

TIO Member Guidance - Reasonable steps to inform consumers and occupiers of IDR and EDR

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Contents

About this Member Guidance	2
Terms used in this document	2
Obligations to take reasonable steps to advise consumers and occupiers of IDR and EDR.....	3
Reasonable steps should be taken at four key stages	4
Good practice before receiving a complaint	5
Published complaints handling process	6
At the point of a member receiving a complaint	7
Completion or closure of a complaint	8
Appendix 1	9

About this Member Guidance

The TIO seeks to provide member guidance to all members to ensure that they understand their obligations, responsibilities, and the processes involved when interacting with complaints and the TIO.

This guidance will help members navigate the changes to the TIO Terms of Reference, ensuring all members are well-informed about the subject matter contained in the guidance and the resources available.

By offering clear and concise information, we enable members to engage with the TIO processes confidently, fostering a sense of fairness and transparency.

This structured guidance will help prevent misunderstandings and miscommunications. We are committed to promoting a culture of trust, clarity and accountability, and reassuring members that their concerns will be handled impartially, consistently and professionally.

This member guidance specifically relates to taking reasonable steps to inform consumers or occupiers of IDR and EDR.

Should you have any questions regarding this guidance please contact the TIO via email at publicconsultation@tio.com.au.

Terms used in this document

IDR	Internal Dispute Resolution
EDR	External Dispute Resolution
TIO	Telecommunications Industry Ombudsman
ToR	TIO Terms of Reference

Obligations to take reasonable steps to advise consumers and occupiers of IDR and EDR

TIO Terms of Reference

The Terms of Reference (**ToR**) establishes the TIO scheme's functions and powers to handle complaints and sets out the TIO's and members' obligations to each other.

Effective 1 January 2025, Clause 6.2 of the ToR says:

'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.'

Clause 6.2 requires members to raise awareness of, and ensure accessibility to, internal dispute resolution (IDR) processes and the TIO's external dispute resolution (EDR) scheme. Requiring members to take reasonable steps to inform consumers and occupiers about IDR and EDR services is an important step to supporting a valuable dispute resolution scheme for the telco industry and the community.

Telecommunications (Consumer Complaints Handling) Industry Standard 2018

The Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (Complaint Handling Standard) also contains obligations for members to implement complaint processes for IDR, and to inform consumers of these IDR options, as well as the option to access EDR through the TIO.

Consistent with, and in addition to, the Complaints Handling Standard, this member guidance outlines the TIO's view of what constitutes 'reasonable steps' to inform consumers and occupiers about the availability of IDR and EDR.

The TIO notes at the time this guidance was published, a review of the Complaints Handling Standard was expected in the near future. Changes to the Complaints Handling Standard may necessitate changes to this guidance.

Reasonable steps should be taken at four key stages

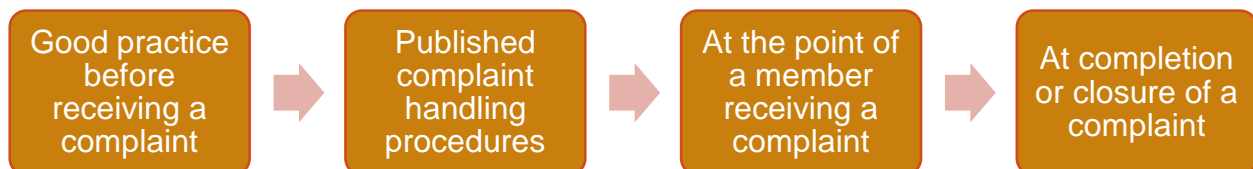
Providing consumers and occupiers with clear and accessible information about complaint processes empowers consumers and occupiers to navigate the complaints process confidently and demonstrates a member's commitment to fair and effective dispute resolution practices.

The TIO has identified four key stages where members can take reasonable steps to ensure consumers and occupiers are informed of IDR and EDR options:

- 1. Good practice before receiving a complaint**
- 2. Published complaints handling process**
- 3. At the point of a member receiving a complaint**
- 4. At completion or closure of a complaint**

Taking reasonable steps across all stages will ensure that members will not only meet their obligations but also build trust and transparency with consumers and occupiers. Providing clear and accessible information empowers consumers and occupiers to navigate the complaints process confidently, demonstrating your commitment to fair and effective dispute resolution practices.

