

Small business telco complaints

Audit of telco compliance with complaints-handling rules for small business customers

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Introduction

Many small businesses depend on a working phone and internet service for their day-to-day operation. Any problems they have with these essential services, including potential disconnection, can have financial consequences, so it is important they can complain to their telcos and have those complaints handled in a timely and effective manner.

In December 2021, the Australian Communications and Media Authority began an audit to identify whether telcos are complying with the Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (the [Complaints Handling Standard](#)).

The Complaints Handling Standard contains important consumer protections that require telcos to:

- > establish a complaints-handling process, which must include minimum requirements for accessibility, timeliness, and transparency
- > manage, monitor, analyse, and record consumer complaints, including requirements for response times for completing steps in the consumer complaints-handling process
- > handle urgent complaints differently to non-urgent complaints.

In its 2020–21 annual report, the Telecommunications Industry Ombudsman (TIO) recorded a 6.6% increase in overall complaints from small business telco customers – up from 18,478 in 2019–20 to 19,689 in 2020–21. Of the total complaints made, those about ‘no or delayed action’ increased by 28.2%, ‘failure to cancel a service’ increased by 67.6% and ‘telco uncontactable’ increased by 181%.¹

In a positive development, TIO complaints data for the first 2 quarters in 2021–22 fell, which may be associated with the decline in the effects of the COVID-19 pandemic. The total number of complaints to the TIO between 1 July and 31 December 2021 from small businesses was 5,588, compared to 10,624 for the same period in 2020, representing a decrease of 47.4%.²

In terms of satisfaction, ACMA research published in October 2020 showed that while 40% of businesses with resolved complaints were satisfied with the way their complaints were handled, 46% were not satisfied.³

¹ Telecommunications Industry Ombudsman (TIO), [Annual Report 2020-21](#), TIO website, 2021, accessed 19 May 2022, pp. 58 - 59.

² TIO, [Quarter 2 Complaints Report \(FY2022\)](#), 2022, p. 4; [Quarter 1 Complaints Report \(FY2022\)](#), 2021, p. 4, TIO website, accessed 19 May 2022.

³ Australian Communications and Media Authority (ACMA), [Australians' telco experience](#), ACMA website, 2020, accessed 19 May 2022.

We undertook this audit to:

- > identify whether there are any potential issues relating to the time telcos are taking to respond to small business customer complaints that warrant deeper analysis against the requirements of the Complaints Handling Standard
- > identify and address any potential non-compliance with the Complaints Handling Standard
- > understand the effectiveness of the systems and processes telcos have in place to monitor and analyse their complaints records to identify and address systemic issues and problems.

Compliance by telcos with the rules for handling complaints from small business customers is one of the ACMA's [compliance priorities for 2021–22](#).

Audit details

The audit involved the ACMA issuing mandatory information-gathering notices to 8 telcos.⁴

The notice required each telco to undertake up to 600 assessments of complaints from small business customers that they received between 1 June and 30 November 2021. Telcos were required to review the complaints to identify non-compliance with the response times for handling complaints under the Complaints Handling Standard. They were also required to provide us with information on the processes, procedures, and systems they have in place for monitoring and analysing their complaint records to identify systemic non-compliance.

The 8 telcos involved in our audit were:

- > Aussie Broadband Limited (Aussie Broadband)
- > Exetel Pty Ltd (Exetel)
- > iiNet Limited (iiNet)
- > M2 Commander Pty Ltd (M2 Commander)
- > Singtel Optus Pty Limited (Optus)
- > Telstra Corporation Limited (Telstra)
- > TPG Internet Pty Ltd (TPG)
- > Vodafone Pty Ltd (Vodafone).

In selecting these 8 telcos, we considered the number of TIO complaints each received from small businesses between 1 January and 30 June 2021. This included the 5 telcos with the largest number of TIO complaints received over the period.

The 8 telcos each use different strategies to respond to small business customer complaints, which may affect individual results and not allow for direct comparisons. However, the individual results will assist us in understanding the varied experiences of small business customers when making a complaint to their telco. They also allow us to identify and address systemic issues and problems in the industry.

Part 7A of the *Australian Communications and Media Authority Act 2005* constrains the ACMA's ability to publicly disclose a telco's identity and the information we collect under notice without the consent of the telco that supplied the information. The information provided by telcos has therefore been aggregated and/or anonymised in this report.

⁴ The information in this report was obtained using the ACMA's compulsory information-gathering powers under the *Telecommunications Act 1997*.

