COMPLAINT HANDLING PROCESS

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1. Introduction

This document explains our complaint handling process (CHP) for our past, current and prospective customers (we'll call them all customers) who are covered by the Telecommunications (Consumer Complaints Handling) Industry Standard 2018 including Telecommunications (Consumer Complaints Handling) Industry Standard Variation 2020 (No. 1) (Complaints Standard).

It outlines how we handle complaints, and is intended especially for our customers, our own staff, other telcos involved in our supply chain, and other interested parties, and it includes the minimum requirements for consumer complaints handling as required by the Complaints Standard.

This CHP takes effect from midnight at the start of 1 April 2021.

2. Accessing this Complaint Handling Process

a. This CHP is available on our website.
b. There is a link on our home page to information:
   i. that sets out how to contact us to make a complaint or enquiry; and
   ii. expressly states that you can use that contact information to make a complaint.
c. We'll also make this CHP available to you:
   - if you ask for it; or
   - as soon as practicable after you inform us that you wish to make a complaint.
     Note to staff: If you're dealing directly with customers, you must give them access to this CHP as described above.

3. Who this CHP applies to

This CHP applies to you if you are:

a. an individual customer who acquires a telecommunications product mainly for personal or domestic use and not for resale; or
b. a business or non-profit that, at the time of contract:
   i. acquires a telecommunications product not for resale; and
   ii. doesn't have a genuine and reasonable opportunity to negotiate the terms; and
   iii. has an (anticipated) annual spend with us of $40,000 or less.

4. Our documented internal processes

a. We are committed to implementing this CHP. We recognise that its goals and outcomes must be supported by documented internal processes – including those set out in this CHP.
b. We will have in place, and implement, the following internal processes:
   i. an internal process for prioritising complaints – see clause 18;
   ii. an internal process for escalating complaints – see clause 29;
   iii. an internal process for classifying complaints into different categories, which clearly describes each category of complaint – see clause 35; and
   iv. an internal process for helping consumers to formulate, make and progress a complaint – see clause 42 – and which sets out steps to assist members of its personnel to help consumers:
      A. with accessibility requirements or disabilities – see clause 43;
      B. from non-English speaking backgrounds – see clause 44; and
      C. suffering financial hardship – see clause 45.

5. Some special terms

a. 'ACMA' means Australian Communications and Media Authority – see clause 40(d).
b. 'Financial hardship' means a situation where:
   i. you can't discharge your financial obligations

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to us, due to illness, unemployment, being the victim of domestic or family violence, or other reasonable temporary or ongoing cause; and

ii. you believe that you will be able to discharge those obligations if the payment or other arrangements relating to the supply of telecommunications products by us to you are changed.

c. 'Internal Process Documents' means the documents that set out our documented internal processes in connection with complaint handling. Where this CHP sets out an internal process, it serves as an Internal Process Document in relation to that process.

d. 'Personal information' means the same as in the Privacy Act 1988.

e. 'Solution' means a way to deal with a complaint – not necessarily the way you want.

f. 'Telecommunications product' means the same as in the Complaints Standard – it covers most telco services and associated goods we supply.

g. 'TIO' means Telecommunications Industry Ombudsman – see clause 30.

h. 'Working day' means a day that is not a Saturday, Sunday or gazetted public holiday in the location of your premises or principal place of business.

6. Representatives

a. You may choose to appoint a 'Representative' i.e. either:

i. an Authorised Representative – who is a person who has authority from you to deal with us on your behalf as your authorised agent; or

ii. an Advocate – who is a person nominated on your behalf to deal with us on your behalf, but does not include an Authorised Representative or a person who has authority to access your account information from us.

b. The forms and procedures for nominating a Representative are on our website.

c. You can nominate a Representative to make and handle a complaint for you.

7. What's a 'complaint'?

Any of the following counts as a complaint:

a. if you express dissatisfaction about our products or services; or

b. if you express dissatisfaction about our complaint handling process –

and you tell us, or imply, that you expect a response.

