

# Annual Report

2023-24



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

This annual report provides an overview of the Telecommunications Industry Ombudsman's activities from July 2023 to June 2024. We also refer to this period as '2023–24' or 'this financial year'.

In this report, references to 'Telecommunications Industry Ombudsman', 'TIO', 'we', 'us', and 'our' refer to the Telecommunications Industry Ombudsman scheme, 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 space 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 'Connecting People, Building Trust, Delivering Fairness'.

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.

- **Achieving our goals.** In this section we share our performance results from the last 12 months and highlight what we have done well and where we are looking to improve.
- **Improving our service.** Read about the strategic projects and initiatives we are working on to ensure our service meets the needs of the Australian telecommunications sector.
- **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.** This section is about how we work and our processes, our legal framework, corporate structure and strategy, and the Board of Directors.

The theme of this year's annual report is 'Connecting People, Building Trust, Delivering Fairness'.

- **Working with the community.** Read about our engagement with the community through outreach activities such as face-to-face events and educational 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.
- **Our people and culture.** Take a deep dive into our people, culture, and workplace statistics.
- **Contributing to industry improvements.** This section discusses our insights and impacts through systemic investigations and policy submissions.
- **Resolving complaints.** 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 complaints appendix for a comprehensive spread of the complaints data.
- **Director's Report and financial statements.** We provide a link to the TIO's Director's Report for the financial year. The report looks at Board activities and presents the TIO's financial position for 2023–24.
- **Glossary.** We define our data and complaints terminology and take you through our complaint categories. This will help you understand specific terms, phrases, and wording we use in the report.
- **Complaints appendix.** This the largest chapter of the report and provides an extensive overview of the complaints we received in 2023–24.

## Chair's message



On 1 December 1993, the Telecommunication Industry Ombudsman (TIO) scheme was officially launched and with it, industry based independent external dispute resolution (EDR) was introduced to Australia. In the following 30 years EDR extended to the core industry sectors of finance and public utilities such as water and energy, transforming consumer protection and industry best practice.

Without question, EDR has proven to be the most significant development and improvement in Australian civil law in the last 50 years. It is now the benchmark of how responsive and innovative industries demonstrate commitment to their customers and how the inherent weaknesses of the formal legal system in relation to cost and timeliness can be overcome.

The TIO is proud to have been the first comprehensive external dispute resolution scheme to emerge in Australia, and pioneer the way for the financial, energy and utility, and other sectors. Internationally, the TIO was the world's first EDR scheme for phone complaints.

Now in our 31st year, the TIO's enduring and fundamental role in the telecommunications landscape – Connecting People, Building Trust and Delivering Fairness in EDR – remains as true today as it was when the scheme commenced.

When performing at its best, the TIO is a partner to the telecommunications sector, helping build trust and confidence between consumers and their telecommunications providers. Our data and insights are valued by our members to assist improved performance and consumer advocates, policy makers, and governments see the TIO as trusted source of balanced advice.

To perform at its best, given the transformation in the communications sector, means the TIO has had to transform itself time and again to deliver a valued and valuable service, and the importance of this reflection cannot be understated. Transformation is not easy.

**“Without question, EDR has proven to be the most significant development and improvement in Australian civil law in the last 50 years.”**

That is why the Board's three-year strategic plan was designed to explore three fundamental questions, namely:

- what must change in our service delivery model to appropriately meet the needs of today's consumers and providers
- how we implement the requisite changes efficiently and effectively
- how do we embed these changes into an "assess and evolve, business-as-usual" state.

At the end of year one, it is the view of the Board that we have made a strong start, but there remains important work to do.

Some key achievements in the last year include a significant uplift in employee engagement, improvements in our complaint handling process while reducing the size of the organisation reflecting lower complaint numbers.

Another achievement is the embedding of our technology transformation, Project ECHO, into a business-as-usual state. We will continue making enhancements to this system to realise its efficiency benefits for our people and the organisation's stakeholders.

Looking to the year ahead, the Board is focused on reaching full maturity in two of our strategic aspirations.

The first aspiration is testing and improving the TIO's approach to fairness and accessibility. While the TIO has always been strong on procedural fairness in our complaint handling, this is not the only dimension to making fair decisions. Substantive fairness is about reaching the right decision given all the circumstances. Equally the TIO needs to be accessible to all consumers and its systems need to be able to accommodate the varied ways consumers wish to engage with a service provider.

The second aspiration is to be a valued and valuable service to our members and stakeholders. This entails efficiency and cost effectiveness in complaint handling as a baseline but also adding value to the business of our providers in terms of data and insight.

The year ahead will see the TIO make a particular investment in nurturing strong, connected, high-quality member relationships. It is the view of the Board that the strength of these relationships and engagement opens the door a little wider to our members, so they better understand the TIO and positive role it plays in helping them deliver a better service.

The TIO must keep evolving. There will always be a need for our core requirement, which is providing EDR for users of communications services. But is this sufficient for the TIO to meet its objectives of adding value, providing fairness, supporting consumer rights, and adding insights and value to industry and society? It would be remiss of our organisation to not consider the shifts in the economy and society and adjust our service accordingly.

The Board is pursuing the best policy outcome for consumers and industry for EDR for the communications sector more broadly than telecommunications. The Federal Government is taking important measures to strengthened consumer protection and redress from the consequences of scams. This brings together the sectors of traditional telecommunications with digital platforms and the financial sector. There is an important role for EDR in this multifaceted policy response to combat scams, but this role needs to see the consumer issues holistically and not only related to scams.

On behalf of the Board, I thank Cynthia Gebert for her hard work, honesty, and transparency as a leader. 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 contribution of Gordon Renouf who finished with the Board in February 2024 after serving nine years as a Director with Consumer Experience. Gordon was genuinely committed to consumer protection, and we thank him for his years of service.

Finally, I welcome new Board member Thu-Trang Tran, who commenced with the Board in February this year as a Director with Consumer Experience.

I look forward to working with her, my fellow TIO Board members, and the Executive Leadership Team in the coming year on making our service fairer, more accessible, and more valued to the Australian telecommunications sector.

**Michael Lavarch AO**  
Board Chair

# Ombudsman's message



The last 12 months have been important and productive for our organisation, working to drive industry change and support consumers and members to reach fair and reasonable outcomes. Entering my second year in the role, I am inspired by our important work and committed to enhancing the critical role the TIO plays in a rapidly changing landscape.

Telecommunication services are essential services, as important to our quality of life and health and wellbeing as the electricity and water in our homes. The proliferation of telecommunication services offers unmatched opportunities for advancements in our work, our healthcare, and our sense of social cohesion and community. And equally, we've observed the consequences of being without telecommunication services, and the challenges that being disconnected can bring.

We must continue to adapt to the changing landscape to ensure a robust sector, and to ensure that consumers have recourse when they have a problem with their phone or internet service. I'm reminded of the major Optus outage in November 2023, and several data breaches exposing consumers' personal information. Telecommunications providers must rise to the challenges of cyber security and service reliability, and we are committed to supporting those efforts.

In November 2023 the TIO celebrated 30 years of operation, delivering complaint handling and industry improvement for the Australian telecommunications sector. This is a tremendous achievement and an endorsement of the TIO's capacity to support the community in successive contexts of technological advancement and regulatory change. I am deeply inspired by this legacy of adaption and agility.

**"I am proud of our capable and terrific team at the TIO. They passionately believe in our work and continue to find new and remarkable ways to better support the industry and its customers."**

When the TIO's inaugural Ombudsman, Warwick Smith, opened our doors to the community in 1993, I don't think he could have predicted how much our sector would change in the subsequent 30 years or how important our work would grow to be. We have always been focused on getting the right outcome for consumers and the telecommunications industry, and we will continue doing so into the future.

When I reflect on our 30 years, I'm struck by the inherent but necessary tension that exists between the role of the Ombudsman and the members it serves. But I see this tension as a potential to build trust and confidence together. I envisage a new era for the TIO and its members. Today's best business practices find opportunities to reach beyond the status quo in every partner. The growth of our sector requires the curiosity of people to rise above old ideas of who we are and what we can achieve and find new opportunities to build trust and move forward together into the next 30 years and beyond.

Over the past 12 months we have delivered on 10 Independent Review recommendations and delivered a number of strategic projects. We have put in place programs and systems to support our people to connect with our vision, purpose, and values and be part of what we are terming the *TIO Way*. The *TIO Way* is a recognition that our work must be innovative and bold to deliver on our commitment to the community we serve. We have captured this call to action in the words: Connecting People, Building Trust, and Delivering Fairness. The *TIO Way* elevates our collective eyeline above business-as-usual activities and asks us to embrace the challenges of the future, and find opportunity in uncertainty.

I am proud of our capable and terrific team at the TIO. They passionately believe in our work and continue to find new and remarkable ways to better support the industry and its customers. Our staff engagement results have lifted considerably in the last 12 months with a 70 per cent positive engagement score, well above industry benchmarks. When our staff feel aligned, safe, and inspired, we do our best work.

One achievement that I am particularly proud of is the delivery of Project ECHO, a technology transformation project that has modernised the way that the TIO captures and records complaints. Just as people change the way they engage with telecommunications services, so should we – and I am pleased to report that Project ECHO has been an overwhelming success.



I would also like to acknowledge the TIO's contribution to several government and sector-wide initiatives such as our submissions to the Telecommunications Consumer Protection Code Review, to Commonwealth Treasury on the recommendations arising from the Australian Competition and Consumer Commission's (ACCC) Digital Platforms Inquiry, and on the Optus Outage as part of the Optus Post-Incident Review. The TIO has continued to drive industry improvement through our policy submissions and systemic issue investigations. Our participation in government processes constitutes a critical component of our work, shining a light on the sometimes-invisible challenges in the telecommunications sector and offering fair and informed insights about potential improvements.

We have a busy year ahead supporting consumers and the telecommunications sector, leveraging the opportunities of technological advancement, and supporting our Consumer Panel which continues to provide invaluable insights and advice. We remain focused on ensuring a fit-for-purpose regulatory regime that reflects consumer expectations of a fair and accessible market. Equally, we remain committed to delivering on our core operations, of providing a free, fair, and accessible dispute resolution service for those who need it.

We're embracing the possibilities that change presents and stand ready to contribute to broader discussions about improved regulation, the possible introduction of a telecommunications provider registration scheme for telecommunications providers with established minimum standards for market entry, and further dialogue about adequate protections for digital platform users.

I would like to thank our dedicated Board of Directors for their leadership and innovation, and in particular our formidable Chair, Professor the Honourable Michael Lavarch AO, for his guidance and insight. I would also like extend my thanks to our members, regulators, industry bodies, and consumer organisations that we have been fortunate to work with in the past year.

And finally, a big thank you to our fantastic team at the TIO. I am inspired by your dedication and commitment, and tenacity in reaching fair and reasonable outcomes, even when the circumstances are challenging. Here's to another 30 years of Connecting People, Delivering Fairness, and Building Trust.

**Cynthia Gebert**  
Ombudsman

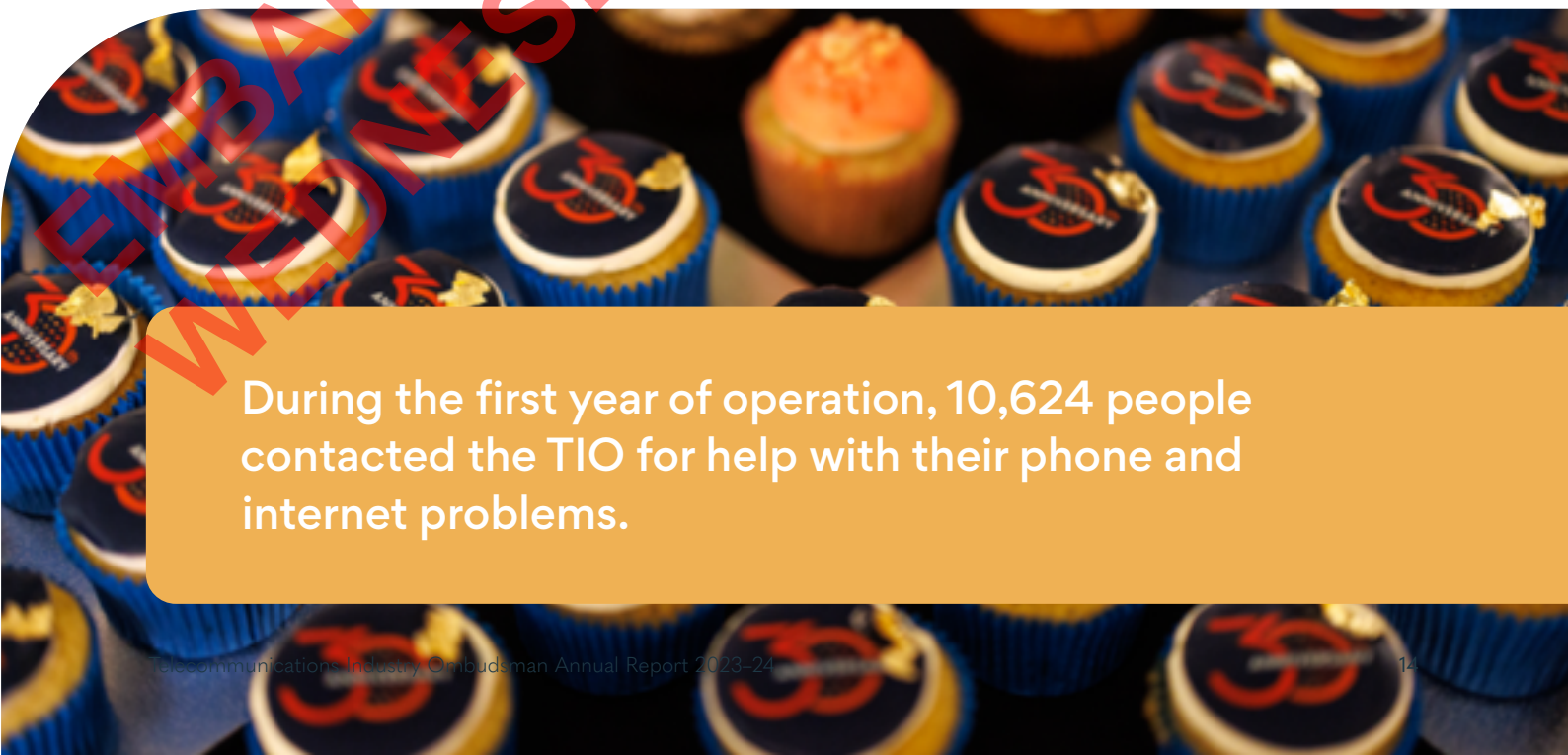
# 30 years of TIO

It's 1993 – Paul Keating is Prime Minister of Australia, Sydney wins the bid to host the 2000 Olympic Games, ALIWEB launches as the first search engine, and an increasing number of websites become available to the general public. And in a world first, IBM introduces a new cordless means of communication - the mobile phone.

With web and mobile networks forever changing the way people communicate and access information, and amid the age-defining shifts transforming the Australian telecommunication sector, the Telecommunication Industry Ombudsman (TIO) scheme officially launches in Melbourne as an independent dispute resolution body.

At the time of launch, the TIO's first Ombudsman, Warwick Smith, took on 15 employees to resolve complaints for the three telecommunications providers that made up the Australian market (Telecom, Optus and Vodafone). During the first year of operation, 10,624 people contacted the TIO for help with their phone and internet problems. Most of these complaints were about billing problems such as metering of calls, crossed lines and other landline faults, and inconsistent customer call records. The TIO also received several complaints about the overall standard of service provided by their telecommunications provider, upgrading of services, and number allocation due to the introduction of the new national phone numbering system.

The mid-90s were a period of turbulent changes. In 1995 Telecom became Telstra, and in 1997 the market was deregulated and opened to full competition with the passing of the Telecommunications Act. The TIO responded by rolling out a program to educate new market entrants, mostly internet service start-ups, as the world turned more and more digital. While the TIO's complaint numbers increased over the 90s, the organisation hired staff to meet the new demand in phone and internet complaints, growing to 30 employees by the end of 1999.



During the first year of operation, 10,624 people contacted the TIO for help with their phone and internet problems.

Six ombudsmen and 30 years later, the TIO has nearly 200 employees distributed among two time zones, and there are more than 1,600 telecommunications provider members providing Australia's 45 million mobile phone and internet services. The organisation has built a strong reputation in the telecommunications space through constant innovation and adaptation, keeping up with technology transformations and policy shifts.

The rollout of the National Broadband Network (NBN) was one of the biggest challenges the organisation faced. In the 2017-18 financial year complaints spiked to 167,831, with many consumers and small businesses facing problems such as merging on to the new network, slow connection times, or having no phone or internet connection at all.

The volatility of the telecommunications market has seen mergers between some of the biggest telecommunications providers including Virgin and Optus in 2006, and more recently, Vodafone and TPG in 2020. In 2018, the introduction of the Telecommunications (Consumer Complaints Handling) Industry Standard set the federal bar for how telecommunications providers must handle complaints, providing consumer protections and creating a significant reduction in complaint numbers.

With this perspective, changes to the telecommunications provider market often reflect changes in complaint types from Australian consumers: the surge in smartphone usage drove a kind of demand that put a strain on mobile network carriers and led to the 2010 Vodafone network crash. Cyberattack complaints, an unfortunate by-product of today's digital economy, have also been brought to by the TIO in recent years, including the 2022 Optus data breach, which affected 9.7 million Australian consumers.

The Covid-19 pandemic brought a new challenge for the organisation, with a huge reliance on phone and internet services during lockdowns, and a shift to working from home for many Australian businesses.

Today, the TIO plays the role of connector between consumers and telecommunications provider providers. Under the leadership of Ombudsman Cynthia Gebert, the TIO's mission is to provide a fair and accessible communications market for Australia. The organisation acknowledges society's reliance on phone and internet products, and the essentiality of these services in everyday life. Our people work hard to resolve complaints and disputes fairly, engaging in constructive communication with both consumers and providers.

## Ombudsmen over the years

### Warwick Smith Ombudsman 1993–1995

#### "A centre of excellence"

"The concept for the TIO began in Canberra. One of the innovative ideas was to have empowerment of consumers to help drive operators to give a higher level of service. And one of the ways to do that was to have an independent body to deal with complaints.

"The Ombudsman in this context was to be a needle. To get better outcomes for consumers, and to find generic complaints that had a significant impact - not just on a small group of people, but finding those problems that affected many. We realised early on that it was important to get wins on those types of complaints. What I was trying to do as an Ombudsman was to get corrective action and to modify the behaviour of the carriers.

"With the provision of vital utilities services, like phone and internet, consumers should always have a way to seek redress that doesn't mean they have to go immediately to a court. And that's what Ombudsman services do. If it ever gets to a point where there are hardly any complaints about service providers... I'll believe it when I see it!"



### John Pinnock Ombudsman 1995–2007

#### "Fun, challenging, uplifting"

"The telecommunication market was new for me when I started at the TIO. One of the biggest challenges was trying to understand an entirely new industry. Understanding the technology, the jargon, and getting to know the issues facing consumers and members.

"We had to find our place in the industry and make sure the providers understood the value of the TIO, in the absence of a regulator or authority. We effectively took that on – simply by the force of our people, and our command of a whole range of issues.

"We helped resolve industry problems that came to light through our complaints data. For example, back-billing was a systemic issue we tripped over. I still remember the first back-billing complaint – it was a woman who moved to a new address in Sydney and asked for a final bill on her old number and got it, but later got charged for calls that hadn't been brought to account on her old number. We didn't know this could happen, but she wasn't the only one, so we realised it was what we would now call a 'systemic' issue.

"At the end of the day, for the staff and for me, we were trying to be an organisation that wasn't just going through the motions, but actually making a difference."



