



Telecommunications Industry Ombudsman Independent Review

Submission by the Australian Communications Consumer Action Network

30 June 2017

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards availability, accessibility and affordability of communications services for all Australians.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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1. Introduction

As the peak national body representing telecommunications consumers, the Australian Communications Action Network (ACCAN) is pleased to have the opportunity to submit to the independent review of the Telecommunications Industry Ombudsman (TIO). The review is an important opportunity to ensure that dispute resolution in the telecommunications industry functions effectively to protect the rights of consumers.

ACCAN would like to express its strong support for the role the TIO plays as an independent, industry-funded scheme that provides a free dispute resolution service for Australian consumers. The TIO plays an important role in empowering consumers to exercise their rights, and by placing a check on the practices of telecommunications service providers.

ACCAN consulted with its members (organisational and individual) in the drafting of this response. As such, this submission contains the views and experiences of: the Consumer Law Action Centre; Legal Aid (Queensland & New South Wales divisions); Financial Counsellors Australia; CHOICE; Care Financial Counselling Service; the Financial Rights Legal Centre; Financial and Consumer Rights Council; and individual members. It is important to consult with financial counsellors and lawyers, as they have first-hand experiences dealing with the TIO when acting on behalf of clients. They are also in a position to obtain first hand feedback from clients who have contacted the TIO about their experiences.

As well as addressing some of the questions posed in the Issues Paper, ACCAN would also like to provide feedback and recommendations on:

- Consumer outreach and engagement functions, particularly with regard to vulnerable consumer groups
- Consumer knowledge of TIO processes
- Data collection, analysis, and reporting
- The accessibility of the TIO's website and resources
- Customer Service
- The accessibility of the TIO to consumers with a disability.

1.1. Review background and scope

The TIO is required by section 133A of the *Telecommunications (Consumer Protection and Services Standards) Act 1999* to undergo an independent review. The review is being conducted by private consultancy Cameron.Ralph.Khoury. and must be completed by 17 August 2017.

The review aims to examine and make recommendations on the:

- Adequacy of the TIO's authorising environment (legislative, Constitution, and Terms of Reference)
- Effectiveness of the TIO's complaint resolution processes, systems, and resources
- Effectiveness of the TIO's approach to systemic issues in improving telecommunications provider practices
- Effectiveness of the TIO's engagement with government, regulators, consumers, industry, and other stakeholders.

1.2. TIO background

The TIO provides consumers and small businesses with independent dispute resolution services for landline, mobile, and internet complaints. All telecommunications service providers must be a member of the TIO and comply with its decisions. The TIO had 1,599 members as at 30 June 2016.

Complaints to the TIO decreased significantly in the five years to 30 June 2016, and are now increasing (a 34% increase in the six months to 31 December 2016). The TIO refers a majority of the complaints it receives to the relevant retail service provider (RSP). About 10% of these are referred back to the TIO, most of which are resolved via conciliation. A small number of complaints are investigated, which can lead to a binding decision issued by the Ombudsman.¹

1.3. Key practices and benchmarks for dispute resolution schemes

As noted in the Issues Paper, the TIO is expected to be accessible, independent, fair, accountable, efficient, and effective.² ACCAN agrees that applying these benchmarks and implementing the key practices outlined in *The Treasury's Key Practices for Industry Customer Dispute Resolution*³ is an appropriate method to measure the adequacy and effectiveness of the TIO.

¹ Telecommunications Industry Ombudsman Independent Review Issues Paper, p.2.

² *Telecommunications (Consumer Protection and Service Standards) Act 1999*, s 128(10); and *Benchmarks for Industry-based Customer Dispute Resolution Schemes*, Australian Government, The Treasury, 4 March 2015.

³ *Key Practices for Industry-based Customer Dispute Resolution*, Australian Government, The Treasury, 4 March 2015.

2. Responses to Issues Paper

2.1. Strengths and weaknesses in the TIO's authorising environment

What are your views on the legislative framework and how it works?

ACCAN's consultation with its members revealed a general perception that the TIO is not as strong or effective as the Financial Ombudsman Service or the Credit and Investments Ombudsman. There is a view that this could be due to weaker regulation than in the financial and energy sectors.

A framework around an industry-based EDR scheme requires a strong regulator with powers to ensure that EDR meets benchmarks and continuously improves access to justice for consumers. The regulator should also issue detailed benchmark guidance for the EDR scheme. There is some concern that in the telecommunications industry, there is a disconnect between the TIO and the ACMA as regulator, and limited transparency over how the ACMA picks up and addresses systemic issues identified by the TIO.

A disconnected relationship between the ACMA, industry participants, and consumers may be a contributing factor to the impression held by consumer representative organisations that the TIO 'lacks teeth'.

Similar guidelines to those applied to external dispute resolution (EDR) schemes operating in the Australian financial system should apply to the TIO and be enforced by a strong regulator. An example of such guidelines is the ASIC guide 'RG 139 Approval and oversight of external complaints resolution schemes'.⁴ These guidelines set out the standard to be met by EDR schemes if they are to be approved to operate by ASIC, and which they are required to continue to meet while they are in operation. The guide applies the six benchmarks mentioned at 2.3 above.