But if you make an initial call to request information, or to request support, or to report a fault or service difficulty, we won't treat it as a complaint unless you ask us to.

And if there was legal action already underway, the subject of that wouldn't be treated as a complaint.

Our staff will:

a. clarify whether you wish to make a complaint, if you contact us and express dissatisfaction through one of the channels in paragraph 10 below, and our staff is uncertain if you wish to make a complaint;

b. where you wish it – assist you to formulate, make and progress a complaint, including in the case of consumers with accessibility requirements or disabilities, and consumers from non-English speaking backgrounds or those suffering financial hardship.

8. When is a complaint 'resolved'?

A complaint counts as 'resolved' when:

a. we and you have agreed on a solution, and we have fully implemented it; or

b. you escalate it to the TIO; or

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c. all internal resolution processes set out in this CHP have been completed and:
   i. you and we have not agreed on a solution; and
   ii. we have advised you about your options for external dispute resolution, including the TIO – see clauses 30 and 40; or
d. we are otherwise entitled to close the complaint under the Complaint Closing Rules in clause 28.

We will confirm that your complaint has been resolved as soon as practicable after we complete our investigation of it, and we'll confirm that in writing, within five working days after you ask us to

9. Our complaints goal

As a customer, you have the right to make a complaint. Our goal is to keep our customers satisfied, and that means as few complaints as possible, and that any complaints that do arise are dealt with openly, fairly and promptly.

To support that goal:

a. Our complaints process is approved by our Chief Executive Officer (or equivalent), who is responsible for ensuring its implementation, operation and compliance in accordance with the Complaints Standard.
b. Our complaints process is managed by a senior manager who must maintain the effective and efficient operation of the process in accordance with the Complaints Standard.
c. Our complaints process is focused on your needs and expectations and is designed to be easy to understand and use.

10. How and when you can make a complaint

You can make a complaint:

Calling	Office Hours
Call 1800 247 835 (AIR TEL)	9.00am to 6pm Monday to Friday (AEST) 9am to 4pm Saturday (AEST)
By letter to Airtel AU Telecom Suite 527, 520 Collins Street Melbourne VIC 3000	24/7 online
https://airtel.au/technical-support/	24/7 online
By email at **complaints@airtel.net.au**	**24/7 online**

11. How and when you can monitor the progress of a complaint

You can monitor complaint progress:

Call, Mail or Email	Office Hours
Call 1800 247 835 and quote your Complaint Case Number	9. 00am to 5pm Monday Friday (AEST)
By email to complaints @ airtel.au	24/7 online
By letter to Airtel, suite 257, 520 Collins Street **Melbourne VIC 3000**	24/7 online

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12. If you need assistance

We will assist you to formulate, lodge and progress a complaint if you need help, including (without limitation) because of accessibility requirements, disability, financial hardship and difficulties with English. Just let our Customer Care officer know you want help. If you can't tell us in that way:

a. write or email your request to an address in clause 10; or
b. contact us through your Representative – see clause 6; or
c. contact us via the National Relay Service on 133 677; or
d. contact us via the Translating & Interpreting Service on 131 450.

13. Receiving your complaint

We'll receive your complaint through any of the contact points in clause 10.

14. Our complaint management steps

We will use our best efforts to resolve your complaint on first contact. If we can't do that, the steps in the following clauses apply.

15. Acknowledgement of your complaint

a. If you make a complaint in person or by telephone to a Customer Care officer, we'll acknowledge it immediately, in writing or verbally.
b. If you make a complaint by email, or online, or by paper post, or by a telephone message recording system, we'll acknowledge it within two working days, in writing or verbally.
c. When we acknowledge your complaint, we'll:
   i. allocate it a unique identifier (e.g. a reference number) (Complaint Number);
   ii. advise you of the Complaint Number; and
   iii. give you instructions about how to monitor the complaint.

