



Telecommunications  
Industry  
Ombudsman

Discussion paper:  
Member Guidance –  
Reasonable steps to inform  
consumers and occupiers of  
IDR and EDR  
December 2024

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## Background

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In August 2024, the TIO commenced consultation on proposed amendments to the TIO Terms of Reference (ToR).

Authority to amend the ToR rests with the Board of Directors of Telecommunications Industry Ombudsman Limited (subject to the requirement under clause 7.11 of the Terms of Reference to consider feedback from relevant federal government ministers).

Following the TIO's consultation period and further engagement with stakeholders the TIO Board approved changes and an amended ToR will come into effect from **1 January 2025**.

The proposed changes are aimed at responding to recent legislative change, implementing recommendations from the 2022 TIO Independent Review and clarifying drafting of some clauses.

Further information on the full suite of changes can be found [here](#).

As at 1 January 2025 Clause 6.2 of the TIO's ToR states:

*'Without limiting members' legal obligations, members must take reasonable steps to inform consumers and occupiers about the availability of the member's complaint handling service and TIO's free, external dispute resolution service for complaints.'*

The aim of this change establishes a members' and (TIO's) obligation to raise awareness of, and ensure accessibility to, member's IDR processes and TIO's EDR scheme as an obligation under the TIO Scheme.

Requiring members to take reasonable steps to signpost IDR and EDR services is an important step towards supporting a valuable dispute resolution scheme for the telco industry and the general public.

TIO will determine reasonable steps appropriate for the circumstances following consultation with members and consumer groups. This member guidance is now open to consultation to assist the TIO form a view of what constitutes 'reasonable steps' in these circumstances.

## Summary of proposed guidance

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The TIO proposes the creation and circulation of Member Guidance – Reasonable steps to inform consumer and occupiers of IDR and EDR.

The aim of the guidance is to provide all members of the TIO a clear understanding of their obligations, responsibilities and processes that can be taken.

By offering clear and concise information on reasonable steps the TIO is seeking to improve confidence and trust in the market.

## Questions for consultation

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As set out above, we are consulting on the proposed *Member Guidance – Reasonable steps to inform consumers and occupiers of IDR and EDR*.

While we are open to general feedback on the ToR via ordinary channels,<sup>1</sup> in this consultation, we seek your feedback in response to the following questions via the submission process outlined below:

1. Does the proposed document successfully reflect the change 6.2 to the TIO's ToR? If not, please outline what amendments should be made to address this?
2. Does the proposed document successfully outline and clarify what reasonable steps a member should take to reasonably signpost IDR and EDR in line with the TIO's ToR? If not, what amendments should be made to achieve this purpose?
3. Does the proposed document provide sufficient guidance to members so that they can ensure they fulfil their obligations in relation to 6.2 of the TIO's ToR? If not, what amendments should be made to achieve this objective?

## How to make a submission

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Stakeholders are invited to make a written submission to this consultation. Written submissions will be made publicly available on our website unless clearly marked as confidential.

Submissions can be emailed to [PublicConsultation@tio.com.au](mailto:PublicConsultation@tio.com.au).

Submissions close at 5 pm on 30 January 2025.

Our timeline for change: we plan to have the amended Terms of Reference in place by 1 January 2025.

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<sup>1</sup> Ordinary channels are: for members, contacting Member Services; for TIO Consumer Panel members, through Consumer Panel meetings; and for any individual or any organisation, through [Compliments and Complaints about the Telecommunications Industry Ombudsman - TIO](#).