Results and findings

The results and our findings are based on the data and information collected from 8 telcos covering the 6-month period from 1 June to 30 November 2021.

Complaint-handling requirements and timeframes

Table 1: Summary of complaint-handling requirements and required telco timeframes

Complaint-handling requirement	Required telco timeframe
Acknowledge complaints received via email, website or recorded telephone message	Within 2 working days of receiving the complaint
<i>Urgent complaints:</i> Confirm proposed resolution, and if the consumer accepts the proposed resolution, implement that resolution	Within 2 working days of receiving the complaint
<i>Non-urgent complaints:</i> Confirm proposed resolution Implement proposed resolution	Within 15 working days of receiving the complaint Within 10 working days of the consumer accepting the proposed resolution, except where exceptions apply

Summary of key results and findings

The 8 telcos had a total of 1.9 million small business customers at 30 November 2021.

During the relevant period, small business customers of the 8 telcos made 28,212 complaints. Of these, 371 (1.3%) were urgent complaints⁵ and 27,841 (98.7%) were non-urgent. The small business customers of the 3 largest telcos in the audit – Telstra, Optus and Vodafone – accounted for 93% of the complaints. The average number of small business complaints per 10,000 customers was 24.6 per month across the 8 telcos, ranging from 5.1 to 30.6 per month.

The audit results are set out in detail in Table 2. In summary:

- > One of the 8 telcos (Telco H) reported that it met the response-time requirements for all steps in the complaints-handling process under the Complaints Handling Standard. Telco H completed 74 complaint assessments.
- > Telco G (large telco) reported that it met the response-time requirements for all steps in the complaints-handling process under the Complaints Handling Standard for non-urgent complaints. The same Telco reported that it failed to implement a proposed resolution within 2 working days for 2 out of 84 urgent complaints assessed.
- > Telco A (large telco) reported that it failed to meet the complaint response-time requirements in 41 out of 600 complaint assessments. This included not acknowledging a complaint received via email, online or recorded telephone message within the 2-working day timeframe for 17 out of 100 complaint assessments, and not implementing a proposed complaint resolution within the 10-working-day timeframe for 7 out of 100 complaint assessments for complaints received over the phone.

⁵ An urgent complaint (defined in section 5 of the Complaints Handling Standard) is described under 'Complaint numbers' in this report.

- > Telco D reported that it failed to meet the complaint response-time requirements in 21 out of 240 complaint assessments. Ten out of 76 complaint assessments related to not implementing a proposed complaint resolution within the 10-working-day timeframe.
- > Telco C reported that it failed to meet the complaint response-time requirements in 21 out of 404 complaint assessments. Ten out of 100 compliance assessments related to implementing a proposed complaint resolution within the 10-working-day timeframe for complaints received over the phone.

Of the remaining 3 telcos:

- > Telco B (large telco) reported that it failed to meet the complaint response-time requirements in 13 out of 512 complaint assessments. Twelve out of 200 complaint assessments related to not implementing a proposed complaint resolution within the 10-working-day timeframe.
- > Telco E reported that it failed to meet the complaint response-time requirements in 13 out of 504 complaint assessments. For the same telco, 6 out of 200 complaint assessments related to not implementing a proposed complaint resolution within the 10-working-day timeframe.
- > Telco F reported that it failed to meet the complaint response time requirements in 5 out of 339 complaint assessments.

We will be raising these matters with the respective telcos.

The audit also found that:

- > All telcos appear to have established processes, procedures and systems for monitoring and analysing their complaint records, with one telco identifying a systemic issue during the relevant period.
- > The telcos use a range of indicators to determine whether a customer (including a small business customer) is making a complaint. We consider that all the indicators identified by one or more of the 8 telcos in Figure 3 should be seen as a customer making a complaint or should, at the very least, prompt the telco agent to seek clarification from the customer on whether they wish to make a complaint.
- > Two of the telcos (one large) provided us with revised data following our queries. This raises questions about the quality of their complaints record-keeping. We are seeking information from both telcos to assure us that their complaints record-keeping is meeting the requirements of the Complaints Handling Standard.