Each of the four key stages reference when a complaint is received or complaint handling procedures. Consistent with the current Complaints Handling Standard, the TIO takes a 'complaint' to mean an expression of dissatisfaction made to a member by a consumer or occupier in relation to their telecommunication product or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected by the consumer or occupier¹.



¹ [Federal Register of Legislation - Telecommunications \(Consumer Complaints Handling\) Industry Standard 2018](#)

Good practice before receiving a complaint

The TIO believes that it is a shared responsibility of all stakeholders within the telecommunications environment, to ensure that consumers and occupiers can interact in the market with confidence and trust.

Building confidence and trust with consumers and occupiers starts long before they have a complaint. By creating a culture that actively seeks and responds to feedback, members can identify potential issues early and address them before they escalate.

Steps a member can take

Members can embed this proactive approach by ensuring all customer facing staff are trained to recognise early signs of dissatisfaction and communicate about IDR and EDR options clearly. Staff will be best supported and empowered to do this where the member makes processes clear and guidance easily accessible.

The TIO views reasonable steps toward setting structures that lead to the ability to inform consumers and occupiers about the availability of IDR and EDR processes before receiving a complaint to include:

1. Providing appropriate avenues to receive feedback from consumers and occupiers and the general public, including via the Member's website, over the telephone and in store.
2. Establishing appropriate mechanisms to review, and if appropriate, respond, to feedback to continuously improve services.
3. Providing appropriate training to staff to enable meaningful solutions and options to be presented to the consumer or occupier.

Published complaints handling process

The Complaints Handling Standard requires members to establish and publish a complaint handling process. This document must be made available on the website, provided or referenced as part of the complaints process. Consumers will engage with this stage of the process when they access a member's complaint handling process on a member's website, or when a member provides a consumer or occupier with a copy after they request access.

A member's complaints handling process plays an important role in ensuring that consumers and occupiers understand what they can expect when they have a complaint, including what to expect from a member in response. It is a 'one-stop-shop' for advice and information about both IDR and EDR.

The Complaints Handling Standard sets out the minimum requirements for what members' complaints handling processes must include. In addition to meeting these minimum requirements for IDR, a member's complaints handling process plays a substantial role in advising consumers and occupiers of their EDR options.

Steps a member can take

It is important that a member's complaints handling processes are expressed in clear and easy to understand terms. It is also important that the complaints handling process is published on a member's website in a location that is easy to find and access and is readily accessible on other platforms and by other means.

The TIO views reasonable steps toward informing consumers and occupiers about the availability of IDR and EDR processes, through a member's published complaints handling process to include:

1. Including key information in the complaint handling process such as:
 - Clarification on what types of contacts or issues will be treated as a complaint (for example, if a consumer makes a simple request for information and does not express dissatisfaction or unhappiness, this will not be considered a complaint.).
 - The timeframes that apply during the IDR process (for example, when consumers or occupiers can expect complaint handling milestones to be reached, or maximum timeframes for receiving a response or resolution).
 - Contact method options and the details for each option to raise a complaint (for example a complaint can be made by phone and the member's phone number is listed, or a complaint can be made in store and a link to store locations is included).
 - Clear information on the points in time during or following IDR that a consumer or occupier can choose to contact the TIO to access EDR.
 - Contact method options and the details for each option to contact the TIO (see appendix).
2. Publishing a link to the complaint handling process that is accessible from both:
 - The member's website homepage.
 - Publish a link to the complaint handling process that is accessible from any webpage with the member's contact details that the member reasonable controls.
3. Making available, on request, a printed copy of your published complaint process.

At the point of a member receiving a complaint

The TIO takes a 'complaint' to mean an expression of dissatisfaction made to a member by a consumer or occupier in relation to their telecommunications product or the complaint handling process itself where a response or resolution is explicitly or implicitly expected by the consumer or occupier.

