that helps improve our Google search ranking and visibility. We have also engaged with Monsido, an online platform that helps improve website accessibility, maintain website quality and web governance.

These efforts go hand-in-hand with improving the overall user experience through various activities that drive web visitation such as organic social media posts and paid Facebook advertising campaigns.

Traditional media, broadcast and radio

In the past year, we focused on building the reputation of Cynthia Gebert as the Telecommunications Industry Ombudsman and ensuring the position of the TIO as an expert and influential voice. We sought TV, print and radio opportunities to grow the association of Cynthia Gebert with the organisation.

Our media coverage was analysed by Isentia to ascertain the tone, content and salience of individual reports to provide an overall Media Impact Score of four. It sits well above other services such as finance and business services, legal services and government agencies in terms of positive media impact.

For the promotion of our publication 'A time for change – Three years of systemic investigations in review', Ombudsman Cynthia Gebert appeared on an exclusive ABC News report and several ABC local and national radio channels. As well as this, she spoke to Macquarie and Nine networks. The success of this media campaign helped put the discussion of direct regulation in the spotlight and presented the TIO as a thought-leader on this topic.

Working with our members

The year at a glance

Telecommunications service providers, including carriers and eligible carriage service providers, are required to be members and fund the dispute resolution scheme operated by the TIO.

At 30 June 2023, we had 1,686 members, an increase compared to last year. In 2022–23, 69 members left* our scheme due to either ceasing to trade as a telecommunications provider or ceasing to trade altogether, and 165 businesses joined as new members.

In 2022–23, we referred seven providers to the Australian Communications and Media Authority (ACMA) for failing to join the scheme. Since referral to the ACMA, six providers have joined the scheme and one was deemed not required to join.

*This includes members who were within the cessation period at the end of the 2023 financial year.

In 2022–23, we referred seven providers to the Australian Communications and Media Authority (ACMA) for failing to join the scheme.

New and terminated members by quarter

	Q1 2023	Q2 2023	Q3 2023	Q4 2023
New members	40	28	50	47
Terminated members	14	29	12	14



1,686 members

165 joined, **69** left (2022–23)

Engaging our members

Our Member Services Team works to build and maintain relationships with members so the benefits can be passed on to consumers.

TIO members include large well-known telecommunications providers, as well as smaller ones.

Some of our members only operate in localised regions or have a specific clientele.

Our Member Services Team works to build and maintain relationships with members so the benefits can be passed on to consumers. The team also helps members with the maintenance of their TIO membership. In addition, our dispute resolution teams work with members to resolve complaints from individuals and small businesses, fairly and in reasonable time, while maintaining our independence.

We guide complaint handling best practices and share information about our service, complaint trends and other insights we have gathered from complaints.

Using data and insights to drive engagement

Our regular reports to members provide information about the issues consumers complain to us about. We meet regularly with larger members to discuss improvements and how we can work better together to resolve complaints.

Our extensive collection of complaint data is used to identify unusual or significant trends in complaints about a member. We analyse data to identify possible systemic issues and work with members to address these issues. Our systemic reports are published regularly throughout the year and insights and learnings are shared with all members through interactive webinars.



Education and training

The TIO member portal continues to be a valuable tool for information and training for members. Members can access reports, invoicing, induction videos, webinars, newsletters, and information about our complaint-handling process.

Our Member Services Team provides members with an access point to learn about our services and processes and raise issues or concerns. The Policy and Systemics Teams work with providers to improve services and reduce complaints.

The monthly publication for members, MNews, highlights membership information and any changes to the complaint-handling processes. During 2022–23, members received 18 editions of MNews.



We hosted two National Member Forums by webinar in October 2022 and June 2023. At these forums, we updated members on our work, governance, insights into complaints and trends, and looked at the year ahead.

In June 2023, Forum attendees heard from TIO Board Chair Professor the Hon. Michael Lavarch AO, Ombudsman Cynthia Gebert, TIO Board Member Gerard Brody, Optus VP Operations & Enablement Francis Martin and Energy Australia Head of Customer Enablement David Campbell.

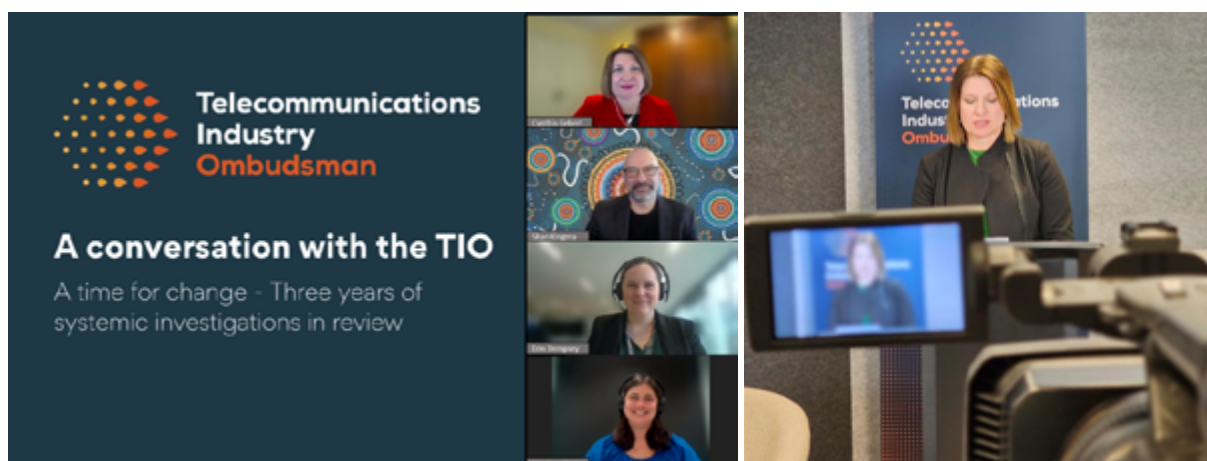


In a first for a National Member Forum, we held a panel discussion with industry experts from telecommunications, energy and water. The panel discussion focused on what change is needed to meet the challenge of supporting vulnerable consumers. The panel, facilitated by Ombudsman Cynthia Gebert, discussed topics around the current system of co-regulation and its effectiveness. The panel also talked about the challenges the telco industry faces when meeting the needs of vulnerable customers and looked at what other industries have done to tackle these challenges.

With the release of our systemic investigation reports, we hosted two interactive webinars, 'A Conversation with the TIO: investigating complaints about essential mobile services' and 'A Conversation with the TIO: A Time for Change – Three Years of Systemic Issues in Review'. These well-attended sessions were conversational; many members shared their experiences and insightful questions. Our webinars have seen a steady growth in attendance and engagement by members.

Our Member Services team also hosted two webinars on complaint-handling processes. The sessions "Let's Talk! Complaints about telco equipment" and "Let's Talk! Joinder, what you need to know" allowed members to learn about and discuss changes to our complaint handling procedures in an interactive format.

The webinars we host continue to see steady growth in attendance and member engagement. Each webinar series: "Let's Talk!", "Conversations with the TIO" and the Member Forums deliver a wide range of information and ways to connect with us and our expert people. We leverage member engagement and feedback to improve member experiences. All webinar sessions are recorded and available in the member portal for members to watch when it suits them.



Our people and culture

Building relationships, capability and performance

We inducted and onboarded 51 employees throughout the year and 86 per cent of employees said their people leader was a good role model.

The role of the Culture and Capability Team is to provide strategic and operational support, ensuring the culture, capability performance and organisational design help the TIO meet its strategic goals.

Developing the capability of our people is a key part of our role. We have expanded development and training opportunities and have become skilled in online delivery.

Our training and development initiatives included:

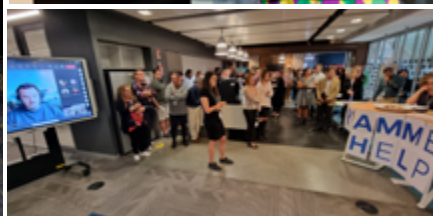
- Plain English training to ensure our internal and external communication is clear, easy to understand, and demonstrated our value of 'Make it easy'.
- A targeted organisational coaching and people leadership program with a focus on leading remote teams for our people leaders.
- A Vulnerable Consumer program to assist our people handling complaints to identify behaviours that may indicate a consumer is experiencing vulnerability and how best to support them.
- Graduate Certificate in Dispute Resolution (GCDRI) workshops – modules specific to the TIO as part of the graduate certificate in dispute resolution were delivered in investigations, dealing with challenging conduct and conciliating an industry dispute.
- Masterclass series for our Dispute Resolution Officers – workshops on having challenging conversations and dealing with unreasonable conduct, maintaining your wellbeing as a complaint handler and managing information sharing.

We inducted and onboarded 51 employees throughout the year and 86 per cent of employees said their people leader was a good role model.

EveryOne Culture

One of the cultural bedrocks of working at the TIO is bringing different perspectives together – no matter if those differences come from religion, gender, hobbies or background. We believe that the sum of all these different perspectives is what makes us stronger as an organisation.

As an inclusive workplace our goal is to make everyone feel accepted and comfortable sharing their thoughts and opinions without judgement for being who they are. This was reflected in our commitment to our EveryOne Culture program. We welcome feedback anytime and from different avenues, but twice a year, our people are given the opportunity to provide formal feedback on a number of measures through pulse surveys which track engagement score and other key wellbeing indicators.



As the numbers showcase our progress, we will continue to make a sustained effort to listen and speak with our people, ask what they struggle with and where they see the biggest issues and immediate areas for improvement.

- **75 per cent of employees said that the TIO makes clear efforts to improve employee wellbeing and safety.**
- **72 per cent of employees said they would recommend the TIO as a great place to work.**
- **86 per cent of employees said that their People Leader is a great role model.**
- **76 per cent of employees said they are proud to work for the TIO.**

Equality, diversity, and inclusion

Equality, diversity, and inclusion (EDI) are pillars on which we build and sustain our EveryOne Culture. EDI is embedded in every facet of our work. It's 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.

We offered learning and growth initiatives to our employees, which helped build awareness of the importance of diversity and inclusion. Our people have shown commitment to diversity and inclusion by taking part in Courageous Conversation events, celebrating diversity events and completing many training activities ranging from Aboriginal and Torres Strait Islander Cross Cultural training, presentations from the First Peoples Assembly of Victoria, Vulnerable Consumer Training, Training in areas of Bullying and Harassment, Sexual Harassment and Equal Employment and Anti-Discrimination.

Our annual report to the Workplace Gender Equality Agency highlighted our work and progress in talent acquisition, leadership, learning and attrition.

Through our memberships with the Diversity Council of Australia, Equal Employment Opportunity Network, Australia Network of Disability and Pride in Diversity we continue to embed a culture of belonging.



'We are committed to our people. We respect and embrace all kinds of diversities and are absolutely committed 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 equality, diversity and inclusion commitment

Employees

On 30 June 2023, the TIO had 194 employees, including five casual employees and five employees currently on parental leave.

Enterprise Agreement

With the Enterprise Agreement expiring on 30 June 2021, negotiations commenced in September 2021 with the union, delegates and employee representatives.

On 17 November 2022 the new Enterprise Agreement 2021 was endorsed with a 'Yes' vote from the majority of our employees who are covered by the agreement.

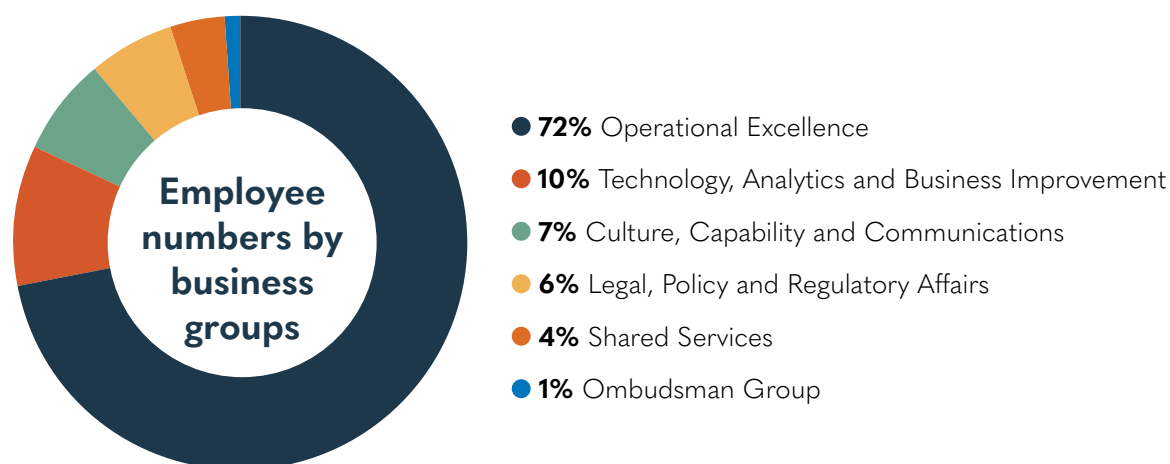
Executive Leadership Team Review

The Executive Leadership Team and the TIO Board undertook a process to outline the organisation's 2024-26 strategic priorities. This review was conducted to set up us up for success and ensure we continue to deliver on our purpose in a more sustainable and agile manner. The outcome also reflected the demands placed on a modern ombudsman scheme in a dynamic environment.

The change saw:

1. functional specialists bringing relevant strategic capabilities to the bear on direction setting and execution for the whole of the TIO
2. wider spans of control with greater accountability for whole of organisation performance
3. increased strategic focus on people and culture that highlights our people as the enablers of the success
4. alignment of technology, improvement, and data analysis to support vision of a more adaptive, future ready organisation
5. Establishment of new Executive Leadership roles:
 - Executive General Manager, Operational Excellence
 - Executive General Manager, Legal, Policy and Regulatory Affairs
 - Executive General Manager, Technology, Analytics and Business Improvement
 - Executive General Manager, Culture, Capability, and Communication.

Our workforce statistics



Total employees by contract and gender

Contract Type	Female	Male	Prefer not to say	Grand Total
Permanent Ongoing	68	87	2	157
Full Time Employees	54	83	2	139
Part Time Employees	14	4		18
Casual	4	1		5
Casual employees	4	1		5
Contract (fixed-term/non-ongoing contract)	16	16		32
Full Time Employees	14	13		27
Part Time Employees	2	3		5
Grand Total	88	104	2	194

Total employees by gender

Gender	Total
Male	104
Female	88
Prefer not to say	2
Grand total	194

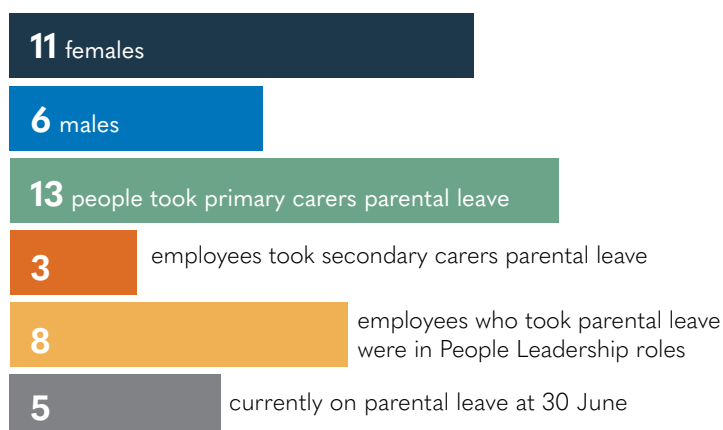
Total employees by grade and gender

Grade	Female	Male	Prefer not to say	Grand Total
Grade 1	20	16	1	37
Grade 2	34	39	1	74
Grade 3	14	19		33
Grade 4	7	16		23
Grade 5	9	11		20
Grade 6	1	2		3
Grade 7	3	1		4
Grand Total	88	104	2	194

Number of employees on flexible working arrangements



Parental leave



Ongoing groups and committees

Proud @ TIO

Proud @ TIO is an Employee Reference Group ('ERG') for LGBTQ+ and intersex ('LGBTIQ+') employees. Proud @ TIO aims to promote an inclusive work environment where LGBTIQ+ employees, their families and friends are accepted, valued and are free from prejudice and discrimination.