**Deirdre O'Donnell**  
Ombudsman 2007–2010



**"Brutal, demanding,  
and inspiring"**

"The first thing that comes to my mind when I think of my time as Ombudsman is growth, both in the size of our organisation and in the volume of complaints we received. At the end of my three years our budget had grown from ten million to thirty million, and staff grew to 250. At the height of demand for our services we would get 9,000 calls per week. It was challenging to ensure the organisation survived the tsunami of complaints, dealt with them in a sustainable way, and without collapsing under the weight of the demand for our services.

"Our biggest accomplishment in my time as Ombudsman was our 'connect resolve' campaign, which served to get the issues of customer service and complaint handling firmly on the national agenda. By targeting our top 10 telecommunications providers, including writing directly to the CEOs with feedback about their poor performance, we succeeded in getting telecommunications providers to improve their services.

"This was a collaborative effort by the organisation. The campaign itself was born from our frontline. I asked the Early Resolution Officers, at the time called Enquiry Officers, what message they would send to the companies to improve customer experience, and they said 'Just connect with your customer and resolve their issue'. It was a brilliant message to the industry."

**Simon Cohen**  
Ombudsman 2010–2016



**"Exhilarating, ever-changing,  
and rewarding"**

"It seemed that there was never a time when important changes were not happening at the TIO.

"The early 2010s saw record complaint numbers at the TIO. Some of the causes were one off – like the extreme challenges of the Vodafone network, and others coincided with the start of the rollout of the NBN in 2012.

"And there were substantial issues with bill shock in the Australian community – perhaps most notoriously with international mobile roaming charges with one customer getting a bill of more than \$140,000, but also with high excess data charges across landline and mobile services. In addition, mobile coverage complaints became a real bugbear – with concerns around how services were marketed, and a widening gap between consumer expectation and service delivery.

"These sector issues really challenged the TIO – sometimes just because of the sheer volume of matters – and at other times because long-term solutions were needed, not an ambulance at the bottom of the cliff.

"These challenges, though, also drove innovation at the TIO, including implementing more efficient dispute resolution methods like conciliation, and improving our own technology, such as implementing a new case management system, to better serve both consumers and telecommunications providers."



**Judi Jones**  
Ombudsman 2016–2022

**“He tangata he tangata he tangata (people, people, people)”**

“Beginning my role in 2016, relatively soon after the rollout of the NBN had changed from fibre to the premises to mixed technology delivery, was a time of incredible challenge – and opportunity.

“In my first year, it was clear that we needed to refocus and rebuild the organisation to respond to a more than 40 per cent increase in complaint volumes.

“At that time we also had work to do with key stakeholders to ensure they understood our place in the regulatory framework. We needed to improve our systemics issues function to be more responsive and share what we were seeing from what consumers were telling us. And we also had to survive the Consumer Safeguards Review that proposed the TIO be replaced by a new body with a smaller mandate with no independent reporting of consumer complaints. And then there was Covid-19.

“While these moments were challenges, they also led to key accomplishments for the TIO. We expanded our workplace to ensure our people were equipped with the skills they needed to be agile and engaged. We improved on the delivery of our systemic issues and reporting functions. We strengthened our stakeholder relationships. And even through the Covid-19 lockdowns in Melbourne, we continued to deliver an effective dispute resolution service.”



**Cynthia Gebert**  
Ombudsman 2022 to present

**“Challenging, fulfilling, fun”**

“Other than learning the technical language and regulatory frameworks of the job, joining the TIO in a hybrid working environment posed its own challenges. I made it my mission to learn not just names and faces, but learn about the people who sit behind the great work that the TIO does, and who make the TIO such a fantastic organisation to be a part of.

“Coming into the co-regulatory environment in telecommunications was vastly different from my experience in the essential services market of energy and water. My first few months were spent understanding this environment, and wrapping my head around how we can work with telecommunications providers to better serve Australia’s phone and internet consumers. I’m really proud of the work we are doing, pushing the industry to consider a more human-centric approach to their service and support.

“It’s great to see industry taking up his challenge, especially because telecommunications is essential to everyday life.

“Change can be difficult, stressful, and a source of tension. But at the end of the day, we’re all focused on getting the right outcome for consumers and industry, leading to a fair and accessible communications market.”





# Achieving our goals

## Our purpose and vision

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

We help build trust and confidence in Australia's telecommunications sector through connecting people and delivering fairness.

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 telecommunications providers 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 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 telecommunications 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 core values

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.



By living these values, we can build a stronger, more united team that thrives.

# Achieving our strategic goals 2024–26

On 30 June 2024 we closed out the first 12 months of our three-year strategic plan. During this time, we built a solid foundation for driving the changes to come over the next 24 months. Our work has reflected several significant changes in our ways of working as well as the wider operating environment including:

- significant improvements in employee engagement, and stability in employee attrition.
- commencement of a new round of Enterprise Agreement negotiations
- establishment of the new Executive Leadership Team
- implementation of Phase 1 of our technology transformation project, Project ECHO – implementing the case management system, a necessary precursor to further enhancements in the way we serve our consumers, members, and other stakeholders
- improved complaint handling service delivery
- progressive implementation of Independent Review recommendations – 10 out of 26 recommendations have been fully implemented with progress made on the majority of remaining recommendations
- increased policy and regulatory contributions – analysis of the adequacy of the consumer protection framework for telecommunications and digital platforms, including the review of the Telecommunications Consumer Protection Code and the dispute resolution environment for scams.

These achievements have created a ripe environment for achieving our three-year strategic goals.

**During this time, we built a solid foundation  
for driving the changes to come over the next  
24 months.**

## Goal 1: A flexible, high-performance culture in which we thrive

Objectives	Measures	2023–24
Energised, trusting, and courageous team	Employee Engagement Score	70%, up 7% on last year
	Improved change readiness score >60%	64%

### Performance summary 2023–24

We have experienced an improvement in engagement over the past 18 months, a great result given the challenging environment created by the implementation of Project ECHO and commencement of Enterprise Agreement negotiations. These results reflect a concerted and focused effort to build a more trusting relationship where transparent and open communication is encouraged, our people feel valued and supported to develop, and there is an appetite and energy for continuous improvement.

Examples of this in practice include:

- adoption of values-based negotiation strategy through the Enterprise Agreement negotiation process that supported a more open, trusting, and transparent negotiation process
- implementation of new intranet and refreshed approach to internal communications to improve how and when information is shared
- integration of TIO values into our ways of working, and as the basis for monthly employee recognition program
- establishment of a Navigating Community Expectations Working Group to ensure we are implementing the systems and processes to support our team in responding to challenging behaviours from consumers.

Our change readiness score was reassessed following the implementation of Phase 1 of Project ECHO. We improved our change readiness to 64 per cent (up from 54 per cent in the previous year), but there's still more to be done with opportunities to enhance engagement. Further work is required to build change preparedness as we continue to improve our complaint handling processes, deliver system improvements, and implement a more dynamic way of working.

Objectives	Measures	2023–24
We are supported to grow, develop, and perform in a changing environment	Improvement in rating by staff of factors critical to Australian Financial Review (AFR) status	Measurement in progress

## Performance summary 2023–24

The ongoing professional and personal development of the TIO team will underpin our ability to lift and sustain organisational performance in an environment of changes in the operating, policy, regulatory, and technological environment in which we operate. Clear accountabilities and contemporary leadership at all levels will drive our success.

There has been significant improvement in the focus and service delivery of the Culture, Capability, and Communication team, with gains in service delivery as well as implementation of strategic initiatives.

The refresh of our wellbeing program and improved targeting of our training program have played an important role in ensuring that the team are supported to grow and develop.

Our focus, particularly on the *TIO Way*, has created the basis for a revised capability program that will underpin further leadership development and performance improvement.

While we have seen improved engagement, we will be undertaking a supplementary survey to understand if we are improving our performance in factors critical to AFR Best Places to Work status.

## Goal 2: An operating model that is dynamic and fit-for-purpose

Objectives	Measures	2023–24
Accessible and adaptive processes that respond to fluctuations in demand and industry change	Our complaint handling service meets or exceeds service level standards	Partially met
	Cost to serve model developed	Measure in development

## Performance summary 2023–24

Despite complaint demand trending down for a number of years, the nature of our work means that we must remain responsive to changes in the external environment. We must also be able to adapt to the changing expectations of an effective EDR scheme.

Initiatives of note that support more accessible and adaptive processes include the expanded use of automation to reduce the time complaints remain in a queue, and the implementation of a Flexible Dispute Resolution Officer role that is able to move across our complaint handling process as required to address demand.

The time to close enquiries and referrals continues to be a relative strength. Positively, our focus on more effective management of the unresolved complaints queue, including using automation, has led to reductions in the time taken to resolve complaints. The comprehensive complaint handling procedure review that is underway will deliver improved performance in 2024–25 as unnecessary steps in our process are removed.



Objectives	Measures	2023–24
Transform our service delivery to meet stakeholder needs and expectations (accessible, independent, fair, efficient, value)	Improvement relative to benchmark for ease of use	Benchmark set at 73%
	Satisfaction (>87%) score	88%

**Performance summary 2023–24**

The implementation of Project ECHO dominated time and resources in the first half of 2023–24 and created a foundation for further improvement to the case handling component of the technology transformation project. Between January and June 2024, we transitioned to more of a business-as-usual rhythm with a fortnightly technology update release cycle.

A revised change management approach was also adapted during this period. This led to the smoother implementation of technology changes and provided the basis for a continuous improvement approach that will deliver ongoing enhancements to end users.

Work has commenced on the cost to serve model, though further attention is required and is a priority for the first quarter of 2024–25.

Our consumer satisfaction score has improved to 88 per cent, and we have established a benchmark for the customer effort score. This is 73 per cent relative to an industry standard of 70 per cent. We aspire to reach an 80 per cent customer effort score in 2024–25. The complaint handling procedure review, quality and fairness framework, and our focus on accessibility, will all support improved performance in this area.

### Goal 3: Deliver a valued and valuable service to consumers and community

Objectives	Measures	2023–24
Accessible and fair service	Improved customer satisfaction (87%) and ease of use score	88%
	85% of cases achieving 90% + of the quality criteria	88%

#### Performance summary 2023–24

It is core to our role that we provide an accessible and fair service to consumers and communities.

Our customer satisfaction has improved, and we are also exploring a net customer trust score.

We have been implementing Independent Review recommendations, including those that go to the accessibility and fairness of our service.

Leveraging the concepts of Human Centred Design and customer experience methodologies, we are seeking to deliver on our purpose by challenging our ways of working and providing a service that meets the needs of all stakeholders.

While we continue to improve the accessibility and utility of our website as a key access point to the TIO, we have also undertaken an external audit of the website including website accessibility, usability, content, design and brand, information architecture, and a technical review of the content management software. This will form the basis for a website refresh in 2024-25.

Work is progressing on our Accessibility Strategy with research launched in July 2024 and a task force of industry and consumer organisations to be formed, with a focus on improving the accessibility of complaints handling for consumers, including those experiencing vulnerability. This will be an important opportunity for improved collaboration between sectors and a driver of improved trust and confidence in the industry. This work will also influence the TIO's internal focus on accessibility which will focus on our complaint handling procedures, digital front door (website including our Consumer Online Services) and employee capability.

Our independent quality review found that we continue to perform to a high standard. Of the 100 files reviewed, 88 per cent achieved 90-100 per cent of the quality criteria. Importantly, the reviewers identified key areas of improved performance relative to last year's review. Further focus is required on ensuring consistency in case handling.

## Goal 4: Deliver a valued and valuable service to industry

Objectives	Measures	2023–24
Collaborative working relationships that support accessible and fair resolution of complaints	Improved performance against member satisfaction benchmark	Benchmark survey conducted
	75% of systemic investigations cases where improvements were made by members	93% of systemic investigations resulted in improvements

### Performance summary 2023–24

Our ability to deliver an efficient, timely, and fair service is directly impacted by the effectiveness of the relationship with industry, in particular, TIO members. To support a collaborative working relationship, we have supplemented our business-as-usual activities with the following initiatives.

- Implemented Independent Review recommendations to streamline our systemic issues process, with positive feedback received from members. Our pilot has transitioned to business-as-usual.
- Engaged with members on changes arising from the implementation of Project ECHO and the process changes proposed to support the implementation of Independent Review recommendations.
- Responded to member specific complaint drivers by implementing bespoke processes to manage these complaints more effectively.
- Conducted a member survey to better understand what we need to focus on to deliver a valued and valuable service to our members. There are four key areas of focus for 2024–25 based on these survey results. This includes a comprehensive member engagement plan which will drive further improvement in the relationships with members.

We continue to exceed the performance measure for improvements made when the TIO undertakes a systemic investigation. In 2023–24, 93 per cent (26 out of 28) of our systemic investigations closed with improvements made by members.



Objectives	Measures	2023–24
Demonstrated value in the TIO’s service	Improved member satisfaction with the TIO service	Benchmark survey conducted

**Performance summary 2023–24**

The service we provide to TIO members extends beyond our complaint handling function. It includes our systemic issues work, data sharing to help identify complaint drivers, capability building to prevent complaint escalation, and the provision of independent information, advice, and referral to consumers.

In 2023–24, we:

- revised our member webinar program to increase relevance, value, and engagement
- improved data accessibility for members
- conducted a member survey that will drive the focus for 2024–25 activities, ensuring we are providing a valued and valuable service.

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## Goal 5: Influential and trusted voice shaping the dispute resolution environment in a changing communications market

Objectives	Measures	2023–24
Our data, knowledge and experience influences policy debate and drives market and regulatory responses	Stakeholders value TIO information and contributions to policy issues (evidence via survey)	Survey yet to be progressed
	Our contribution was recognised or reflected in 85% of concluded regulatory processes	Our contribution was recognised in 100% of concluded policy processes

### Performance summary 2023–24

Our data and insight work aims to deliver high quality, independent information and analysis about the customer experience in the telecommunications industry. It is aimed at informing government, regulators, and policy decision-makers. This work is undertaken to maximise the effectiveness of our casework, reduce the occurrence of complaints, and maximise our profile and reputation.

In 2023–24 we:

- produced publications that draw attention to key issues impacting telecommunications consumers and industry
- incorporated interactive data on our website to increase the accessibility and utilisation of our independent data
- implemented Independent Review recommendations focused on improved data sharing with regulators and improved systemic investigation efficiency
- shared our data and insights to contribute to public debate about appropriate telecommunications consumer protections and dispute resolution
- made 28 submissions to policy consultations. Of the 10 policy consultations that have concluded, 10 of our submissions influenced change, with our recommendations either being adopted or the outcome being consistent with our position (100 per cent).

We will survey stakeholders to understand the value placed on our contributions to policy and regulatory issues.

Objectives	Measures	2023–24
Strategic engagement that delivers improved outcomes for consumers and industry	Timely and impactful engagement (measured by stakeholder value placed on engagement and impact)	Survey yet to be progressed
	Media Impact Score (iSentia) equal to or greater than FY23 (4.15)	Media score 3.5

### Performance summary 2023–24

Strategic engagement with government, policy makers, regulators, peak bodies, and other stakeholders is necessary to perform the breadth of our role. In 2024–25 our focus included:

- deepening our relationships with industry and consumer peak bodies to increase their understanding of our role, processes, and value
- active engagement with industry to understand emerging trends that may impact our role and emerging consumer protection issues
- strategic engagement with the Australian Competition and Consumer Commission (ACCC), Commonwealth Treasury, Australian Communications and Media Authority (ACMA), e-Safety Commissioner, and other stakeholders interested in digital platform consumer protections to ensure that our capability and capacity to provide EDR services is recognised.

In 2024–25, we will survey stakeholders to understand and assess the value placed on our engagement.

For the 2024–25 period, we achieved a media impact score (MIS) of 3.5. Although this is slightly lower than the last year, it still sits right at the top of Isentia's industry benchmark with the highest industry (university/education) having an MIS of 3.5.

## Goal 6: Future ready systems and processes to ensure we remain relevant, accessible, and effective

Objectives	Measures	2023–24
Robust, secure, innovative, and scalable information technology and data solutions now and into the future	Project ECHO delivered in line with agreed parameters agreed and on time and on budget	Project ECHO delivered in line with parameters
	Timely and effective complaint trend analysis enabled by improved data capability	Further work required

### Performance summary 2023–24

Our ability to deliver a service that is adaptive, relevant, and effective demands that we invest in new technologies and data solutions in a secure and scalable way that is fit-for-purpose for the TIO.

In November 2023 we delivered Phase 1 of Project ECHO. This has allowed us to move onto a scalable cloud-based platform, Microsoft Dynamics 365 (D365), for our complaints management. This was a necessary precursor to further improvements and technology solutions that can be made to improve consumer satisfaction with our services and improve operational performance. We have adopted a continuous improvement approach to subsequent releases. This will ensure that we continue to enhance how D365 serves the TIO.

A revised Project ECHO roadmap will be developed for Phase 2 and beyond. This reflects a reprioritisation of the Member Portal to ensure that it provides an effective and fit for purpose solution for members.

We developed a Minimum Viable Product for our Consumer Online Services using our internal resources. This will be delivered early in 2024-25, with a continuous improvement lens to ensure that we are able to meet the accessibility and effectiveness needs of consumers.

Our complaint analysis capacity has been slowed by the implementation of Project ECHO and the requirement to rebuild our data warehouse. Further work is required to support achievement of the objective.



Objectives	Measures	2023–24
Robust and mature internal governance and compliance models	Internal models meet best practice standards	Ongoing work

**Performance summary 2023–24**

Future ready systems and processes must be underpinned by robust and mature internal governance and compliance models. Over the last 12 months we have matured our Project Management Office to support fit-for-purpose project governance and project management methodologies.

The TIO’s Project Management Framework has been simplified and updated to define new processes and guidance to successfully manage the TIO projects portfolio. A new Projects Forum will be commencing in October 2025 to:

- review and monitor the TIO project portfolio
- assess and categorise new initiatives
- plan and allocate resources
- update portfolio risk and issues.

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WEDNESDAY 2 OCTOBER 2024



# Improving our service

Every five years, legislation mandates the TIO undertake an Independent Review to assess compliance with the Government Benchmarks for Industry-Based Customer Dispute Resolution.

The last review was completed in 2022 and provided 26 recommendations to improve the TIO service's accessibility, independence, fairness, accountability, efficiency, and effectiveness.

To date, the TIO has successfully implemented 10 of these recommendations including:

- routine information sharing with the ACCC and ACMA
- consumers now receiving an automated follow-up from the TIO after their complaint has reached the end of the referral period
- disability awareness training for our staff
- expanding collection of socio demographic information (including through our online complaints form)
- retiring our fast-track complaints process.

The TIO is committed to continuously improving the dynamic communications market in Australia. To this end, work will continue to implement the remaining 16 recommendations by the end of 2026.

## Strategic projects

Over the past 12 months our teams delivered some of the most significant system transformations the TIO has ever undertaken. These achievements include the:

- **implementation of a new complaint handling system through Project ECHO.** The new system will enable scalable solutions for both consumers and members
- **publishing of quarterly data reports on our website.** These reports have been made available in the TIO website and include insights, demographics, and locations of complaint resolution data of all TIO members
- **TIO Data Warehouse revamp.** This bold move has enabled a more efficient and sustainable system architecture that underpins all data management.

Six key elements underpin the TIO's strategic framework. They ensure our time and effort is focused on providing a fair, independent, and accessible External Dispute Resolution (EDR) service for individual consumers, occupiers and owners of property, small businesses, and not-for-profits who have been unable to resolve their complaint with a phone or internet service provider.



Six key elements underpin the TIO's strategic framework.

In 2024–25, we are challenging ourselves to step up how we deliver on our purpose for the benefit of all our stakeholders.