16. Initial assessment of your complaint

On initial assessment, a Customer Care officer will:

a. identify and flag it if it is an urgent complaint – see clause 17;
b. categorise it according to our internal complaints classification process – see clause 35;
c. identify and flag complaints about billing errors – see clause 24;
d. assess whether it can be resolved without further investigation; and if so skip to:
   i. clause 22 (for non-urgent complaints) or
   ii. clause 23 (for urgent complaints).

17. How we identify urgent complaints

Your complaint is identified as urgent if:

a. you have applied for or have been accepted as being in financial hardship under our Financial Hardship Policy and the subject matter of your complaint can reasonably be presumed to directly contribute to or aggravate your financial hardship; or
b. disconnection of your service is imminent or has occurred and where due process has not been followed; or
c. it relates to a service for which you receive Priority Assistance under the Priority Assistance for Life Threatening Medical Conditions Code.

Our Customer Care officers are trained to watch for these factors and must flag a complaint as urgent if any of them are seen to apply.

18. Internal prioritisation process

We are flexible in the way we prioritise complaint processing, because special circumstances can apply. But in normal circumstances:

a. Urgent complaints have highest priority.
b. Complaints involving services to customers with significant health problems, or the care of young children or who are in remote locations or who

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are old-aged are prioritised next.

c. Complaints that are approaching, or have exceeded maximum response times are prioritised next.

We can often only know about these, or other, important factors if you tell us. You can alert us using any of the contact channels through which you can lodge a complaint.

19. Concerns about applicable response time

a. If you notify us that you are not satisfied with the response times that apply to the handling or management of your complaint, within five working days we'll advise you about:
   i. our internal prioritisation process – see clause 18;
   ii. our internal escalation process – see clause 29; and
   iii. options for external dispute resolution, including the TIO – see clauses 30 and 40.

b. If you then indicate to us that you would like the complaint to be given priority or to be escalated, we will, within five working days, assess the complaint in accordance with our internal prioritisation process or our internal escalation process, whichever is relevant, and prioritise or escalate it where appropriate.

20. Request for urgency

a. If you reasonably notify us that you want your complaint to be assessed and treated as urgent, within two working days we'll advise you about:
   i. our internal prioritisation process – see clause 18;
   ii. our internal escalation process – see clause 29; and
   iii. options for external dispute resolution, including the TIO – see clauses 30 and 40.

b. If you then indicate to us that you would like the complaint to be given priority or to be escalated, we will, within five working days, assess the complaint in accordance with our internal prioritisation process or our internal escalation process, whichever is relevant, and prioritise or escalate it where appropriate.

21. Investigation of your complaint

In investigating a complaint, a Customer Care officer will:

a. make any relevant enquiries of you, your Authorised Representative or Advocate, or our systems or other staff, or of any other telcos involved in our supply chain, and other interested parties;
b. investigate the complaint suitably for its seriousness;
c. fairly and carefully consider the merits of the complaint;
d. focus on finding the optimal solution for you and the situation;
e. seek guidance from a manager if necessary; and
f. keep in mind our obligations under the Complaints Standard and this document.

22. Our response and proposed solution

a. We'll offer a solution for your complaint within 15 working days of receiving it, unless a delay prevents that – see clause 31. And see clause 23 regarding urgent complaints.
b. We'll confirm that offer in writing, within five working days after you ask us to.

23. Handling urgent complaints & how they're different from ordinary complaints

An urgent complaint will be handled generally in accordance with this CHP, but within two working days of receiving your urgent complaint, we will:

a. offer a solution; and
b. if you accept that solution, action it –

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(unless a delay prevents that – see clause 31) and we'll confirm that in writing, within five working days after you ask us to.

24. Complaints about billing errors

If you make a complaint during a billing period about a billing error, we will resolve it by the end of the billing period immediately following your current billing period, or within 40 calendar days, whichever occurs first.

25. Solutions

a. The solution we offer will be tailored to you so that, as far as practicable, it addresses the main cause of the complaint, and your individual circumstances.
b. Where a complaint is indicative of a broader problem or systemic issue, we'll seek to resolve the main cause of that problem or issue.
c. We aren't required to action that proposed solution unless and until you accept it. If you do accept our proposed resolution, we are allowed a period of time to action it – see clause 27.