Together TIO

Together TIO is an action-based, employee-led group. The aim of the group is to create a workplace of choice that celebrates diversity in all its forms by monitoring and sharing current research about diversity, organising events and activities and raise awareness about diversity in the workplace.

The Reconciliation Action Plan (RAP) Working Group

The RAP Group represents the commitment of our organisation, and all our people, to embrace, respect and promote inclusion and the cultures, rights and perspectives of First Nations peoples.

We have a commitment to, and respect for, the rights of Aboriginal and Torres Strait Islander peoples – in particular, their inalienable right to effective telecommunications, and their right to resolution of issues and disputes.

Our vision for reconciliation is one where First Nations peoples exercise their rights, and our organisation has strong, positive and mutually respectful relationships with Aboriginal and Torres Strait Islander peoples.

Workplace Health and Safety (WHS) Committee

The goal of the WHS Committee is to improve health and safety and to prevent workplace injuries and illnesses at the workplace. We are proactive about creating, maintaining and continually improving a work environment which highly values the health and wellbeing of its staff.

Record and Destruction (RaD) Group

The RaD Group identifies data held by the organisation and then works with departments to reduce volumes of records in line with the TIO Retention and Destruction of Records policy.

Engagement Survey Working Group

Key to leveraging the power of our people and strengthen capability and performance is an engaged workforce. Two times a year, we measure our employee engagement through Pulse Surveys. The Engagement Survey Working Group identifies organisational opportunities before they become harmful to productivity and company culture. Results from their findings and recommendations help our organisation work out what areas are important to our people and how to improve on them.

ECHO Change Champions

ECHO Change Champions help create an ongoing feedback loop and embed Change Management. Change Champions assist ECHO's Product Owner, Subject Matter Experts and Change Team to foster a modern ombudsman scheme and a continuous improvement culture.

Reward and recognition

Every year, the TIO celebrates outstanding employees and teams' contributions through our People Awards. Given the timing of a number of organisational changes, we recently celebrated two rounds of awards with the 2022 People Awards taking place in September and the 2023 People Awards taking place in June 2023.

The 2022 People Awards

The 2022 awards recognised the contributions of our people from 1 July 2021 to 30 June 2022. Our Executive Leadership Team selected nine winners from over 60 nominations.

On Friday 14 October 2022, we announced the winners at the Our People Awards ceremony.

The 2022 People Awards recipients were:

The Star Award:

for a team or individual who went above and beyond their role expectations:

2022 recipients:

The TIO Radio project – Femke Bertsché, Julie Pearce, Sarah Carnovale, Shaun Kingma, Lucy Andrews, Steven Jauw and Georgy Wood

The Heidi Jane Odermatt Leadership Scholarship:

for an emerging leader, who is not in a people leader role, and who demonstrated commitment to learning, development and excellence in leadership:

2022 recipient:

Dhivya Kaliappan

The Chelsey Callaghan Knowledge Scholarship:

for an individual who is committed to sharing their knowledge, experience, and expertise across the organisation:

2022 recipient:

Vivian Tee

The Values Awards:

for teams or individuals who have demonstrated the TIO's values:

2022 Dare to be Great Value Award recipients:

Reclassification Superstars – Gaganpreet Kaur, Dylona Charan, Beau Linton-Smith, Robert Peterwood, Lagi Lulio, Chris Reid, Thalia Alexopoulos, Rhys Woosnam, Grayden Pickering-Wheat, Joe Salvaretnam, James Micallef and Karen Winter

2022 Respect and Inspire Value Award recipients:

Michael Marcus

2022 Evolve and Grow Value Award recipients:

Louise Fali

2022 Appreciate and Celebrate Value Award recipients:

Joe Selvaretnam

2022 Make it Easy Value Award recipients:

The Targeted Resolution Team – Penny Goulding, Danny Pollard, Zoe Harris-Westrup, Cermela Stagnitti, Guido Riveros, Hait Sanli, James Zong, Kali Power, Lewis Baker, Michael Kieca, Nick Carruthers, Terri Lourey and Mitchell Hamblyn

The People's Choice Award:

for an individual or team for best personifying the TIO:

2022 recipient:

David Anderson

The 2023 People Awards

The 2023 awards recognised the contributions of our people from 1 June 2022 to 1 May 2023. Our Executive Leadership Team selected nine winners from 166 nominations.

On Thursday 22 June 2023, we announced and celebrated the winners at our People Awards Ceremony.

The 2023 People Awards and their recipients were:

The Star Award:

for a team or individual who went above and beyond their role expectations:

2023 recipients:

The Targeted Resolution Team – Christie Nguyen, Daniel Lee, Douglas Rand, Guido Riveros, James Wisnesky, Joanne Ishac, Julian Mulder, Kali Power, Lewis Baker, Miachal Kieca, Mitchell Hamblyn, Nick Carruthers, Puneet Sandhu and Terri Lourey



Being awarded the People's Choice Award was arguably one of the greatest highlights of my ten year career at the TIO. The trophy was already around when I started as an Enquiry Officer in Early Resolution, so it's really cool to see my name amongst some great people.

Working in an operations role now, we deal with a lot of different stakeholders both internally and externally, with a lot of different needs.

It's not a one-size-fits all industry, and we have to be mindful of that. There is a wide spectrum of people that we help. We need to be accessible on all fronts and cater to different needs.

The great thing about working at the TIO is that there is so much opportunity to make positive change. We've created a work environment and a culture where we are open to ideas, and that means transformation can happen.

When we encounter an issue, I trust my team to work out a solution. That trust means they feel empowered to come with their own ideas which help the organisation, and it's also something they can put their own name on.

They don't get a People's Choice Award trophy every time, but being responsible for solving a queue issue or consumers problem is really meaningful, and really satisfying work.

David Anderson

Operations and Quality Lead, Early Resolution
Winner of the 2022 People's Choice Award

The Heidi Jane Odermatt Leadership Scholarship:

for an emerging leader, who is not in a people leader role, and who demonstrated commitment to learning, development and excellence in leadership:

2023 recipient:

Michael Kieca

The Chelsey Callaghan Knowledge Scholarship:

for an individual who is committed to sharing their knowledge, experience, and expertise across the organisation:

2023 recipient:

Robert Petterwood

The Values Awards:

for teams or individuals who have demonstrated the TIO's values:

2023 Dare to be Great Value Award recipients:

Siranga Gamage and Leonie Jensen

2023 Respect and Inspire Value Award recipients:

Valerie Passey and Lawrence Erskine

2023 Evolve and Grow Value Award recipients:

Ken Harly and Megan Drew

2023 Appreciate and Celebrate Value Award recipients:

Alana Thompson and Joe Selvaretnam

2023 Make it Easy Value Award recipients:

Gysvier Noriega and Megan Rooney

The People's Choice Award:

for an individual or team for best personifying the TIO:

2023 recipient:

Tammie McDonald



I was very surprised to win this year's People's Choice award. It was really great to be recognised for the different pieces of work I've completed across the organisation in the four years that I've been here, and to see how that contributes to supporting the organisation.

Learning and development is an important part of someone's career. If we look at what "working" has looked like over the last couple of years, it's changed completely. And with all those changes, how people learn at work has evolved too. We've had to pivot in order to keep up.

In the last twelve months, we've been doing a lot of work around getting frameworks in place for capability and leadership growth. The background work has been done and a lot of the early stages have been put in place. We want to make it as easy as possible for people to be able to access what they need so that they can evolve and grow into their roles.

We're enabling people with the right skills and capabilities in order to do their jobs now and in to the future. We are making sure we give them the processes, frameworks and infrastructures to be able to succeed.

Tammie McDonald

Manager Learning and Development, People & Culture
Winner of the 2023 People's Choice Award

Workplace health and safety

Our commitment to provide a safe work environment extends beyond our obligation under the **Work Health and Safety Act 2011**. It is the right thing to do to support our employees' wellbeing and create an environment where we will thrive.

Key areas of focus

During 2022-23, our attention was on employee wellbeing, collaboration, and consultation. We focused on the effective management of COVID-19 impacts, planning and response, supporting the establishment of hybrid work.

Management and consultation

Our WHS Committee and Executive Leadership Team continued to consult with leaders and employees to monitor health and wellbeing, report and track injury and illness, check home-office ergonomic set ups and changes to our WHS documents.

Employee wellbeing

Our wellbeing focus during 2022-23 was on maintaining connection and engagement with employees during the COVID-19 pandemic and focusing on our employee's mental health. This required varied approaches to ensure individual's needs were assessed effectively, whilst aligning with federal and state health directions and regulations.

Based on our experience of the previous year, we took a proactive approach to support our people during this challenging time, and provide a physical and psychologically safe working environment. This included unlimited access to our Employee Assistance Program provided by Converge International.

We created many touch points with our employees. These included surveys, all-employee conversations with the Ombudsman and social events to provide avenues for feedback and open interaction without physical barriers. Staying connected in a new hybrid environment safeguarded people's ability to remain independent and gave a sense of stability during a constantly evolving work setting.

To support the development of the TIO's wellbeing journey, our EDI Lead launched the TIO Wellbeing Strategy and Program. This program is in its initial phase and over the next six months will be assessed to establish where we can continue to improve.

Employees participated in

558

activities about wellbeing/workplace health and safety

Employees completed

771

hours of training in workplace health safety and wellbeing

RAP Working Group



Our ongoing focus remains on engaging, informing and involving our people and stakeholders in reconciliation efforts and key to this was the TIO Board's support for the Voice to Parliament.

We pay our respects to the Traditional Owners of the land where we work, the Wurundjeri People of the Kulin Nation and the Whadjuk People of the Noongar Nation. We acknowledge their continuing connection to land, culture and community. Sovereignty was never ceded. Australia always was and always will be Aboriginal and Torres Strait Islander land.

In September 2022, the Reconciliation Action Plan (RAP) Working Group achieved a significant milestone by submitting a report on our "Reflect" RAP initiatives to Reconciliation Australia. This report marks the first stage of our journey delivering our reconciliation commitments and we eagerly await the acceptance of our report to progress to the "Innovate" RAP phase.

During the Innovate RAP phase, we will strive for a deeper understanding of our sphere of influence and establish the most effective approach to advancing reconciliation. Our ongoing focus remains on engaging, informing and involving our people and stakeholders in reconciliation efforts and key to this was the TIO Board's support for the Voice to Parliament. In early July 2023 the Board endorsed our position on the Voice:

TIO supports the Uluru Statement from the Heart and accepts its generous invitation to walk together with Australia's First Nations People towards a better future. We support the proposed constitutionally enshrined Voice to Parliament as the first step in this journey.

As an Ombudsman service, we believe in the power of listening to achieve fair outcomes. We see our support for the Voice as a natural extension of the commitment to reconciliation we have made through our Reconciliation Action Plan. We know from our community outreach work with First Nations communities that listening to the members of a community is how to achieve the best outcomes for that community.

Progress on reconciliation requires respectful and inclusive conversations. TIO acknowledges the diversity of views about the upcoming referendum on a Voice to Parliament. We encourage all Australians to engage with this issue with an open mind and to make an informed decision at the referendum.

Other key highlights of the past twelve months include:

- **The Birrarung Walking Tour – 6 Oct 2022:** As part of our NAIDOC Week celebrations, a group of TIO staff embarked on an immersive educational walking tour along Birrarung Marr, the walkway by the Yarra river. This tour, run by the Koorie Heritage Trust, provided insights into Koorie culture and shared stories about the naming of the river. Participants expressed their gratitude and humility for the opportunity to learn about First Nations histories, cultures and practices. This deepened our appreciation for First Nations' culture and encourages a desire to learn more about one's own heritage.
- **First Nations Library:** To foster greater understanding and appreciation, we established a dedicated First Nations Library in our office during NAIDOC Week. This collection features books on First Nations culture, history, and art. The library aims to provide readers with the opportunity to immerse themselves in the words of First Nations authors through memoirs and fiction novels. We are thrilled by the positive response and plan to expand the collection further.
- **Survival Day opt-in – 26 Jan 2023:** In 2023, about a third of our employees chose to work on 26th January, commonly known as Survival Day. This opt-in initiative was an increase compared to the previous year. Some employees shared their impressions and reasons for their decision, emphasising the importance of recognising the hardships faced by First Nations Australians and using the day as an opportunity for reflection and mourning. By opting for an alternative day off, they showed solidarity and respect for the Aboriginal and Torres Strait Islander community.
- **Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS) Map of First Nations Australia:** Recognising the rich diversity of Aboriginal and Torres Strait Islander Australia, we have prominently displayed a map in a well-utilised location within our office. This map serves as a visual representation of the different cultural groups, languages, customs, and laws that exist across the country. We unveiled the map at our Reconciliation Week morning tea during one of our Community Days, where all staff gather in the office, emphasising the importance of acknowledging and celebrating First Nations heritage.
- **National Reconciliation Week 2023:** We held a wonderful morning tea in our office, catered by Torres Strait-owned Mabu Mabu. The morning tea sparked fabulous conversation on the ingredients, spices and flavours used in the food, and gave our people the chance to admire our new framed Map of First Nations Australia.

- **TIO response to the Voice to Parliament:** We also began discussions on developing TIO's approach to the upcoming referendum on a First Nations Voice to Parliament. Acknowledging there are diverse views in the community, including among First Nations communities, we drafted a statement for our website and social media channels explaining the TIO supports the Uluru Statement from the Heart and accepts its generous invitation to walk together with Australia's First Nations people towards a better future, and that we support the proposed constitutionally enshrined Voice to Parliament as the first step in this journey.
- **Cultural Training:** We remain committed to our staff program focused on cultural training, which has been scheduled for later this calendar year. The workshop enhances our knowledge in developing an awareness of Aboriginal and Torres Strait Islander culture and identity, developing awareness of the strengths of Aboriginal and Torres Strait Islander culture and people. It will assist in making the connection and understanding the impact of colonisation and past policy for Aboriginal and Torres Strait Islander people today. New Starters have continued to complete Aboriginal and Torres Strait Islander cultural competence training as part of their induction training.