Detailed findings and observations

Complaint numbers

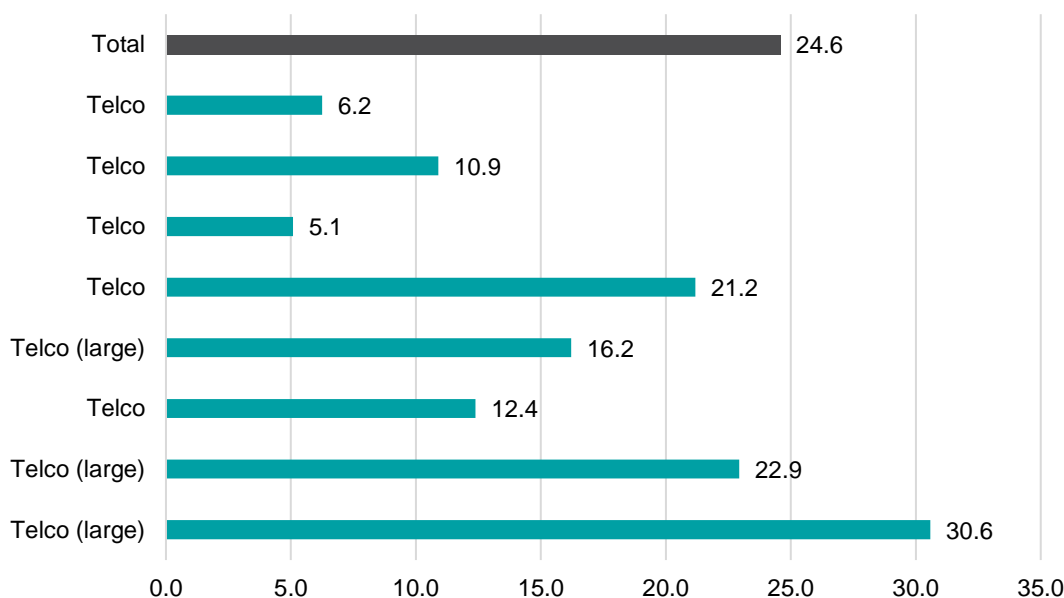
Based on the data we received, small business customers⁶ made a total of 28,212 complaints to the 8 telcos during the relevant period. This equates to an average of 154 complaints per day. Of these:

- > 26,311 (93%) were made to the 3 largest telcos in this audit – Telstra, Optus and Vodafone
- > 1,901 (7%) were made to the other 5 telcos in this audit – Aussie Broadband, Exetel, iiNet, M2 Commander and TPG Internet.

⁶ The total number of telco small business customers remained fairly stable (average of 1.91 million) over the relevant period, ranging from 1.93 million in June to 1.90 million in November 2021 (n=8).

The average number of complaints made per 10,000 small business customers during the relevant period ranged across the telcos from 5.1 to 30.6 per month, with an average of 24.6 per month (see Figure 1).

Figure 1: Average number of total complaints made per 10,000 small business customers per month, from 1 June to 30 November 2021, by telco (n=8)



The way a telco must handle a complaint under the Complaints Handling Standard depends on whether the customer has made an urgent or a non-urgent complaint. Tighter timeframes apply to handling urgent complaints.

The definition of an urgent complaint is set out in section 5 of the Complaints Handling Standard. It includes:

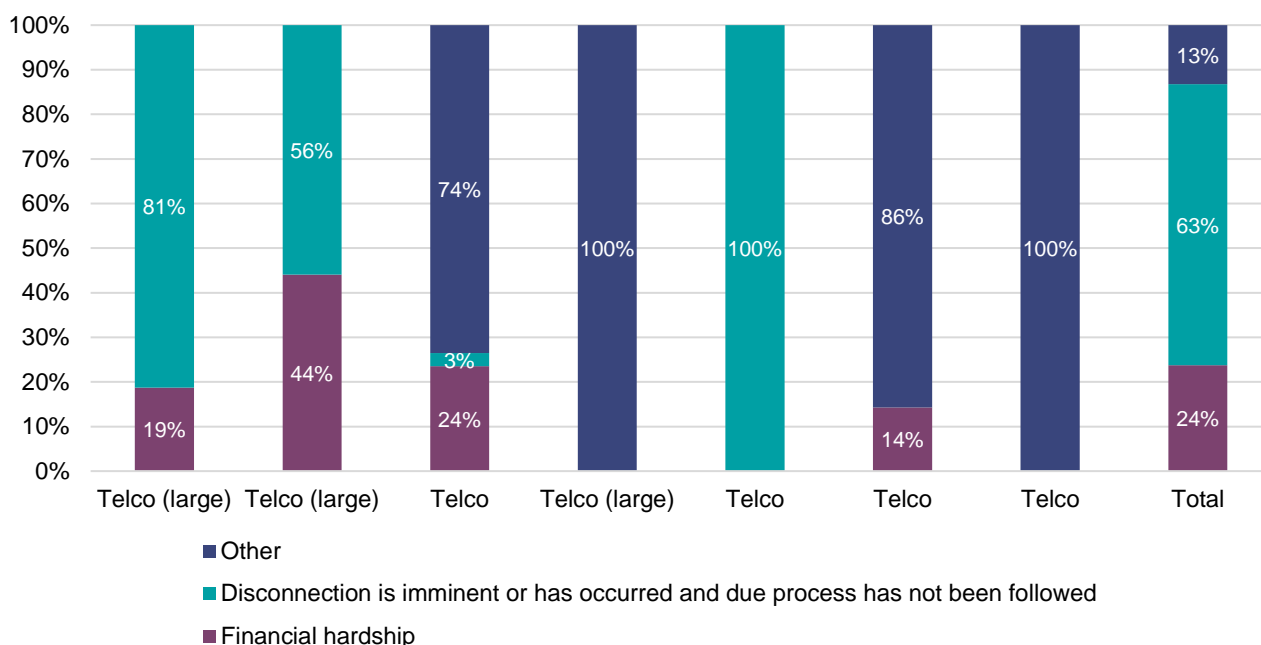
- > where the complaint is made by a customer who has applied for or has been accepted as being in financial hardship under the telco's financial hardship policy and where the subject matter of the complaint can reasonably be presumed to directly contribute to or aggravate the financial hardship of that customer; or
- > where disconnection of a service is imminent or has occurred and where due process has not been followed.