Work has already started in most areas, the next 12 months will see significant results in:

- **accessibility and fairness of our service.** A thorough review of our processes and ways of working is under way aiming to maximise the value we deliver to our consumers and members. In addition, we are exploring better ways of enhancing the TIO experience for the most disadvantaged and vulnerable cohorts
- **enhancing connections with consumers and members.** We are pursuing more strategic ways of engaging with our stakeholders. This involves assessing the impact of existing touch points and focusing on the needs of consumers and members and working backwards from there
- **scaling and evolving our systems.** We will be updating internal systems and finding synergies among processes to integrate and simplify system applications and interfaces. Technology projects will include cyber security, cloud telephony, and omnichannel among others
- **independent Review recommendations.** Work will continue to implement the recommendations of the 2022 Independent Review of the TIO. We will focus on increasing process efficiencies, expanding service accessibility, and updating case handling procedures.

The implementation of the TIO strategic framework is critical to ensure we are well positioned to take on the exciting opportunities that a changing communications environment creates.

In 2024–25, we are challenging ourselves to step up how we deliver on our purpose for the benefit of all our stakeholders.





# About us

## Our structure

Our corporate structure consists of a board of directors and an executive leadership 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.

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.





### **Board Chair (Independent)**

**Professor The Hon. Michael Lavarch – AO, LLB**

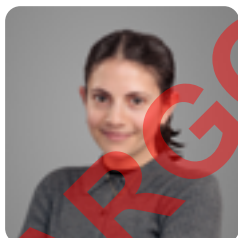
Michael has held senior roles in government, including serving as Australia's Attorney-General (1993-1996). He has also held the roles of Secretary-General of the Law Council of Australia, Commissioner for the Australian Skills Quality Authority and Chair of Australian Catholic Safeguarding Limited. 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 is also a Member of the Queensland Treaty Independent Interim 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 is a non-executive director of the Ecstra Foundation and is a Consumer Panel Member for the Australian Financial Complaints Authority. She is also a member of the Law Council of Australia's Consumer Law Committee and represents Legal Aid NSW on the Australian Securities & Investments Commission's Consumer Consultative Panel.



### **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.



### **Director with Not-For-Profit Governance Experience**

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

Julie has more than 25 years of 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, Deputy Chair of Plan International Australia and Deputy Chair of the Australian Research Integrity Committee. She has a particular interest in global health and governance having worked with the United Nations Development Programme and other organisations on projects relating to public health and HIV/AIDS in more than 20 countries in Asia, the Pacific, Africa and Eastern Europe.



### **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 consultant to Endeavour Energy, as well as well as Chairing Endeavour Energy's Audit, Finance and Risk Committee. Geoff's former positions include; Vice President of Athletics Australia, Chairman of Hanover Welfare Services; non-executive director of United Energy, 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**

**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 is also a board director of the Australian Financial Complaints Authority, Fitzroy Legal Service, and Mortgage Stress Victoria, and was a board director of the Energy & Water Ombudsman Victoria from 2014 to 2023. Gerard is chair of Community Legal Centres Australia, the peak body for community legal centres nationally and 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.



**Director with Industry Experience**  
**Andrew Sheridan – CA, MA (Hons)**

Andrew is the Vice President of Government and Regulatory 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.

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



**Director with Consumer Experience**  
**Thu-Trang Tran – LLM (Intl. Law), GradDipLP, LLB, B.Comm (Info. Sys.)**

Thu-Trang began her career as a commercial and information technology lawyer. She has since combined her social justice values, strategic leadership, and regulatory expertise in private and public sector organisations in Australia and overseas over the past two decades. Thu-Trang also serves as a Commissioner on the Victorian Liquor Commission, and serves as a Board Director with auDA, Good Shepherd Australia New Zealand, and the Victorian Interpreting and Translating Service Language Loop. She has also held executive roles in regional and state peak not-for-profit organisations and was previously a Commissioner on the Victorian Building Authority Board.

Please note: missing from the Board of Directors photo is Andrew Sheridan, Director with Industry Experience.





# 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, supported by the Executive Leadership Team.

The 2023-24 Executive Leadership Team is as follows:

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



## 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, financial limits, and compensation for non-financial loss. The Ombudsman also liaises with key stakeholders, including ministers, government departments, industry and consumer groups, and members.



**Cynthia Gebert**  
Ombudsman

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.

Before joining the TIO, Cynthia was 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 a member of the Executive Committee of the Australian and New Zealand Ombudsman Association (ANZOA), previously serving as its Chair. 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.

## Chief Financial Officer

The Chief Financial Officer leads the Finance team and is responsible for financial management at the TIO, including overseeing business strategy and providing leadership across corporate governance and compliance. The Finance team is accountable for providing relevant and timely business insights to internal and external customers, ensuring the efficient and accurate processing of transactions, and promoting an effective financial control environment.



**Mat Stewart**  
Chief Financial Officer

Mat has worked in public practice and industry with experience across all facets of financial sustainability including reporting, planning, strategy, compliance, risk, and treasury. He has experience in both commercial and not-for-profit organisations across the health, telecommunications, entertainment, and financial services sectors. Mat is a qualified Chartered Accountant and member of the Australian Institute of Company Directors with a Bachelor of Business in Accountancy from RMIT.

## Legal, Policy, and Regulatory Affairs and Company Secretary

The Legal, Policy, and Regulatory Affairs Group provides legal advice to the organisation, works closely with the Ombudsman on land access matters, and works with regulators, the telecommunications industry, and other stakeholders to drive improvements across the communications environment. The group conducts systemic issue investigations and comments regularly through public consultation processes.

This role is also responsible for supporting the governance of TIO as Company Secretary.



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

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 of Victoria awards.

## 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 provider.

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



**Bernie Wise**

**Executive General Manager, Operational Excellence**

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 and change. She has a strong foundation in alternative dispute resolution methodologies, investigation techniques, decision-making, and ethics. Bernie is passionate about helping vulnerable people and making sure all people receive the best possible experience when dealing with their telecommunication complaint.

## Technology, Analytics, and Business Improvement

The Technology, Analytics, and Business Improvement Group is dedicated to enabling and sustaining technology services by providing robust information technology infrastructure, comprehensive business application and solutions, data, reporting and analytics, continuous improvement of systems, and governance of project delivery. This cross-functional group supports TIO's operational performance and delivers technology-led improvements for employees, consumers, members, external stakeholders, and regulators.



**Cathy Thomas**

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

Cathy Thomas is our Executive General Manager of the Technology, Analytics, and Business Improvement group. She has over 25 years of experience working across all phases of IT strategic 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 fostering a culture of collaboration and innovation across her team.



## Culture, Capability, and Communication

The Culture, Capability, and Communication Group provides strategic and operational support to the TIO team to ensure that the capability, performance, culture, and organisational design supports us to deliver on our strategic priorities.

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



**Amanda Armstrong**

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

Combining pragmatic, impactful approaches, and strategic thinking, Amanda heads the Culture, Capability and Communications team. She focuses on enabling a safe, thriving environment for our people while supporting the team to build the reputation of the TIO in the wider 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.



# Governance

## Governance overview

The Telecommunications Industry Ombudsman is a public company, limited by guarantee and, a not-for-profit that is 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 TIO 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 the independence of 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

The TIO scheme 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.

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

Members of the TIO scheme are bound by the TIO Constitution, 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 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.

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

We are also expected to meet the [Government Benchmarks for Industry-Based Customer Dispute Resolution](#) published by Commonwealth Treasury. The Benchmarks 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 and 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 change to our processes are compliant with the Privacy Act.

The Office of the Australian Information Commissioner (OAIC) recognises the TIO as an external dispute resolution (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 TIO Constitution 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 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.

## 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**

<b>Government</b>	<p><b>Federal Minister responsible for Communications</b></p> <p><b>Department responsible for Communications</b> – sets overarching telecommunications policy and coordinates implementation; administers the mobile black spot funding program.</p> <p><b>State/Territory Governments</b> – some contribute to mobile black spot funding.</p>
<b>Regulators</b>	<p><b>Australian Communications and Media Authority (ACMA)</b> – administers the telecommunications licensing and conduct regime; enforces compliance with the TIO scheme membership and Ombudsman decisions; approves industry codes.</p> <p><b>Australian Competition &amp; Consumer Commission (ACCC)</b> – regulates the network and market competition; administers the Australian Consumer Law, including ensuring fair market practices.</p>
<b>Consumer organisation</b>	<p><b>TIO's Consumer Panel</b> – provides the TIO with diverse consumer perspectives to inform its work.</p> <p><b>Australian Communications Consumer Action Network (ACCAN)</b> – the telecommunications specific peak body for consumer education, advocacy, and research.</p> <p><b>Financial Counselling Australia</b> – provides consumer case work and advice and contributes to policy debates with a hardship and debt focus.</p> <p><b>Consumer Law Centres and other consumer organisations and advocacy groups.</b></p>
<b>Industry associates</b>	<p><b>Communications Alliance</b> – the telecommunications specific peak body for industry advocacy; develops industry code, standards, and guidelines.</p> <p><b>Communications Compliance</b> – monitors compliance with industry codes.</p> <p><b>Other telecommunications associations.</b></p>
<b>Dispute resolution</b>	<p><b>TIO</b> – 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.</p>



A photograph of four people (three women and one man) smiling and posing in a desert landscape with red soil and sparse vegetation. The man on the right is wearing sunglasses and a dark shirt. The woman next to him is wearing a blue shirt and sunglasses. The woman next to her is wearing a grey shirt and sunglasses. The woman on the far left is wearing a blue shirt and has her hand raised near her face. A purple banner is overlaid on the bottom of the image.

# 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, we attend a range of events, festivals and roadshows across Australia each year. This year, we also focused on reaching out to new migrants and multicultural Australians where English is their second language, and communities struggling with the cost-of-living crisis. We attended several 'Bring Your Bills Day' events across Australia and are continuing with this theme alongside other organisations and community support services.

We have attended disability expos in Victoria, Queensland, and Perth, with more planned in other states in the remainder of the calendar year. Our team also visited remote communities in rural and regional areas, with roadshows in Western Australia and the Northern Territory.

We continued our participation in the Yabun Festival, held each year on 26 January. Yabun is the largest one-day gathering and recognition of Aboriginal and Torres Strait Islander cultures in Australia, held on the traditional lands of the Gadigal people in Sydney. This event attracted around 40,000 attendees and was a great opportunity to connect and offer support and guidance to the community, helping them with their telecommunications problems.



We have continued with our webinars to local volunteer services and organisations that help their communities. These webinars aim to educate organisations about our service, explain how we can assist, and gather insights about the challenges facing vulnerable consumers. In total, we hosted and attended 40 events during the year.

We have reached out to Australians through a range of events, from rural roadshows speaking to small communities, to large expos and conferences connecting with thousands of attendees. 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.

## Working together

We 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), and the Western Australian Ombudsman. Partnerships with other ombudsman offices and services mean we can reach larger audiences and work with each other by sharing insights, resources, and experiences to the benefit of all communities.



## Event partnership highlights 2023–24

- **Regional Awareness and Accessibility Program event in Carnarvon and Esperance WA.** In partnership with the Western Australian Ombudsman, this four-day road show visited regional towns providing pop-up info clinics, meetings with local organisations that support the community, and information sessions for First Nations communities.
- **Bring Your Bills Day sessions in Dubbo.** In partnership with the EWON, the purpose of these events was to assist and support the community who are experiencing difficulties with their bills due to the high cost-of-living.
- **Disability Expos by Impact Institute.** Alongside AFCA, these events ran over two days in multiple states across Australia to support the disability sector. AFCA and the TIO were there to support attendees with problems they are facing with their telecommunications provider or finance provider. We heard about challenges with accessibility, and lack of support or options for people with disabilities.
- **Information days in Broken Hill, Wilcannia and Menindee.** In partnership with the Tenant Support & Education Programme, we reached out to communities to provide information, support, and guidance on their options when seeking help for financial hardship.





## Ombudsman out and about

Ombudsman Cynthia Gebert attended many events throughout the year, participating in panel discussions, presentations, and speeches.

### Ombudsman out and about highlights 2023–24

- **Financial Abuse Leadership Summit.** The Ombudsman spoke about the need for changes to the consumer protections framework to better protect survivors of domestic and family violence.
- **Financial Counselling Australia events in NSW, TAS, VIC (FCVIC), SA.** She shared information about financial hardship complaints, current challenges in the telecommunications industry, and what we are doing at the TIO to help people remain connected to their services, build trust, and deliver fairness.
- **FCVIC 2024 Summit.** This panel session discussed the wide range of factors contributing to financial hardship and the importance of making it easy for consumers to navigate the complexities of the essential services market.
- **Australian Competition and Consumer Commission National Consumer Congress panel.** Cynthia discussed consumer protection and enforcement in the telecommunications sector.
- **Telecommunications Society webinar series.** Alongside Dr Karen Lee from the University of Technology Sydney, the Ombudsman discussed her position on directly regulating consumer protections in the telecommunications industry, and what is required to rebalance regulation in an era of distrust.
- **Thriving Communities Partnership webinar series.** This event focused on the unique problems faced by multicultural Australians during the cost-of-living crisis and the value and importance of understanding these experiences in service delivery.



## Consumer Panel

In March 2020, we established a consumer panel to provide us with access to diverse consumer perspectives to inform our work. The purpose of the Consumer Panel is to provide us with feedback about the individual and small business consumer experience of phone and internet services and products, and how we handle complaints. The insights gained also help us inform our members, internet and phone providers, about current consumer issues about dispute resolution.

The Consumer Panel consists of 11 panel members and is jointly chaired by the Ombudsman and Lynda Edwards as the Consumer Co-Chair. Lynda is Financial Counselling Australia's Financial Capability Coordinator and brings a wealth of knowledge and experience with disadvantaged and vulnerable consumers, particularly those in rural, remote and Aboriginal and Torres Strait Islander communities.

### Co-Chairs message

It has been another financially difficult year for many Australian consumers which is causing issues for some households with staying connected via what is such an essential service, our mobile phones and internet.

I have personally seen this firsthand in my role as Coordinator for Financial Capability at Financial Counselling Australia. I am grateful to have a seat at this table representing the First Nations Financial Literacy Network. It allows me to shine a light on and discuss issues facing many telecommunications provider consumers, but in particular, the issues our First Nations communities face.

I am heartened as Co-Chair of the TIO Consumer Panel to see the passion and commitment to improving the telecommunications landscape for consumers from my Co-Chair, TIO Ombudsman Cynthia Gebert, and all our Consumer Panel members.

The focus of our meetings has been on the big issues that many Australians are facing. In particular, those most vulnerable to financial hardship. The cost of living crisis continues and financial difficulties keep growing in size and scale. Panel members are still telling us about problems with the way telecommunications providers respond to many issues, including but not limited to domestic and family violence.

**Panel members are still telling us about problems with the way telecommunications providers respond to many issues, including but not limited to domestic and family violence.**

We're still hearing about digital inclusion issues that stop consumers from fully and equally participating in society. There are also too many consumers who struggle to achieve consistent reliable connectivity, particularly in regional, rural, and remote areas.

But even as we see some of these problems on repeat – we've also seen a rise in opportunities and tools to make things better for telecommunications consumers. Externally, we've seen new rules put in place to better protect and support consumers, we're seeing hard discussions at higher levels about the future of the regulatory environment, and we're seeing more light shone on the need for new solutions to regional, rural and remote challenges.

Alongside the challenges, we've also seen larger telecommunications providers come to the table to work with the community sector to make things better for telecommunications consumers. That's something to celebrate and I hope to see more of it in the year ahead.

Internally, our Panel members have continued to share insights to drive improvement. Through calibrating the top three telecommunications issues Panel members see between meetings, we learn more about the bigger picture and where to focus on supporting telecommunications provider consumers. As the TIO continues to work through its responses to the 2022 Independent Review of the TIO, the Panel has provided rolling feedback that I'm confident consumers will meaningfully benefit from.

As we move forward into another year where even bigger changes to the telecommunications landscape are possible, I will be looking to Panel members and the TIO to strive for a more universal and kind experience for consumers of essential telecommunications services.

I would also like to take this opportunity to thank my Co-Chair, TIO Ombudsman Cynthia Gebert, and all our Panel members for their open discussions, input to ideas for solutions, and their ongoing commitment to improving the telecommunications provider environment.

**Lynda Edwards**

TIO Consumer Panel Co-Chair  
Coordinator – Financial Capability Community of Practice  
Financial Counselling Australia

As the TIO continues to work through its responses to the 2022 Independent Review of the TIO, the Panel has provided rolling feedback that I'm confident consumers will meaningfully benefit from.

# Working with our members

## The year at a glance

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

On 30 June 2024 we had 1,713 members, an increase compared to last year. During the last financial year, 54 members left\* our scheme due to either ceasing to trade as a telecommunications provider or ceasing to trade altogether, and a further 133 businesses joined as new members.

In 2023–24, we referred four providers to the Australian Communications and Media Authority (ACMA) for failing to join the scheme, or for non-compliance with the scheme. Since referring non-members to the ACMA, one provider has joined our scheme and the other providers remain under investigation.

\*This includes members who were within the membership cessation period at the end of the 2023–24 financial year.

### New and terminated members

	Q1 2023–24	Q2 2023–24	Q3 2023–24	Q4 2023–24
New members	35	33	32	33
Terminated members	7	16	15	16



**1,713** members, **54** left, **133** joined

## Engaging our members

TIO members include large and well-known telecommunications providers, and small niche telecommunications providers. Some of our members operate only in localised regions or have a specific clientele. Our Member Services team builds and maintains relationships with all members regardless of their size or service offering.

We provide education to our members on our processes and the sector, so the benefits can be passed on to their community, and this helps to build and maintain trust and confidence between telecommunications providers and their customers.

The Member Services team assists members with the maintenance of their TIO membership, and our Dispute Resolution Teams collaborate with members to resolve complaints from people and small businesses. Collectively, we guide establishment of best practices in complaint handling while sharing information about emerging complaint patterns through our complaints data.

### Using data and insights to drive engagement

We supply regular reports to members that provide insights 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 collective efforts drive industry change and reduce systemic issues.

We leverage our complaint data to identify unusual or significant trends in member complaints. This data is examined to uncover potential systemic issues, and we work with members to address these concerns. We also share insights and knowledge with all members through interactive webinars.

**We meet regularly with larger members to discuss improvements and how we can work better together to resolve complaints.**

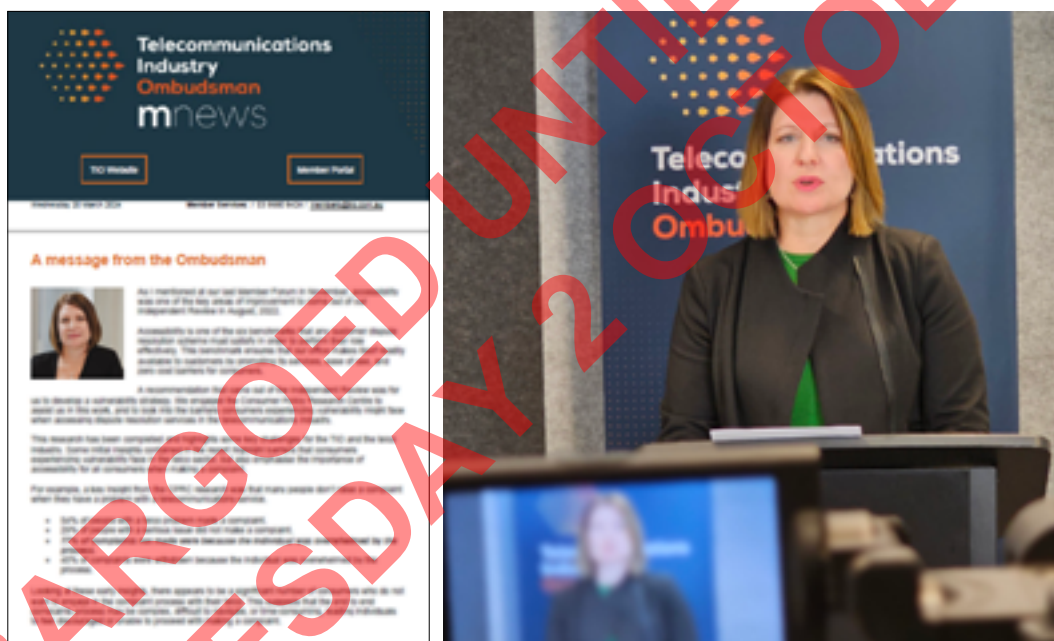


## Education and training

The TIO Member Portal is a valuable tool where members can access information and training including 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 Regulatory Affairs team works with members when systemic issues are identified to improve services and reduce complaints.