Together, we are dedicated to promoting reconciliation and fostering an inclusive and culturally respectful workplace. We appreciate the contributions and perspectives of all our employees as we continue this journey towards reconciliation.

Contributing to industry improvements

Systemic issue investigations

When we identify a likely systemic issue, we contact the provider and work together to address the root cause of these complaints.

Systemic issues

A systemic issue is one that has, or is likely to have, a negative effect on several consumers or a particular type of consumer. A systemic issue could be about:

- a telecommunications provider's systems, policies, processes, or practices
- repeated conduct by a telecommunications provider that indicates potential non-compliance with the law, regulatory requirements, or good industry practice
- widespread issues driving complaints, which may arise from general industry practices, gaps in consumer awareness, or the broader regulatory and telecommunications operating landscape.

Our systemic investigations piece together information from individual complaints, analysis of complaint trends and discussions with industry, consumer groups and regulators. We use this information to identify a pattern of broader issues which may affect consumers.

When we identify a likely systemic issue, we contact the provider and work together to address the root cause of these complaints. Through this process we can help a wide number of consumers who have experienced the same issue, prevent more consumers from having the same problem, and prevent future complaints.

In 2022–23, we investigated 22 new systemic issues covering a range of topics, including:

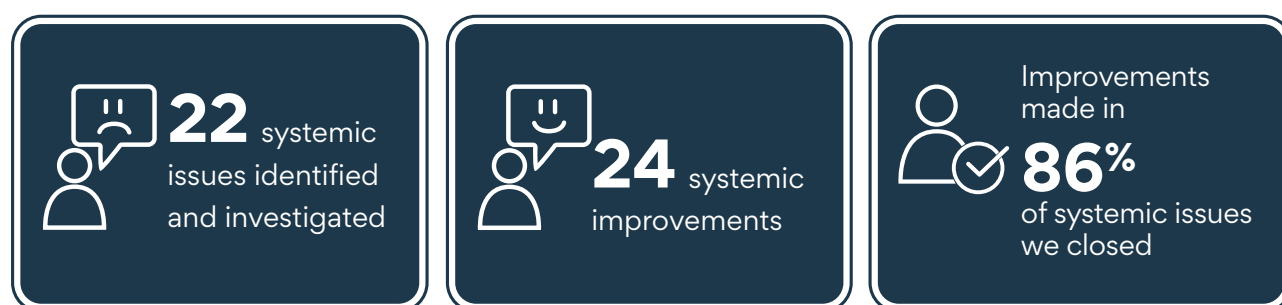
- billing, charges or payment issues, including problems issuing refunds
- misleading sales practices, including product advertising and misrepresentations about who the consumer is signing up with
- information about products and services, including pricing, speed, product inclusions and exclusions, and data usage
- accessibility of customer authentication practices
- customer service issues, getting help, cancelling a service and internal complaint handling processes.

We closed 28 systemic investigations and members agreed to make improvements in 24 of these investigations.

We referred four systemic issues to regulators, including issues where providers:

- misrepresented their identity and the purpose of sales visits
- charged for excess data without giving consumers prior warning or an explanation of charges
- sold products and services to vulnerable consumers who did not want or could not afford those services
- failed to engage with our investigation.

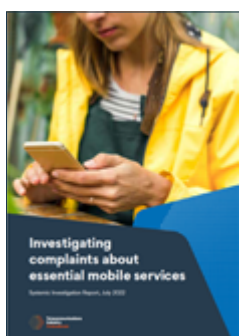
During this period, regulators acted on one systemic issue we referred to them.



Systemic publications

We publish reports about the systemic investigations we undertook into issues that broadly affected the entire industry.

This year, we published three systemic investigation reports on the following topics.



Investigating complaints about essential mobile services

Many of us consider our mobile phone service as essential to daily life. We rely on our mobile service to bank, shop, access health and government services, contact emergency services, and connect socially. Between July 2020 and March 2022, we received over 63,000 complaints about mobile services, which was our most complained about service type.

In July 2022, we published [Investigating complaints about essential mobile services](#). The report reveals key problem areas driving complaints about mobile services. It also suggests improvements providers can make to assist consumers with mobile service complaints and tips for consumers to avoid common issues.



Our financial hardship complaints 2021–2023

When a consumer struggles to pay their bills, they may be in financial hardship. Financial hardship is becoming a reality for more Australians with the increasing cost of living, placing pressures on households, and leaving consumers to make difficult choices about how they will pay for essential telco services.

In April 2023, we published our thematic review of [Our financial hardship complaints 2021–2023](#). This report provides an overview of the complaints we received about financial hardship between 1 April 2021 and 31 March 2023. The report shares updated data about our financial hardship complaints since our September 2021 systemic report [Responding to consumers in financial hardship](#).



Three years of systemic investigations in review

In June 2023, we published [A time for change – Three years of systemic investigations in review](#). The report is a review of our systemic issues work for the period 1 July 2020 to 30 April 2023. The report makes four recommendations about how the telecommunications regulatory framework and industry could evolve to help prevent and reduce complaints and the themes we explore in the report from occurring in the future. Our recommendations included a call for direct regulation to protect vulnerable consumers and a registration scheme for telco providers with minimum entry requirements.

Contribution to public policy

We have the complaint handling expertise and existing regulatory relationships to adapt and evolve to handle digital platform complaints.

Of our 18 submissions this financial year, the relevant regulatory, advocacy or government agency has concluded nine of the consultation processes. In nine of these concluded policy consultations, our submissions influenced change, with our recommendations either being adopted or the outcome being consistent with our position.

We made submissions across a wide range of topics, including the Digital Platforms Services Inquiry and the TCP Code Review.

Digital Platforms Services Inquiry

In 2020, the Australian Government directed the Australian Competition and Consumer Commission (ACCC) to conduct an inquiry into markets for the supply of digital platform services. These include internet search engines and social media services. As part of the Inquiry, the ACCC proposed the establishment of a Digital Platforms Ombudsman.

In February 2023, we made a [submission](#) to the Treasury's follow-up consultation to the regulatory reform recommendations arising from the ACCC's Inquiry.

Our submission explained why we are the appropriate body to handle digital platform complaints rather than a newly established body. We noted we have the complaint handling expertise and existing regulatory relationships to adapt and evolve to handle digital platform complaints.

Telecommunications Consumer Protections Code Review

The TCP Code, developed by the telco peak industry body Communications Alliance, is reviewed every five years. The May–June 2023 consultation was the first step in the review process, due to be finalised in 2024.

In June 2023, we made a [submission](#) to this review stating the TCP Code is no longer fit for purpose and should be replaced by direct regulation. Considering the essentiality of telco services, incorporating consumer protections in direct regulation would create better outcomes for consumers and the industry.

Our submission explained that government and regulators have the requisite expertise and remit to draft effective and enforceable obligations.

Our submission also made 30 recommendations on how the Code could be improved if it remains in place, including:

- better protections about sales practices and product information
- improved protections for consumers experiencing payment difficulties and more robust credit assessments to help ensure consumers are sold products they can afford
- stronger requirements for telco bills to be issued in all circumstances, and for these bills to be clear and easy to understand
- requirements for mandatory payment methods that must be offered to all consumers
- mandatory protections for consumers experiencing domestic or family violence.

Case study

Conall* was sold more than \$15,000 worth of mobiles and accessories while on a government pension

Conall has significant ongoing physical and mental health conditions. He is not able to work and relies on government support for income.

Conall went to a CurbTel store wanting to sign up for new mobile services. CurbTel signed him up for multiple expensive mobile handsets, plans and accessories. The cost over the contract period was more than \$15,000.

When Conall did not meet his monthly payments, CurbTel cancelled the services. It also charged him for breaking the contracts, which included high payout costs for the mobile handsets and other equipment.

Conall's representative complained to us saying CurbTel had not sold the services responsibly. The representative said Conall did not understand the contracts or costs involved when signing up for the services and could not afford to pay for them.

CurbTel told us it was appropriate to sell Conall the services. It said he passed its credit check process because he had previously paid his accounts on time. CurbTel also said it had prevented Conall from purchasing more than four handsets. However, following the complaint to our office, CurbTel agreed to waive the cancellation fees out of goodwill to Conall. It let him keep his mobile handsets.

* Names of all parties have been changed.

Resolving complaints

How our complaint resolution process works

First contact and referral

Our complaint process begins when a consumer or small business contacts us for help about their phone or internet problem they couldn't fix with their provider.

If the complaint is something we can help with, our Early Resolution Officers refer the matter to their provider. The provider then responds directly to the consumer or small business.

If the complaint has urgent issues that need to be addressed quickly, we ask the provider to resolve the urgent issues within two business days. For medical or safety issues, we follow up with consumers to ensure those issues have been addressed.

Most complaints we refer to providers are resolved without the need for further involvement from us.

Unresolved and escalated complaints

Some complaints are not resolved by the referral process. If the consumer or small business asks for further help to have their complaint resolved, we assign the complaint to a Dispute Resolution Officer who will assist the consumer and their provider to reach a resolution.

Our Dispute Resolution Officers are trained to understand technical and legal issues and to work with the parties to resolve the complaint.

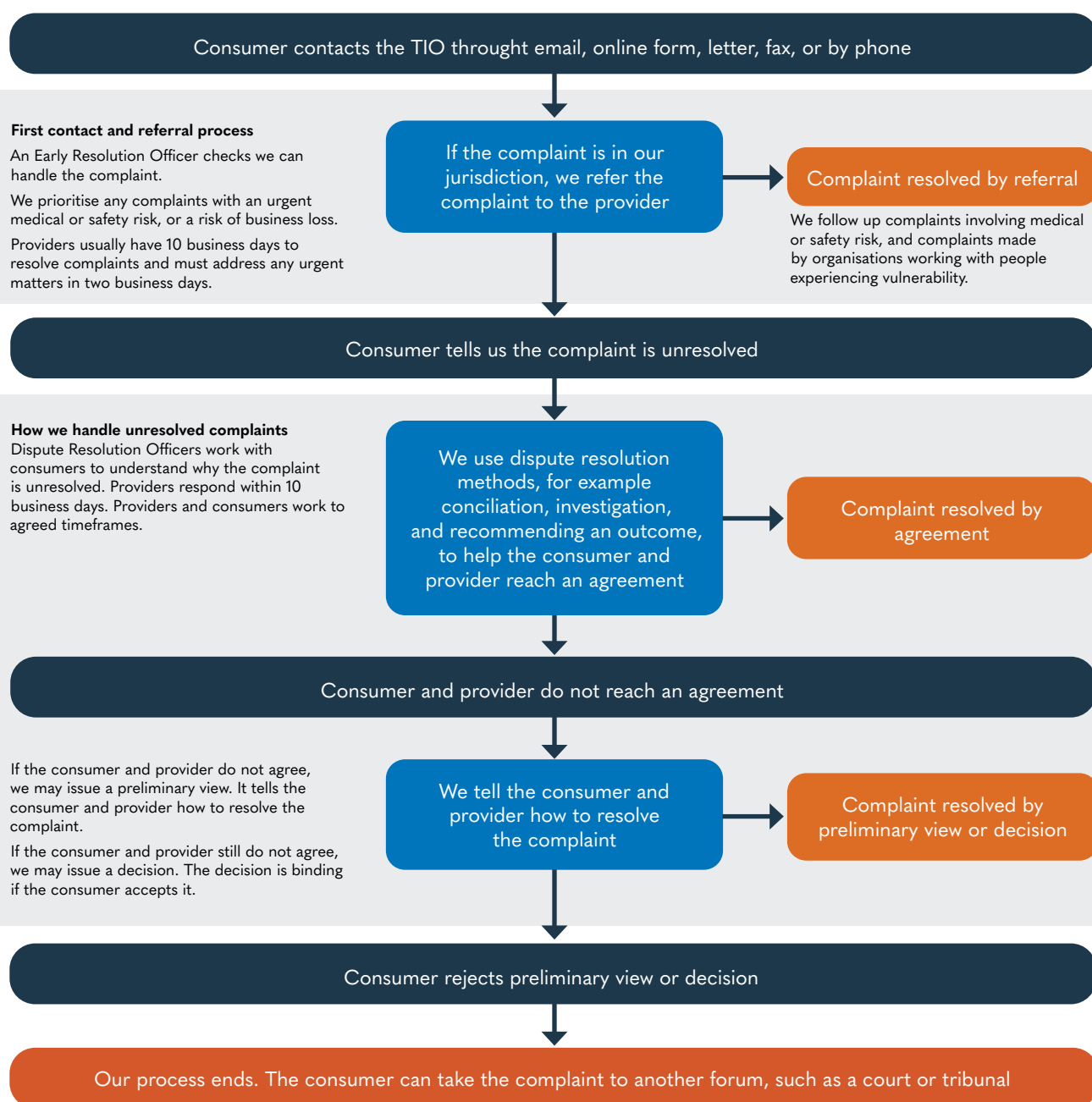
Many complaints are resolved by agreement during conciliation and investigation, while others are resolved after we reach a preliminary view.

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 decide what is a fair and reasonable outcome for the complaint. If the consumer accepts the decision, it is binding on the provider. In almost all cases, providers implement the decisions we make. When a provider does not implement a decision, we refer the matter to the ACMA for enforcement action.

Overview of the complaint process

Figure 2: Overview of the TIO complaint process



Land access objections

Telecommunications carriers install and maintain infrastructure to serve the current and future needs of Australian consumers and the community. To help them do this, the **Telecommunications Act 1997** gives carriers rights to access land without the landowner's or occupier's consent, and without the need to obtain state, territory or local government approval. Carriers can access land to inspect, install low-impact infrastructure and maintain infrastructure if they have complied with procedures under various laws and codes first. Low-impact infrastructure is equipment that has low visual impact and includes certain types of towers and antennae, aerial cables, underground cables and pits.

This regime is intended to ease the efficient roll out of telecommunications networks, ensuring the availability of accessible and affordable phone and internet services for Australian consumers.

Landowners and occupiers may object to a carrier's proposed land access activity if their reasons for objecting relate to allowable grounds. If they do object, carriers must consult with landowners and occupiers to try to resolve their concerns. If, after consultation, a landowner or occupier asks the carrier to refer their objection to the Telecommunications Industry Ombudsman, the carrier must do so.

We have the power to make directions about the way in which a carrier engages in the land access activity, and the carrier must comply with any directions given by the Telecommunications Industry Ombudsman. Our role assessing land access objections is separate to the scheme's role handling telco complaints.

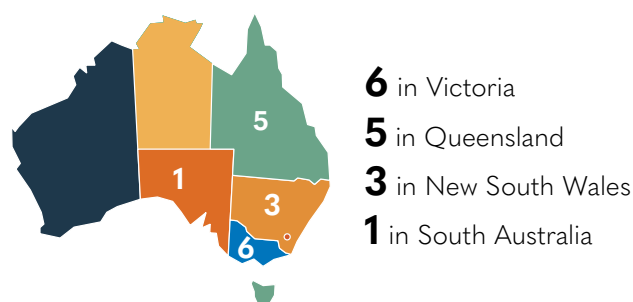
Land access objections 2022–23

In 2022–23 we received 15 land access objections and closed a total of 16. Of the 16 objections we closed, six were cases received in 2022–23 and 10 were cases received in the previous financial year.

