

27 March 2025

Authority Secretariat
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Sent by email to haveyoursay@acma.gov.au

Dear ACMA,

TIO submission on the ACMA Compliance Priorities 2025-26

Thank you for the opportunity to share our views on potential compliance areas for the ACMA to focus on in the 2025-26 financial year.

Based on our complaints handling experience and investigation work over the past year, the Telecommunications Industry Ombudsman (TIO) continues to support the following priority areas:

1. Compliance with the Telecommunications (Consumer Complaints Handling) Industry Standard 2018

We continue to be concerned about telco provider compliance with obligations in the Consumer Complaints Handling Standard and again support this as a priority area for the ACMA.

We receive complaints from consumers about inaccessible customer service and unclear or inconsistent communication. We are also concerned about telco compliance with the requirement to inform consumers of their external dispute resolution options based on surveys conducted by our office.

With amendments to the Consumer Complaints Handling Standard commencing this year¹, we support the ACMA's focus on compliance in this area.

2. Protecting consumers who are experiencing financial hardship

We continue to receive complaints from consumers who have not been offered appropriate financial hardship assistance, despite the Telecommunications Financial Hardship Standard

¹ ACMA (February 2025), [Changes to consumer complaints-handling rules](#), accessed 14 March 2024

commencing last year. We have also conducted (or are in the process of conducting) systemic investigations involving financial hardship issues over the past 12 months, including one referral to the ACMA for potential breach of the Standard.

We see complaints where consumers experiencing payment difficulties are:

- refused a payment arrangement or extension
- offered an unsuitable payment arrangement that does not reflect their capacity to pay
- disconnected or restricted from their service, despite asking for help or having a payment arrangement in place
- unable to contact their telco provider or do not receive a response from their telco provider when seeking help.

Improvements made by telcos as part of our systemics work included uploading a payment assistance policy on their website, updating their financial hardship policy in light of the new Standard, introducing new teams with specialised knowledge and improved staff training.

We also continue to identify telcos who do not have an updated payment assistance policy on their website. While many of telcos respond positively to our systemic investigation process, we are concerned that smaller telcos may not be aware of their obligations.

Further, the number of financial hardship complaints to our office has increased, up from 331 in Quarter 2 FY2024 to 620 in Quarter 2 FY2025, an increase of 87%.

3. Supporting consumers experiencing domestic and family violence

We are pleased that obligations to protect and support telco consumers experiencing domestic and family violence will be in place soon. Consumers experiencing domestic and family violence can be among the most vulnerable in our community. We receive complaints from victim survivors who say the way their telco dealt with them exacerbated their vulnerability. In some complaints, the actions of a telco exposed the victim survivor to greater risk or made them feel unsafe. Clear obligations on telcos will support the ACMA in taking enforcement action to address these harms.

With the Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 commencing this year, it is important that the ACMA pursues telco compliance of the new obligations. Compliance with the Standard is not just about telco trust and confidence – it is vital to the safety of victim survivors in their dealings with their telco.

4. Poor sales practices to vulnerable consumers

Poor sales practices in the telco sector have significant impacts on the most vulnerable cohorts of consumers and erode trust and confidence in the sector more generally. We continue to receive complaints from consumers who are impacted by mis-selling and unconscionable conduct in the sale of telco products and services.

In 2023 and 2024, the TIO referred a number of telcos to the ACMA regarding concerning sales practices. We are pleased that the ACMA has acted in response to these referrals and

issued Directions to comply with the Telecommunications Consumer Protections Code where appropriate. We support the ACMA's continued focus on this area.

5. Enduring priorities

We continue to support protecting vulnerable telco customers and combating spam and telco scams as enduring ACMA compliance priorities.

Thank you for considering our submission and we look forward to the outcome of this consultation.

Yours sincerely,

Cynthia Gebert
Telecommunications Industry Ombudsman