Should the TIO's Terms of Reference contain more detail?

Overall feedback from ACCAN's members is that the TIO Terms of Reference do not need to contain more detail and that a public version of the document be simplified further to make it more accessible to all consumers.

As an alternative it was suggested that instead of locating detail about how the scheme works in separate documents, there could be one single document in Plain English that contains all relevant information about the scheme. This would be useful as feedback is that once a consumer is asked to look at multiple documents, they are likely to stop paying attention or switch off.

Multiple organisations noted that what is important is that information contained in TIO policy documents (i.e. about what complaints the TIO will or will not pursue) is accessible and easy to find on the TIO website. This information could be easier to locate and understand than it currently is.

⁴ Australian Government, Australian Securities and Investments Commission, RG 139 Approval and oversight of external complaints resolution schemes, 13 June 2017, <http://asic.gov.au/regulatory-resources/find-a-document/regulatory-guides/rg-139-approval-and-oversight-of-external-complaints-resolution-schemes/>

2.2. Volatility of the TIO's workload

How can the TIO improve its readiness for changes in complaint numbers?

There is concern that the TIO is not handling complaints when it has a backlog (see the case study submitted by the Financial Rights Legal Centre (FRLC) below).

In its response to the TIO funding model review in 2016, ACCAN stated that a key problem with the TIO's ability to deal with volatile complaints numbers is its funding model. The current funding model makes it difficult for the TIO to respond quickly to variations in complaint numbers, which can lead to issues like the one described above.

In that submission, ACCAN detailed some ways in which the TIO's fees structure could be amended, including by introducing a membership fee payable by industry members, including wholesale service providers and aggregators to contribute to operational costs. Such a membership fee could be scaled according to the size of the organisation. This would amortise the costs of the overall benefits of the scheme across the industry as a whole, and reduce the operational fees currently charged. It would also allow for a baseline certainty of income, meaning the TIO would be better equipped to deal with unpredictable complaint number increases, preventing delays for consumers.

The recent rise in complaint numbers over the past 12 months is also of concern to ACCAN. A rise in complaint numbers with no clear cause is indicative of problems within service providers and their complaint handling processes. While higher complaint numbers have been attributed to increase in premises switching to the National Broadband Network, there is no clear evidence that this is actually the case as complaints about NBN services remain relatively stable proportionate to the number of active NBN connections.

The TIO could improve its readiness for changes in complaint numbers by working more closely with industry members on improving their internal complaints handling processes. Supporting service providers to deal with issues as they arise will potentially lead to reductions in complaints to the TIO, and reduce frustrations for consumers seeking resolution of their issues. This would benefit both industry and consumers.

In addition, RSPs should be obligated to report on the complaint trends they experience to the TIO. Increased access to this data will enable the TIO to better predict rising complaint numbers.

Better engagement with consumer organisations will also enable the TIO to improve its readiness for changes in complaints numbers. See 3.5 'Stakeholder engagement' for more on this point.

Case Study: Complaints not handled due to complaints backlog at the TIO

"Last year I had a complaint in the TIO. My client had been a victim of Family Violence and fraud from an ex-partner. When I lodged the complaint, I got an acknowledgment from the TIO. The complaint remained unresolved so I notified the TIO of same. The complaint continued to remain unresolved despite negotiations with the telco [telecommunications service provider]. This went on for 9 months. I regularly sent emails to the TIO saying that the complaint was unresolved. The TIO never responded again until the telco finally resolved the complaint.

It became apparent during that case that the TIO was simply not there and not responding. I never

received an email to explain this or that the TIO was busy.

I have since been told by Dianne Carmody (Deputy Ombudsman) that during that period the TIO was extremely busy due to a spike in complaints and was simply not responding.

This is not acceptable and the TIO should have been sanctioned over the failure to meet appropriate EDR criteria. The TIO was not accessible in any sense during this period. At a minimum, the TIO needs to have processes to ensure people are aware of what is going on with their complaint.

My concern is that many complainants would have simply had to give up because the TIO was not responding.

In future, the TIO needs to accept that there are fluctuations and staff accordingly. This will mean ensuring fees increase overall to cover the required staffing to cope with fluctuations.”

2.3. Effectiveness of the TIO’s complaints resolution

ACCAN’s members noted that the TIO does not appear to be as involved in its members’ complaint processes as other EDR schemes. As indicated above, ACCAN considers there to be considerable value in a more active role for the TIO in this area.

The TIO must increase its line of sight over its members’ dispute resolution and complaint handling processes. Identifying and remedying issues with RSP complaint handling in the early stages will reduce the number of complaints reaching the TIO. This will in turn reduce costs associated with the TIO for RSPs.

What are your views on the TIO’s complaint resolution process?

The following is a summary of feedback on the TIOs complaint handling process provided to ACCAN by its members.