It is important members have a reasonable opportunity to resolve complaints with consumers and occupiers at the earliest opportunity. Doing so provides members with the best chance to restore the relationship and build trust and confidence with the consumer or occupier.

The member flagging EDR when a consumer raises an IDR complaint is crucial as it ensures transparency and provides clear pathways for consumers if their issue is not resolved internally. This ensures that consumers and occupiers are able to make informed and appropriate decisions. TIO's EDR scheme is available to members and consumers if they have been unable to resolve a complaint through IDR. The TIO provide free, fair and independent assistance to consumers and occupiers and members.

Steps a member can take

When a member receives a complaint, they should promptly acknowledge it as a complaint and attempt to resolve the issue(s) at the earliest opportunity if the issue can be resolved in line with their published procedures. If the matter cannot be resolved internally, a consumer or occupier must be made aware of the EDR options available to them.

The TIO views reasonable steps toward informing consumers and occupiers about the availability of TIO's EDR process when members receive a complaint to include:

1. All member customer facing staff:
 - Have an awareness of internal complaint processes.
 - Have access to internal complaint processes.
 - Use the knowledge and awareness to provide early and appropriate complaint handling to consumers through the IDR channel.
2. All member customer facing staff:
 - Have an awareness of the TIO and the TIO's complaint processes.
 - Have access to the TIO referral information.
 - Use the knowledge and awareness to provide early and appropriate complaint handling to customers through raising awareness of the TIO.
3. That all customer facing staff make every effort to appropriately raise and refer complaints through both their own IDR processes and the TIO's EDR processes in a timely and appropriate manner.
4. All member staff can easily classify, manage, resolve and identify complaints in line with the Complaints Handling Standard.
5. At the time of taking a verbal complaint, explaining TIO's EDR service and giving details of TIO's website and telephone number if the complaint is not resolved.
6. At the time of confirming receipt of a written complaint, explaining the TIO's EDR services and giving details of the TIO's website and telephone number if the complaint is not resolved.
7. All members can use the data received from their complaints to assist with refining Case Handling Procedures and identify any emerging issues or potential complaint trends.

Completion or closure of a complaint

When members receive consumer or occupier complaints, members must attempt make best efforts to resolve the issue on the first contact. Addressing complaints demonstrates that a consumer or occupier's concerns have been taken seriously and given the appropriate level of attention. There will be times where members and customers do not agree on how to resolve a complaint.

Taking reasonable steps to signpost EDR options at the end of a complaint is not only a requirement of all members of the TIO scheme but is also imperative for ensuring that members have a comprehensive and professional approach. Seeking to safeguard both the consumer or occupier and the member, building trust and confidence in the processes.

Steps a member can take

A member can demonstrate its commitment to signposting the EDR options available by clearly advising customers of the TIO in all customer-facing materials and training staff to inform customers about these options at the point that issues cannot be resolved internally.

The TIO considers reasonable steps to signpost the TIO's EDR scheme with consumers when members close a complaint includes:

1. At the time of verbally informing a consumer or occupier that a complaint is being closed, by explaining the TIO's EDR services and given details of the TIO's website and telephone number.
2. At the time of confirming a complaint is being closed in writing, by explaining the TIO's EDR services and giving details of the TIO's website and telephone number.
3. Reference to the TIO is included in all complaint handling correspondence sent to a consumer or occupier and verbally advised if the complaint is being handled over the phone or in person.
4. Clearly inform the consumer or occupier of the steps the member has taken to address their issue with reference to the IDR processes.
5. Ensure all customer facing staff are aware of the requirements to signpost the TIO, how to do this and have internal mechanisms in place to ensure this is occurring.
6. Using the signposting of IDR and EDR as a demonstration to consumers of the organisation's commitment to fair practices and accountability.

Appendix 1

How to reference the TIO on your website, in person or over the phone.

To find out more about how the TIO can assist you, you can visit the TIO's webpage 'What we can help with' or contact the TIO:

Phone 1800 062 058

Online www.tio.com.au

Email tio@tio.com.au

Post PO Box 276, Collins Street West, VIC 8007

Fax 1800 630 614

Access using a language interpreter, Auslan interpreter or the National Relay Service – 'Interpreters and accessibility' webpage.