Of the 28,212 small business complaints made to the telcos over the period, 1.3% (371) were identified as urgent complaints. Of these:

- > 234 related to 'where disconnection of a service is imminent or has occurred and where due process has not been followed'
- > 88 related to 'where the complaint is made by a customer who has applied for and has been accepted as being in financial hardship where the subject matter of the complaint could directly contribute to or aggravate the financial hardship of the customer'.

The information provided by the telcos also indicated that 4 of the 7 telcos that received urgent complaints did not limit urgent complaints to the categories identified in the Complaints Handling Standard. The remaining 49 'other' urgent complaints mostly related to service provisioning and cancellation matters.

Figure 2: Urgent complaints made by small business customers to their telco from 1 June to 30 November 2021, by complaint reason, by telco (n=7)



Response time requirements

Under the Complaints Handling Standard, telcos must meet certain response times for each step in the complaints-handling process. The required timeframes are shorter for handling urgent complaints than for non-urgent complaints:

- > **Acknowledging complaints (urgent and non-urgent)** – Telcos must acknowledge a complaint immediately if the complaint was received by telephone or in store (paragraph 12(2)(a)). If the complaint was received by email, through the telco’s website, by post⁷, or via recorded telephone message, the telco must acknowledge the complaint within 2 working days of receiving the complaint (paragraph 12(2)(b)).
- > **Confirmation of a proposed resolution (non-urgent)** – Telcos must provide confirmation of a proposed resolution of a non-urgent complaint within 15 working days of receiving the complaint (paragraph 13(1)(g)).
- > **Implementation of a proposed resolution (urgent)** – Telcos must implement a proposed resolution that was accepted by the customer, within 2 working days of receiving the urgent complaint (paragraph 13(1)(h)).
- > **Implementation of a proposed resolution (non-urgent)** – Subject to limited exceptions⁸, telcos must complete all necessary actions to implement a proposed resolution of a non-urgent complaint within 10 working days of the customer accepting the resolution (paragraph 13(1)(j)).

The Complaints Handling Standard also imposes requirements on telcos to advise customers about delays to proposed timeframes for managing complaints (section 14).

⁷ The post and in store contact methods are out of scope for this audit. Additionally, the telephone contact method for acknowledging complaints is out of scope for this audit.

⁸ This requirement does not apply where: it is otherwise agreed with the consumer; the consumer agreed to undertake actions to implement the proposed resolution by a specified time, but did not complete the actions as agreed; the complaint is an urgent complaint and paragraph 13(1)(h) applies.

We required the 8 telcos to each review:

- > the 100 most recent small business complaints they received during the relevant period via email, their website or recorded telephone message to identify any non-compliance with the 2-working-day acknowledgement requirement
- > the 200 most recent small business non-urgent complaints they received via telephone (100), online or by email (100) to identify any non-compliance with the 15-working-day timeframe to confirm resolution of non-urgent complaints
- > the 200 most recent small business non-urgent complaints they received via telephone (100), online or email (100) to identify any non-compliance with the 10-working day timeframe to implement proposed resolutions of complaints
- > the 100 most recent small business urgent complaints they received to identify any non-compliance with the requirement for implementing proposed resolution of urgent complaints.