The monthly publication for members, MNews, highlights membership information and any changes to the complaint handling processes. During 2023–24, members received 17 MNews editions.



We hosted two National Member Forums by webinar in November 2023 and June 2024. The forums were well attended by a wide range of our membership, where we updated members on our work, governance, insights into complaints and trends, and looked at the year ahead.

In the November 2023 National Member Forum, we also held a panel discussion with guests from the telecommunications industry and community sector.

Ombudsman Cynthia Gebert facilitated the discussion that looked at the barriers consumers face when bringing a complaint to an organisation.

In June 2024, National Member Forum attendees heard from TIO Board Chair Professor the Hon. Michael Lavarch AO, Ombudsman Cynthia Gebert, Executive General Manager Operational Excellence Bernie Wise, and Executive General Manager, Technology, Analytics, and Business Improvement Cathy Thomas.

We continued our series of webinars, keeping members informed of changes to the way we report our data in the *Technology transformation and reporting changes* webinar and hosted a member consultation on the proposed changes to our reclassification process.

The webinar *Let's Talk! Difficult and challenging contact* proved a popular topic and was well attended. Members learnt about effective techniques for managing challenging behaviour and shared their experiences.

The webinars we host continue to see steady growth in attendance and member engagement. Each webinar series, including *Lets Talk!* and *Conversations With the TIO*, along with the National Member Forums, delivers 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 accessible from the TIO Member Portal for members to watch at a time that suits their schedule.





# Our people and culture

## Building relationships, capability, and performance

We inducted and onboarded 30 employees throughout the year and 93 per cent of employees said they know how their work contributes to the success of the TIO.

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

Building our people's connection to our purpose and supporting the growth of their capability are key parts of our role. We prioritise investing in our people so that we can provide an exceptional service. To help achieve this we completed 4,942 hours of training across the year with our people.

Our training and development initiatives included:

- a Train the Trainer Program to assist our people who deliver training with enhancing their skills delivering training to ensure it is effective, engaging, and leads to higher performance
- LinkedIn Learning for self-directed development opportunities in various areas of interest, with courses ranging from leadership development, coaching, communications, strategic thinking, to software programs
- Microsoft Dynamics 365 was implemented as our new case management system and we ensured our people were skilled in the use of the new system ready for its launch

- a Leading Through Change Workshop which upskilled our people leaders in leading their teams through change
- a De-escalation Skills Program to assist our people with handling complaints with challenging consumer behaviours, by looking at de-escalation skills and understanding personal conflict narratives. The program establishes a framework for understanding and responding to the primary drivers of conflict
- Family Violence Safeguarding Officer Training in partnership with WIRE assisted our Safeguarding Officers to support our people who may be experiencing family violence and to ensure we provide a high level of support for consumers who contact us
- 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, including modules specific to the TIO as part of the GCDRI.

The program establishes a framework for understanding and responding to the primary drivers of conflict.



## Our culture


Bringing our unique perspectives together, and genuinely prioritising inclusion and psychological safety, is what makes us stronger as an organisation.

As an inclusive workplace our goal is to ensure everyone feels welcome, comfortable sharing their opinions without judgement, and safe to bring their full selves to work. We welcome feedback consistently throughout the year, even establishing an anonymous portal called 'ASK ELT'. We also undertake formal employee engagement surveys twice a year.

While we will never stop focusing on improving our culture, we are confident we are moving in the right direction, having seen a seven-point rise in engagement over this financial year.

While the numbers showcase our progress, we will continue to make a sustained effort to communicate with our people, ask what matters to them, and explore how we can continue to address areas for improvement.

This year we have implemented 'Team Promises' empowering our teams to work together to build culture in ways that are meaningful and relevant to them. We believe culture builds within an organisation, so our focus will also be to listen, co-design, and act together.

A photograph of two women standing in front of a large screen at a conference. The woman on the left has long dark hair and is wearing a green top. The woman on the right has dark hair and is wearing a white blazer over a blue top. They are both smiling. In the background, other people are visible, and a large screen displays a blue and white graphic. A green semi-transparent box with white text is overlaid on the bottom right of the image.

**We welcome feedback consistently throughout the year, even establishing an anonymous portal called 'ASK ELT'.**

## Employee engagement statistics

### Employee engagement score

**70%** up **2%** on Sep 23 up **7%** on Feb 23

### Things that are working well for the TIO

Learning and Enablement	Your Manager	Your Manager
I know how my work contributes to the success of the TIO	My People Leader genuinely cares about my wellbeing	My People Leader role models the values and behaviours of the TIO
93% agreed	89% agreed	89% agreed

The survey also highlighted areas that we need to focus on:

- Building Trust – the Executive Leadership Team will continue working on creating trust and confidence in the leadership of our organisation.
- Action – we will find better ways to funnel our collective feedback, ideas, and suggestions.
- Job Control – we will address and find smart ways to manage and prioritise workload.

Employee Engagement Heatmap showing our people's comments – with negative on the left and more positive on the right.



# Equality, diversity, and inclusion

Equality, diversity, and inclusion (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 offer learning and growth initiatives to our employees, which help build awareness of the importance of diversity, inclusion, and wellbeing.

Our people have shown commitment to diversity and inclusion by taking part in 487 hours of EDI training over the year. Activities included Aboriginal and Torres Strait Islander Cross Cultural training and Uluru Statement from the Heart workshops.



*'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



Our people have participated in training and awareness events on:

- Pride in Diversity – LGBTQ+ Introduction and Awareness Training
- Pride in Diversity – LGBTQ+ Empowering Allies in the Workplace and Beyond
- Diversity Council Australia - Case Study Conversation: Family and Domestic Violence
- Koorie Heritage Trust – Building Aboriginal Cultural Competency Training
- Financial Wellbeing Workshops with Money Talks - Having Difficult Conversations
- Flux Academy – Financial Awareness Training

Our people also have access to various training modules as part of their LinkedIn Learning subscriptions and have completed a variety of modules to increase their awareness in the EDI space, including Disability Awareness, Diversity Awareness and Belonging, and Unconscious Bias modules.

We launched our refreshed Wellbeing Strategy for our people including to a full calendar of events such as mindfulness, onsite EAP, physical fitness activities, and awareness campaigns. An audit into psychosocial safety across our organisation has also been completed.

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.



# Employees

On 30 June 2024, the TIO had 194 employees, including nine casual employees and three employees currently on parental leave.

## Enterprise agreement

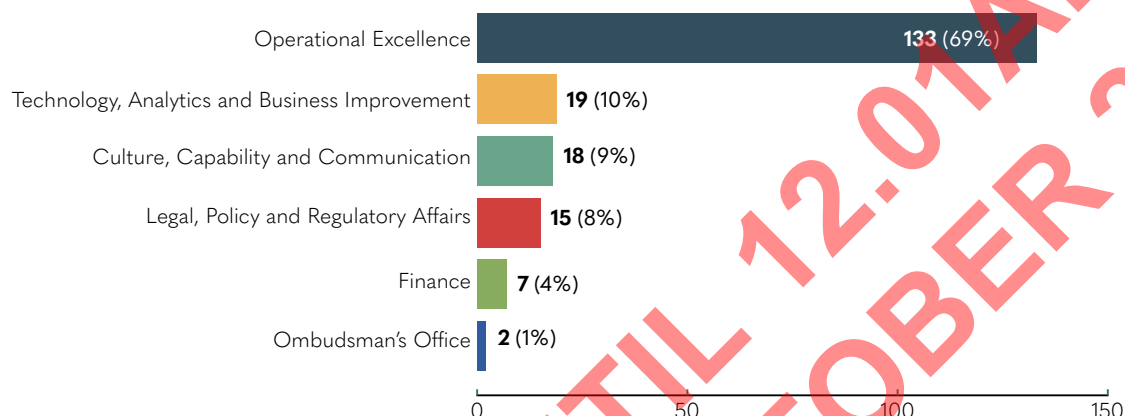
With the Enterprise Agreement nominal period ending on 30 June 2024, formal negotiations commenced in February 2024 with the union, delegates, and employee representatives. At 30 June 2024, negotiations have progressed well with parties anticipating completion of the new enterprise agreement in Quarter 1, 2025.



At 30 June 2024, negotiations have progressed well with parties anticipating completion of the new enterprise agreement in Quarter 1, 2025.

# Our workforce statistics

## Employee numbers by business group



## Total employees by contract and gender

Contract Type	Female	Male	Prefer not to say	Total
<b>Permanent Ongoing</b>	<b>79</b>	<b>90</b>	<b>2</b>	<b>171</b>
Full Time Employees	67	85	2	154
Part Time Employees	12	5		17
<b>Casual</b>	<b>7</b>	<b>2</b>		<b>9</b>
Casual Employees	7	2		9
<b>Contract (fixed-term/non-ongoing contract)</b>	<b>9</b>	<b>5</b>		<b>14</b>
Full Time Employees	8	5		13
Part Time Employees	1			1
<b>Total</b>	<b>95</b>	<b>97</b>	<b>2</b>	<b>194</b>

## Total employees by gender

Gender	Total
Female	95
Male	97
Prefer not to say	2
<b>Total</b>	<b>194</b>

### Total employees by grade and gender

Grade	Female	Male	Prefer not to say	Total
Grade 1	26	17	1	44
Grade 2	34	35	1	70
Grade 3	8	18		26
Grade 4	12	15		27
Grade 5	8	10		18
Grade 6	1	1		2
Grade 7	5	1		6
Training/Intern	1			1
<b>Total</b>	<b>95</b>	<b>97</b>	<b>2</b>	<b>194</b>

### Parental Leave by Primary and Secondary Carers

	Female	Male	Total
Primary Leave	4	3	7
Secondary Leave	1	5	6
<b>Total</b>	<b>5</b>	<b>8</b>	<b>13</b>

### Number of employees on flexible work arrangements by group and gender

Group	Female	Male	Total
Culture, Capability and Communications	2	2	4
Legal, Policy and Regulatory Affairs	2	1	3
Operational Excellence	13	11	24
Technology, Analytics and Business Improvement	1		1
<b>Total</b>	<b>18</b>	<b>14</b>	<b>32</b>

### Employees utilising Compressed Work Week arrangements

Group	Female	Male	Total
Culture, Capability and Communications		1	1
Legal, Policy and Regulatory Affairs	1	1	2
Operational Excellence	6	5	11
<b>Total</b>	<b>7</b>	<b>7</b>	<b>14</b>

## Groups and committees

### Proud@TIO

Proud@TIO is an Employee Reference Group (ERG) for 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 raising awareness about diversity in the workplace.

### The Reconciliation Action Plan (RAP) Working Group

The RAP Working 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. We are proactive about creating, maintaining and continually improving a work environment which highly values the health and wellbeing of all its staff.



### Psychosocial Working Group

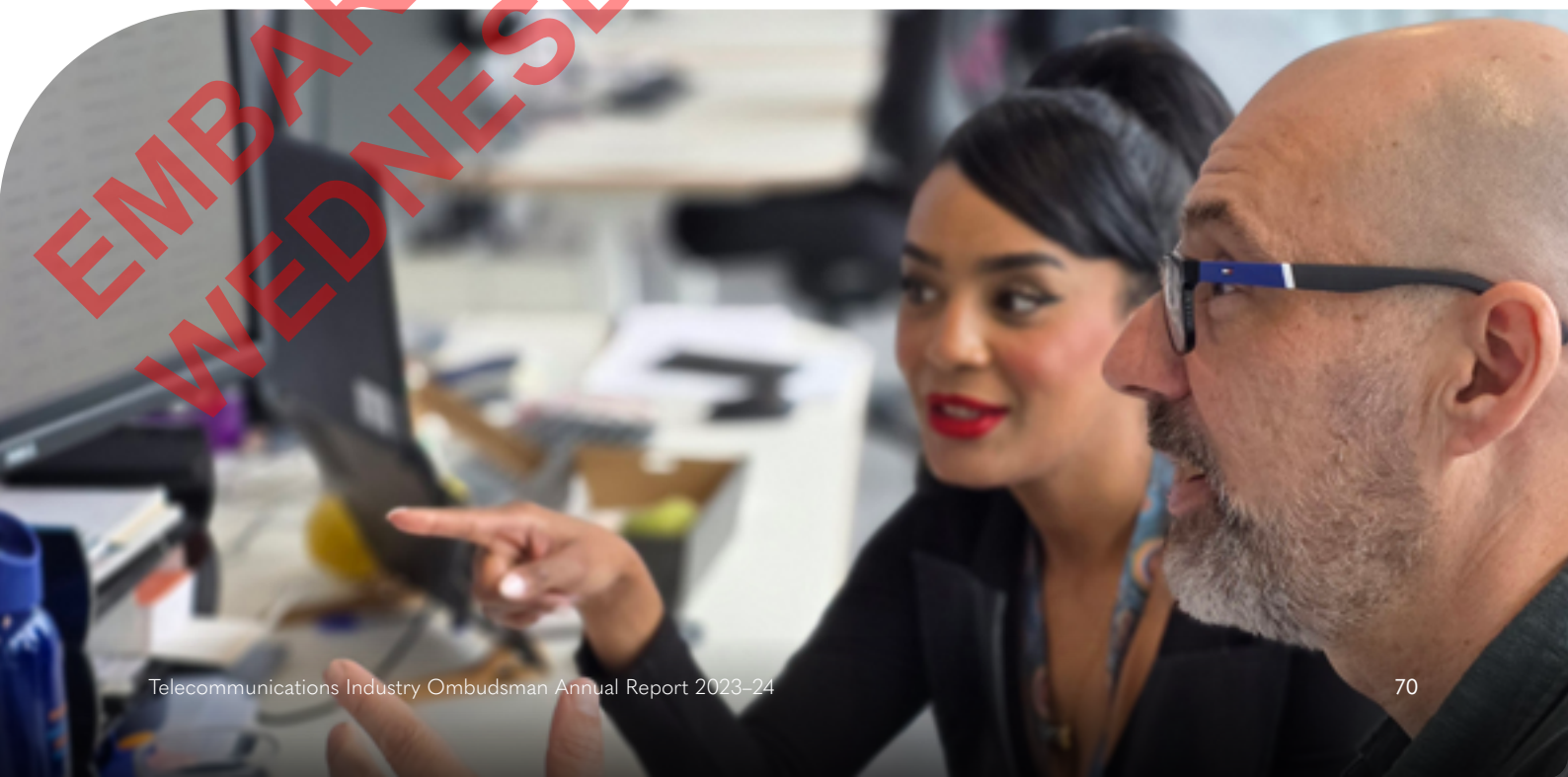
The Psychosocial Working Group was formed this year to champion psychosocial safety across the organisation and to navigate the new legislative framework. By consulting with our people, the group will implement actions to prevent psychosocial injury as well as acting as advisors to the wellbeing strategy.

### Family Violence Working Group

At the TIO, we are committed to supporting any consumers or employees who may be experiencing family violence. The Family Violence Working Group aims to establish best practice supports and ways of working in relation to the sensitive, confidential, and supportive management of family violence matters.

### Navigating Community Behaviours Working Group

With heightening pressures in the community, many frontline services and contact centres are experiencing a rise in inappropriate, complex, or aggressive behaviours. To ensure we have best practice policies and processes in place we established a working group to audit our current frameworks, consult with our people, and embed solid systems.





## Reward and recognition

Every year, the TIO celebrates outstanding employees and team contributions through our People Awards. This year we celebrated our People Awards in June 2024.

We have also launched our Everyday Heroes Awards which are peer nominated monthly awards aligned to our values Fairness, Integrity, Collaboration, and Excellence to recognise colleagues whose work has had a meaningful impact. Winners are presented each month at our Community Day.



Every year, the TIO celebrates outstanding employees and team contributions through our People Awards.



I am deeply honoured to receive the Ombudsman's Choice Award. This recognition was unexpected

and humbling. Although I have been with the TIO for just over 18 months, my passion for telecommunications and supporting my colleagues has always been a driving force.

In my current role as Operations and Service Officer, I am fulfilling a long-held aspiration. This position allows me to enhance our technological capabilities, respond to the needs of my colleagues, and contribute to the development of training and knowledge. I believe our goal is to deliver fair, accessible, and sustainable outcomes for consumers from all walks of life.

Few roles or organisations offer the opportunity to make such a significant positive impact on the world, and I believe the TIO is one of them. It is a source of continuous pride and motivation for me.

At the TIO, everyone contributes in their unique way, bringing new ideas, solutions, and different methods of working. This collaborative environment ensures that we can help a diverse range of consumers, from small business owners to grandparents connecting with their grandchildren, and children exploring the world of dinosaurs. Our success in resolving complaints directly benefits these individuals, and it is their stories that drive our mission.

**Dan McCormack**

Operations and Service Officer, Operational Excellence  
2024 Ombudsman's Choice Award winner

## The 2024 People Awards

The 2024 awards paid homage to the heartbeat of the TIO – our people. We celebrated the diversity of talents, experiences, and perspectives that enrich our organisation. It's our team that supports community and industry, connecting people, building trust, and delivering fairness.

On 18 June 2024, we announced and celebrated winners and nominees at our People Awards Ceremony.

The 2024 People Awards and their recipients were:

### Ombudsman Choice Award

Recognising an individual or team that went above and beyond their role description, selected by the Ombudsman.

2024 recipient:

**Dan McCormack**

### Contribution Award

Recognising an individual who contributes to the TIO's goals by volunteering their time on working groups, committees, employee resource groups, workshops, or social bonding activities outside of their role responsibilities.

2024 recipient:

**Joe Selvaretnam**

### 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.

2024 recipient:

**Angie Sun**



Winning the People's Choice Award as a part of the Targeted Resolution Team (TRT) is certainly one of my

highlights here at the TIO. Seeing our team's name pop up was certainly unexpected at an awards event filled with so many star-studded names.

I'm so proud of the team and glad we were recognised for the hard work we have put in over the past year. From being on the frontline during the Optus outage, to tackling complex cases with active conciliation techniques, TRT has truly done it all.

I'm most proud of how the team has really evolved over the year into a truly positive working environment where authenticity and approachability are encouraged. This team is home for me and everyone that is lucky enough to be in it. Being part of this team inspires us to always do better and feel like we are a part of something bigger here at the TIO.

We try to bring about positive change every day and we always hope that this results in a better dispute resolution process for our consumers and members. Everyday work is meaningful and satisfying, and we feel supported in constantly shifting boundaries in what is possible at the TIO.

**Targeted Resolution Team (TRT), Operational Excellence People's Choice Award**

Written by TRT member Michal Keica

### Chelsey Callaghan Knowledge Scholarship

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

2024 recipient:

**Lewis Baker**

### The Values Awards

For teams or individuals who have demonstrated the TIO's values.

2024 Fairness Award recipient:

**Sam Stradling**

2024 Integrity Award recipient:

**Thalia Alexopoulos**

2024 Excellence Award recipient:

**Elizabeth Hutchings**

2024 Collaboration Award recipient:

**Sarah Carnovale**

### The People's Choice Award

For an individual or team who was consistently voted across all categories.

2024 recipient:

**Targeted Resolution Team**



# Workplace health and safety

Workplace health and safety continues to be vitally important at the TIO and has been a key focus area in the Culture, Capability, and Communication Group's strategic plan.

## Key areas of focus

Over the past 12 months we have supported our peoples' physical and psychological wellbeing with particular emphasis on the demands of the hybrid working environment. This included reporting and tracking of injury and illness occurring in the home, and controls that can be put in place to mitigate future risk.

