

Complaint Management Policy

Overview

At nbn we strive to personally and professionally demonstrate certain values in our actions. We are disciplined and reliable and engender trust and integrity - we are up-front, honest, transparent and responsive. We deliver on our commitments and actively pursue improvements in our network and supporting services.

nbn appreciates that on occasion people may not be satisfied with the service they receive from nbn or our contractors. We recognise the right of any person covered by this policy to raise an issue or make a complaint and we are committed at all levels of the organisation to their efficient, impartial and courteous resolution.

Purpose

nbn's requirements for complaint management and reporting arise from the directions of senior management and from government and regulatory obligations.

Complaints

This policy provides information about the framework that is in place for handling complaints about nbn and nbn related activities from the following:

- members of the public
- end-users of services supplied by access seekers/retail service providers via the nbn
- owners and/or occupiers of land accessed by nbn or its contractors
- community groups, local government, consumer groups, councils, and Members of Parliament
- the Telecommunications Industry Ombudsman (TIO)
- the Australian Communications Media Authority (ACMA)
- property developers (in relation to the provision of fibre in new developments) with no direct contractual relationship with nbn
- access seekers (e.g. RSP's, ISP's and aggregators) with no direct contractual relationship with nbn, and
- 'Authorised Representatives' and 'Advocates' for the above complainants.

Issues which arise directly between nbn and its access seekers, including under the WBA, or contractors, suppliers or developers, are dealt with in accordance with our arrangements with them, and are not covered by this policy.

As nbn is a wholesale only provider, complainants are encouraged to seek to resolve issues directly with their access seeker or telecommunications retail service provider. Anyone can, however, raise a complaint which will be logged in nbn's Community Relationship Management (CRM) system to track, resolve and close the issue in accordance with this policy and nbn's internal procedure. nbn will keep access seeker's apprised of relevant issues where appropriate.

For the purposes of this policy, an 'Authorised Representative' is a person who has authority from a complainant to deal with nbn on behalf of that complainant as their authorised agent. An 'Advocate' is a person nominated by a complainant to deal with nbn on the complainant's behalf (but, unlike an Authorised Representative, does not act as the complainant's agent nor have authority to access any of the complainant's account information from nbn).



A person who is an Authorised Representative has the power to act on the complainant's behalf as if they are the complainant or if the Authorised Representative has more limited rights, the level of access that the Authorised Representative has to the complainant's information. A person acting as an Advocate has no power to act on the complainant's behalf and has no access to their information without the complainant being present and agreeing to such action.

While this policy does not apply to complaints from access seekers with whom nbn has a direct contractual relationship, access seekers may raise complaints on behalf of end users under this policy if they are an Authorised Representative or Advocate of the end user and obtain the consent of the end user for nbn to discuss their complaint with and, if required, disclose of any of the end user's personal information to, the access seeker. The access seeker's appointment as an Authorised Representative or Advocate does not limit nbn's ability to discuss the complaint directly with the end user.

Any personal information collected about a complainant by nbn during this process will be handled in accordance with the Privacy Act 1988 and nbn's Privacy Policy.

Faults not covered by this policy

Service faults, notified to nbn by access seeker's are in a special class and are handled in accordance with the procedures and timeframes set out in the Assurance Module of the WBA Operations Manual, and the WBA Service Levels Schedule.

In summary these fault rectification procedures involve:

- the end user reporting the fault directly to their access seeker
- the access seeker conducting an agreed series of checks to determine where the cause of the fault lies
- the access seeker promptly reporting any fault to nbn which appears to be nbn's responsibility
- nbn investigating and repairing any relevant faults in its network or equipment as necessary and confirming to the access seeker that the fault is resolved as relevant
- the access seeker confirming that the issue no longer impacts the end user.

When nbn receives a complaint directly about faults, nbn will conduct a review of any known planned/unplanned outages on the nbn network impacting that complainant and also promptly bring the issue to the attention of the access seeker and relevant nbn parties to assist with resolution.

Scope

This policy applies to all employees, contractors and consultants of nbn.

Policy Approach

nbn manages complaints to a high standard commensurate with the nature of its construction tasks and operation of its wholesale telecommunications network.

nbn and its contractors will respond to all complaints to seek to quickly resolve the complaint to the satisfaction of the person complaining.