If a telco received fewer than 100 complaints over the relevant period, the total complaints received were reviewed.

If a telco identified any non-compliance with its sample complaints, it was required to provide copies (up to a maximum of 10 complaints for each provision in the Complaints Handling Standard that may have been breached) to the ACMA.

Table 2 shows the audit results for compliance with response time requirements.

Table 2: Summary of compliance outcomes by telco (anonymised)



	Acknowledge within 2 working days (urgent and non-urgent, non-telephone)	Confirm proposed resolution within 15 working days		Implement proposed resolution within 10 working days*		Implement proposed resolution within 2 working days (urgent)	Total
		Online or email	Telephone	Online or email	Telephone		
Telco A:							
Complaint sample size	100	100	100	100	100	100	600
Compliance outcomes (compliant/non-compliant)	83/17	95/5	96/4	97/3	93/7	95/5	559/41
Telco B:							
Complaint sample size	100	100	100	100	100	12	512
Compliance outcome (compliant/non-compliant)	100/0	100/0	100/0	94/6	94/6	11/1	499/13
Telco C:							
Complaint sample size	100	35	100	35	100	34	404
Compliance outcome (compliant/non-compliant)	100/0	35/0	90/10	35/0	90/10	33/1	383/21
Telco D:							
Complaint sample size	82	39	37	39	37	6	240
Compliance outcome (compliant/non-compliant)	82/0	33/6	33/4	33/6	33/4	5/1	219/21
Telco E:							
Complaint sample size	100	100	100	100	100	4	504
Compliance outcome (compliant/non-compliant)	100/0	98/2	97/3	96/4	98/2	2/2	491/13
Telco F:							
Complaint sample size	113	63	50	63	50	n/a^	339
Compliance outcome (compliant/non-compliant)	110/3	62/1	49/1	63/0	50/0	n/a^	334/5
Telco G:							
Complaint sample size	100	100	100	100	100	84	584
Compliance outcome (compliant/non-compliant)	100/0	100/0	100/0	100/0	100/0	82/2	582/2
Telco H:							
Complaint sample size	27	17	3	17	3	7	74
Compliance outcome (compliant/non-compliant)	27/0	17/0	3/0	17/0	3/0	7/0	74/0

* Unless one of the exceptions at paragraph 13(1)(j) of the Complaints Handling Standard applies. ^ Telco F did not receive any urgent complaints during the relevant period.



Our observations

Overall, the audit results were positive. While there is some room for improvement, no underlying systemic compliance issues with the complaint response-time requirements in the Complaints Handling Standard were identified. Compliance rates across the telcos ranged from 91 per cent to 100 per cent, with 5 of the 8 telcos reporting a compliance rate above 95 per cent.

Monitoring and analysis of complaints

Under section 18 of the Complaints Handling Standard, telcos must establish processes, procedures and systems for monitoring and analysing their complaints records to identify systemic issues and problems, and prevent those issues, problems and related complaints from recurring.

We asked the 8 telcos to describe the processes, procedures and systems they had in place during the relevant period for monitoring and analysing their complaint records to identify systemic issues and problems.

Based on the responses received, we found that:

- > All the telcos undertake regular monitoring and analysis of their complaint records to identify systemic issues and problems, including preventing those systemic issues and related complaints from recurring. The frequency and sophistication of analysis varied across telcos, with all telcos conducting monthly reviews as a minimum.
- > Many telcos share the insights from their complaints analysis internally with relevant teams, stakeholders and senior leadership, to determine areas of concern and potential improvements.

We also asked the telcos whether they identified any systemic issues or problems during the relevant period, including what actions they took to prevent those systemic issues, problems and related complaints from recurring.

Only one telco reported a potential systemic issue identified through regular monitoring and analysis of its complaint records. The systemic issue related to customer data integrity, with the telco advising that it reviewed potentially affected accounts and paused any critical processes that could impact customers. This telco also reported that this resulted in a positive outcome for customers, and assisted in identifying and resolving the issue sooner than may otherwise have occurred.



Our observations

All telcos reported having processes, procedures and systems for monitoring and analysing their complaint records to identify systemic issues. As only one telco reported identifying a systemic issue during the relevant period, there is an opportunity for more active monitoring and analysis of complaint records by all the telcos in this audit.