We have also created new working groups to support psychological and psychosocial safety. This has resulted in the rollout of new policies, procedures, and training for our people to better equip them. Our future goal is to establish and deliver a psychosocial safety framework to strengthen informed decision-making for our people.

## Employee Wellbeing

Our wellbeing focus for 2023-24 was mental health and maintaining connection. We tailored this work to the individual needs of our diverse workforce through the creation of multiple resource touch points. The Workplace Health and Safety Group implemented online tools for our employees to have access to a mental health app, and an expanded Employee Assistance Program, including in-office sessions for one day a month. The rollout of these tools was supported by weekly blogs to inform and educate our people on what was available.

For new starters at the TIO, we have developed a Peer Support Program and a Buddy Program. These programs will roll out over the coming months of the new financial year to provide support and a familiar face for all new employees coming into the organisation.

We also launched our Wellbeing Strategy. We now have a program for each season that aligns with six pillars: Psychological Wellbeing, Psychosocial Safety, Physical Wellbeing, Financial Wellbeing, Inclusion, and the TIO Values.

**Our future goal is to establish and deliver a psychosocial safety framework to strengthen informed decision-making for our people.**



# Contributing to industry improvements

## Systemic issues

A systemic issue is one that has, or is likely to have, a negative effect on a number of 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 potential systemic issue, we contact the provider and work together to address the root cause of the issue. 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.



## Systemic issues investigations

From 1 July 2023, we commenced a new systemic investigation process which involves both formal investigations and informal investigations. We will informally investigate a matter when we need additional information to better understand an identified issue to determine the appropriate next steps.

In 2023-24, we commenced 40 new formal investigations and 12 informal investigations into systemic issues. The systemic issues we investigated covered a range of topics, including:

- billing, charges, or payment issues, including international roaming fees, receiving a refund, direct debit issues, and prepaid plans
- providers' response to consumers when they have a complaint, including not informing consumers on their right to make a complaint and to pursue external dispute resolution options, like the TIO
- consumers not receiving appropriate assistance when experiencing financial hardship
- privacy and security concerns
- consumers having trouble contacting their provider about their telecommunications service
- misleading sales practices, including unconscionable sales to consumers experiencing vulnerability
- technical issues or faults.

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

- included unfair contract terms in their contracts
- engaged in misleading or unconscionable sales practices
- misrepresented themselves as another provider
- failed to interact with disadvantaged or vulnerable consumers appropriately due to inflexible authentication practices.

In response to referrals made by the TIO in 2023–24, regulators issued a direction to the provider to comply for one referral, are currently considering four referrals, and have closed one referral with no action.

**52**

new formal and informal systemic investigations commenced

**34**

improvements made by members across formal and informal investigations\*

\*includes investigations commenced in the previous financial year

## Contribution to public policy

Of our 28 submissions this financial year, the relevant regulatory, advocacy, or government agency has concluded 10 of the consultation processes. In 10 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 to the Telecommunications Financial Hardship Industry Standard consultation and the Carriage Service Provider Registration or Licensing Scheme consultation.

### Telecommunications Financial Hardship Industry Standard consultation

In 2023, the Australian Communications and Media Authority (ACMA) released its draft *Telecommunications (Financial Hardship) Industry Standard 2024* (the Standard) for comment. The Standard is intended to improve protections for telecommunications consumers who are experiencing financial hardship and ensure that disconnection from essential telecommunications services only happens as a last resort.

In November 2023, we made a [submission](#) to the ACMA's consultation and supported the introduction of measures to further protect consumers who may be facing financial hardship. We welcomed the introduction of robust direct industry regulation in this space.

Our submission outlined our support for a broad definition of financial hardship that captures all consumers who may need help, and we recommended that evidence should not be required to determine initial eligibility for appropriate hardship assistance.

We also noted the Standard should require telecommunications providers to list the TIO's contact details on restriction, suspension, and disconnection notices, to ensure consumers at risk of having their services disconnected are aware they can contact us for help. This feedback was accepted by the ACMA, with the final Standard requiring credit management notices to include contact details for the TIO and financial counselling services.

Following the consultation process, the ACMA's new and revised Standard commenced on 29 March 2024.

**In November 2023, we made a submission to the ACMA's consultation and supported the introduction of measures to further protect consumers who may be facing financial hardship.**

## Consultation On Carriage Service Provider (CSP) Registration or Licensing Scheme for the Telecommunications Industry

In September 2023, the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) sought feedback about the development of a registration or licensing scheme for telecommunications retailers.

In December 2023, we made a [submission](#) to the Department's consultation, stating that any type of registration scheme would be a welcome addition to the consumer protection framework to improve transparency and accountability in the telecommunications sector.

Our submission argued that any type of registration scheme should require telecommunications providers to confirm they meet minimum requirements alongside providing basic information. This type of registration scheme should be supported by clear consequences if telecommunications providers fail to meet minimum requirements and clear parameters for refusing and revoking registration.

Our submission highlighted key elements that are required for a potential registration scheme to be effective, including that:

- all CSPs in the telecommunications supply chain should be required to register with the scheme
- CSPs should provide basic information and confirmations that support minimum capabilities
- capability statements that draw from existing essential service sectors could prevent consumer harms
- the thresholds for refusing and revoking registration must be sufficiently clear
- supporting mechanisms must be put in place to support an effective registration scheme.

# Case study

## Systemic investigation

### **Tamin Tutoring\* was charged an unfairly high early cancellation fee**

Tamin Tutoring, a small business, signed up to a NBN service and equipment bundle with BlockTel. Tamin Tutoring needed the service and equipment to conduct remote tutoring lessons via phone and video conferencing. Tamin Tutoring was assured by BlockTel that the service and equipment bundle would be suitable for online video calls and work with its existing phone number.

However, after the service and equipment was installed, Tamin Tutoring kept experiencing faults with its service. Online video calls were slow and kept dropping out and phone calls were not coming through consistently.

Tamin Tutoring told BlockTel it wanted to cancel its contract due to the faults. BlockTel told Tamin Tutoring they can cancel, but they would have to pay over \$7,000 for cancelling the contract early, which was the cost of the remainder of the contract.

Tamin Tutoring didn't want to pay this cancellation fee because it said the service never worked properly. After Tamin Tutoring made a complaint to our office, the parties agreed that Tamin Tutoring could exit its contract and only pay 40 percent of the cost of the cancellation fees, which represents the time it was still able to use the service.

\*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 with their phone or internet problem. 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

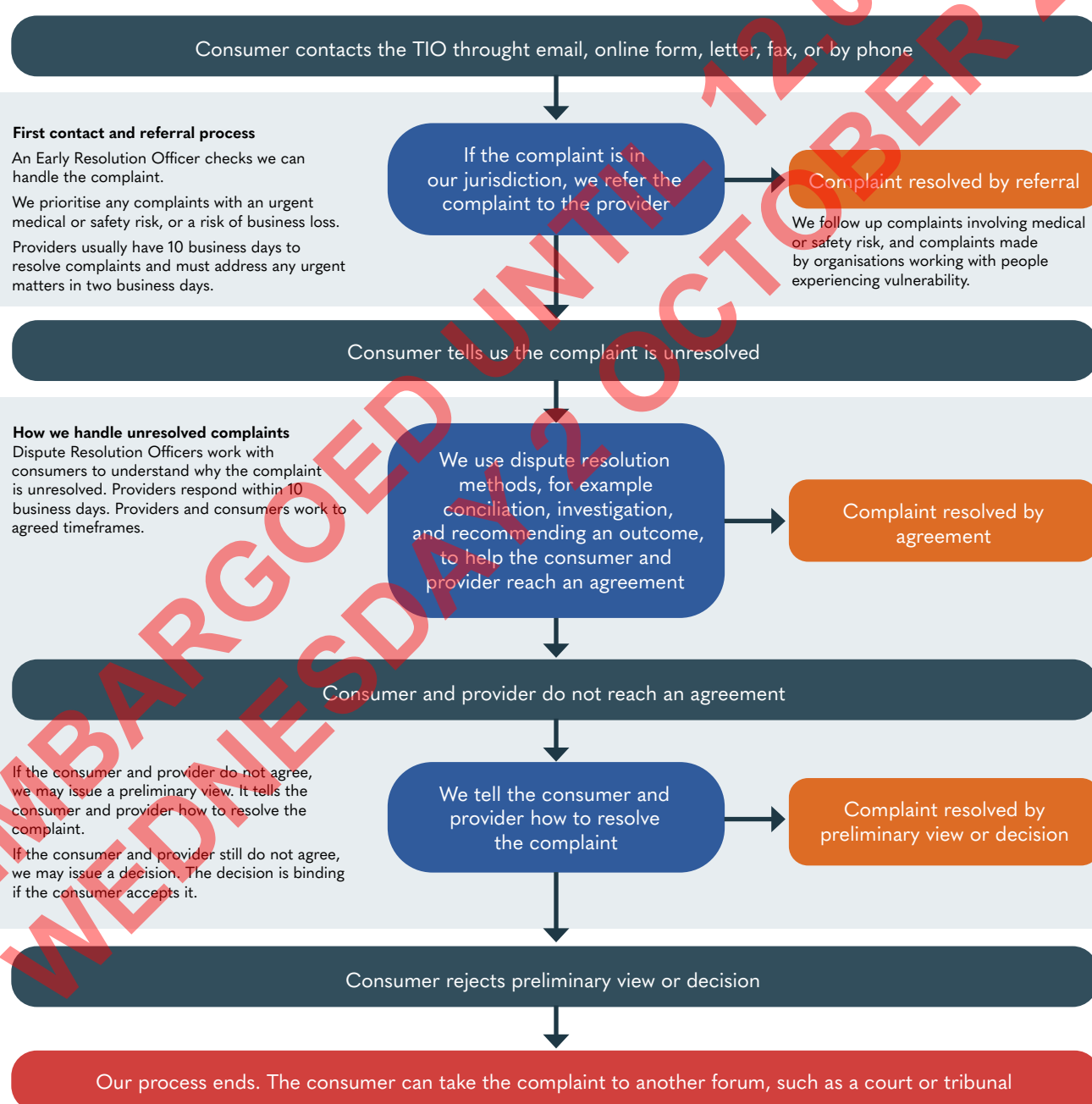
Some complaints are not resolved by the referral process. If the consumer or small business asks for further help to have their complaint resolved, we assign the complaint to a Dispute Resolution Officer who will assist the consumer and their provider to reach a fair and reasonable resolution.

Our Dispute Resolution Officers are trained to consider the law, good industry practice, and the specific circumstances of the complaint. Most complaints are resolved by agreement during conciliation and investigation, while others are resolved after we reach a preliminary view. A preliminary view is what we think a fair and reasonable outcome is in the circumstances. If a consumer does not agree with the preliminary view, our process ends.



If a consumer accepts our preliminary view but the provider does not, we then issue a final decision. 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 our decision, we refer the matter to the Australian Communications and Media Authority for enforcement action.

**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, Schedule 3 of the Telecommunications Act 1997 (Schedule 3) 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, provided carriers have complied with various laws and codes first. Low-impact infrastructure is equipment that has low visual impact and includes certain types of equipment including antennae, aerial cables, underground cables, and pits.

This regime is intended to facilitate the efficient rollout of telecommunications networks to ensure the availability of accessible and affordable telecommunications 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 landowners or occupiers object, carriers must consult with them to try to resolve their concerns. If, after consultation, a landowner or occupier asks the carrier to refer their objections to the Telecommunications Industry Ombudsman, the carrier must do so.

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

## Land access objections 2023–24

In 2023–24, the Telecommunications Industry Ombudsman received six land access objections and closed a total of 15. Of the 15 objections closed, three were cases received in 2023–24 and 11 were received in previous financial years.

### Land access objections received by state

Type of activity	Volume
Installation	4
Installation and maintenance	2

- One was about land in Victoria
- Five were about land in New South Wales.

# Case study

## Land access

### Land access

The carrier wanted to install cable under an internal waterway to improve its telecommunications network. A carrier can access private land to install low-impact facilities if it complies with procedures under Schedule 3 and the *Telecommunications Code of Practice 2021 (Code)*.

The carrier gave the landowner the required notice seeking access to the landowner's land for a period of about one year to install the cable.

The landowner objected in writing to the activity proceeding. The landowner considered the proposal did not sufficiently protect the environment, was concerned to know the location of the cable once installed, and said the timing proposed was problematic.

In response, the carrier explained its works would not have an ongoing impact on the land but agreed to take further steps. The carrier agreed to clarify the location of the cable on the land after installation and to avoid some dates.

The landowner was not satisfied with the carrier's response and asked the carrier to refer its objections to the Telecommunications Industry Ombudsman, who sought further information and assessed the objections.

The Telecommunications Industry Ombudsman directed the carrier to notify the landowner of its start and finish dates (excluding some dates) because the Telecommunications Industry Ombudsman was satisfied not knowing start and finish dates for three days of work over about one year would cause the landowner detriment and inconvenience. Otherwise, the Telecommunications Industry Ombudsman was satisfied the landowner's concerns were addressed by the carrier meeting its obligations under Schedule 3 and the Code.

After the Telecommunications Industry Ombudsman's decision the carrier was permitted to undertake the activity.

# The year in complaints

## Complaints fast facts

Total contacts

**130,942**

 **63,513** Online

 **67,429** Calls

Escalated complaints

**8,308**

↓ **11.90%** on 2022–23

Total complaints referred

**56,718**

↓ **14.6%** on 2022–23



**44.2%**

of all complaints  
were network issues



**55.1%**

escalated complaints  
closed within 60 days  
(43% in 2022–23)



**Mobile** was the  
most complained  
about service type with

**24,655** complaints

**8** binding decisions  
referred to ACMA for  
enforcement

**0** direction to implement  
referred to ACMA for  
enforcement

**1** in 2022–23



**20.4%**

decrease in financial  
hardship or repayment  
arrangement complaints

Who complained



**50,096** (88.3%)

Residential

**6,622** (11.7%)

Small business

## Events that shaped the complaint landscape

The announcement of the 3G network shutdown raised concerns about the ability of consumers with limited mobile coverage and affordability issues to stay connected. There has also been an increased focus on consumer protections, with the introduction of new rules to protect telecommunications consumers experiencing financial hardship and rules to combat the rising prevalence of scams.

### Infrastructure and the market

TPG Group, Telstra, and Optus announced the phased shutdown of their 3G networks to better facilitate the use of their 4G and 5G networks. The shutdown means that devices that rely solely on the 3G network and do not have the capability to connect to 4G or 5G will no longer have connectivity, including the ability to make triple zero calls.

All 3G devices will be affected by the shutdown, including mobile phones, tablets, smart watches, EFTPOS machines, and medical alarms. Some early 4G devices which do not support 4G voice calling, or 4G devices that force calls to triple zero to the 3G network, will also be affected.

TPG Telecom switched off their 3G network in January 2024. While the full impact of the 3G network shutdown won't be known until Telstra and Optus also switch off their 3G networks, the TIO has received complaints from consumers who are concerned about the shutdown of the 3G network. Consumers raised concerns about access to triple zero, device compatibility issues, coverage issues, and connectivity during natural disasters.

Consumers raised concerns about access to triple zero, device compatibility issues, coverage issues, and connectivity during natural disasters.



## Disruptions to the telecommunications industry

In November 2023, Optus had an unplanned outage of its internet, mobile, and landline services that affected reportedly over 10 million people and 400,000 businesses across Australia. Many services were impacted, including hospitals, banks, and some train services. Notably, Optus consumers could not call triple zero via a landline service and mobile users could only call triple zero if other carriers were available.

To raise public awareness of how the TIO could assist consumers, including conciliating compensation claims, we published information on our website and spoke to the media. We also used these channels to inform consumers about their rights.

To prepare for a potential influx of complaints, we reallocated employees from other areas of the TIO, actively monitored our call and email queues, and some call centre staff worked overtime to ensure all the complaints we received were processed and referred to Optus in a timely manner.

Most complaints we received were from consumers seeking compensation for a range of harms, such as lost income from being unable to work, pay for food, bills and other essentials, study, and contact family, friends, and support services. Small businesses also made claims for lost revenue as they were unable to operate their business. Other than financial compensation, consumers also sought remedies such as the reconnection of services, release from contract without cost, information from Optus about how the outage happened and when it would be resolved, and an apology.

The TIO made submissions to both the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' post-incident review and the [Senate Environment and Communications References Committee's Inquiry](#) highlighting our insights from the outage.

## Changes in the regulatory landscape

The review of the Telecommunications Consumer Protection Code by Communications Alliance, the peak industry body for the telecommunications sector, continues. This review commenced in May 2023 and occurs every five years.

The Australian Communications and Media Authority's (ACMA) Telecommunications (Financial Hardship) Industry Standard 2024 came into effect on 29 March 2024. The Standard contains rules to provide greater protections for consumers experiencing financial hardship.

In September 2023, the Government announced it is considering introducing a registration or licensing regime for carriage service providers. With no current barriers to entry into the telecommunications market, the introduction of such a scheme would raise the bar for telcos and significantly improve the consumer experience.

In November 2023, the Government announced its intention to introduce new mandatory industry codes to set out the responsibilities of the private sector in relation to scam activity, with a focus on telecommunications providers, banks, and digital communication platforms.

The *Telecommunications Legislation Amendment (Enhancing Consumer Safeguards and Other Measures) Bill 2023* was passed by Parliament in May 2024. This amendment gives the ACMA the power to publish identified internal dispute resolution data and clarifies the TIO's jurisdiction to handle complaints about Statutory Infrastructure Provider obligations to connect properties to their networks.

The Telecommunications Amendment (SMS Sender ID Register) Bill 2024 was introduced to Parliament in June 2024. The Bill would amend the Telecommunications Act 1997 to require the ACMA to establish and maintain an SMS Sender ID Registry to combat scammers impersonating legitimate businesses to target consumers.

# Case study

## Landline

### Richard's\* family was at risk with no landline service

Richard lives in a rural, high fire risk area and has an InContact landline service with his telecommunications provider. Since Richard's wife has a serious medical condition, he also has a Priority Assistance service on the landline. Living in a mobile blackspot area meant that when his landline stopped working, he had to travel over 1km from home to call emergency services.

Richard had experienced continual intermittent issues on his landline service for the last 10 years and often reported these faults to his telecommunications provider. One day, the landline stopped working entirely. Richard's telecommunications provider sent a technician out who laid a cable on the ground so the landline would work, but this was only a temporary fix.

The technician told Richard they only completed a temporary fix and that they needed to permanently fix the line through additional works. Soon after, the service stopped working again, and Richard came to our office for assistance.

Through our investigation we discovered that the telecommunications provider was aware of the need to permanently replace the lead-in in 2014 but did not replace it until 2022. Despite Richard having no mobile coverage at his address, his telecommunications provider did not supply an interim service during the fault period, even when Richard requested it. After some time, the parties were able to reach an agreement to resolve the complaint, and Richard's telecommunications provider paid him a settlement amount over \$2,000.

\*Names of all parties have been changed.

## Trends in complaints

*Note: In 2024, the TIO underwent an organisation-wide technology update that impacted how we collect and categorise our data. This has resulted in changes to some data sets.*

Complaints and total contacts continued to decrease in 2023–24, consistent with the trend over the last four years.

We received 56,718 complaints about providers in 2023–24, a decrease of 14.6 per cent compared to the previous year. Enquires to the TIO increased 22.6 per cent, to 32,384. Telstra and Optus accounted for the largest volume of enquiries at 27.1 per cent and 23.5 per cent respectively. Enquiries about Telstra increased 17.2 per cent in volume while those about Optus increased by 23.8 per cent.

Compared to last year, consumers returning to the TIO with an unresolved complaint have decreased from 13,131 in 2022–23 to 11,894 in 2023–24. An unresolved complaint is a complaint or enquiry referral that the consumer tells us was not resolved after we referred it to the provider.