26. Communicating our decision about the complaint

a. We'll notify you of our decision about your complaint as soon as practicable after we complete our investigation, including offering any solution in accordance with clause 22.
b. We'll communicate this information by email or text message or by phone.
c. We'll confirm it in writing, within five working days after you ask us to.

27. Implementing an agreed solution

We'll fully action a solution within ten working days after you agree to it, unless:

a. we and you agree otherwise; or
b. you agreed to do something to facilitate the solution by a certain time, and you failed to do so; or
c. it's an urgent complaint and clause 23 applies.

28. Closing a complaint – (Complaint Closing Rules)

We may close your complaint in our complaints system if:

a. the complaint is resolved and there is nothing left for us to do; or
b. you consent; or
c. we have completed the Unsatisfactory Outcome Procedure in clause 32; or
d. we have completed the Unreasonable Complaint Procedure in clause 33; or
e. we have completed the Lost Contact Procedure in clause 34.

29. Internal escalation process

a. Your complaint will be escalated and managed accordingly if you reasonably request it.
b. You can request escalation using any of the contact channels through which you can lodge a complaint.
c. Internal escalation and management may not accelerate resolution if the complaint is not urgent and its processing already meets the applicable standards and is within the permitted maximum response time/s.
d. A complaint will be automatically escalated if:
    i. a maximum response time has been exceeded;
    ii. it becomes urgent; or
    iii. you notify us of another factor that increases the seriousness of your complaint or the need for expedited resolution.
e. Each escalated complaint will be referred to a more senior Customer Care officer, who will assess the reason/s for the escalation and the best way to respond to them, and direct action accordingly.

30. Process where a complaint is referred

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to the TIO for external resolution

a. You may refer a complaint to the TIO after we have been given a reasonable opportunity to resolve it.

b. You can refer a complaint to the TIO:

i. through its website at www.tio.com.au;

ii. by phone on 1800 062 058;

iii. by writing to PO Box 276, Collins Street West Vic 8007;

iv. through the National Relay Service – call on 1800 555 677 then ask for 1800 062 058 ;

v. by faxing a consumer complaint form (see www.tio.com.au/__data/assets/pdf_file/0006/9195/TIO-consumer-complaint - form-Feb-2016.pdf) to 1800 630 614; or

vi. by emailing the consumer complaint form to tio@tio.com.au.

c. The TIO may accept your complaint if:

i. it is about your landline telephone, mobile or internet service, damage to your property or telecommunications equipment; and

ii. you have already tried to contact us to resolve your complaint with us; and

iii. you the account holder or have you been authorised to deal with the matter by the account holder; and

iv. your complaint less than two years old (or between two and six years old, if you have a good reason for not making it before).

d. If TIO accepts your complaint, it will process it according to its current procedures.

31. If delays occur or are anticipated

a. If there's a delay in the timeline for managing or handling your complaint, we'll inform you as soon as possible after we become aware of it.

b. If we do not reasonably believe we can resolve:

Type of complaint	'Relevant Period'
a complaint about a billing error	by the end of the billing period immediately following your current billing period, or within 40 calendar days, whichever occurs first
an urgent complaint	within two working days of receipt
an urgent complaint	within 15 working days of receipt

we will advise you within the applicable 'Relevant Period':

i. why there is a delay;

ii. the new timeframe that will apply; and

iii. if we expect resolution to require more than ten more working days after the end of the applicable 'Relevant Period', of your options for external dispute resolution including the TIO (except if the delay is because of a notified mass outage of service).