We will be seeking further information from relevant telcos to seek assurance that their complaint-monitoring processes, procedures and systems include analysis of compliance with the Complaints Handling Standard.

Telco criteria for determining whether a customer is making a complaint

Under the Complaints Handling Standard, a complaint means:

An expression of dissatisfaction made to a carriage service provider by a consumer in relation to its telecommunications products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected by the consumer.

It does not include an initial call to request information or support or to report a fault or service difficulty unless a consumer advises that they want that call treated as a complaint, and does not include an issue that is the subject of legal action.

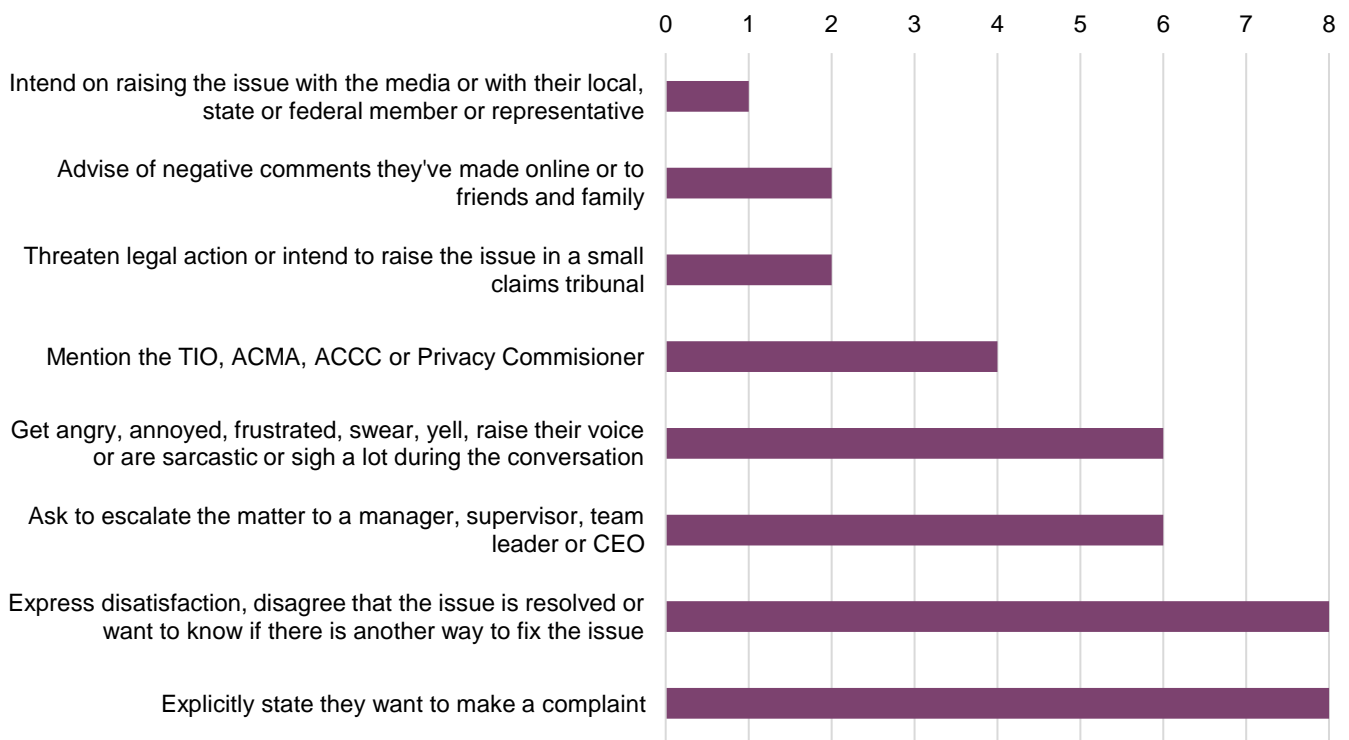
We asked each telco to identify the criteria, including indicators, they use to determine whether a customer, including a small business customer, is making a complaint and then grouped these by frequency of mention across the 8 telcos.

Based on the responses received, we found that:

- > Most telcos provide their staff with key trigger words or phrases to assist them to determine whether a customer is making a complaint.
- > If there is some doubt whether a customer is making a complaint, most telcos indicated that they guide their staff to ask the customer if they would like the matter to be considered a complaint.

Figure 3 provides a summary of information the 8 telcos provided on the indicators they use to help determine whether a customer is making a complaint.