Compared to last year, consumers returning to the TIO with an unresolved complaint have decreased from 13,131 in 2022–23 to 11,894 in 2023–24.



**Graph 1: Complaints by service type and quarter 2022–23 to 2023–24**



Mobile services were the most complained about service type in 2023-24 for the third year in a row. Complaints about mobile services accounted for 43.5 per cent of all complaints this year. However, the total volume of mobile complaints decreased by 22.1 per cent from 31,633 in 2022-23 to 24,655 in 2023-24.

This year the proportion of complaints about internet services increased slightly, with 39.4 per cent of all complaints about internet services, compared to 30.8 per cent last year. Internet complaint volumes increased by 9.3 per cent compared to the previous year. The largest increase was in Q2 due to an increase in complaints about 'no phone or internet service' and 'network outage'. This was the period that the TIO started receiving complaints in relation to the Optus outage.

The proportion and volume of complaints relating to landline services continued to decrease this year, consistent with the trend observed over the last four years. The volume of landline complaints dropped by 14 per cent, and made up a proportion of 6.4 per cent of all complaints.

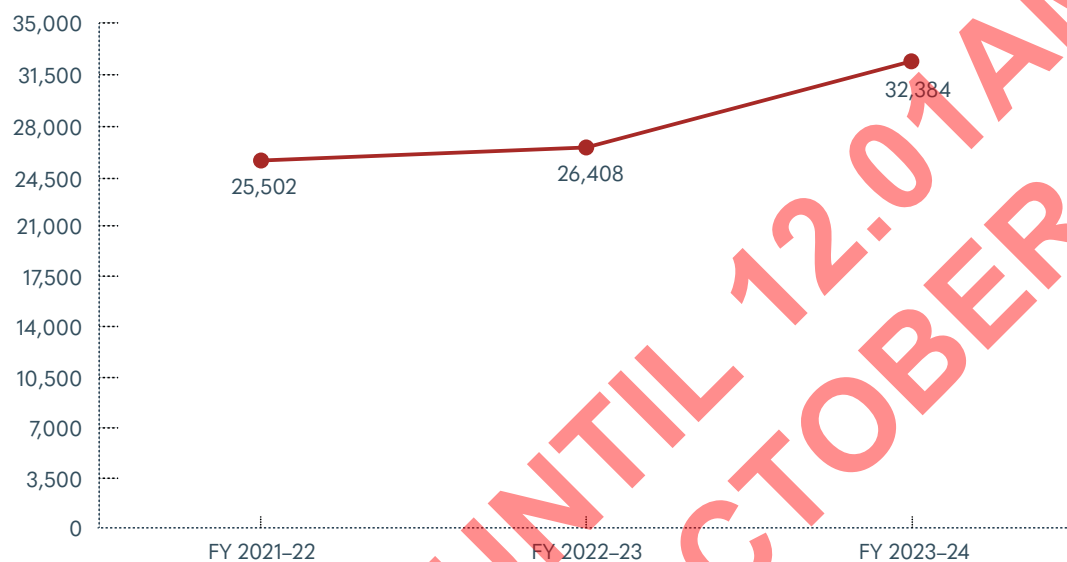
The proportion of complaints about multiple service types (complaints with more than one service type involved), decreased from 14.7 per cent to 10.1 per cent of all complaints. The volume of complaints about multiple services decreased by 41.4 per cent, to 5,701.

The TIO received 411 property complaints. This is an increase of 49 complaints compared to the previous year.

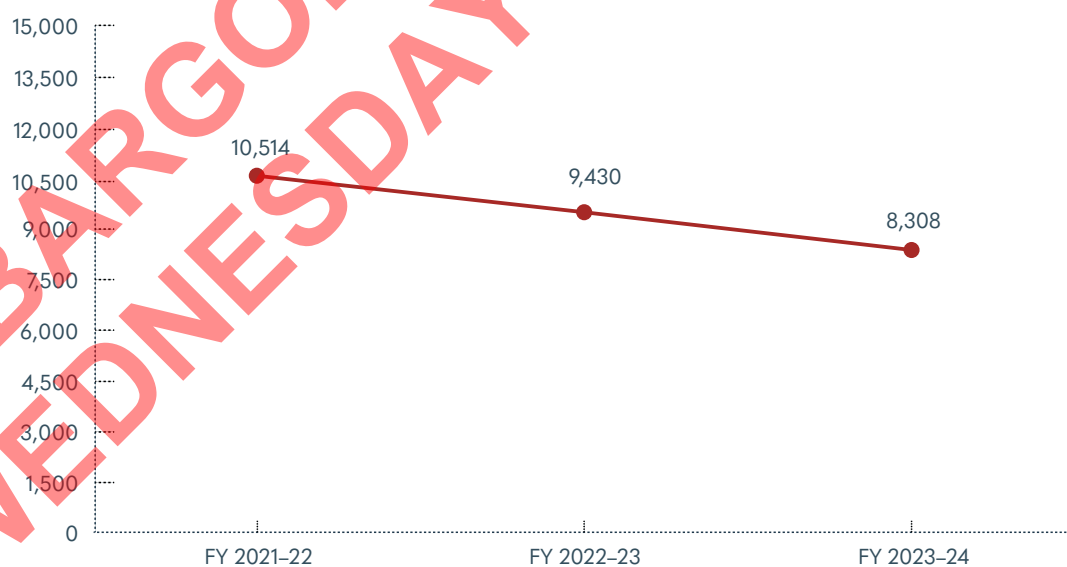
**Table 1: Complaints by service type 2021-22 to 2023-24**

Service Type	2021-22	2022-23	2023-24
Internet	33.9%	30.8%	39.4%
Landline	8.5%	6.3%	6.4%
Mobile	39.7%	47.7%	43.5%
Multiple	17.4%	14.7%	10.1%
Property	0.5%	0.5%	0.7%

**Graph 2: Enquiries 2021–22 to 2023–24**



**Graph 3: Escalated complaints 2021–22 to 2023–24**



## Top 10 issues

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

Of the top 10 most complained about issues, four increased in volume. These were complaints about 'inadequate fault testing', 'delay establishing a service', 'no phone or internet service', and 'non-financial loss – not privacy'.

'Non-financial loss – not privacy complaints' have increased for the second year in a row, by 3.4 per cent compared to 2022–23.

Other than the top 10 issues, the biggest improvements were seen in complaints about 'unauthorised disclosure' of information (78.8 per cent decline), and 'non-financial loss – privacy' (68.9 per cent decline). In the top 10 issues, complaints about a 'resolution agreed but not met', and 'service and equipment fees' also declined by 27.6 per cent and 14.1 per cent respectively.

**Table 2: Top 10 issues 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	38,374	35,748	63.0%	-6.8%
Service and equipment fees	22,322	19,178	33.8%	-14.1%
No phone or internet service	6,371	6,730	11.9%	5.6%
Inadequate fault testing	4,051	5,512	9.7%	36.1%
Resolution agreed but not met	7,541	5,458	9.6%	-27.6%
Intermittent service or drop outs	5,983	5,374	9.5%	-10.2%
Delay establishing a service	4,428	4,778	8.4%	7.9%
Failure to cancel a service	4,960	4,473	7.9%	-9.8%
Non-financial loss - not privacy	3,895	4,027	7.1%	3.4%
Slow data speed	3,769	3,484	6.1%	-7.6%

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

## Issues by service type

Nine of the top 10 issues for mobile services decreased, with the biggest decrease seen in 'resolution agreed but not met' (31.3 per cent decrease). The only increase in the top 10 issues was in 'inadequate fault testing' (24.3 per cent increase).

Seven of the top 10 issues in internet services increased compared to 2022–23. The largest increases were seen in complaints about 'inadequate fault testing' (46.3 per cent increase) and 'delay establishing a service' (34.5 per cent increase). In the top 10 issues, internet complaints about a 'resolution agreed but not met' saw the largest decline, down 9.2 per cent compared to last year.

Though not within the top 10 issues raised, we observed notable increases in internet complaints about a problem with a 'network outage' (63.5 per cent increase) and 'financial loss' (53.3 per cent increase) with some cases attributed to the Optus network outage that occurred in November 2023.

All issues in the top 10 for multiple services decreased when compared to 2022–23. Complaints about a 'resolution agreed but not met' improved the most with a 46.7 per cent reduction in complaints followed by 'service and equipment fees' with a 46.3 per cent reduction.

Two of the top 10 issues for landline complaints increased with 'inadequate fault testing' up to 474 complaints (72.4 per cent increase) and having 'no phone or internet service' up to 1,181 complaints (1.4 per cent increase). Though not within the top 10 issues for landline complaints, there was an increase in 'equipment fault' complaints by 70.8 per cent (by 51 complaints).

**In the top 10 issues, internet complaints about a 'resolution agreed but not met' saw the largest decline, down 9.2 per cent compared to last year.**

**Table 3: Top 10 issues for mobile services 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	18,622	15,639	63.4%	-16.0%
Service and equipment fees	10,611	8,584	34.8%	-19.1%
Resolution agreed but not met	3,951	2,715	11.0%	-31.3%
Poor mobile coverage	2,656	2,201	8.9%	-17.1%
Non-financial loss - not privacy	1,707	1,668	6.8%	-2.3%
Equipment Fault	2,125	1,666	6.8%	-21.6%
Misleading conduct when making a contract	1,976	1,632	6.6%	-17.4%
Failure to cancel a service	1,665	1,364	5.5%	-18.1%
Partially restricted service	1,395	1,304	5.3%	-6.5%
Inadequate fault testing	1,008	1,253	5.1%	24.3%

**Table 4: Top 10 issues for internet services 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	11,455	14,144	63.3%	23.5%
Service and equipment fees	7,078	7,785	34.9%	10.0%
Intermittent service or drop outs	3,617	3,519	15.8%	-2.7%
No phone or internet service	2,838	3,459	15.5%	21.9%
Inadequate fault testing	2,216	3,243	14.5%	46.3%
Delay establishing a service	2,268	3,051	13.7%	34.5%
Slow data speed	2,834	2,643	11.8%	-6.7%
Failure to cancel a service	2,144	2,331	10.4%	8.7%
Resolution agreed but not met	2,062	1,873	8.4%	-9.2%
Non-financial loss - not privacy	1,481	1,758	7.9%	18.7%



**Table 5: Top 10 issues for multiple services 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	5,802	3,658	64.2%	-37.0%
Service and equipment fees	3,721	1,997	35.0%	-46.3%
No phone or internet service	1,437	1,246	21.9%	-13.3%
Intermittent service or drop outs	1,152	760	13.3%	-34.0%
Resolution agreed but not met	1,125	600	10.5%	-46.7%
Inadequate fault testing	552	542	9.5%	-1.8%
Delay establishing a service	724	498	8.7%	-31.2%
Failure to cancel a service	792	480	8.4%	-39.4%
Non-financial loss - not privacy	567	456	8.0%	-19.6%
Poor mobile coverage	547	354	6.2%	-35.3%

**Table 6: Top 10 issues for landline services 2023–24**

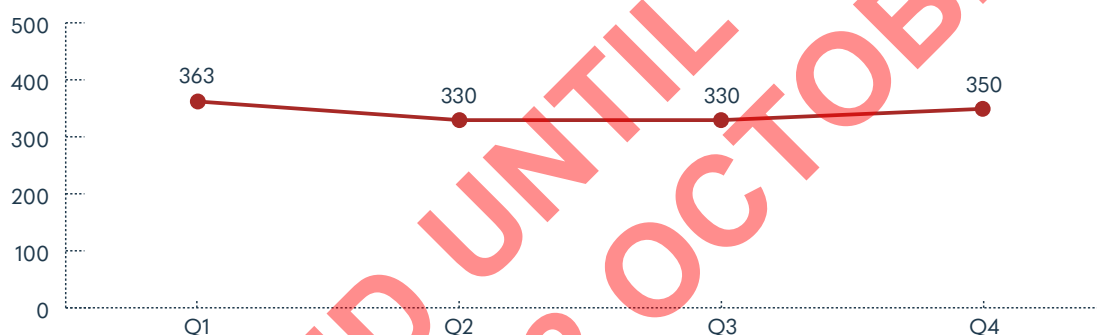
Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	2,495	2,307	63.8%	-7.5%
No phone or internet service	1,165	1,181	32.7%	1.4%
Service and equipment fees	912	812	22.5%	-11.0%
Inadequate fault testing	275	474	13.1%	72.4%
Delay establishing a service	378	333	9.2%	-11.9%
Number problem due to connection, disconnection or transfer	368	325	9.0%	-11.7%
Failure to cancel a service	359	298	8.2%	-17.0%
Resolution agreed but not met	403	270	7.5%	-33.0%
Partially restricted service	284	263	7.3%	-7.4%
Business loss	297	250	6.9%	-15.8%
Disconnection in error	349	250	6.9%	-28.4%

# Financial hardship complaints

**Table 7: Financial hardship complaints 2022–23 to 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
Financial Hardship or Repayment Arrangement	1,724	1,373	2.4%	-20.4%

**Graph 4: Financial hardship complaints by quarter 2023–24**



**Table 8: Financial hardship complaints by service type and quarter 2023–24**

Quarter	Landline	Internet	Mobile	Multiple	Property	Total
Q1	3	45	252	63	-	363
Q2	2	53	226	49	-	330
Q3	1	60	240	29	-	330
Q4	3	78	241	28	-	350

**Table 9: Financial hardship complaints by consumer type and quarter 2023–24**

Quarter	Residential	Small Business & Others	Total
Q1	340	23	363
Q2	315	15	330
Q3	310	20	330
Q4	334	16	350



# Case study

## Financial hardship

### **Carlo\* was placed into further hardship after falling victim to a scam**

Carlo is a full-time university student and has a mobile service with BranchTel. Carlo's only source of income is government youth allowance payments, and after his weekly rent and utility bills, Carlo only has \$35 left to spend on food and transport costs each week.

Carlo met Iris online, and over time they developed an online friendship. After a few months, Iris asked Carlo to purchase three mobile phones for her, telling him that she was having trouble setting up her own telecommunications account, but she would pay him back. Carlo purchased the phones, then sent them to the address Iris gave him, thinking he would eventually be reimbursed. After Carlo sent the phones to Iris, she stopped responding to his messages and he soon realised he was the victim of a scam.

Carlo was left with the debt of \$3,200 for the phones, which caused him great distress. He contacted BranchTel for help as he could not afford to pay off the debt, which had placed him in further hardship. After BranchTel did not respond to his complaint, Carlo contacted our office for help.

During conciliation, BranchTel agreed to waive some of the debt and offered Carlo a payment plan for \$180 per month, but this amount was far in excess of what Carlo could afford. After we raised our concerns with BranchTel about this unreasonable payment plan, BranchTel eventually agreed to waive all of the debt owing on Carlo's account due to the severe financial hardship Carlo was experiencing.

\*Names of all parties have been changed.

## Network complaints

Complaints involving network issues made up 44.2 per cent of our complaints, an increase from 39.9 per cent in 2022–23.

The volume of complaints about network issues reduced by 5.3 per cent in total and declined for all service types except internet. The highest volume reduction was observed in multiple services (28.5 per cent) followed by landline services (13.5 per cent), and mobile services (10.3 per cent) when compared to the previous year. The volume of internet services was up by 8.8 per cent.

Compared to 2022–23, complaints about network issues for services delivered over the NBN declined by 8.0 per cent, while services delivered over other networks declined by 2.2 per cent.

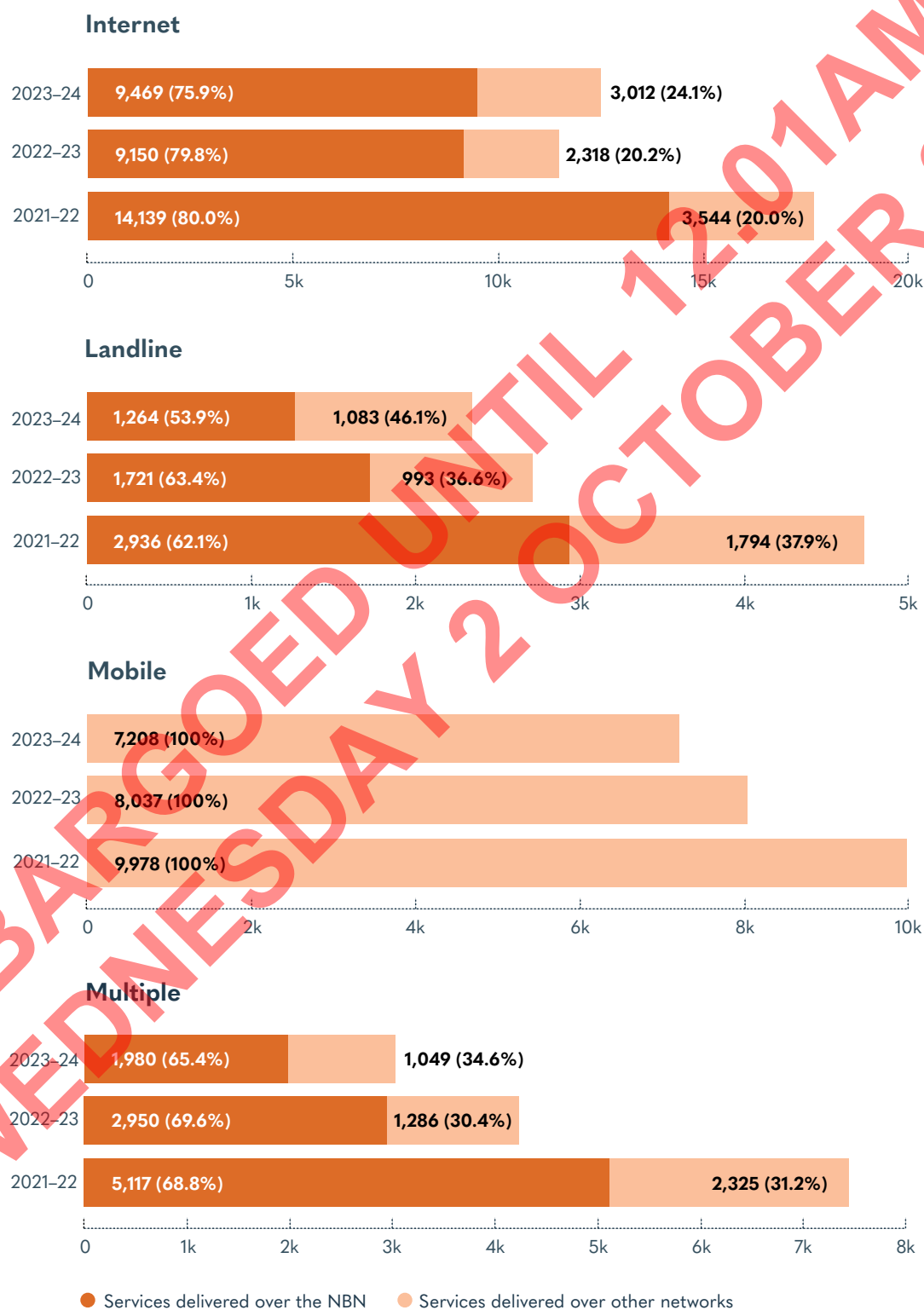
Within the top 10 issues in network complaints, 'network outage' complaints increased by 120.4 per cent to 1,618 complaints, 'delay establishing a service' increased by 7.9 per cent to 4,778 complaints and having 'no phone or internet service' increased by 5.6 per cent to 6,730.

The biggest improvements were in complaints regarding 'changing provider' (32 per cent decrease) followed by 'disconnection in error' (27.5 per cent decrease) and 'poor mobile coverage' (20.2 per cent decrease).

We saw decreases in complaints about all network issues from both residential (2.8 per cent decrease) and small business and other consumers (19.1 per cent decrease). Both consumer types experienced fewer challenges changing provider, with complaints about this issue decreasing 29.6 per cent and 40.5 per cent, respectively.

