

29 January 2025

Cynthia Gebert  
Telecommunications Industry Ombudsman  
**By email:** publicconsultation@tio.com.au

Dear Ms Gebert and team,

**RE: TIO Member Guidance – Reasonable steps to inform consumers and occupiers of IDR and EDR**

I am writing on behalf of Financial Counselling Victoria (FCVic), the peak body for financial counsellors in Victoria who collectively assist more than 23,000 of the most vulnerable Victorians every year. You already know the work of our sector well, with many of our members advocating for the consumer rights of their clients when liaising with telco providers and with the Telecommunications Industry Ombudsman (TIO).

I write today on your consultation on the TIO's Member Guidance on the Terms of Reference clause 6.2 'Signposting'. **We broadly support the publication of this Guidance as it helps to promote effective internal and external dispute resolution mechanisms.**

We do make additional comments for your consideration, as follows:

- The reference to a 'valuable dispute resolution scheme for the telco industry and the community' – we suggest that this be rephrased to recognise the important consumer empowerment and social and economic justice role of a dispute resolution scheme. This will help to build a consumer-first mindset shift for telco providers.

One option may be to amend the sentence to "Requiring members to take reasonable steps to inform consumers and occupiers about IDR and EDR services is an important step to promote consumer rights, and continuous service improvement for the telco industry."

- The complaints handling process should be expressed not only in 'clear and easy to understand terms', but specifically in Plain English. The Australian Government Style Manual entry on 'Plain language and word choice' can assist members in communicating clearly at an appropriate level.
- Where the guidance states that the complaints handling process should be 'readily accessible on other platforms', it should specify inclusion on proprietary platforms such as dedicated member apps and portals, which is where consumers are most likely to engage with their telco provider (e.g. the My Telstra or My Optus app).
- The guidance should recommend that printed copies of the published complaint process be made available not just on request but be permanently available at the counter in all store locations.

- The 'How to reference the TIO' in the Appendix should provide telco providers with set messaging about the role of the TIO as consumers may not be aware of their rights to complain and seek assistance, or of the role that an ombudsman can play.

For instance, a general reference could be 'The Telecommunications Industry Ombudsman provides free, fair and independent help for phone and internet complaints'.

Further, a reference at the conclusion of an internal complaint could be - 'If you are not satisfied with how we have handled your complaint, you can contact the Telecommunications Industry Ombudsman and make an independent complaint'.

Thank you for your consideration. To discuss this letter further or for any further queries, please contact FCVic's Advocacy Manager Amanda Chan on [achan@fcvic.org.au](mailto:achan@fcvic.org.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Zyl', with a horizontal line underneath.

Zyl Hovenga-Wauchope  
Chief Executive Officer  
Financial Counselling Victoria