32. Unsatisfactory Outcome Procedure

a. Within five working days after you:

i. notify us that you are not satisfied with the progress of your complaint; or

ii. notify us that you are not satisfied with the outcome of your complaint; or

iii. enquire about your options to pursue your complaint further –

iv. we'll advise you about:

v. our internal escalation process – see clause 29 (to the extent that you haven't already availed yourself of it); and

vi. your options for external dispute resolution,

including the TIO – see clauses 30 and 40.

b. If you then indicate to us that you would like the complaint to be given priority or to be escalated, we will, within five working days, assess the complaint in accordance with our internal prioritisation process or our internal escalation process, whichever is relevant, and prioritise or escalate it where appropriate.

c. Unless you avail yourself of any remaining internal escalation process or internal prioritisation process, we may then close your complaint under the Complaint Closing Rules.

33. Unreasonable Complaint Procedure

a. If we consider that:
   i. we can do nothing more to resolve your complaint or assist you; and
   ii. your behaviour or complaint is frivolous or vexatious –
   we may decide not to deal further with your complaint.
   We won't do that without careful consideration, and appropriate internal escalation, and acting reasonably.

b. Within five working days of such a decision, we'll advise you of the reasons for our decision and your options for external dispute resolution, including the TIO – see clauses 30 and 40.

c. After that:
   i. we may then close your complaint under the Complaint Closing Rules; and
   ii. we reserve the right not to accept any further complaints from you on the same or similar issues, except as a part of an external dispute resolution process.

d. Nonetheless, if you ask for written confirmation of our reasons and your options for external resolution, we'll provide them within five working days – see clauses 30 and 40.

34. Lost Contact Procedure

a. If we unsuccessfully attempt to contact you to discuss your complaint or offer a solution:
   i. at least five different times;
   ii. on five different days;
   iii. in a ten day period –
   we will write to you:
   iv. advising we couldn't contact you;
   v. detailing our contact attempts; and
   vi. inviting you to contact us to discuss the complaint within a specified period (of at least ten working days).

b. Unless you contact us to discuss the complaint within that period, we may then close your complaint under the Complaint Closing Rules.

35. Internal Complaints Classification Process

a. Complaints will be categorised as follows:
   i. NBN
      A. Billing & Payment
      B. Connection
      C. Contracts
      D. Credit management
      E. Customer service
      F. Faults
      G. Privacy
      H. Transfer
   ii. Other internet
      A. Billing & Payment
      B. Connection
      C. Contracts
      D. Credit management
      E. Customer service
      F. Faults
      G. Privacy
      H. Transfer
   iii. Landline
      A. Billing & Payment
      B. Connection

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C. Contracts
D. Credit management
E. Customer service
F. Faults
G. Privacy
H. Transfer

iv. Mobile
A. Billing & Payment
B. Connection
C. Contracts
D. Credit management
E. Customer service
F. Faults
G. Privacy
H. Transfer

Each category has been titled so as to clearly describe the kinds of complaints covered. Staff must apply the categories carefully and appropriately.

b. The Customer Care officer who first deals with a complaint after we receive it must classify it.
c. Where, in the course of dealing with a complaint, a Customer Care officer recognises that a complaint should be classified by reference to alternative or additional categories, they must amend the classification accordingly and make a brief note of the amendment/s and reasons.

36. Restriction on legal proceedings

We will not commence legal proceedings against you that has the same subject matter as a complaint:

a. while the complaint is being handled internally; or
b. within seven working days after you are advised of the outcome of the complaint; or
c. while the complaint is being investigated by the TIO.

37. Charges for using our complaints process

Our complaints process is free to use.

38. Limit on cancelling service

If:

a. you make a complaint; and
b. you weren't able to resolve it directly with us; and
c. you pursue external dispute resolution –

we will not cancel your service for those reasons alone.

39. Credit management action suspended

We will not take credit management action over a disputed amount if you have made a complaint and we know:

a. it has not been resolved to your satisfaction; and
b. it is being investigated by us or the TIO or some other recognised third party.