**The volume of complaints about network issues reduced by 5.3 per cent in total and declined for all service types except internet.**

**Graph 5: Network complaints by service type 2021–22 to 2023–24**





## Complaints by provider

Complaints about the top 10 telco providers accounted for 87.9 per cent of all complaints received, which is a decrease from 90.1 per cent last year. The number of providers we received complaints about dropped from 296 last year to 293 this year.\*

Four of the top 10 providers had an increase in complaints from the previous year; Uniti Retail, Tangerine Telecom, Dodo Services, and Southern Phone Company.

New to the top 10, complaints about Uniti Retail increased 159 per cent, with the telco rising from being the 26th most complained about in 2022–23, to 10th in 2023–24.

Tangerine Telecom is also new to the top 10 most complained about providers, with a 78.9 per cent increase in complaints. Tangerine moved from 12th in 2022–23 to 9th in 2023–24.

Complaints about Dodo Services increased by 41.4 per cent and Southern Phone Company increased by 1.9 per cent compared to last year.

Complaints about Telstra\*\* accounted for 39.9 per cent of all complaints, decreasing from 40.4 per cent compared to the previous year. Telstra's complaint volume decreased by 15.7 per cent in 2023–24.

Optus Group\*\* accounted for 25.7 per cent of all complaints. Within the top 10 group, Optus has the largest decrease in complaint volume to 14,561 complaints (a decrease of 28.4 per cent).

Complaints about Vodafone decreased by 0.5 per cent. Complaints also decreased for TPG Group\*\* (9.9 per cent) for iiNet (10.5 per cent) and Aussie Broadband Limited (0.6 per cent).

Medion Australia Pty Limited\*\*\* and Internode dropped out of the top 10 with declines in complaints of 11.6 per cent and 4.7 per cent respectively.

\*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."

**Complaints about Dodo Services increased by 41.4 per cent and Southern Phone Company increased by 1.9 per cent compared to last year.**

**Table 10: Top 10 service providers by complaints 2023–24**

Provider	2022–23	2023–24	2023–24 % of total	Change from 2022–23
Telstra	26,833	22,624	39.9%	-15.7%
Optus Group	20,323	14,561	25.7%	-28.4%
Vodafone Australia Limited	5,063	5,039	8.9%	-0.5%
TPG Group	2,222	2,002	3.5%	-9.9%
iiNet Ltd	1,874	1,678	3.0%	-10.5%
Southern Phone Company Ltd	1,044	1,064	1.9%	1.9%
Aussie Broadband Limited	890	885	1.6%	-0.6%
Dodo Services Pty Ltd	577	816	1.4%	41.4%
Tangerine Telecom Pty Ltd	394	705	1.2%	78.9%
Uniti Retail Pty Ltd	178	461	0.8%	159.0%

# Residential complaints

We received a total of 50,096 complaints from residential consumers, a 13.8 per cent decrease from the previous year. Complaints from residential consumers accounted for 88.3 per cent of all complaints received this year, a slight increase from last year's 87.6 per cent.

## Residential complaints by service type

For residential consumers complaints about internet services increased by 9.5 per cent while those about property increased by 19.8 per cent in 2023–24. Complaints about all other service types decreased. The largest decline was for complaints about multiple services (41.6 per cent decrease), followed by mobile services (22.5 per cent decrease).

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 44.7 per cent, a slight decrease from last year (49.7 per cent).

Complaints about internet services made up 40.8 per cent of residential complaints, an increase from 32.1 per cent last year. Complaints about landline services continued to decline in volume in 2023–24 (down 8 per cent), however the proportion of complaints about landline services from residential consumers increased to 4.9 per cent in 2023–24 from 4.6 per cent last year.

**Table 11: Residential complaints by service type 2021–22 to 2023–24**

Service type	2021–22	2022–23	2023–24
Internet	35.9%	32.1%	40.8%
Landline	6.3%	4.6%	4.9%
Mobile	41.8%	49.7%	44.7%
Multiple	15.4%	13.0%	8.8%
Property	0.5%	0.6%	0.8%

Complaints about internet services made up 40.8 per cent of residential complaints, an increase from 32.1 per cent last year.

## Residential complaints by top 10 issues

'No or delayed action' by the provider and 'service and equipment fees' continued to be the two most complained about issues by residential consumers this year.

The largest increase in complaints was about 'inadequate fault testing', which increased by 36.4 per cent compared to the previous year. The other issues which increased included 'delay establishing a service' (12.0 per cent), having 'no phone or internet service' (8.7 per cent) and 'non-financial loss – not privacy' (4 per cent).

Though not within the top 10 issues, complaints about a 'network outage' increased 111.7 per cent to 1,391 complaints, and 'financial loss' increased 32.2 per cent to 1,617 complaints.

Of the top 10 issues for residential consumers, the largest decreases were observed for complaints about a 'resolution agreed but not met' (26.8 per cent), 'service and equipment fees' (13.2 per cent), and 'failure to cancel a service' (9.7 per cent).

**Table 12: Top 10 issues in residential complaints 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	33,506	31,494	62.9%	-6.0%
Service and equipment fees	19,853	17,229	34.4%	-13.2%
No phone or internet service	5,225	5,677	11.3%	8.7%
Resolution agreed but not met	6,746	4,941	9.9%	-26.8%
Inadequate fault testing	3,553	4,845	9.7%	36.4%
Intermittent service or drop outs	5,266	4,810	9.6%	-8.7%
Delay establishing a service	3,767	4,219	8.4%	12.0%
Failure to cancel a service	4,354	3,930	7.8%	-9.7%
Non-financial loss – not privacy	3,547	3,690	7.4%	4.0%
Slow data speed	3,465	3,203	6.4%	-7.6%

**Graph 6: Residential complaints by service type and quarter 2021-22 to 2023-24**

	Q1 2021-22	Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23	Q2 2022-23	Q3 2022-23	Q4 2022-23	Q1 2023-24	Q2 2023-24	Q3 2023-24	Q4 2023-24
<b>Total</b>	18,425	15,711	19,026	15,296	13,968	15,768	15,699	12,700	11,295	12,737	14,007	12,057
<b>Internet</b>	6,874	5,427	7,067	5,229	4,268	4,816	5,230	4,366	4,129	4,981	5,940	5,403
<b>Landline</b>	1,237	920	1,190	982	721	593	712	626	534	591	755	561
<b>Mobile</b>	7,255	6,920	7,683	6,790	6,910	8,260	7,670	6,060	5,117	5,825	6,191	5,257
<b>Multiple</b>	2,976	2,356	2,983	2,221	1,987	2,011	2,008	1,573	1,435	1,259	1,030	700
<b>Property</b>	83	88	103	74	82	88	79	75	80	81	91	136



# Small business complaints

The TIO received 6,622 complaints from small businesses, a 19.6 per cent decrease from 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

Complaints from small businesses were at lower levels for all service types except internet in 2023–24.

Internet complaints increased by 7 per cent to 1,882, and made up a proportion of 28.4 per cent of all small business complaints.

Complaints about mobile services accounted for 34.2 per cent of small business complaints, which was an increase from 33.2 per cent last year. This is the second year that mobile services have been the dominant service type for small business complaints.

Complaints about multiple services accounted for 19.3 per cent of overall small business complaints, a decline from 26.2 per cent of complaints last year. Landline services complaints accounted for 17.7 per cent of small business complaints, a decrease from 18.9 per cent last year.

Table 13: Small business complaints by service type 2021–22 to 2023–24			
Service type	2021–22	2022–23	2023–24
Internet	21.1%	21.3%	28.4%
Landline	22.3%	18.9%	17.7%
Mobile	26.2%	33.2%	34.2%
Multiple	29.9%	26.2%	19.3%
Property	0.5%	0.5%	0.3%

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 top 10 issues

Eight of the top 10 issues for small business consumers decreased in volume compared to last year.

Complaints related to 'resolution agreed but not met' decreased by 35 per cent, 'intermittent service or dropouts' by 21.3 per cent, and 'service and equipment fees' by 21.1 per cent.

Complaints about 'inadequate fault testing' increased for the second year in a row (up 33.9 per cent in 2023-24). Of all small business complaints, 10.1 per cent had problems with 'inadequate fault testing' in 2023-24 compared to 6.0% the previous year.

Service problems with an add-on feature (such as email, call waiting, alarm failure) appeared in the top 10 issues for small businesses for the first time. Complaints about add-on features increased by 6.2 per cent, accounting for a proportion of 5.7 per cent of total small business complaints.

Although a decline in absolute volume, small business complaints about 'no or delayed action by provider', 'business loss', and 'no phone or internet service' accounted for higher proportions of small business complaints compared to the previous year.

**Table 14: Top 10 issues in small business complaints 2023-24**

Complaint Issue	2022-23	2023-24	2023-24 % of total	Change from 2022-23
No or delayed action by provider	4,868	4,254	64.2%	-12.6%
Service and equipment fees	2,469	1,949	29.4%	-21.1%
Business loss	1,096	1,064	16.1%	-2.9%
No phone or internet service	1,146	1,053	15.9%	-8.1%
Inadequate fault testing	498	667	10.1%	33.9%
Intermittent service or drop outs	717	564	8.5%	-21.3%
Delay establishing a service	661	559	8.4%	-15.4%
Failure to cancel a service	606	543	8.2%	-10.4%
Resolution agreed but not met	795	517	7.8%	-35.0%
Service problem with add-on feature eg email, call waiting, alarm etc failure	355	377	5.7%	6.2%

**Graph 7: Small business complaints by service type and quarter 2021-22 to 2023-24**

	Q1 2021-22	Q2 2021-22	Q3 2021-22	Q4 2021-22	Q1 2022-23	Q2 2022-23	Q3 2022-23	Q4 2022-23	Q1 2023-24	Q2 2023-24	Q3 2023-24	Q4 2023-24
<b>Total</b>	3,007	2,621	2,902	2,512	2,315	2,112	2,023	1,791	1,647	1,746	1,714	1,515
<b>Internet</b>	638	524	644	527	488	410	443	418	361	488	558	475
<b>Landline</b>	677	623	589	569	496	377	327	354	290	287	296	302
<b>Mobile</b>	762	702	763	666	675	764	729	565	577	611	551	526
<b>Multiple</b>	913	761	893	740	646	551	518	442	412	353	306	206
<b>Property</b>	17	11	13	10	10	10	6	12	7	7	3	6

## Complaints by consumer language spoken other than English

**Table 15: Complaints by consumer language spoken other than English 2023-24**

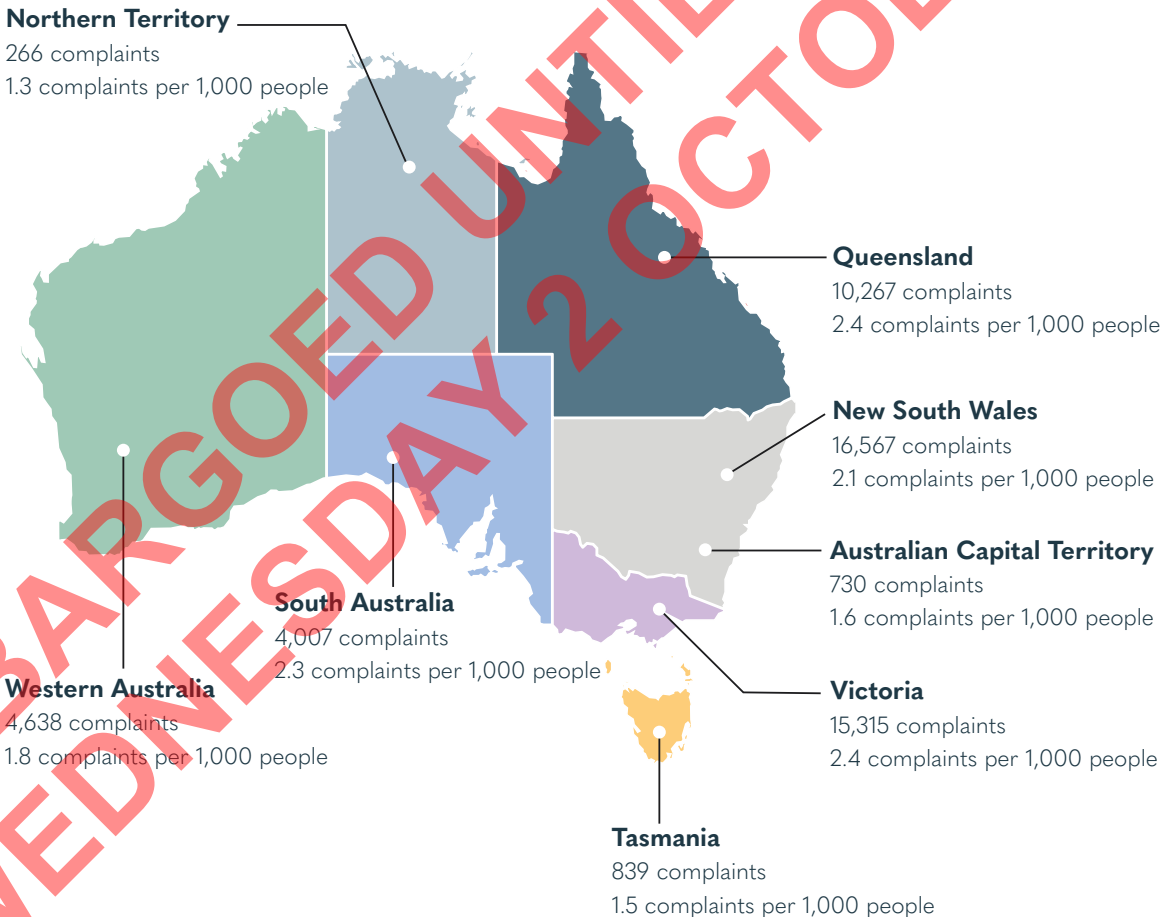
Language	2023-24	Language	2023-24
Arabic	315	Hebrew	20
Hindi	308	Japanese	20
Chinese	259	Malay	18
Greek	171	Samoa	18
Italian	170	Filipino (Tagalog)	16
Spanish	162	Bosnian	14
Mandarin	153	Somali	14
Persian	140	Thai	13
Other	122	Pashto	12
Vietnamese	102	Albanian	10
Cantonese	97	Fijian	10
Punjabi	87	Khmer	10
Filipino	80	Romanian	9
Tamil	80	Amharic	8
Urdu	77	Hazaragi	8
Sinhalese	73	Swahili	8
Turkish	65	Burmese	7
French	63	Auslan	6
German	61	Oromo	6
Portuguese	53	Gaelic	5
Croatian	51	Tigrinya	5
Nepali	41	Czech	4
Serbian	41	Kurdish	4
Korean	40	Lao	4
Macedonian	40	Bulgarian	3
Indonesian	37	Dinka	3
Russian	36	Swedish	3
Polish	33	Aceh	2
Hungarian	24	Danish	2
Afrikaans	23	Acholi	1
Maltese	23	Karen	1
Dutch	20	Pitjantjatjara	1
		Rohingya	1

## Complaints by First Nations consumers

Table 16: Complaints by First Nations consumers 2023–24

First Nation	2023–24
Aboriginal	1,115
Aboriginal and Torres Strait Islander	138
Torres Strait Islander	51

Figure 3: Complaints by state 2023–24







# Directors' Report and financial statements

Download the TIO Directors' Report and Financial Statements 2023–24

EMBARGOED UNTIL 12:01 AM  
WEDNESDAY 2 OCTOBER 2024

# 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 leading to an enquiry classification or up until a complaint or enquiry referral 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 expressions of dissatisfaction about a provider that have not been raised with the provider before a consumer contacts us. We send enquiry referrals 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).

### **External Dispute Resolution (EDR)**

is a service that operates as an alternative to courts and tribunals to help people resolve complaints they have not been able to fix with their service provider.

### **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, which means one complaint can have multiple 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.

### **Landline complaints**

includes complaints about voice services delivered over the Public Switched Telephone Network (PSTN) and voice services delivered over the National Broadband Network (Voice over Internet Protocol or 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.

### **Percentages**

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**

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	Cooling off
	Inadequate credit assessment
	Inadequate documentation
	Inadequate explanation of product
	Misleading conduct
	Product unsuitable
	Refused a service
	Unable to contract
	Unconscionable conduct
In contract	Equipment finance agreement
	Failure to cancel
	Mishandled or inaccurate information – not personal
	Not liable for contract
	Request to change account holder
	Unfair contract terms
Connection	Variation by provider
	Changing provider
	Delay
	Number problem
	Unauthorised transfer

## Service delivery

Category	Issue keyword
No service	Disconnection in error
	Network outage
	No service
Poor service quality	Intermittent/drop outs
	Noise/interference
	Poor mobile coverage
	Restricted service
	Slow data speed
Equipment	Fault
	Unsuitable
Special and account services	Cannot access account or data - technical
	Directory listing - business
	Disability equipment
	Enhanced/add on feature
	Loyalty programs
	Priority assistance

## Payment for a service

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

## Customer service

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

## Property

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

## Schedule 3

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

# Complaints appendix

## Complaint distribution

### A1: Complaints by service type change 2022-23 to 2023-24

Year	Internet	Landline	Mobile	Multiple	Property	Total
2023-24	22,335	3,616	24,655	5,701	411	<b>56,718</b>
2022-23	20,439	4,206	31,633	9,736	362	<b>66,376</b>
Change from 2022-23	9.3%	-14.0%	-22.1%	-41.4%	13.5%	<b>-14.6%</b>

### A2: Complaints by service type 2021-22 to 2023-24

Year	Internet		Landline		Mobile		Multiple		Property		Total	
	Vol	%	Vol	%	Vol	%	Vol	%	Vol	%	Vol	%
2023-24	22,335	39.4%	3,616	6.4%	24,655	43.5%	5,701	10.1%	411	0.7%	<b>56,718</b>	<b>100%</b>
2022-23	20,439	30.8%	4,206	6.3%	31,633	47.7%	9,736	14.7%	362	0.5%	<b>66,376</b>	<b>100%</b>
2021-22	26,930	33.9%	6,787	8.5%	31,541	39.7%	13,843	17.4%	399	0.5%	<b>79,500</b>	<b>100%</b>

### A3: Complaints by consumer type 2021-22 to 2023-24

Year	Residential		Small Business		Total	
	Vol	%	Vol	%	Vol	%
2023-24	50,096	88.3%	6,622	11.7%	<b>56,718</b>	<b>100%</b>
2022-23	58,135	87.6%	8,241	12.4%	<b>66,376</b>	<b>100%</b>
2021-22	68,458	86.1%	11,042	13.9%	<b>79,500</b>	<b>100%</b>



**A4: Enquiries 2021–22 to 2023–24**

Year	Enquiries
2023–24	32,384
2022–23	26,408
2021–22	25,502

**A5: Top 10 issues 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	38,374	35,748	63.0%	-6.8%
Service and equipment fees	22,322	19,178	33.8%	-14.1%
No phone or internet service	6,371	6,730	11.9%	5.6%
Inadequate fault testing	4,051	5,512	9.7%	36.1%
Resolution agreed but not met	7,541	5,458	9.6%	-27.6%
Intermittent service or drop outs	5,983	5,374	9.5%	-10.2%
Delay establishing a service	4,428	4,778	8.4%	7.9%
Failure to cancel a service	4,960	4,473	7.9%	-9.8%
Non-financial loss – not privacy	3,895	4,027	7.1%	3.4%
Slow data speed	3,769	3,484	6.1%	-7.6%

# Residential complaints

## A6: Residential complaints by service type 2021–22 to 2023–24

Year	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
2023–24	20,453	40.8%	2,441	4.9%	22,390	44.7%	4,424	8.8%	388	0.8%	50,096
2022–23	18,680	32.1%	2,652	4.6%	28,900	49.7%	7,579	13.0%	324	0.6%	58,135
2021–22	24,597	35.9%	4,329	6.3%	28,648	41.8%	10,536	15.4%	348	0.5%	68,458