Land access objections received by activity type

Type of activity	Volume
Installation	12
Maintenance	2
Inspection & installation	1

Land access objections received by state



Case study

Land access

A carrier wanted to install underground conduit and cable and replace an existing telco pit on rural land next to a railway line to improve the telecommunications network it operates. A carrier has the right to access private land to install low-impact facilities and maintain existing telecommunications facilities if it complies with procedures under Schedule 3 of the *Telecommunications Act 1997* (Schedule 3), including complying with the Telecommunications Code of Practice 2021 (Code).

The carrier notified the occupier of its proposal to access their land to undertake the activity more than ten business days before its proposed start date. The carrier's notice explained the activity being proposed, the purpose for the proposed activity, and the pathway under the code for objecting to the proposed activity.

The proposed location was near a railway line. The occupier did not want the carrier to undertake the activity because they were concerned about safety during and after construction, so the occupier objected in writing to the carrier.

The carrier tried to resolve the occupier's objection by explaining it proposed replacing

an existing pit at its same location, and that the proposed cable path ran away from the railway line. The carrier considered there was no alternative cable path because of the need to utilise the existing pit, and so the carrier agreed to work with the occupier on suitable arrangements for undertaking the activity.

The occupier asked the carrier to refer their concerns to the Telecommunications Industry Ombudsman because it was unsatisfied with the carrier's response.

We directed the carrier to notify the occupier of its start and finish dates because we were satisfied detriment and inconvenience would be experienced by the occupier not knowing start and finish times inside a three-month window. We were also satisfied that the further information provided by the carrier to the occupier addressed the occupier's concerns, along with the carrier meeting its obligations. We considered the proposed location was not problematic or inconvenient, and there was no economically feasible or technically practicable alternative.

Our decision meant the carrier could go ahead with the activity.

The year in complaints

Complaints fast facts

Complaints received

66,388

↓16.5% on 2021-22

Escalated complaints

9,429

↓10.2% on 2021-22

Contacts received

181,136

 **107,878** Online

 **73,258** Calls



Mobile was the most complained about service type with

31,649

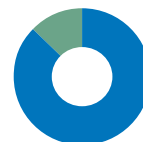
complaints



43%

escalated complaints closed within 60 days (56% in 2021-22)

Who complained



58,083 (87.5%)

Residential

8,305 (12.5%)

Small business



1.2%

increase in financial hardship or repayment arrangement complaints

10

decisions (5 in 2021-22)

6 Ombudsman

4 Delegated person



39.5%

of all complaints were network issue

3

binding decisions referred to ACMA for enforcement

1

direction to implement referred to ACMA for enforcement

3

in 2021-22

* Complaint statistics shown in the Annual Report reflect live data which relates to the 2022-23 financial year as at 13 July 2023. Complaints that were deregistered or reclassified before this date have been excluded. Complaint statistics shown in the Financial Report reflect the gross number of invoiced transactions for the financial year as at 30 June 2023 with reclassifications adjusted separately.

Events that shaped the complaint landscape

In September 2022, Optus experienced a data breach, which resulted in the unauthorised disclosure of a reported 9.8 million customers' personal information.

The essentiality of telco services was highlighted this year by the commencement of customer identity authentication rules and changes to consumer protections announced by the Federal Government in June 2023. The introduction of new identity rules was timely as the impact of a large-scale data breach was felt.

Infrastructure and the market

In February 2023, NBN Co announced plans to upgrade a million households and businesses to full fibre to the premises connection, with up to 58 per cent located in regional areas and the rest in metro areas. NBN Co aims to connect approximately three million premises by the end of 2025.

In May 2023, the ACCC rejected NBN Co's proposed variation to its Special Access Undertaking, on the basis that it was not satisfied the proposed variation would result in access terms that would promote the long-term interest of consumers. The ACCC was also concerned the proposed variation would pose risks to efficiency and competition.

Disruptions to the telecommunications industry

In September 2022, Optus experienced a data breach, which resulted in the unauthorised disclosure of a reported 9.8 million customers' personal information. This included customers' names, addresses, dates of birth, contact details, account information and government identity documents.

The TIO received complaints from consumers about a range of issues relating to the breach. Many consumers told us they were concerned about their personal and financial safety. Common complaint issues included consumers who wanted to know what information had been disclosed in the breach, wanted to cancel their contract without having to pay for contract termination fees or device repayments or wanted compensation, including recovering the cost of replacing stolen identity documents.

Under this Determination, providers are required to use multi-factor identity authentication for all high-risk transactions.

Optus actively worked with us to resolve complaints. Because of ongoing investigations by the regulator, we could not make a decision about whether Optus had breached consumers' privacy. However, we helped Optus and consumers come to agreements about how their complaints should be resolved. In each complaint, we considered whether the disclosure of the consumer's information directly caused the consumer harm and whether this harm was quantifiable. While outcomes for these complaints varied on a case-by-case basis, examples of resolutions include goodwill payments and reimbursements for steps consumers took to mitigate the risk of identity theft.

In response to the data breach, the Government took steps to protect affected consumers' identity, such as making amendments to the Telecommunications Regulations 2021 to allow Optus to share limited information with financial institutions and government agencies to detect and mitigate the risks of malicious activity. The Government also established a register to help stop compromised identities from being used fraudulently.

Changes in the regulatory landscape

On 30 June 2022, the ACMA Telecommunications Service Provider (Customer Identity Authentication) Determination 2022 (Determination) came into effect. The Determination contains rules designed to prevent fraud and identity theft. Under this Determination, providers are required to use multi-factor identity authentication for all high-risk transactions. These includes actions such as SIM swaps, transfers from post-paid to pre-paid services, change of ownership requests or adding new services or devices to an account.

After considering the views of various stakeholders, including the TIO, the Government decided to remake the sunseting CSG instruments for at least three years, with some revisions.

The Government commenced a thematic review of the Customer Service Guarantee (CSG) in February 2023. The CSG is a long-standing retail consumer protection which has not substantially changed since its inception in 2011. After considering the views of various stakeholders, including the TIO, the Government decided to remake the sunseting CSG instruments for at least three years, with some revisions.

In May 2023, ACMA published its [*Financial hardship in the telco sector: Keeping the customer connected*](#) report. The report identifies a range of issues affecting consumers who are facing difficult financial circumstances. The report found effective protections for consumers are essential, commensurate with the role of telecommunications as an essential service.

Communications Alliance, the peak industry body for the telco sector, commenced the first steps in its scheduled review of the TCP Code in May 2023. This review occurs every five years and is due to be finalised in 2024. The TCP Code is a major piece of consumer protections for the telco sector.

In May 2023, the Government announced it has made the decision to pause the expansion of the Consumer Data Right (CDR) to the telco sector. The Government stated this decision was in line with recommendations from the independent Statutory Review that further time is needed for the CDR to mature.



Case study

Dr Kumari* did not get an explanation for her mobile outage

Dr Kumari lives in rural NSW. She has a mobile service with Fort Mobile and uses the service for her work.

In early 2022, Dr Kumari's mobile service stopped working at her home.

After several days, Dr Kumari called Fort Mobile to say her mobile was not working. She asked whether there was a problem in her area, and if there was, when it would be fixed.

Fort Mobile said its systems did not show any problems in her area. This explanation did not make sense to Dr Kumari.

Her service was still not working, and her neighbours (also with Fort Mobile) were experiencing the same issues.

After several weeks her service was still not working, so Dr Kumari contacted our office and made a complaint.

After we referred the complaint, Fort Mobile told Dr Kumari a network outage had impacted her town. Fort Mobile resolved the complaint by refunding the service charges Dr Kumari had paid during the time her service was not working.

* Names of all parties have been changed.

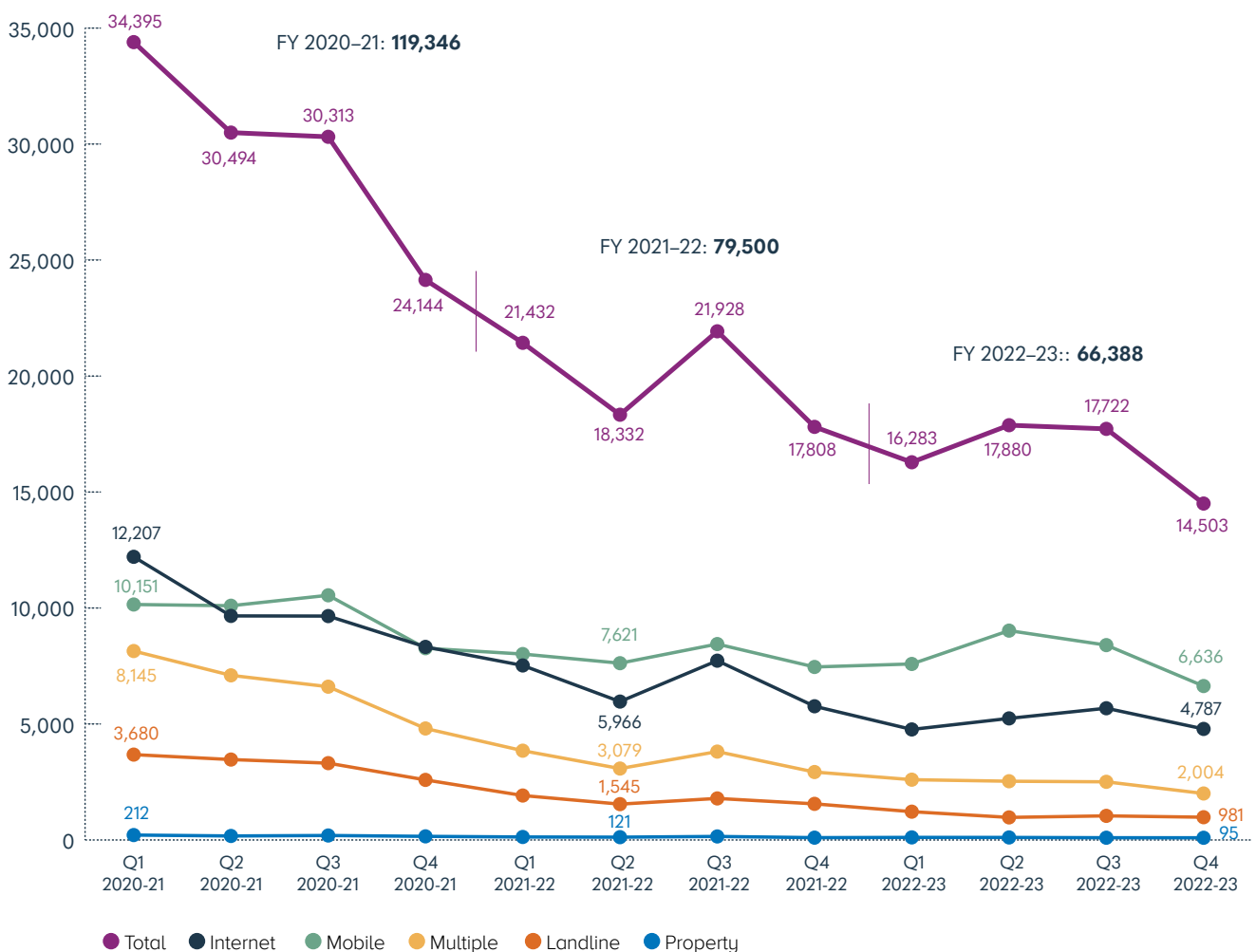
Trends in complaints

Complaints and total contacts continued to decrease in 2022–23, consistent with the trend over the last four years.

We referred 66,388 complaints to providers in 2022–23, a reduction of 16.5 per cent compared to the previous year. Enquiries increased by 3.6 per cent, to 26,412. The increase in enquiries was driven largely by enquiries relating to Optus group. We received 66.8 per cent more enquiries about Optus group in 2022–23 compared to 2021–22.

Compared to last year, complaints coming back to us unresolved have also declined, although they have not fallen as much as the overall decline in complaints.

Graph 1: Complaints by service type and quarter 2020–21 to 2022–23



	Q1 2020-21	Q2 2020-21	Q3 2020-21	Q4 2020-21	Q1 2021-22	Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23	Q2 2022-23	Q3 2022-23	Q4 2022-23
Total	34,395	30,494	30,313	24,144	21,432	18,332	21,928	17,808	16,283	17,880	17,722	14,503
Internet	12,207	9,659	9,652	8,324	7,523	5,966	7,729	5,764	4,765	5,241	5,679	4,787
Landline	3,680	3,467	3,312	2,590	1,916	1,545	1,791	1,557	1,220	973	1,039	981
Mobile	10,151	10,098	10,548	8,267	8,015	7,621	8,446	7,458	7,588	9,025	8,400	6,636
Multiple	8,145	7,097	6,608	4,807	3,849	3,079	3,810	2,929	2,599	2,532	2,507	2,004
Property	212	173	193	156	129	121	152	100	111	109	97	95

Complaints by service type

Mobile services were the most complained about service type in 2022-23 for the second year in a row. Complaints about mobile services accounted for 47.7 per cent of complaints this year, compared to 39.7 per cent in 2020-21. The absolute volume of mobile complaints increased by 0.3 per cent from 31,540 in 2021-22 to 31,649 in 2022-23. Quarterly mobile complaint volumes were elevated particularly in the second quarter and declined in the fourth quarter to below 21-22 levels.

This year, the proportion of complaints about internet services decreased slightly and now represents 30.8 per cent of complaints, compared to 33.9 per cent last year. Internet complaint volumes reduced by 24.1 per cent compared to the previous year. Complaints about internet services remained below their 2021-22 levels in each quarter. However, these complaints increased in the second and third quarters compared to the previous quarter.