40. External dispute resolution

The following external dispute resolution bodies may be able to assist with your complaint, but may require that you first attempt to resolve it directly with us:

a. the Telecommunications Industry Ombudsman (TIO) – see clause 30;
b. the Office of Fair Trading in Your State or Territory – visit your State or Territory consumer website;
c. for Australian Consumer Law matters, the Australian Consumer and Competition Commission (ACCC) – www.accc.gov.au ;
d. for Telecommunications Consumer Protections Code matters, the Australian Communications & Media Authority (ACMA) – www.acma.gov.au;
e. for privacy issues, the Office of the Australian Information Commissioner (OAIC) – www.oaic . gov.au.

41. Further requirements for our staff

We will ensure that our staff who deal directly with customers and/or with complaints:

a. are given access to a copy of this CHP;
b. are given access to our Internal Process Documents;
c. understand:
   i. the requirements for consumer complaints handling under the Complaints Standard;
   ii. their roles and responsibilities under this CHP; and
   iii. the requirements of our Internal Process Documents;
d. clarify whether you wish to make a complaint, if you contact us and express dissatisfaction through one of the channels in paragraph 10 above, and our staff is uncertain if you wish to make a complaint;
e. understand what remedies are available to assist with the resolution of a complaint;
f. manage and resolve complaints in an effective and efficient manner in accordance with the Complaints Standard;
g. treat you with fairness and courtesy when you make a complaint;
h. can identify and record a complaint; and
i. can classify complaints in accordance with clause 35.

42. Process : helping consumers to formulate, make and progress a complaint

a. If a customer requests help in formulating, making or progressing a complaint, that is an 'Assistance Request'.
b. If a Customer Care officer otherwise considers that a customer needs help in formulating, making or progressing a complaint, they must ask whether the customer would like help in doing so. If the customer responds affirmatively, that is also an 'Assistance Request'.
c. An Assistance Request may relate to any or all of:
   i. formulating;
   ii. making; and/or
   iii. progressing –
   a complaint. This process only applies to the items that are included in the Assistance Request.
d. In all cases, the customer should first be advised of the option of appointing an Authorised Representative or Advocate to provide the assistance they require. Wherever possible, it is better that the customer is assisted by a person independent of us. The remainder of this process applies if a customer does not elect to appoint an Authorised Representative or Advocate.
e. Formulating a complaint
   i. 'Formulating' means to express something in a meaningful, orderly and accurate way.
   ii. The Customer Care officer should talk to, and listen to, the customer to identify what they are complaining about, and why.
   iii. The Customer Care officer should then prepare a written statement (Draft Complaint) that clearly states the complaint as they understand it.
   iv. The Customer Care officer should read the Draft Complaint to the customer, and ask if the customer approves it as a statement of their complaint.
   v. If the customer asks that the Draft Complaint be emailed to them for consideration, the Customer Care officer should do so.
   vi. If the customer wishes the Draft Complaint to be amended, the Customer Care officer should do so.
   vii. If the customer approves a Draft Complaint, the Customer Care officer should email the approved version to the customer, clearly identifying it as the approved version.
   viii. The complaint is now 'formulated'.
f. Making a complaint
   i. 'Making a complaint' means to register it in

our complaint handling system.

ii. The Customer Care officer should ask the customer to confirm that they want the Customer Care officer to cause the complaint to be registered in our complaint handling system.

iii. If the customer responds affirmatively, the Customer Care officer should cause the complaint to be registered in our complaint handling system and confirm to the customer when that has been done.

iv. The complaint is now 'made'.

g. Progressing a complaint

i. 'Progressing' a complaint means:

A. to request that it be classified as urgent; or

B. to escalate or prioritise it in accordance with this CHP.

ii. The Customer Care officer should:

A. advise the customer to contact Customer Care if they wish to do any of those things; and

B. make a clear and prominent customer care note that the complaint is subject to 'Special Assistance'.

iii. Whenever that customer contacts any Customer Care officer seeking to progress their complaint, the Customer Care officer should:

A. note that the complaint is subject to 'Special Assistance'; and

B. help the customer, as required in the circumstances, to achieve the progress they seek.

h. Nothing in this process implies that a customer may require Customer Care staff to assume entire responsibility for the formulation, making or progression of a complaint. We are 'helping' the customer, not carrying out the process instead of them.

i. Nothing in this process implies that a customer is entitled to a different outcome than if they were not receiving help from us. We are helping then to 'formulate, make and progress' a complaint, not assuring a special outcome.

j. This process may overlap and interact with the processes in clauses 43, 44 and/or 45. Customer Care officers should use discretion and common sense where this occurs e.g. where a customer needs help in formulating a complaint and is not fluent in English, it is necessary to consider involving an interpreter service before undertaking the steps in clause 42(e) – 'Formulating a complaint'.