## A7: Top 10 issues in residential complaints 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	33,506	31,494	62.9%	-6.0%
Service and equipment fees	19,853	17,229	34.4%	-13.2%
No phone or internet service	5,225	5,677	11.3%	8.7%
Resolution agreed but not met	6,746	4,941	9.9%	-26.8%
Inadequate fault testing	3,553	4,845	9.7%	36.4%
Intermittent service or drop outs	5,266	4,810	9.6%	-8.7%
Delay establishing a service	3,767	4,219	8.4%	12.0%
Failure to cancel a service	4,354	3,930	7.8%	-9.7%
Non-financial loss - not privacy	3,547	3,690	7.4%	4.0%
Slow data speed	3,465	3,203	6.4%	-7.6%

## Small business complaints

**A8: Small business complaints by service type 2021–22 to 2023–24**

Year	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
2023–24	1,882	28.4%	1,175	17.7%	2,265	34.2%	1,277	19.3%	23	0.3%	<b>6622</b>
2022–23	1,759	21.3%	1,554	18.9%	2,733	33.2%	2,157	26.2%	38	0.5%	<b>8241</b>
2021–22	2,333	21.1%	2,458	22.3%	2,893	26.2%	3,307	29.9%	51	0.5%	<b>11042</b>

**A9: Top 10 issues in small business complaints 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	4,868	4,254	64.2%	-12.6%
Service and equipment fees	2,469	1,949	29.4%	-21.1%
Business loss	1,096	1,064	16.1%	-2.9%
No phone or internet service	1,146	1,053	15.9%	-8.1%
Inadequate fault testing	498	667	10.1%	33.9%
Intermittent service or drop outs	717	564	8.5%	-21.3%
Delay establishing a service	661	559	8.4%	-15.4%
Failure to cancel a service	606	543	8.2%	-10.4%
Resolution agreed but not met	795	517	7.8%	-35.0%
Service problem with add-on feature eg email, call waiting, alarm etc failure	355	377	5.7%	6.2%

# Complaints about internet services

## A10: Internet complaints by year 2021–22 to 2023–24

Year	Complaints	Proportion of complaints
2023–24	22,335	39.4%
2022–23	20,439	30.8%
2021–22	26,930	33.9%

## A11: Internet complaints by consumer type 2021–22 to 2023–24

Year	Residential	%	Small Business	%	Total
2023–24	20,453	91.6%	1,882	8.4%	22,335
2022–23	18,680	91.4%	1,759	8.6%	20,439
2021–22	24,597	91.3%	2,333	8.7%	26,930

## A12: Top 10 issues for internet services 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	11,455	14,144	63.3%	23.5%
Service and equipment fees	7,078	7,785	34.9%	10.0%
Intermittent service or drop outs	3,617	3,519	15.8%	-2.7%
No phone or internet service	2,838	3,459	15.5%	21.9%
Inadequate fault testing	2,216	3,243	14.5%	46.3%
Delay establishing a service	2,268	3,051	13.7%	34.5%
Slow data speed	2,834	2,643	11.8%	-6.7%
Failure to cancel a service	2,144	2,331	10.4%	8.7%
Resolution agreed but not met	2,062	1,873	8.4%	-9.2%
Non-financial loss – not privacy	1,481	1,758	7.9%	18.7%

## A13: Internet fault and connection complaints by network 2022–23 to 2023–24

Year	Services delivered over the NBN	Services delivered over other networks
2023–24	9,469	3,012
2022–23	9,150	2,318

# Complaints about mobile services

## A14: Mobile complaints by year 2021–22 to 2023–24

Year	Complaints	Proportion of complaints
2023–24	24,655	48.5%
2022–23	31,633	47.7%
2021–22	31,541	39.7%

## A15: Mobile complaints by consumer type 2021–22 to 2023–24

Year	Residential	%	Small Business	%	Total
2023–24	22,390	90.8%	2,265	9.2%	24,655
2022–23	28,900	91.4%	2,733	8.6%	31,633
2021–22	28,648	90.8%	2,893	9.2%	31,541

## A16: Top 10 issues for mobile services 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	18,622	15,639	63.4%	-16.0%
Service and equipment fees	10,611	8,584	34.8%	-19.1%
Resolution agreed but not met	3,951	2,715	11.0%	-31.3%
Poor mobile coverage	2,656	2,201	8.9%	-17.1%
Non-financial loss - not privacy	1,707	1,668	6.8%	-2.3%
Equipment Fault	2,125	1,666	6.8%	-21.6%
Misleading conduct when making a contract	1,976	1,632	6.6%	-17.4%
Failure to cancel a service	1,665	1,364	5.5%	-18.1%
Partially restricted service	1,395	1,304	5.3%	-6.5%
Inadequate fault testing	1,008	1,253	5.1%	24.3%

## A17: Mobile fault and connection complaints by network 2022–23 to 2023–24

Year	Services delivered over the NBN	Services delivered over other networks
2023–24	-	7208
2022–23	-	8037



# Complaints about multiple services

## A18: Multiple complaints by year 2021–22 to 2023–24

Year	Complaints	Proportion of complaints
2023–24	5,701	10.1%
2022–23	9,736	14.7%
2021–22	13,843	17.4%

## A19: Multiple complaints by consumer type 2021–22 to 2023–24

Year	Residential	%	Small Business	%	Total
2023–24	4,424	77.6%	1,277	22.4%	5,701
2022–23	7,579	77.8%	2,157	22.2%	9,736
2021–22	10,536	76.1%	3,307	23.9%	13,843

## A20: Top 10 issues for multiple services 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	5,802	3,658	64.2%	-37.0%
Service and equipment fees	3,721	1,997	35.0%	-46.3%
No phone or internet service	1,437	1,246	21.9%	-13.3%
Intermittent service or drop outs	1,152	760	13.3%	-34.0%
Resolution agreed but not met	1,125	600	10.5%	-46.7%
Inadequate fault testing	552	542	9.5%	-1.8%
Delay establishing a service	724	498	8.7%	-31.2%
Failure to cancel a service	792	480	8.4%	-39.4%
Non-financial loss – not privacy	567	456	8.0%	-19.6%
Poor mobile coverage	547	354	6.2%	-35.3%

## A21: Multiple fault and connection complaints by network 2022–23 to 2023–24

Year	Services delivered over the NBN	Services delivered over other networks
2023–24	1,980	1,049
2022–23	2,950	1,286

# Complaints about landline services

## A22: Landline complaints by year 2021–22 to 2023–24

Year	Complaints	Proportion of complaints
2023–24	3,616	6.4%
2022–23	4,206	6.3%
2021–22	6,787	8.5%

## A23: Landline complaints by consumer type 2021–22 to 2023–24

Year	Residential	%	Small Business	%	Total
2023–24	2,441	67.5%	1,175	32.5%	3,616
2022–23	2,652	63.1%	1,554	36.9%	4,206
2021–22	4,329	63.8%	2,458	36.2%	6,787

## A24: Top 10 issues for landline services 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	2,495	2,307	63.8%	-7.5%
No phone or internet service	1,165	1,181	32.7%	1.4%
Service and equipment fees	912	812	22.5%	-11.0%
Inadequate fault testing	275	474	13.1%	72.4%
Delay establishing a service	378	333	9.2%	-11.9%
Number problem due to connection, disconnection or transfer	368	325	9.0%	-11.7%
Failure to cancel a service	359	298	8.2%	-17.0%
Resolution agreed but not met	403	270	7.5%	-33.0%
Partially restricted service	284	263	7.3%	-7.4%
Business loss	297	250	6.9%	-15.8%
Disconnection in error	349	250	6.9%	-28.4%

## A25: Landline fault and connection complaints by network 2022–23 to 2023–24

Year	Services delivered over the NBN	Services delivered over other networks
2023–24	1,264	1,083
2022–23	1,721	993

# Complaints by provider

## A26: Top 10 service providers by complaints 2023–24

Provider	2022–23	2023–24	2023–24 % of total	Change from 2022–23
Telstra	26833	22624	39.9%	-15.7%
Optus Group	20323	14561	25.7%	-28.4%
Vodafone Australia Limited	5063	5039	8.9%	-0.5%
TPG Group	2222	2002	3.5%	-9.9%
iiNet Ltd	1874	1678	3.0%	-10.5%
Southern Phone Company Ltd	1044	1064	1.9%	1.9%
Aussie Broadband Limited	890	885	1.6%	-0.6%
Dodo Services Pty Ltd	577	816	1.4%	41.4%
Tangerine Telecom Pty Ltd	394	705	1.2%	78.9%
Uniti Retail Pty Ltd	178	461	0.8%	159.0%

## A27: Top 10 service providers by service type 2023–24

Provider	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
Telstra	8,120	35.9%	2,116	9.4%	9,128	40.3%	3,131	13.8%	129	0.6%	22,624
Optus Group	4,413	30.3%	512	3.5%	8,445	58.0%	1,178	8.1%	13	0.1%	14,561
Vodafone Australia Limited	655	13.00%	9	0.20%	4,087	81.10%	288	5.70%			5,039
TPG Group	1,378	68.8%	111	5.5%	338	16.9%	171	8.5%	4	0.2%	2,002
iiNet Ltd	1,209	72.10%	153	9.10%	134	8.00%	182	10.80%			1,678
Southern Phone Company Ltd	571	53.7%	162	15.2%	235	22.1%	96	9.0%			1,064
Aussie Broadband Limited	767	86.70%	32	3.60%	39	4.40%	46	5.20%	1	0.10%	885
Dodo Services Pty Ltd	534	65.4%	31	3.8%	199	24.4%	52	6.4%			816
Tangerine Telecom Pty Ltd	568	80.60%	19	2.70%	83	11.80%	31	4.40%	4	0.60%	705
Uniti Retail Pty Ltd	431	93.50%	7	1.50%			23	5.00%			461

## Complaints by state

### A28: Complaints by state 2021–22 to 2023–24

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2023–24	730	16,567	266	10,267	4,007	839	15,315	4,638
2022–23	941	19,607	333	12,467	5,220	1,111	18,686	5,332
2021–22	1,067	26,554	487	15,172	5,746	1,301	22,998	5,944

### A29: Percentage of complaints by state 2021–22 to 2023–24

Year	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
2023–24	1.3%	29.2%	0.5%	18.1%	7.1%	1.5%	27.0%	8.2%
2022–23	1.4%	29.5%	0.5%	18.8%	7.9%	1.7%	28.2%	8.0%
2021–22	1.3%	33.4%	0.6%	19.1%	7.2%	1.6%	28.9%	7.5%

### A30: Complaints by state and service type 2023–24

State	Internet	%	Landline	%	Mobile	%	Multiple	%	Property	%	Total
ACT	345	47.3%	32	4.4%	278	38.1%	69	9.5%	6	0.8%	<b>730</b>
NSW	6,783	40.9%	1,181	7.1%	6,661	40.2%	1,816	11.0%	126	0.8%	<b>16,567</b>
NT	96	36.1%	18	6.8%	125	47.0%	24	9.0%	3	1.1%	<b>266</b>
QLD	4,322	42.1%	637	6.2%	4,106	40.0%	1,134	11.0%	68	0.7%	<b>10,267</b>
SA	1,500	37.4%	236	5.9%	1,857	46.3%	393	9.8%	21	0.5%	<b>4,007</b>
TAS	309	36.8%	63	7.5%	360	42.9%	89	10.6%	18	2.1%	<b>839</b>
VIC	6,081	39.7%	974	6.4%	6,643	43.4%	1,494	9.8%	123	0.8%	<b>15,315</b>
WA	1,974	42.6%	247	5.3%	1,890	40.8%	484	10.4%	43	0.9%	<b>4,638</b>

## Top 10 complaints issue by state

### A31: Australian Capital Territory 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	547	469	64.2%	-14.3%
Service and equipment fees	302	252	34.5%	-16.6%
No phone or internet service	77	85	11.6%	10.4%
Failure to cancel a service	98	83	11.4%	-15.3%
Intermittent service or drop outs	83	79	10.8%	-4.8%
Inadequate fault testing	55	77	10.5%	40.0%
Resolution agreed but not met	96	66	9.0%	-31.3%
Non-financial loss – not privacy	58	62	8.5%	6.9%
Delay establishing a service	68	59	8.1%	-13.2%
Slow data speed	67	47	6.4%	-29.9%

### A32: New South Wales 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	11,204	10,347	62.5%	-7.6%
Service and equipment fees	6,581	5,541	33.4%	-15.8%
No phone or internet service	2,161	2,244	13.5%	3.8%
Inadequate fault testing	1,284	1,792	10.8%	39.6%
Intermittent service or drop outs	1,892	1,761	10.6%	-6.9%
Resolution agreed but not met	2,200	1,543	9.3%	-29.9%
Delay establishing a service	1,356	1,454	8.8%	7.2%
Failure to cancel a service	1,441	1,234	7.4%	-14.4%
Non-financial loss - not privacy	1,171	1,200	7.2%	2.5%
Slow data speed	1,140	1,038	6.3%	-8.9%

**A33: Northern Territory 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	191	173	65.0%	-9.4%
Service and equipment fees	97	83	31.2%	-14.4%
No phone or internet service	32	34	12.8%	6.3%
Failure to cancel a service	20	27	10.2%	35.0%
Intermittent service or drop outs	23	25	9.4%	8.7%
Inadequate fault testing	22	24	9.0%	9.1%
Delay establishing a service	36	22	8.3%	-38.9%
Equipment Fault	22	21	7.9%	-4.5%
Resolution agreed but not met	44	21	7.9%	-52.3%
Slow data speed	25	17	6.4%	-32.0%

**A34: Queensland 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	7,231	6,506	63.4%	-10.0%
Service and equipment fees	4,186	3,408	33.2%	-18.6%
No phone or internet service	1,166	1,372	13.4%	17.7%
Intermittent service or drop outs	1,159	1,044	10.2%	-9.9%
Inadequate fault testing	749	1,040	10.1%	38.9%
Resolution agreed but not met	1,408	994	9.7%	-29.4%
Delay establishing a service	884	975	9.5%	10.3%
Failure to cancel a service	957	785	7.6%	-18.0%
Slow data speed	810	703	6.8%	-13.2%
Non-financial loss - not privacy	692	679	6.6%	-1.9%



**A35: South Australia 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	3,104	2,508	62.6%	-19.2%
Service and equipment fees	1,833	1,398	34.9%	-23.7%
Resolution agreed but not met	638	410	10.2%	-35.7%
Inadequate fault testing	321	387	9.7%	20.6%
No phone or internet service	460	385	9.6%	-16.3%
Failure to cancel a service	407	364	9.1%	-10.6%
Intermittent service or drop outs	475	340	8.5%	-28.4%
Delay establishing a service	275	311	7.8%	13.1%
Service problem with add-on feature eg email, call waiting, alarm etc failure	237	258	6.4%	8.9%
Non-financial loss - not privacy	279	240	6.0%	-14.0%

**A36: Tasmania 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	668	525	62.6%	-21.4%
Service and equipment fees	374	267	31.8%	-28.6%
No phone or internet service	100	117	13.9%	17.0%
Inadequate fault testing	61	85	10.1%	39.3%
Resolution agreed but not met	125	81	9.7%	-35.2%
Failure to cancel a service	73	70	8.3%	-4.1%
Intermittent service or drop outs	85	67	8.0%	-21.2%
Delay establishing a service	72	58	6.9%	-19.4%
Non-financial loss – not privacy	58	51	6.1%	-12.1%
Slow data speed	79	51	6.1%	-35.4%

**A37: Victoria 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	10,722	9,694	63.3%	-9.6%
Service and equipment fees	6,253	5,242	34.2%	-16.2%
No phone or internet service	1,761	1,624	10.6%	-7.8%
Resolution agreed but not met	2,136	1,532	10.0%	-28.3%
Intermittent service or drop outs	1,671	1,405	9.2%	-15.9%
Inadequate fault testing	1,131	1,388	9.1%	22.7%
Delay establishing a service	1,237	1,255	8.2%	1.5%
Non-financial loss - not privacy	1,173	1,220	8.0%	4.0%
Failure to cancel a service	1,337	1,152	7.5%	-13.8%
Slow data speed	979	930	6.1%	-5.0%

**A38: Western Australia 2023–24**

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	3,116	3,025	65.2%	-2.9%
Service and equipment fees	1,771	1,576	34.0%	-11.0%
No phone or internet service	480	571	12.3%	19.0%
Inadequate fault testing	353	469	10.1%	32.9%
Intermittent service or drop outs	503	469	10.1%	-6.8%
Resolution agreed but not met	634	428	9.2%	-32.5%
Delay establishing a service	376	418	9.0%	11.2%
Failure to cancel a service	401	401	8.6%	0.0%
Slow data speed	344	357	7.7%	3.8%
Non-financial loss – not privacy	306	308	6.6%	0.7%

# Unresolved and escalated complaints

## A47: Top 10 issues in unresolved complaints 2023–24

Unresolved Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
No or delayed action by provider	7,566	7,573	63.7%	0.1%
Service and equipment fees	5,271	4,300	36.2%	-18.4%
Intermittent service or drop outs	1,627	1,564	13.1%	-3.9%
No phone or internet service	1,397	1,497	12.6%	7.2%
Non-financial loss - not privacy	1,343	1,483	12.5%	10.4%
Resolution agreed but not met	1,925	1,391	11.7%	-27.7%
Inadequate fault testing	945	1,330	11.2%	40.7%
Slow data speed	1,047	1,022	8.6%	-2.4%
Delay establishing a service	901	985	8.3%	9.3%
Poor mobile coverage	961	807	6.8%	-16.0%

## A48: Time to close escalated complaints 2021–22 to 2023–24

Days to close	2021–22	2022–23	2023–24	2023–24 Closures
Up to 60 days	56.2%	43.0%	55.1%	4,534
Up to 120 days	83.9%	84.1%	83.5%	6,873
More than 120 days	16.1%	15.9%	16.5%	1,357
<b>Total closed complaints</b>	<b>11,289</b>	<b>9,039</b>		<b>8,230</b>

## A49: Outcome type for closed escalated complaints 2023–24

Type of outcome	Proportion of closed complaints
Financial only	41.4%
Financial and non financial	22.8%
Non financial only	19.5%
No compensation or action by provider	10.5%
Other unknown outcome only	5.8%

# Financial hardship complaints

## A50: Financial hardship complaints 2022–23 to 2023–24

Complaint Issue	2022–23	2023–24	2023–24 % of total	Change from 2022–23
Financial Hardship or Repayment Arrangement	1,724	1,373	2.4%	-20.4%

## A51: Financial hardship complaints by quarter 2023–24

Quarter	2023–24
Q1	363
Q2	330
Q3	330
Q4	350

## A52: Financial hardship complaints by service type and quarter 2023–24

Quarter	Internet	Landline	Mobile	Multiple	Property	Total financial hardship complaints
2023–24 Q1	45	3	252	63	-	363
2023–24 Q2	53	2	226	49	-	330
2023–24 Q3	60	1	240	29	-	330
2023–24 Q4	78	3	241	28	-	350

## A53: Financial hardship complaints by consumer type and quarter 2023–24

Quarter	Residential	Small Business & Others	Total financial hardship complaints
2023–24 Q1	340	23	363
2023–24 Q2	315	15	330
2023–24 Q3	310	20	330
2023–24 Q4	334	16	350

## Contact us

You can complain through our website at [www.tio.com.au](http://www.tio.com.au) or by calling **1800 062 058**.

You can post a letter to:

PO Box 276  
Collins Street West  
VIC 8007 or  
fax it to **1800 630 614**.

If you need to use a language other than English, call the Translating and Interpreting Service on **134 450** and they will help you speak with us. They are a free service.

If you would like to make a complaint using our Auslan Video Interpreting Service, please visit this [link](http://www.tio.com.au/auslan-booking-form):  
[www.tio.com.au/auslan-booking-form](http://www.tio.com.au/auslan-booking-form)

Calls to the above numbers on mobile phones may incur charges.

## Getting someone to help you

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



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