Figure 3: Indicators telcos use to determine whether a customer is making a complaint and number of telcos using each indicator (n=8)





Our observations

We consider that all the indicators identified in Figure 3 should be seen as a customer making a complaint or should, at the very least, prompt the telco agent to seek clarification from the customer on whether they wish to make a complaint.

Telco complaints-handling processes

The Complaints Handling Standard sets out the minimum requirements a telco's complaints-handling process must meet. These include that the complaints-handling process must:

- > state that customers have a right to make a complaint (paragraph 8(1)(f))
- > set out how a customer can make a complaint and monitor the progress of their complaint (paragraph 8(1)(g)).

Telcos must also ensure that there is a link on the homepage of their website that allows a customer to access information setting out how to contact the telco to make a complaint or enquiry (paragraph 8(3)(a)).

Our review found that all the telco complaints-handling processes:

- > are easily accessible on the telcos' websites
- > acknowledge that customers have a right to make a complaint
- > set out how customers can make a complaint and monitor the progress of their complaint.



Our observations

Overall, we found that the telcos had documented complaints-handling processes that informed customers (including small business customers) about the ways in which they can contact the telco to make a complaint and monitor the progress of their complaint.

Attachment A: Extract from Telecommunications Complaints Handling Standard

5 Definitions

In this instrument:

complaint means an expression of dissatisfaction made to a carriage service provider by a consumer in relation to its telecommunications products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected by the consumer.

It does not include an initial call to request information or support or to report a fault or service difficulty unless a consumer advises that they want that call treated as a complaint, and does not include an issue that is the subject of legal action.

urgent complaint means a complaint:

- (a) where the complaint is made by a consumer who has applied for or has been accepted as being in financial hardship under that carriage service provider's financial hardship policy and where the subject matter of the complaint can reasonably be presumed to directly contribute to or aggravate the financial hardship of that consumer;
- (b) where disconnection of a service is imminent or has occurred and where due process has not been followed; or
- (c) which involves a priority assistance consumer and the service for which they are receiving priority assistance.

8 Minimum requirements – accessibility

(1) A complaints handling process must:

- (a) be set out in writing;
- (b) be made available to the public on the carriage service provider's website in a concise form that sets out the minimum requirements for complaints handling referred to in paragraphs (d) to (n), and sections 9 and 10;
- (c) be made available to a consumer on request, or as soon as practicable after a consumer informs the carriage service provider they wish to make a complaint, in a form that is suitable for the consumer and, where appropriate, made available to carriage service providers or carriers identified in sections 23 and 24;
- (d) be free of charge for consumers to use;
- (e) be focused on the needs and expectations of consumers making a complaint and be easy to understand and use;
- (f) state that consumers have a right to make a complaint;
- (g) set out how a consumer can make a complaint and monitor the progress of their complaint;

- (h) permit consumers to make complaints by telephone, letter, email and online;
- (i) permit consumers to make complaints in store and contact the carriage service provider about their complaint during in store hours, where the carriage service provider offers services at a physical location;
- (j) set out the times during which a consumer can make a complaint and contact the carriage service provider about their complaint by telephone or online;
- (k) specify the telephone number, street or post office box address, email address and web address where a consumer can make a complaint;
- (l) state that members of its personnel will:
 - (i) clarify with a consumer if they wish to make a complaint where the consumer has made contact and expressed dissatisfaction through one of the channels referred to in paragraph (h) or paragraph (i), and the member of the personnel is uncertain if the consumer wishes to make a complaint; and
 - (ii) provide consumers with help to formulate, make and progress a complaint, and to help consumers with accessibility requirements or disabilities, and consumers from non-English speaking backgrounds or those suffering financial hardship;
- (m) allow for consumers to nominate a representative to make and handle a complaint;
- (n) set out each potential step in the process for managing a complaint that was unable to be resolved on first contact, including the following steps:
 - (i) communicating to the consumer who made the complaint an acknowledgement that the complaint has been received, a unique reference number or some other unique identifier for the complaint and instructions about how the complaint can be monitored;
 - (ii) initial assessment of a complaint;
 - (iii) investigation of a complaint;
 - (iv) response to a complaint and proposed resolution;
 - (v) communicating the carriage service provider's decision in response to the complaint;
 - (vi) implementation of agreed resolution;
 - (vii) closing a complaint;
 - (viii) the process by which the consumer can refer a complaint to the TIO for external dispute resolution; and
 - (ix) the procedures for identifying and handling urgent complaints, including how those procedures differ from handling ordinary complaints.