It is the responsibility of all employees and contractors involved in handling a complaint to appropriately prioritise its resolution in accordance with this policy and nbn's Complaint Management Key Performance Indicators (KPIs). Please refer to section 'Overview of Complaints Process' in this policy.

Regulatory Requirements

nbn must adhere to all applicable regulatory requirements including industry codes applicable to wholesale services..



In its capacity as a member of the Telecommunications Industry Ombudsman (TIO) Scheme, nbn must also comply with requests and directions from the TIO.

Complaint Definition

A complaint is an expression of dissatisfaction in relation to telecommunications goods or services or the complaints handling process itself, where a response or resolution is expected by the person complaining.

An initial call to request a service or information or to request support is not necessarily a complaint. An initial call to report a fault or service difficulty is not a complaint. However, if the caller advises that they want their initial call treated as a complaint, it will be treated in that way. If a recipient of a call is uncertain, they will ask if the caller wishes to make a complaint and rely on their response.

Complaints can range from individual perceptions which can be dealt with by the provision of information, to very serious expressions of dissatisfaction following particular incidents which could result in damage to property or nbn's reputation and to remove potential and recognised risks to health and safety.

Types of Complaints

Formal Complaints

These are relatively simple, straight-forward expressions of dissatisfaction which may be managed at the first point of contact. Although they may require the advice of a subject matter expert (SME) within nbn, they do not typically require cross functional collaboration to resolve.

Complex Complaints

Complex complaints are those which cannot be resolved/managed at the first point of contact and are generally of a more serious or complex nature than formal complaints. They typically require cross functional collaboration to resolve, a number of interactions or discussions with the complainant and may involve commitment of resources. Complex complaints are referred to a dedicated case management team.

Some typical examples are:

- complaints about damage to, or remediation of, property during network construction
- network installation issues
- road closure or property access problems
- unmet new development timeframes
- escalated formal complaints.

Urgent Complaints

These are any complaints:

- involving a complainant who is a priority assistance customer of an access seeker, that nbn is providing a service for which they are receiving priority assistance
- where disconnection of a service is imminent or has occurred and where due process has not been followed, or



- made by a complainant who has applied for consideration, or been accepted, as being in financial hardship under their access seeker's financial hardship policy where the subject matter of the complaint can reasonably be presumed to directly contribute to or aggravate their financial hardship.

These are treated by NBN Co as urgent complaints. Where a complainant seeks to have a complaint treated as urgent, we will also tell them about our internal prioritisation and escalation processes. nbn seeks to provide confirmation of the proposed resolution of the urgent aspects of an urgent complaint (and, if accepted by the complainant, implementation of the urgent aspects of the resolution) within 2 working days after the date the complaint is received. Where we believe that the urgent aspects of an urgent complaint cannot be resolved within 2 working days nbn will seek to advise the complainant before the second working day of:

- the reasons for the delay
- the specific timeframe for completion of the resolution
- if the anticipated delay is 10 working days or more (and not the result of a mass service disruption), their options for external dispute resolution including the TIO.

Complaints Process

Complaints are categorised, prioritised and assigned to nbn's appropriate subject matter expert to seek to ensure resolution in a timely fashion in accordance with the nbn Complaints Management KPIs.

Overview of Complaints Process

Complaints may be made and updates on the progress of complaints obtained by contacting our Complaints Team on the following

- the NBN Co website online form at 'Contact Us' www.nbnco.com.au/online_channel/contact_us
- by email to complaints@nbnco.com.au
- by phone to 1800 687 626
- by mail Locked Bag 27, Gold Coast MC, 9726
- by fax to Complaint Team 1800 106 033.

nbn will seek to acknowledge written complaints within 2 working days.

The impact and urgency of all complaints are assessed to determine who needs to be notified (both internally and externally) and whether a SME is required to resolve the complaint.

In accordance with nbn's Complaints Management KPIs, nbn endeavours to resolve formal complaints within 5 working days of receipt and preferably at the first point of contact.

In the case of complex complaints a case manager will contact the complainant on receipt of the complex complaint. nbn will seek to achieve a resolution within 20 working days of receipt. nbn will seek to advise complainants before working day 20 if the complaint cannot be resolved within 20 working days, providing reasons for the delay and a timeframe for resolution.