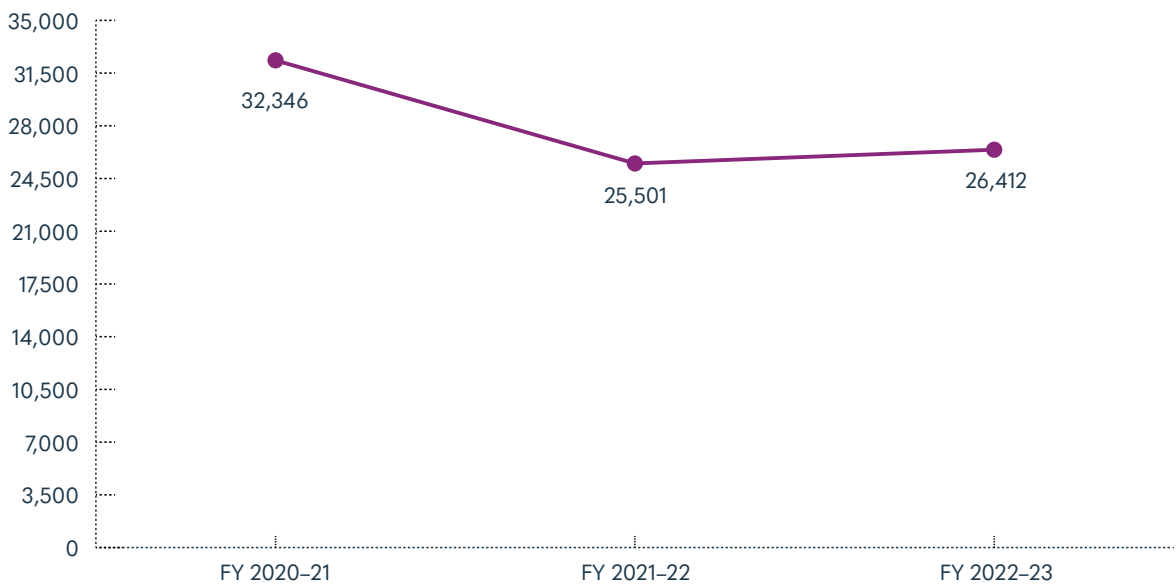
The proportion and volume of complaints relating to landline services continued to fall this year, consistent with the downward trend observed over the last three years. The volume dropped by 38.1 per cent and this service type made up 6.3 per cent of all complaints.

The proportion of complaints about multiple service types decreased from 17.2 per cent to 14.5 per cent. The volume of complaints about multiple services decreased by 29.5 per cent.

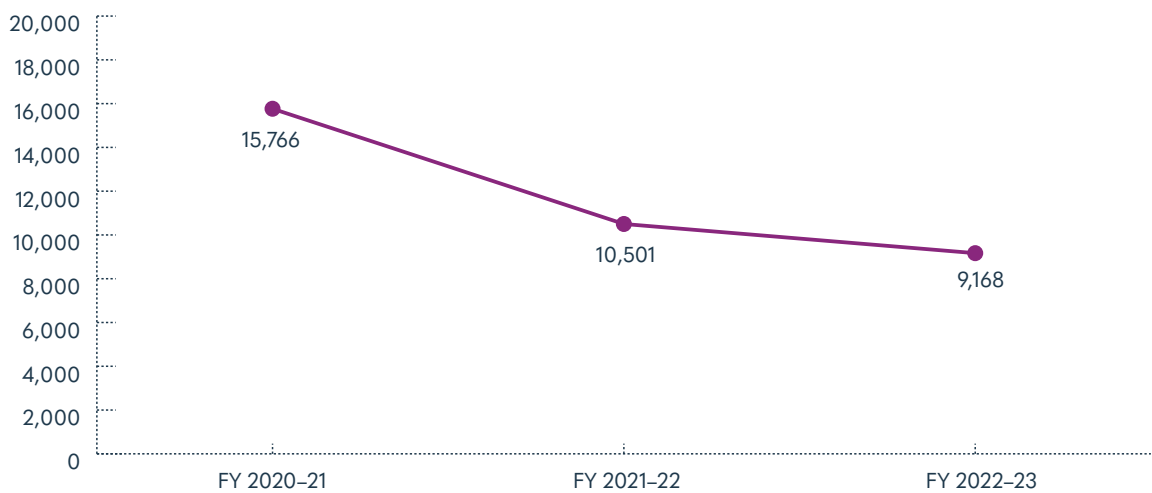
Table 1: Complaints by service type 2020-21 to 2022-23

Service Type	2020-21	2021-22	2022-23
Internet	33.4%	33.9%	30.8%
Landline	10.9%	8.6%	6.3%
Mobile	32.7%	39.7%	47.7%
Multiple	22.3%	17.2%	14.5%
Property	0.6%	0.6%	0.6%

Graph 2: Enquiries 2020–21 to 2022–23



Graph 3: Escalated complaints 2020–21 to 2022–23



Top 10 issues

No or delayed action by a provider and service and equipment fees were the most common issues in complaints for the third year in a row.

Six of our top 10 complained about issues fell in volume when compared to 2021–22. The four issues which increased in volume were no or delayed action by provider, failure to cancel a service, inadequate fault testing and non-financial loss – not privacy.

Non-financial loss - not privacy complaints increased by 132.3 per cent because we began to handle this issue in January 2022 when our modernised terms of reference came into effect. As a result of this change, non-financial loss – not privacy issues were only considered in the second half of 2021–22, and 2022–23 is the first full financial year where we have handled complaints about this issue.

The biggest improvements were seen in complaints about delay establishing a service (41.2 per cent decline), complaints about no phone or internet service (40.1 per cent decline), and slow data speed (35.1 per cent decline). Poor mobile coverage complaints declined by 27.2 per cent and are no longer in our top 10 complaint issues.

Table 2: Top 10 issues 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No or delayed action by provider	35,666	37,735	56.8%	5.8%
Service and equipment fees	23,158	21,062	31.7%	-9.1%
Resolution agreed but not met	7,464	6,727	10.1%	-9.9%
No phone or internet service	10,268	6,146	9.3%	-40.1%
Intermittent service or drop outs	8,839	5,825	8.8%	-34.1%
Failure to cancel a service	4,269	4,810	7.2%	12.7%
Delay establishing a service	7,358	4,330	6.5%	-41.2%
Inadequate fault testing	3,654	3,906	5.9%	6.9%
Slow data speed	5,663	3,677	5.5%	-35.1%
Non-Financial Loss – Not Privacy	1,420	3,299	5.0%	132.3%

Issues by service type

We observed a reduction in complaints across all service types except mobile, which increased by 0.3 per cent. The largest reduction was for landline complaints, which decreased by 38.1 per cent.

Eight of the top 10 issues for mobile services increased, with the biggest increases seen in complaints about unauthorised disclosure of personal information (375.8 per cent increase), failure to cancel a service (49.0 per cent increase) and termination fees (45.9 per cent). The increase in unauthorised disclosure of personal information issues was driven by complaints related to the Optus data breach.

The two issues for mobile services which decreased were complaints about poor mobile coverage (down 23.6 per cent) and variation to a contract or plan (down 4.4 per cent).

Seven of the top 10 issues in internet services decreased compared to 2021–22. The largest reductions were seen in complaints about connection delays (41.3 per cent decrease), no service (39.7 per cent decrease) and intermittent service or dropouts (35.4 per cent). Internet complaints about missed appointments declined by 44.3 per cent compared to last year, and this issue has dropped out of the top 10.

Internet complaints about non-financial loss – not privacy increased by 114.9 per cent, and this issue entered the top 10 for the first time. The large increase is because we began to handle complaints about this issue in the second half of 2021–22.

Except for complaints about unauthorised disclosure of personal information, all other issues in the top 10 for multiple services fell when compared to 2021–22. Unauthorised disclosure complaints for multiple services increased by 218.3 per cent. As with mobile complaints, this issue was largely due to the Optus data breach.

The largest reductions for multiple services were in complaints about connection delays (53.8 per cent decrease), no phone or internet service (48.6 per cent) and poor mobile coverage (41.0 per cent).

Landline complaints saw a reduction in all top 10 issues with the highest reduction from complaints about connection delays (53.1 per cent decline), no service (42.5 per cent) and disconnection in error (42.2 per cent). The smallest decline was for complaints about failure to cancel a service, which declined by 9.8 per cent, and entered the top 10 landline complaint issues after being ranked 11th in 2021–22.

Table 3: Top 10 issues for mobile services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	14,619	18,342	58.0%	25.5%
Service And Equipment Fees	9,667	10,010	31.6%	3.5%
Resolution Agreed But Not Met	3,521	3,542	11.2%	0.6%
Poor Mobile Coverage	3,398	2,595	8.2%	-23.6%
Unauthorised Disclosure	495	2,355	7.4%	375.8%
Equipment Fault	2,027	2,064	6.5%	1.8%
Misleading Conduct When Making A Contract	1,641	1,909	6.0%	16.3%
Variation To A Contract Or Plan By Member	1,700	1,625	5.1%	-4.4%
Failure To Cancel A Service	1,081	1,611	5.1%	49.0%
Termination Fee	1,059	1,545	4.9%	45.9%

Table 4: Top 10 issues for internet services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	11,617	11,271	55.1%	-3.0%
Service And Equipment Fees	7,872	6,706	32.8%	-14.8%
Intermittent Service Or Drop Outs	5,491	3,547	17.3%	-35.4%
Slow Data Speed	4,248	2,781	13.6%	-34.5%
No Phone Or Internet Service	4,592	2,769	13.5%	-39.7%
Delay Establishing A Service	3,825	2,247	11.0%	-41.3%
Inadequate Fault Testing	1,971	2,140	10.5%	8.6%
Failure To Cancel A Service	1,944	2,082	10.2%	7.1%
Resolution Agreed But Not Met	2,050	1,835	9.0%	-10.5%
Non-Financial Loss – Not Privacy	599	1,287	6.3%	114.9%

Table 5: Top 10 issues for multiple services 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	6,208	5,638	58.5%	-9.2%
Service And Equipment Fees	4,370	3,490	36.2%	-20.1%
No Phone Or Internet Service	2,638	1,355	14.1%	-48.6%
Intermittent Service Or Drop Outs	1,735	1,093	11.3%	-37.0%
Resolution Agreed But Not Met	1,337	978	10.1%	-26.9%
Failure To Cancel A Service	855	766	7.9%	-10.4%
Delay Establishing A Service	1,498	692	7.2%	-53.8%
Unauthorised Disclosure	175	557	5.8%	218.3%
Bill Unclear Or Not Received	655	542	5.6%	-17.3%
Poor Mobile Coverage	879	519	5.4%	-41.0%

Table 6: Top 10 issues for landline services 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	3,181	2,459	58.4%	-22.7%
No Phone Or Internet Service	1,954	1,123	26.7%	-42.5%
Service And Equipment Fees	1,241	851	20.2%	-31.4%
Resolution Agreed But Not Met	548	368	8.7%	-32.8%
Delay Establishing A Service	769	361	8.6%	-53.1%
Number Problem Due To Connection, Disconnection Or Transfer	599	352	8.4%	-41.2%
Failure To Cancel A Service	389	351	8.3%	-9.8%
Disconnection In Error	592	342	8.1%	-42.2%
Changing Provider	446	295	7.0%	-33.9%
Partially Restricted Service	460	267	6.3%	-42.0%

Complaints about financial hardship

Table 7: Financial hardship complaints 2020–21 to 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
Financial Hardship or Repayment Arrangement	1,615	1,634	2.5%	1.2%

Graph 4: Financial hardship complaints by quarter 2022–23

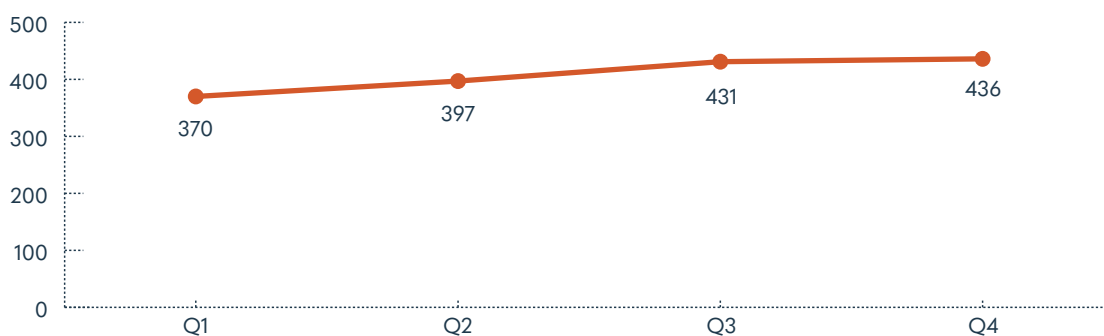


Table 8: Financial hardship complaints by service type and quarter 2022–23

Quarter	Landline	Internet	Mobile	Multiple	Property	Total
Q1	3	40	255	72	–	370
Q2	7	42	279	69	–	397
Q3	4	55	315	57	–	431
Q4	5	54	281	96	–	436

Table 9: Financial hardship complaints by consumer type and quarter 2022–23

Quarter	Residential	Small Business & Others	Total
Q1	342	28	370
Q2	370	27	397
Q3	410	21	431
Q4	415	21	436



Case study

Neil* was not offered a reasonable payment arrangement when he was unable to work

Neil has several services with Pebble Telco. Last year, he became seriously ill and was not able to work. This significantly reduced the income available to Neil's family each week. Because of this, he was not able to keep up with his monthly payments and a large debt built up on his account.

Neil contacted Pebble Telco to ask for help. Pebble Telco gave Neil an extension on the due date for his charges, but when the extension ran out he was not able to pay off the full amount. Neil contacted Pebble Telco again, but it refused to consider setting up a payment arrangement unless

he paid \$350 within the following fortnight. Neil could not afford this, so he contacted our office.

After we referred Neil's complaint to Pebble Telco's escalated complaints team, they came to an agreement about how Neil would pay off his debt. Neil agreed to cancel some of his services to reduce his ongoing monthly charges. Pebble Telco agreed Neil could pay off his debt over several months, at a monthly rate he could afford.

* Names of all parties have been changed.

Network complaints

Complaints involving network issues made up 39.5 per cent of our complaints, a significant fall from 49.6 per cent in 2021–22 and the lowest level in over five years.

The volume of complaints about network issues reduced by 33.5 per cent in total, and declined for all service types. The highest volume reduction was observed in landline services (43.1 per cent), followed by multiple services (42.6 per cent), and internet services (35.2 per cent) when compared to the previous year.

Compared to 2021–22, complaints about network issues for services delivered over the NBN declined by 37.6 per cent, while services delivered over other networks declined by 28.3 per cent.

This year, 42,536 premises were connected to the NBN, with 8,558,654 premises active on the NBN at the end of the year. In 2021–22, 315,715 premises were connected to the NBN network, with 8,516,118 total premises active on the NBN network at the end of that year*.