43. Process: helping customers with accessibility requirements or disabilities

TIO has published a comprehensive Position Statement on Responding to consumers with different needs (including customers with accessibility requirements or disabilities): https://www.tio.com.au/about-us/position-statements/responding-to-consumers-with-different-needs

A copy is attached to this CHP as Annexure 1.
We endorse this Position Statement and require that all Customer Care officers and other staff involved with complaint handling:

a. **Step 1:** *Understanding the Position Statement*
Read and understand the Position Statement. Discuss with your supervisor if any aspect isn't clear.

b. **Step 2:** *Action steps*
Each bullet point in the Position Statement regarding dealing with relevant customers and their complaints is to be considered, and actioned as appropriate, in the course of those dealings.

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44. Process: helping customers from non-English-speaking backgrounds

TIO has published a comprehensive Position Statement on Responding to consumers with different needs (including customers from non-English-speaking backgrounds): https://www.tio.com.au/about-us/position-statements/responding-to-consumers-with-different-needs

A copy is attached to this CHP as Annexure 1.

We endorse this Position Statement and require that all Customer Care officers and other staff involved with complaint handling:

a. **Step 1:** *Understanding the Position Statement*
   Read and understand the Position Statement. Discuss with your supervisor if any aspect isn't clear.
b. **Step 2:** *Action steps*
   Each bullet point in the Position Statement regarding dealing with relevant customers and their complaints is to be considered, and actioned as appropriate, in the course of those dealings.

45. Process: helping customers suffering financial hardship

Our Financial Hardship Policy fully details how we deal with and help customers suffering financial hardship. It sets out the steps we go through in receiving, processing and finalising a financial hardship application.

A copy of our Financial Hardship Policy is available on our web site.

We require that all Customer Care officers and other staff involved with complaint handling:

a. **Step 1:** *Understanding the Position Statement*
   Read and understand the Financial Hardship Policy. Discuss with your supervisor if any aspect isn't clear.
b. **Step 2:** *Action steps*
   Each numbered paragraph in the Financial Hardship Policy is to be considered in dealing with relevant customers and their complaints, and actioned as appropriate, in the course of those dealings.

   The steps in the Financial Hardship Policy should be followed in order. Where a step needs to be taken by the customer, assist the customer to do so.

46. Complaint records we'll keep

We'll record for each complaint, and retain for two years:

a. your name and contact details, and your representative where applicable;
b. a unique identifier (eg a reference number) that will ensure we can subsequently identify the complaint and its subject matter;
c. a description of the nature of the complaint and the issues raised as part of the complaint;
d. a description of the resolution we or you proposed including the date by which you must provide a response in relation to the proposed resolution;
e. a description of the results of any investigation;
f. a description of our reasons for its proposed resolution;
g. your response to the proposed resolution of the complaint, any reasons you give, and if you have requested the proposed resolution in writing, that this request has been made;
h. a description of the agreed resolution of the complaint, including any associated commitments and the date this is

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communicated to you;

i. the implementation of any required actions; and
j. copies of any correspondence sent by or to you regarding the complaint.

47. Privacy

We will ensure that personal information we collect in connection with a complaint is not disclosed to a third party except:

a. as required to manage a complaint to the TIO or the ACMA;
b. with your express consent; or
c. as otherwise required or authorised by law.

Annexure 1 –

Telecommunications Industry Ombudsman
Responding to consumers with different needs

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