(2) A carriage service provider must ensure that its personnel dealing directly with consumers:

- (a) are given access to a copy of:
 - (i) the complaints handling process; and
 - (ii) any documentation setting out the documented internal processes; and

- (b) understand the minimum requirements for consumer complaints handling, their roles and responsibilities under the complaints handling process and any requirements in the documented internal processes.

(3) A carriage service provider must ensure there is a link on the homepage of its website via which a consumer can access information that:

- (a) sets out how to contact the carriage service provider to make a complaint or enquiry; and
- (b) includes an express statement that the contact information provided under paragraph (a) can be used to make a complaint.

12 Acknowledging complaints

(1) A carriage service provider must acknowledge a complaint by providing the consumer to whom the complaint relates with a written or verbal response which indicates that the complaint has been received, a unique reference number or some other unique identifier for the complaint and instructions about how the complaint can be monitored

(2) A carriage service provider must acknowledge a complaint in accordance with subsection (1):

- (a) where the complaint was received by telephone or in store – immediately;
- (b) where the complaint was received by:
 - (i) email;
 - (ii) through the carriage service provider's website;
 - (iii) post; or
 - (iv) a recorded telephone message -
within 2 working days of receiving the complaint.

13 Resolution of complaints

(1) A carriage service provider must:

- (a) use its best efforts to resolve a complaint on first contact;
- (b) implement processes for the identification, management and resolution of urgent complaints;
- (c) investigate a complaint to the extent that is commensurate with the seriousness of the complaint, where it is not possible to resolve a complaint to the satisfaction of the consumer at first contact or without an investigation;
- (d) ensure that its personnel understand what remedies are available to assist with the resolution of a complaint;
- (e) tailor any remedy offered to a consumer so that, as far as practicable, the remedy addresses the main cause of the complaint, and the individual circumstances of the consumer;
- (f) resolve complaints about alleged billing errors no later than the end of the billing period immediately following the consumer's current billing period, or within 40 calendar days, whichever occurs first;
- (g) provide confirmation of a proposed resolution of a complaint, within 15 working days of receiving the complaint;

- (h) provide confirmation of a proposed resolution of an urgent complaint, and if the consumer accepts the proposed resolution, implement that resolution, within 2 working days of receiving the urgent complaint;
 - (i) where a complaint is indicative of broader problem or systemic issue, seek to resolve the main cause of that problem or issue;
 - (j) complete all necessary actions to implement a proposed resolution, within 10 working days of the consumer accepting that resolution, except where:
 - (i) otherwise agreed with the consumer;
 - (ii) the consumer agreed to undertake actions to implement the proposed resolution by a specified time, but did not complete the actions as agreed;
 - (iii) the complaint is an urgent complaint and paragraph (h) applies;
 - (k) provide confirmation to a consumer that their complaint has been resolved, as soon as practicable after the carriage service provider completes its investigation of the complaint; and
 - (l) only allow a complaint or an urgent complaint to be closed with the consent of the consumer, or where the carriage service provider has complied with subsection 15(2), section 16 or section 17.
- (2) A carriage service provider must, upon receiving a request from a consumer to provide written confirmation of the matters set out in paragraphs (1)(g), (h) or (k), provide that confirmation in writing to the consumer within 5 working days after receiving the request.

18 Complaints monitoring and analysis processes, procedures and systems

A carriage service provider must establish processes, procedures and systems, for monitoring and analysing its complaints records to identify systemic issues and problems, and prevent those systemic issues, problems and related complaints from recurring.

19 Requirements for monitoring and analysis of complaints and complaints handling process

A carriage service provider must:

- (a) classify and analyse complaints a minimum of once every three months, to identify, address and take steps to prevent frequent problems and systemic issues from recurring;
- (b) review its complaint handling process every 12 months to:
 - (i) ensure it is suitable, adequate, effective and efficient;
 - (ii) identify new issues and correct deficiencies that need specific attention, and record any new issues and deficiencies identified;
 - (iii) assess its compliance with this industry standard;
 - (iv) identify areas for improvement or that require change; and
 - (v) evaluate potential changes;
- (c) take action taken to address problems or issues identified in paragraphs (a) and (b) as soon as practicable;

- (d) record in writing any steps taken under paragraph (c);
- (e) ensure that any significant complaints, problems or issues identified under this section are efficiently and effectively managed and that there are processes for senior management to be notified where appropriate; and
- (f) ensure that its processes for implementing the requirements in paragraphs (a) to (e) are set out in writing, and made available to personnel responsible for monitoring and analysing complaints and the complaints handling process.