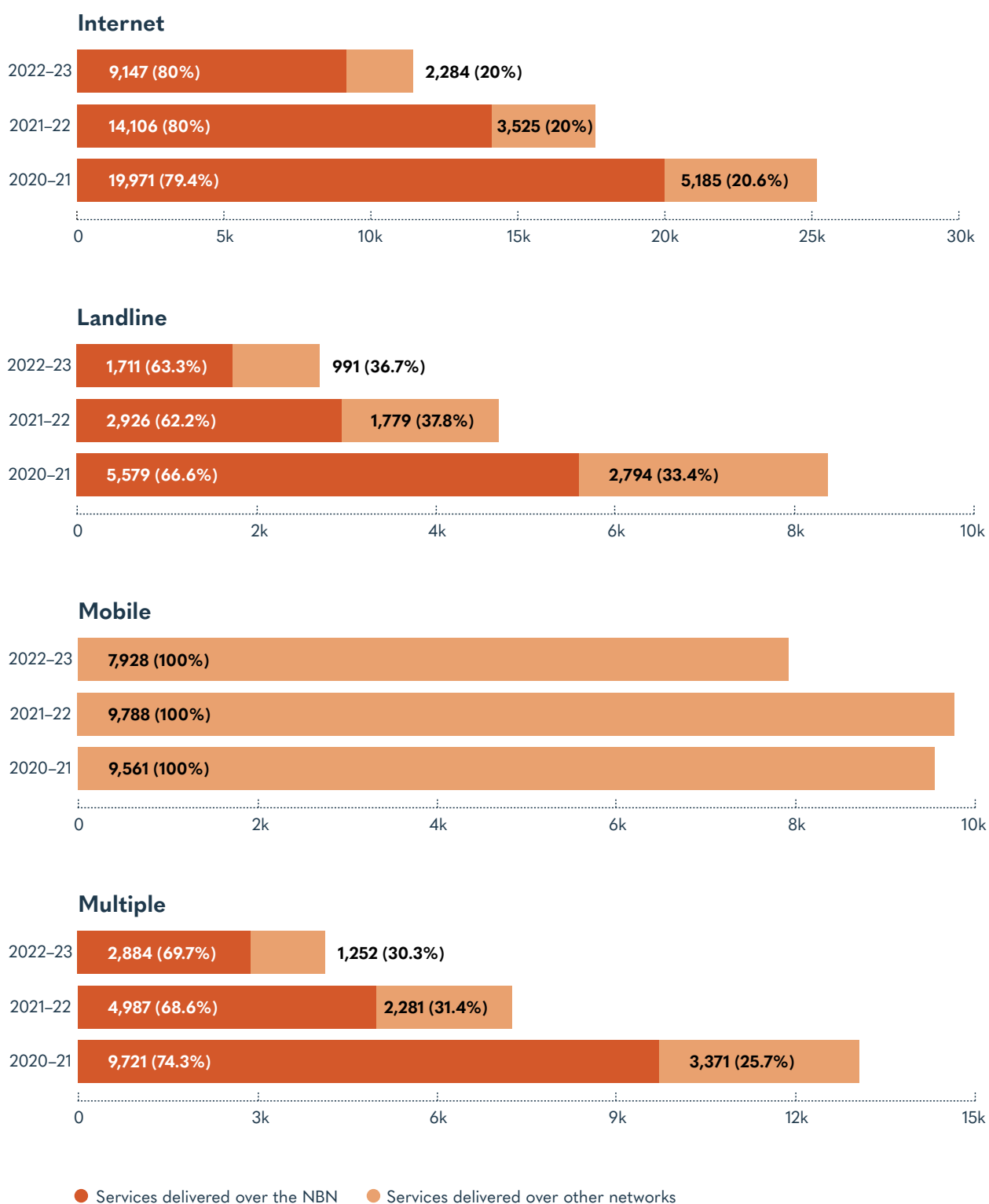
The experience of connecting to or receiving a service delivered over the NBN is influenced by a range of factors. These include the actions of internet service providers, wholesalers and NBN Co, and factors within consumers' premises.

All network issues declined compared to last year, with the largest reductions being complaints with noise/interference issues (41.2 per cent decline), connection delays (41.2 per cent), and no phone or internet service (40.1 per cent).

We saw decreases in complaints about all network issues in complaints from both residential and small business and other consumers. The largest decline for residential consumers was connection delay issues (down 39.6 per cent). For small business and other consumers, the largest decrease was for noise/interference (52.4 per cent decrease).

* Source: Nbnco.com.au. 2021. [National Broadband Network – Rollout Information](https://nbnco.com.au/2021/national-broadband-network-rollout-information)

Graph 5: Network complaints by service type 2020–21 to 2022–23



Complaints by provider

Complaints about the top 10 providers accounted for 90.1 per cent of all complaints received, which is a slight decrease from 90.3 per cent last year. The number of providers we received complaints about dropped from 321 last year to 297 this year.*

Complaints about Telstra** accounted for 40.4 per cent of all complaints, decreasing from 52.5 per cent in the previous year. Telstra's complaint volume decreased by 35.7 per cent this year.

Optus Group** accounted for 30.6 per cent of complaints, an increase from 19.8 per cent in 2020–21. Optus Group complaint numbers increased by 29.5 per cent in compared to 2021–22.

Complaints about TPG Group** fell by 31.0 per cent. Complaints also decreased for iiNet (14.7 per cent), Aussie Broadband Limited (21.4 per cent), Dodo Services Pty Ltd (48.8 per cent) and Medion Australia Pty Limited*** (10.7 per cent).

Complaints about Vodafone Australia Limited increased by 4.9 per cent, and Southern Phone Company Ltd increased by 26.1 per cent.

Internode Pty Limited is a recent entrant into the top 10, with an 11.1 per cent increase in complaints, making up 0.7 per cent of total complaints. Boost Tel Pty Ltd is no longer in the top 10 list.

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

** Refer to the glossary for details of member grouping.

*** Offering products and services under the brand "ALDI mobile".

Table 10: Top 10 service providers by complaints 2020–21 to 2022–23

Provider	2021–22	2022–23	2022–23 % of total	Change from 2021–22
Telstra Group	41,737	26,837	40.4%	-35.7%
Optus Group	15,696	20,323	30.6%	29.5%
Vodafone Australia Limited	4,830	5,069	7.6%	4.9%
TPG Group	3,220	2,222	3.4%	-31.0%
iiNet Ltd	2,196	1,874	2.8%	-14.7%
Southern Phone Company Ltd	828	1,044	1.6%	26.1%
Aussie Broadband Limited	1,133	890	1.3%	-21.4%
Dodo Services Pty Ltd	1,127	577	0.9%	-48.8%
Medion Australia Pty Limited	572	511	0.8%	-10.7%
Internode Pty Ltd	424	471	0.7%	11.1%

Residential complaints

We received a total of 58,083 complaints from residential consumers, a 15.1 per cent decrease from the previous year. Complaints from residential consumers accounted for 87.5 per cent of all complaints received this year which is an increase from last year's 86.1 per cent.

Residential complaints by service type

Complaints about mobile services for residential consumers increased by 0.8 per cent in 2022–23, while residential complaints for all other service types decreased. The largest decline was for residential landline complaints (38.7 per cent), followed by multiple (27.9 per cent).

Most complaints received from residential consumers were about their mobile and internet services. Complaints about mobile services made up the highest proportion of residential complaints at 49.7 per cent, which is an increase from last year (41.8 per cent). This is the highest proportion of mobile complaints in over five years for residential consumers.

Complaints about internet services made up 32.2 per cent of residential complaints, a decrease from 36.0 per cent last year. Complaints about landline services continued to decline in 2022–23, falling to 4.6 per cent of all residential complaints compared to 6.4 per cent last year. This is to be expected as consumers move away from reliance on fixed telephone services.

Table 11: Residential complaints by service type 2021–22 to 2022–23

Service Type	2020–21	2021–22	2022–23
Internet	36.0%	36.0%	32.2%
Landline	8.2%	6.4%	4.6%
Mobile	35.1%	41.8%	49.7%
Multiple	20.0%	15.2%	12.9%
Property	0.7%	0.6%	0.6%

Residential complaints by top 10 issues

No or delayed action by the provider and service and equipment fees continued to be the two biggest issues faced by residential consumers this year. Four of the top 10 issues for residential consumers increased this year.

The largest increase was for non-financial loss – not privacy, which increased by 137.0 per cent and is a new addition to this year's top 10. This increase is due to 2022–23 being the first full financial year where we have considered this issue.

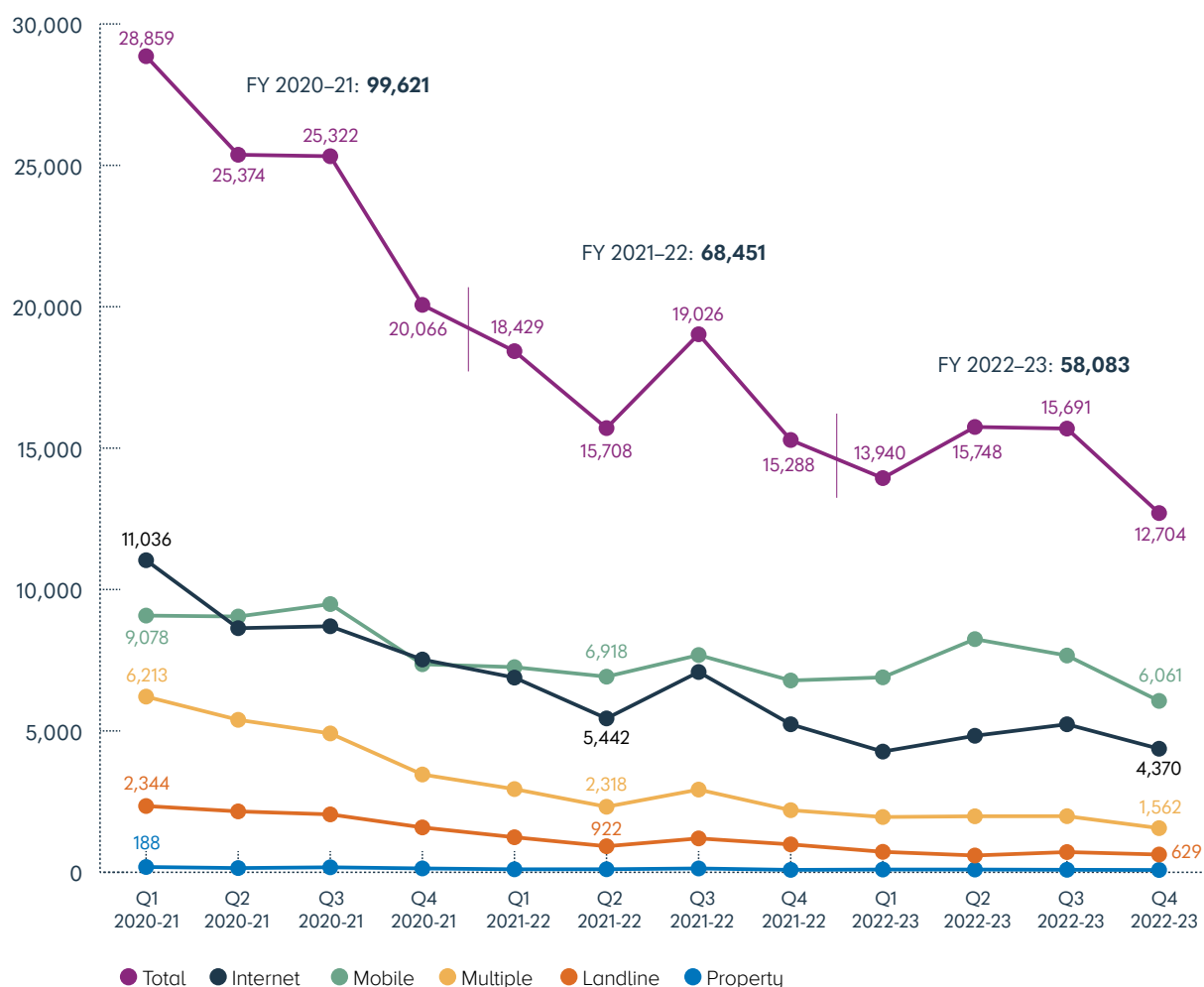
The other issues which increased were failure to cancel a service (17.4 per cent), no or delayed action by provider (8.0 per cent) and inadequate fault testing (7.6 per cent).

Poor mobile coverage issues declined by 27.4 per cent and dropped out of the top 10 issues for residential consumers.

Within the top 10 issue for residential consumers, the largest decreases compared to 2021–22 were observed for delay establishing a service (39.6 per cent), no phone or internet service (38.9 per cent) and intermittent service or drop outs (34.6 per cent).

Table 12: Top 10 issues in residential complaints 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	30,514	32,967	56.8%	8.0%
Service And Equipment Fees	20,372	18,705	32.2%	-8.2%
Resolution Agreed But Not Met	6,601	6,004	10.3%	-9.0%
Intermittent Service Or Drop Outs	7,849	5,133	8.8%	-34.6%
No Phone Or Internet Service	8,293	5,069	8.7%	-38.9%
Failure To Cancel A Service	3,591	4,217	7.3%	17.4%
Delay Establishing A Service	6,127	3,701	6.4%	-39.6%
Inadequate Fault Testing	3,192	3,435	5.9%	7.6%
Slow Data Speed	5,146	3,373	5.8%	-34.5%
Non-Financial Loss – Not Privacy	1,269	3,007	5.2%	137.0%

Graph 6: Residential complaints by service type and quarter 2021–22 to 2022–23


	Q1 2020–21	Q2 2020–21	Q3 2020–21	Q4 2020–21	Q1 2021–22	Q2 2021–22	Q3 2021–22	Q4 2021–22	Q1 2022–23	Q2 2022–23	Q3 2022–23	Q4 2022–23
Total	28,859	25,374	25,322	20,066	18,429	15,708	19,026	15,288	13,940	15,748	15,691	12,704
Internet	11,036	8,633	8,701	7,525	6,885	5,442	7,083	5,235	4,269	4,828	5,235	4,370
Mobile	9,078	9,045	9,485	7,358	7,255	6,918	7,683	6,783	6,894	8,246	7,666	6,061
Multiple	6,213	5,392	4,911	3,459	2,943	2,318	2,925	2,197	1,955	1,981	1,985	1,562
Landline	2,344	2,154	2,048	1,587	1,240	922	1,199	987	724	595	716	629
Property	188	150	177	137	106	108	136	86	98	98	89	82

Small business complaints

We received 8,305 complaints from small businesses, which was a 24.8 per cent decrease on the previous year and the lowest volume of small business complaints in the last three years.

Many small businesses rely heavily on phone, internet, and landline services, or a combination of these, for the day-to-day operation of their business.

Small business complaints by service type

Small business complaints were lower for all service types compared to 2021–22.

Complaints about mobile services accounted for 33.5 per cent of small business complaints, which was an increase from 26.3 per cent last year. This is the first year that mobile services have been the dominant service type for small business complaints. Internet services made up 21.3 per cent of small business complaints, which is similar to last year.

Multiple services complaints accounted for 26.0 per cent of complaints, a decline from 29.7 per cent of complaints last year. Landline complaints accounted for 18.7 per cent of small business complaints, which was a reduction from 22.3 per cent last year.