Where resolution is not possible, the complainant will be advised of their options including to contact the Telecommunications Industry Ombudsman where applicable. nbn will observe the applicable timeframes of the TIO.

nbn will also seek to provide interim updates on the progress of complaint resolution on request.



Escalations

Escalation is an essential element of the successful management of complaints.

The primary reasons a complaint may be escalated within nbn include:

- the complexity of the issues involved, including as a result of required timeframes, or knowledge or experience constraints of the current complaint owner
- resolution options at the current level have been exhausted
- the complaint not being resolved in the required or agreed time frame
- the complaint having wider implications for nbn
- a request for escalation from the complainant.

While the goal is to resolve complaints at the first point of contact, a complaint will be escalated internally to the case management team where the complainant indicates they are dissatisfied with the resolution proposed.

If all reasonable avenues of internal escalation have been exhausted but a complaint remains unresolved, we will provide clear and accessible information about options for external dispute resolution (including the Telecommunications Industry Ombudsman (TIO) where either nbn or the complainant believe the matter is within the TIO's jurisdiction).

Complaint Resolution Dissatisfaction

If after careful consideration and appropriate escalation, nbn resolves a complaint however, the complainant is dissatisfied with the outcome nbn will inform the complainant of their options for external dispute resolution including the TIO.

Process Improvement

In order to seek to identify and reduce the recurrence of complaints arising from systemic issues, nbn:

- monitors complaints to seek to identify emerging issues requiring specific attention and address those as soon as practicable, and
- analyses and classifies complaint data at least every 3 months to seek to identify recurring problems and issues and action opportunities for improvement.

nbn's processes also seek to ensure rapid and effective management of, and notification to appropriately senior management of, significant complaints or issues.

Record Keeping

nbn's CRM system enables it to manage, monitor, analyse, record and report on complaints and keep records confidentially in accordance with its obligations under the law (including the Privacy Act 1988) and applicable industry codes which include identification of the complainant, the nature of the complaint, the steps taken to address the complaint and the resolution of the complaint.

nbn complaint records include where relevant:

- a unique reference number
- details of the issues raised
- the resolution
- the due date for a response



- the results of any investigation
- copies of any correspondence sent by or to the complainant.

nbn monitors the progress of complaints and any commitments made.

Roles and Responsibilities

The responsibilities of the Chief Executive Officer and Senior Management include:

- in the case of the CEO only, to approve nbn's complaint handling process and ensure its implementation, operation and compliance
- encouraging an environment where complaints are handled seriously and comprehensively
- ensuring that an effective complaint management system is developed and in place for nbn
- ensuring appropriate resources are available and utilised for effective complaint management
- reporting to the Government in accordance with regulatory requirements set expectations
- compliance with this policy.

The responsibilities of the General Managers and Business Unit Managers include:

- adhering to this policy
- compliance with this policy
- ensuring employees understand this policy
- dealing with all referred complaints in accordance with the defined Complaint Management KPIs.

The responsibilities of employees and its contractors include:

- compliance with this policy
- ensuring complaints are recorded in CRM
- ensuring appropriate actions are implemented to seek to prevent complaints from recurring
- escalating complex complaints to their manager or to the case management team.

The responsibilities of the Case Management Team include:

- case management of complex complaints
- compliance with this policy
- taking responsibility for complaints and collaborating with the appropriate stakeholders, including external industry bodies and customer groups, to bring about swift and thorough resolutions
- resolving complaints within the Complaints Management KPIs.
- ensuring nbn complaints management complies with regulatory obligations and government expectations
- reviewing and evaluating the implementation and effectiveness of this policy
- identifying systemic issues and trends and raising corrective and preventative actions



- maintaining a network of SMEs across nbn
- conducting post complaint reviews on a regular basis.

The responsibilities of the Contact Centre include:

- compliance with this policy
- resolving complaints within the Complaints Management KPIs
- providing a single, publicly recognisable point of contact for the receipt and management of any complaints including through access seeker's regardless of whether those complaints are of a system, network or corporate nature
- escalating complex complaints to case managers
- referring formal complaints to SMEs where necessary
- ensuring complainant feedback is sought where appropriate following the resolution of complaints.

Further Information

Please contact NBN Co on info@nbnco.com.au if you require additional information in relation to this policy.