Table 13: Small business complaints by service type 2021–22 to 2022–23

Service Type	2020–21	2021–22	2022–23
Internet	20.0%	21.2%	21.3%
Landline	24.9%	22.3%	18.7%
Mobile	20.8%	26.3%	33.5%
Multiple	33.9%	29.7%	26.0%
Property	0.4%	0.6%	0.5%

Complaints by top 10 issues

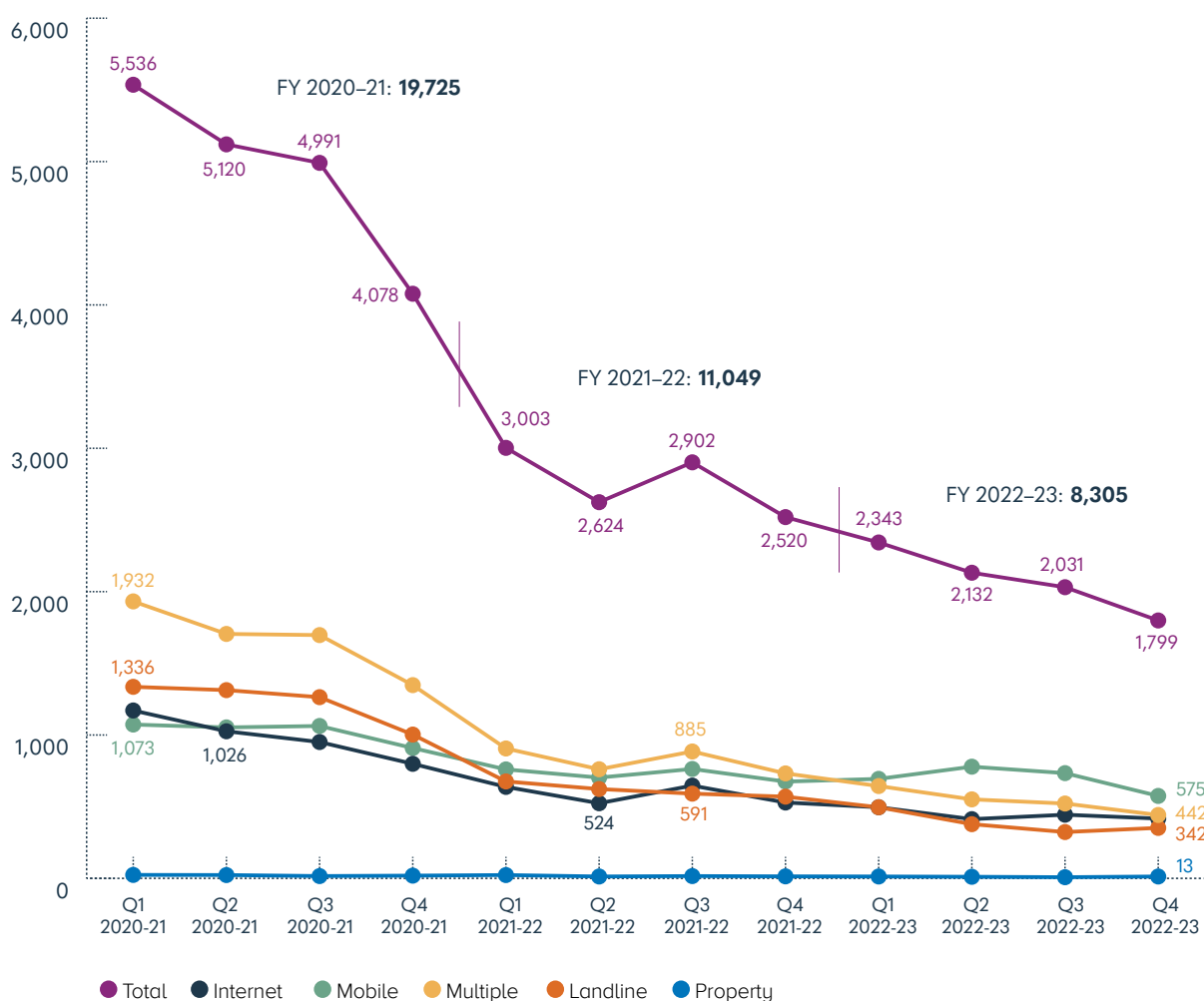
Nine of the top 10 issues for small business consumers decreased in volume compared to last year. Complaints related to delays establishing a service decreased by 48.9 per cent, no phone or internet service fell by 45.5 per cent and disconnection in error fell by 32.2 per cent.

The only issue which increased was inadequate fault testing (1.9 per cent increase). This issue is new to the top 10 and occurred in 5.7 per cent of small business complaints in 2022–23. Poor mobile coverage decreased by 25.7 per cent and is no longer in the top 10 small business issues.

Although they declined in absolute volume, small business complaints about no or delayed action by a provider, service and equipment fees, business loss and failure to cancel a service were found in higher proportions of small business complaints compared to 2021–22. No or delayed action and service and equipment fees remained the two most prevalent issues and business loss moved from the 9th most frequent issue to 8th.

Table 14: Top 10 issues in small business complaints 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	5,152	4,768	57.4%	-7.5%
Service And Equipment Fees	2,786	2,357	28.4%	-15.4%
No Phone Or Internet Service	1,975	1,077	13.0%	-45.5%
Business Loss	1,191	947	11.4%	-20.5%
Resolution Agreed But Not Met	863	723	8.7%	-16.2%
Intermittent Service Or Drop Outs	990	692	8.3%	-30.1%
Delay Establishing A Service	1,231	629	7.6%	-48.9%
Failure To Cancel A Service	678	593	7.1%	-12.5%
Disconnection In Error	748	507	6.1%	-32.2%
Inadequate Fault Testing	462	471	5.7%	1.9%

Graph 7: Small business complaints by service type and quarter 2021-22 to 2022-23


	Q1 2020-21	Q2 2020-21	Q3 2020-21	Q4 2020-21	Q1 2021-22	Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23	Q2 2022-23	Q3 2022-23	Q4 2022-23
Total	5,536	5,120	4,991	4,078	3,003	2,624	2,902	2,520	2,343	2,132	2,031	1,799
Multiple	1,932	1,705	1,697	1,348	906	761	885	732	644	551	522	442
Landline	1,336	1,313	1,264	1,003	676	623	591	570	496	378	323	352
Internet	1,171	1,026	951	799	638	524	647	529	496	413	444	417
Mobile	1,073	1,053	1,063	909	760	703	763	675	694	779	734	575
Property	24	23	16	19	23	13	16	14	13	11	8	13

Financial statements

[Download the TIO Directors' Report and Financial Statements 2022–23](#)

Glossary

Data and complaints terminology

This section explains the finer points of our data and defines the terms we use in this report.

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.

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

Complaint data is calculated as at the end of the current reporting period.

Previous quarters/financial year(s) may be adjusted if a complaint or enquiry is cancelled or reclassified before the end of the current period.

Data does not reflect cancellations or reclassifications that are processed by the TIO after the most recent period end date. Subsequent cancellations or reclassifications will be reflected in the next reporting period.

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 send 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).

Network Issues

are complaints that include issues from the connection, no service, and poor service quality keywords. These are only counted once, regardless of the number of issues raised in the complaint.

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.

Issues/Keywords

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 101 to 104.

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

Telstra group includes “Telstra Limited” and “Telstra Corporation Limited”. Optus group includes “Optus Internet Pty Ltd”, “Opus 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

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.

Per centages

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

Property complaints

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

Top 10 providers by complaints

Where we talk about the Top 10 providers by complaints, we mean those member companies we received the most complaints about in the latest reporting period.

Provider complaints

includes complaints made by consumers against member organisations. 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.

Small business & others

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

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. 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.

Complaint issue categories and keywords

Establishing a service

Category	Issue 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
In contract	Unconscionable conduct
	Variation by provider
	Request to change account holder
	Not liable for contract
	Unfair contract terms
	Equipment finance agreement
	Mishandled or inaccurate information - not personal
Connection	Failure to cancel
	Delay
	Number problem
	Changing provider
	Unauthorised transfer

Service delivery

Category	Issue 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 and account services	Priority assistance
	Disability equipment
	Enhanced/add-on feature
	Directory listing – business
	Can't access account or data – technical
	Loyalty programs

Payment for a service

Category	Issue 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

Customer service

Category	Issue 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 – privacy
	Non-financial loss – not privacy
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

Property

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

Schedule 3

Category	Issue keyword
Land access notice	No notice of activity
	Premature objection
	Refusal to refer objection to the TIO
	Defective notice
	Carrier objection referral

Appendix

Complaint distribution

A1: Complaints by service type change 2020–21 to 2022–23

Year	Internet	Landline	Mobile	Multiple	Property	Total
2022–23	20,472	4,213	31,649	9,642	412	66,388
2021–22	26,983	6,808	31,540	13,667	502	79,500
Change from 2021–22	-24.1%	-38.1%	0.3%	-29.5%	-179%	-16.5%

A2: Complaints by service type 2020–21 to 2022–23

Year	Internet		Landline		Mobile		Multiple		Property		Total	
	Vol	%	Vol	%	Vol	%	Vol	%	Vol	%	Vol	%
2022–23	20,472	30.8%	4,213	6.3%	31,649	47.7%	9,642	14.5%	412	0.6%	66,388	100%
2021–22	26,983	33.9%	6,808	8.6%	31,540	39.7%	13,667	17.2%	502	0.6%	79,500	100%
2020–21	39,842	33.4%	13,049	10.9%	39,064	32.7%	26,657	22.3%	734	0.6%	119,346	100%

A3: Complaints by consumer type 2020–21 to 2022–23

Year	Residential	%	Small Business	%	Total	
					Vol	%
2022–23	58,083	87.5%	8,305	12.5%	66,388	100%
2021–22	68,451	86.1%	11,049	13.9%	79,500	100%
2020–21	99,621	83.5%	19,725	16.5%	119,346	100%

A4: Enquiries 2020–21 to 2022–23

Year	Enquiries
2022–23	26,412
2021–22	25,501
2020–21	32,436

A5: Top 10 issues 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No or delayed action by provider	35,666	37,735	56.8%	5.8%
Service and equipment fees	23,158	21,062	31.7%	-9.1%
Resolution agreed but not met	7,464	6,727	10.1%	-9.9%
No phone or internet service	10,268	6,146	9.3%	-40.1%
Intermittent service or drop outs	8,839	5,825	8.8%	-34.1%
Failure to cancel a service	4,269	4,810	7.2%	12.7%
Delay establishing a service	7,358	4,330	6.5%	-41.2%
Inadequate fault testing	3,654	3,906	5.9%	6.9%
Slow data speed	5,663	3,677	5.5%	-35.1%
Non-Financial Loss – Not Privacy	1,420	3,299	5.0%	132.3%

Residential complaints

A6: Residential complaints by service type 2020–21 to 2022–23

Year	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
2022–23	18,702	32.2%	2,664	4.6%	28,867	49.7%	7,483	12.9%	367	0.6%	66,388
2021–22	24,645	36.0%	4,384	6.4%	28,639	41.8%	10,383	15.2%	436	0.6%	79,500
2020–21	35,895	36.0%	8,133	8.2%	34,966	35.1%	19,975	20.0%	652	0.7%	119,346

A7: Top 10 issues in residential complaints 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	30,514	32,967	56.8%	8.0%
Service And Equipment Fees	20,372	18,705	32.2%	-8.2%
Resolution Agreed But Not Met	6,601	6,004	10.3%	-9.0%
Intermittent Service Or Drop Outs	7,849	5,133	8.8%	-34.6%
No Phone Or Internet Service	8,293	5,069	8.7%	-38.9%
Failure To Cancel A Service	3,591	4,217	7.3%	17.4%
Delay Establishing A Service	6,127	3,701	6.4%	-39.6%
Inadequate Fault Testing	3,192	3,435	5.9%	7.6%
Slow Data Speed	5,146	3,373	5.8%	-34.5%
Non-Financial Loss – Not Privacy	1,269	3,007	5.2%	137.0%

Small business complaints

A8: Small business complaints by service type 2020–21 to 2022–23

Year	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
2022–23	1770	21.3%	1549	18.7%	2782	33.5%	2159	26.0%	45	0.5%	8305
2021–22	2338	21.2%	2460	22.3%	2901	26.3%	3284	29.7%	66	0.6%	11049
2020–21	3947	20.0%	4916	24.9%	4098	20.8%	6682	33.9%	82	0.4%	19725

A9: Top 10 issues in small business complaints 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	5,152	4,768	57.4%	-7.5%
Service And Equipment Fees	2,786	2,357	28.4%	-15.4%
No Phone Or Internet Service	1,975	1,077	13.0%	-45.5%
Business Loss	1,191	947	11.4%	-20.5%
Resolution Agreed But Not Met	863	723	8.7%	-16.2%
Intermittent Service Or Drop Outs	990	692	8.3%	-30.1%
Delay Establishing A Service	1,231	629	7.6%	-48.9%
Failure To Cancel A Service	678	593	7.1%	-12.5%
Disconnection In Error	748	507	6.1%	-32.2%
Inadequate Fault Testing	462	471	5.7%	1.9%

Complaints about internet services

A10: Internet complaints by year 2020–21 to 2022–23

Year	Complaints	Proportion of complaints
2022–23	20,472	30.8%
2021–22	26,983	33.9%
2020–21	39,842	33.4%

A11: Internet complaints by consumer type 2020–21 to 2022–23

Year	Residential	%	Small Business	%	Total
2022–23	18,702	91.4%	1,770	8.6%	20,472
2021–22	24,645	91.3%	2,338	8.7%	26,983
2020–21	35,895	90.1%	3,947	9.9%	39,842

A12: Top 10 issues for internet services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	11,617	11,271	55.1%	-3.0%
Service And Equipment Fees	7,872	6,706	32.8%	-14.8%
Intermittent Service Or Drop Outs	5,491	3,547	17.3%	-35.4%
Slow Data Speed	4,248	2,781	13.6%	-34.5%
No Phone Or Internet Service	4,592	2,769	13.5%	-39.7%
Delay Establishing A Service	3,825	2,247	11.0%	-41.3%
Inadequate Fault Testing	1,971	2,140	10.5%	8.6%
Failure To Cancel A Service	1,944	2,082	10.2%	7.1%
Resolution Agreed But Not Met	2,050	1,835	9.0%	-10.5%
Non-Financial Loss – Not Privacy	599	1,287	6.3%	114.9%

A13: Internet fault and connection complaints by network 2020–21 to 2022–23

Year	Services delivered over the NBN	Services delivered over other networks
2022–23	9,147	2,284
2021–22	14,106	3,525

Complaints about mobile services

A14: Mobile complaints by year 2020–21 to 2022–23

Year	Complaints	Proportion of complaints
2022–23	31,649	47.7%
2021–22	31,550	39.7%
2020–21	39,064	32.7%

A15: Mobile complaints by consumer type 2020–21 to 2022–23

Year	Residential	%	Small Business	%	Total
2022–23	28,867	91.2%	2,782	8.8%	31,649
2021–22	28,639	90.8%	2,901	9.2%	31,540
2020–21	34,966	89.5%	4,098	10.5%	39,064

A16: Top 10 issues for mobile services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	14,619	18,342	58.0%	25.5%
Service And Equipment Fees	9,667	10,010	31.6%	3.5%
Resolution Agreed But Not Met	3,521	3,542	11.2%	0.6%
Poor Mobile Coverage	3,398	2,595	8.2%	-23.6%
Unauthorised Disclosure	495	2,355	7.4%	375.8%
Equipment Fault	2,027	2,064	6.5%	1.8%
Misleading Conduct When Making A Contract	1,641	1,909	6.0%	16.3%
Variation To A Contract Or Plan By Member	1,700	1,625	5.1%	-4.4%
Failure To Cancel A Service	1,081	1,611	5.1%	49.0%
Termination Fee	1,059	1,545	4.9%	45.9%

A17: Mobile fault and connection complaints by network 2020–21 to 2022–23

Year	Services delivered over the NBN	Services delivered over other networks
2022–23	–	7928
2021–22	–	9788

Complaints about multiple services

A18: Multiple complaints by year 2020–21 to 2022–23

Year	Complaints	Proportion of complaints
2022–23	9,642	14.5%
2021–22	13,667	17.2%
2020–21	26,657	22.3%

A19: Multiple complaints by consumer type 2020–21 to 2022–23

Year	Residential	%	Small Business	%	Total
2022–23	7,483	77.6%	2,159	22.4%	9,642
2021–22	10,383	76.0%	3,284	24.0%	13,667
2020–21	19,975	74.9%	6,682	25.1%	26,657

A20: Top 10 issues for multiple services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	6,208	5,638	58.5%	-9.2%
Service And Equipment Fees	4,370	3,490	36.2%	-20.1%
No Phone Or Internet Service	2,638	1,355	14.1%	-48.6%
Intermittent Service Or Drop Outs	1,735	1,093	11.3%	-37.0%
Resolution Agreed But Not Met	1,337	978	10.1%	-26.9%
Failure To Cancel A Service	855	766	7.9%	-10.4%
Delay Establishing A Service	1,498	692	7.2%	-53.8%
Unauthorised Disclosure	175	557	5.8%	218.3%
Bill Unclear Or Not Received	655	542	5.6%	-17.3%
Poor Mobile Coverage	879	519	5.4%	-41.0%

A21: Multiple fault and connection complaints by network 2020–21 to 2022–23

Year	Services delivered over the NBN	Services delivered over other networks
2022–23	2,884	1,252
2021–22	4,987	2,281

Complaints about landline services

A22: Landline complaints by year 2020–21 to 2022–23

Year	Complaints	Proportion of complaints
2022–23	4,213	6.3%
2021–22	6,808	8.6%
2020–21	13,049	10.9%

A23: Landline complaints by consumer type 2020–21 to 2022–23

Year	Residential	%	Small Business	%	Total
2022–23	2,664	63.2%	1,549	36.8%	4,213
2021–22	4,348	63.9%	2,460	36.1%	6,808
2020–21	8,133	62.3%	4,916	37.7%	13,049

A24: Top 10 issues for landline services 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	3,181	2,459	58.4%	-22.7%
No Phone Or Internet Service	1,954	1,123	26.7%	-42.5%
Service And Equipment Fees	1,241	851	20.2%	-31.4%
Resolution Agreed But Not Met	548	368	8.7%	-32.8%
Delay Establishing A Service	769	361	8.6%	-53.1%
Number Problem Due To Connection, Disconnection Or Transfer	599	352	8.4%	-41.2%
Failure To Cancel A Service	389	351	8.3%	-9.8%
Disconnection In Error	592	342	8.1%	-42.2%
Changing Provider	446	295	7.0%	-33.9%
Partially Restricted Service	460	267	6.3%	-42.0%

A25: Landline fault and connection complaints by network 2020–21 to 2022–23

Year	Services delivered over the NBN	Services delivered over other networks
2022–23	1,711	991
2021–22	2,926	1,779

Complaints by provider

A26: Top 10 service providers by complaints 2022–23

Provider	2021–22	2022–23	2022–23 % of total	Change from 2021–22
Telstra Group	41,737	26,837	40.4%	-35.7%
Optus Group	15,696	20,323	30.6%	29.5%
Vodafone Australia Limited	4,830	5,069	7.6%	4.9%
TPG Group	3,220	2,222	3.4%	-31.0%
iiNet Ltd	2,196	1,874	2.8%	-14.7%
Southern Phone Company Ltd	828	1,044	1.6%	26.1%
Aussie Broadband Limited	1,133	890	1.3%	-21.4%
Dodo Services Pty Ltd	1,127	577	0.9%	-48.8%
Medion Australia Pty Limited	572	511	0.8%	-10.7%
Internode Pty Ltd	424	471	0.7%	11.1%

A27: Top 10 service providers by service type 2022–23

Provider	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
Telstra Group	7,529	28.1%	2,582	9.6%	11,617	43.3%	4,957	18.5%	152	0.6%	26,837
Optus Group	4,204	20.7%	582	2.9%	12,701	62.5%	2,801	13.8%	35	0.2%	20,323
Vodafone Australia Limited	571	11.3%	6	0.1%	4,133	81.5%	356	7.0%	3	0.1%	5,069
TPG Group	1,434	64.5%	150	6.8%	361	16.2%	269	12.1%	8	0.4%	2,222
iiNet Ltd	1,252	66.8%	182	9.7%	170	9.1%	266	14.2%	4	0.2%	1,874
Southern Phone Company Ltd	535	51.2%	101	9.7%	282	27.0%	125	12.0%	1	0.1%	1,044
Aussie Broadband Limited	745	83.7%	33	3.7%	35	3.9%	72	8.1%	5	0.6%	890
Dodo Services Pty Ltd	369	64.0%	29	5.0%	110	19.1%	67	11.6%	2	0.3%	577
Medion Australia Pty Limited	0	–	0	–	511	100.0%	0	–	0	–	511
Internode Pty Ltd	328	69.6%	33	7.0%	40	8.5%	68	14.4%	2	0.4%	471

Complaints by state

A28: Complaints by state 2020–21 to 2022–23

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2022–23	1,019	20,486	387	12,914	5,399	1,151	19,326	5,644
2021–22	1,073	26,590	487	15,184	5,764	1,300	23,041	5,961
2020–21	1,539	39,978	708	22,441	8,108	1,904	35,792	8,751

A29: Percentage of complaints by state 2020–21 to 2022–23

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2022–23	1.5%	30.9%	0.6%	19.5%	8.1%	1.7%	29.1%	8.5%
2021–22	1.3%	33.4%	0.6%	19.1%	7.3%	1.6%	29.0%	7.5%
2020–21	1.3%	33.5%	0.6%	18.8%	6.8%	1.6%	30.0%	7.3%

A30: Complaints by state and service type 2022–23

State	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
ACT	376	36.9%	59	5.8%	466	45.7%	113	11.1%	5	0.5%	1,019
NSW	6,549	32.0%	1,436	7.0%	9,328	45.5%	3,040	14.8%	133	0.6%	20,486
NT	117	30.2%	20	5.2%	187	48.3%	61	15.8%	2	0.5%	387
QLD	4,042	31.3%	751	5.8%	6,073	47.0%	1,984	15.4%	64	0.5%	12,914
SA	1,437	26.6%	336	6.2%	2,869	53.1%	726	13.4%	31	0.6%	5,399
TAS	306	26.6%	81	7.0%	572	49.7%	179	15.6%	13	1.1%	1,151
VIC	5,829	30.2%	1,240	6.4%	9,357	48.4%	2,769	14.3%	131	0.7%	19,326
WA	1,806	32.0%	287	5.1%	2,756	48.8%	762	13.5%	33	0.6%	5,644

Top 10 complaint issue by state

A31: Australian Capital Territory 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	465	592	58.1%	27.3%
Service And Equipment Fees	320	313	30.7%	-2.2%
Failure To Cancel A Service	60	104	10.2%	73.3%
Resolution Agreed But Not Met	106	92	9.0%	-13.2%
Intermittent Service Or Drop Outs	132	81	7.9%	-38.6%
No Phone Or Internet Service	120	74	7.3%	-38.3%
Delay Establishing A Service	102	72	7.1%	-29.4%
Slow Data Speed	88	70	6.9%	-20.5%
Unauthorised Disclosure	14	62	6.1%	342.9%
Equipment Fault	40	52	5.1%	30.0%

A32: New South Wales 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	11,801	11,516	56.2%	-2.4%
Service And Equipment Fees	7,620	6,520	31.8%	-14.4%
No Phone Or Internet Service	3,807	2,127	10.4%	-44.1%
Resolution Agreed But Not Met	2,410	2,035	9.9%	-15.6%
Intermittent Service Or Drop Outs	3,320	1,859	9.1%	-44.0%
Failure To Cancel A Service	1,366	1,468	7.2%	7.5%
Delay Establishing A Service	2,573	1,376	6.7%	-46.5%
Inadequate Fault Testing	1,335	1,273	6.2%	-4.6%
Slow Data Speed	2,044	1,141	5.6%	-44.2%
Non-Financial Loss - Not Privacy	502	1,053	5.1%	109.8%

A33: Northern Territory 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	226	220	56.8%	-2.7%
Service And Equipment Fees	126	103	26.6%	-18.3%
Delay Establishing A Service	41	39	10.1%	-4.9%
Resolution Agreed But Not Met	52	39	10.1%	-25.0%
No Phone Or Internet Service	75	38	9.8%	-49.3%
Equipment Fault	21	24	6.2%	14.3%
Failure To Cancel A Service	29	24	6.2%	-17.2%
Slow Data Speed	37	24	6.2%	-35.1%
Inadequate Fault Testing	17	22	5.7%	29.4%
Intermittent Service Or Drop Outs	46	21	5.4%	-54.3%

A34: Queensland 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
No Or Delayed Action By Provider	6,841	7,359	57.0%	7.6%
Service And Equipment Fees	4,431	4,096	31.7%	-7.6%
Resolution Agreed But Not Met	1,452	1,309	10.1%	-9.8%
No Phone Or Internet Service	2,063	1,151	8.9%	-44.2%
Intermittent Service Or Drop Outs	1,627	1,135	8.8%	-30.2%
Failure To Cancel A Service	813	968	7.5%	19.1%
Delay Establishing A Service	1,475	885	6.9%	-40.0%
Slow Data Speed	1,065	797	6.2%	-25.2%
Inadequate Fault Testing	696	731	5.7%	5.0%
Equipment Fault	664	693	5.4%	4.4%

A35: South Australia 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	2,643	3,155	58.4%	19.4%
Service And Equipment Fees	1,767	1,771	32.8%	0.2%
Resolution Agreed But Not Met	606	575	10.7%	-5.1%
Intermittent Service Or Drop Outs	591	474	8.8%	-19.8%
No Phone Or Internet Service	587	454	8.4%	-22.7%
Failure To Cancel A Service	335	412	7.6%	23.0%
Inadequate Fault Testing	260	312	5.8%	20.0%
Equipment Fault	272	307	5.7%	12.9%
Delay Establishing A Service	430	280	5.2%	-34.9%
Misleading Conduct When Making A Contract	264	278	5.1%	5.3%

A36: Tasmania 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	602	686	59.6%	14.0%
Service And Equipment Fees	353	358	31.1%	1.4%
Resolution Agreed But Not Met	137	109	9.5%	-20.4%
No Phone Or Internet Service	159	98	8.5%	-38.4%
Intermittent Service Or Drop Outs	103	87	7.6%	-15.5%
Slow Data Speed	77	81	7.0%	5.2%
Failure To Cancel A Service	66	73	6.3%	10.6%
Delay Establishing A Service	108	68	5.9%	-37.0%
Inadequate Fault Testing	42	61	5.3%	45.2%
Equipment Fault	54	55	4.8%	1.9%

A37: Victoria 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	10,355	10,922	56.5%	5.5%
Service And Equipment Fees	6,749	6,108	31.6%	-9.5%
Resolution Agreed But Not Met	2,102	1,966	10.2%	-6.5%
No Phone Or Internet Service	2,791	1,723	8.9%	-38.3%
Intermittent Service Or Drop Outs	2,400	1,659	8.6%	-30.9%
Failure To Cancel A Service	1,253	1,338	6.9%	6.8%
Delay Establishing A Service	2,184	1,236	6.4%	-43.4%
Inadequate Fault Testing	985	1,103	5.7%	12.0%
Unauthorised Disclosure	248	1,071	5.5%	331.9%
Non-Financial Loss – Not Privacy	418	1,044	5.4%	149.8%

A38: Western Australia 2022-23

Complaint Issue	2021-22	2022-23	2022-23 % of total	Change from 2021-22
No Or Delayed Action By Provider	2,688	3,247	57.5%	20.8%
Service And Equipment Fees	1,764	1,764	31.3%	0.0%
No Phone Or Internet Service	587	593	10.5%	1.0%
Intermittent Service Or Drop Outs	617	508	9.0%	-17.7%
Resolution Agreed But Not Met	657	479	8.5%	-27.1%
Slow Data Speed	341	416	7.4%	22.0%
Delay Establishing A Service	440	372	6.6%	-15.5%
Poor Mobile Coverage	265	350	6.2%	32.1%
Failure To Cancel A Service	449	343	6.1%	-23.6%
Inadequate Fault Testing	361	283	5.0%	-21.6%

Unresolved and escalated complaints

A39: Top 10 issues in unresolved complaints 2022–23

Unresolved Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
Service And Equipment Fees	4,933	4,269	32.5%	-13.5%
No Or Delayed Action By Provider	2,168	3,123	23.8%	44.0%
Resolution Agreed But Not Met	1,398	1,278	9.7%	-8.6%
Intermittent Service Or Drop Outs	1,586	1,176	9.0%	-25.9%
Unauthorised Disclosure	204	1,030	7.9%	404.9%
Non-Financial Loss – Not Privacy	406	1,012	7.7%	149.3%
No Phone Or Internet Service	1,215	890	6.8%	-26.7%
Poor Mobile Coverage	1,142	783	6.0%	-31.4%
Slow Data Speed	1,046	772	5.9%	-26.2%
Termination Fee	415	652	5.0%	57.1%

A40: Time to close escalated complaints 2020–21 to 2022–23

Days to close	2020–21	2021–22	2022–23	2022–23 closures
Up to 60 days	52.5%	56.2%	43.1%	3,893
Up to 120 days	87.8%	83.9%	84.0%	7,597
More than 120 days	12.2%	16.1%	15.9%	1,442
Total closed complaints	15,677	11,278		9,039

A41: Outcome type for closed escalated complaints 2022–23

Type of outcome	Proportion of closed complaints
Financial outcome	39.4%
Financial and non financial outcomes	30.5%
Non financial outcome	18.4%
No compensation or action by provider	7.2%
Unknown outcome	4.5%

A42: Financial hardship complaints 2020–21 to 2022–23

Complaint Issue	2021–22	2022–23	2022–23 % of total	Change from 2021–22
Financial Hardship or Repayment Arrangement	1,615	1,634	2.5%	1.2%

A43: Financial hardship complaints by quarter 2022–23

Quarter	2022–23
Q1	370
Q2	397
Q3	431
Q4	436

A44: Financial hardship complaints by service type and quarter 2022–23

Quarter	Landline	Internet	Mobile	Multiple	Property	Total financial hardship complaints
2022–23 Q1	3	40	255	72	–	370
2022–23 Q2	7	42	279	69	–	397
2022–23 Q3	4	55	315	57	–	431
2022–23 Q4	5	54	281	96	–	436

A45: Financial hardship complaints by consumer type and quarter 2022–23

Quarter	Residential	Small Business & Others	Total financial hardship complaints
2022–23 Q1	342	28	370
2022–23 Q2	370	27	397
2022–23 Q3	410	21	431
2022–23 Q4	415	21	436

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