An issue with the TIO’s complaint handling process is the amount of time given to RSPs to respond to complaint referrals from the TIO. Currently RSPs have 10 working days to respond to these complaints. This is arguably too long for many consumers, who are already in many cases very frustrated, and who have likely made multiple calls to, and spent time dealing with, the RSP without achieving resolution. This long period of time may mean that some consumers decide to give up rather than pursue a solution. Subsequently, it is possible that statistics on how many complaints are actually fully and satisfactorily resolved are inaccurate.

Concerns have also been raised with ACCAN from consumers who have been in dispute with their providers, and who go to the TIO as a last resort, to be told they must take up the issue again with their provider as the next step. Once consumers have reached the point of contacting the TIO, they are understandably unwilling to take up the issue again with their provider directly. When it comes to dealing with consumers experiencing financial hardship, ACCAN heard that the TIO could improve its complaint handling by applying the same financial hardship guidelines that RSPs are expected to follow. The TIO has worked with industry and consumer organisations to develop these guidelines⁵

⁵ Responding to Consumers in Financial Hardship: Principles and Practices for Telecommunications Service Providers, 01 May 2017, <https://www.tio.com.au/publications/media/telecommunications-financial-hardship-guide-updated>

for RSPs, however it would benefit from raising and applying them throughout the complaint resolution process.

Other ways in which the complaint resolution process could be improved include:

- Registering all disputes so that consumers do not fall out of the process simply because the RSP fails to contact them.
- Adding escalated internal dispute resolution contacts to the contact details on the TIO website, as opposed to only listing general numbers. This will enable consumers to more easily resolve their complaint without going to the TIO.
- By issuing detailed guidance on the TIO’s approach to complaints resolution that is easy to find and understand, and having a clear, diarised process that progresses to a determination.
- The TIO could also look to the Financial Ombudsman Service’s fast-track program for simple complaints. The process involves “...fewer touch points and earlier, more active engagement between FOS staff and both parties to a dispute [and] enables a simpler, faster, and improved experience for both applicants and financial services providers.”⁶

In addition, the TIO’s complaint process should be more clearly articulated and easier to find on the TIO website. This will enable people to know from the outset (before lodgement) what is most likely to occur, and what kinds of complaints will be considered. Knowing the process and likely outcome can alleviate stress for vulnerable consumers. This is particularly important for individuals who do not have the assistance of a financial counsellor, lawyer, or other representative.

The Financial and Consumer Rights Council’s 2017 report ‘Rank the Telco’ provides analysis based on a survey of Victorian financial counsellors’ views of RSPs financial hardship policies and processes. In that report it is stated that:⁷

“Several financial counsellors were critical of TIO processes and complaint outcomes. These respondents argued that going to the TIO can result in significantly higher workload, when compared to other industry ombudsman; and that providers remain difficult to work with in the external dispute resolution process. At its conclusion, for some financial counsellors, outcomes for the client may only improve marginally, and staying connected is by no means guaranteed.”

Consumers with disability

ACCAN has been contacted by three consumers with disability in the past 12 months who have had difficulty in their engagement with the TIO. All have experienced a complex communication process due to their disability and the way they were treated by TIO staff. In each case, the actual complaint with the RSP has taken a back seat to the complaint the consumers have been making about the TIO process and the way it communicates.

⁶ Financial Ombudsman Service Australia, ‘New dispute resolution process’, <https://www.fos.org.au/resolving-disputes/our-new-process/>

⁷ Financial and Consumer Rights Council, Rank the Telco, <https://accan.org.au/files/Grants/Rank%20the%20Telco%20Report.pdf> p. 23.

There is room for improvement in the way the TIO communicates with consumers with disability. One suggestion is creating a disability-specific complaints area within the TIO, staffed by TIO officers that have specific training in disability awareness and appropriate ways to deal with complaints complicated by an individual's disability.

Is the TIO maintaining the right balance between consumers and telecommunications service providers and is its approach procedurally fair?

Financial counsellors reported to ACCAN that TIO staff have become increasingly angry and judgemental of complainants in recent times, and they have received more reports from clients that TIO staff are rude to them. They have not received similar feedback about other EDR schemes. It is important that the TIO trains its staff to deal appropriately and patiently with consumers, who are likely to be in vulnerable situations already.

There is also a perception that the TIO aligns itself with service providers rather than clients, and clients and their representatives feel as though the onus is placed on the consumer to prove that they are not in the wrong. Given the information asymmetry and power imbalance between consumer and RSP, this would suggest that the TIO's approach is could be better balanced.

Specific and concerning feedback provided to ACCAN by a financial counsellor was that none of their clients would have had a win with the TIO without their advocacy and assistance guiding the clients through the TIO process.

Issues with attribution

The TIO often reports lower complaints volumes as evidence that consumers' rights are being better protected by co-regulatory efforts or industry good practice. However, the TIO does not provide evidence, research, or data showing how these conclusions are arrived at. Other EDR schemes in financial services and utilities sectors do not make the same claims. This perhaps contributes to the perception that the TIO is aligned with industry rather than with the service and protection of consumers.

See as an example 'Issues in Mobile Complaints' in chapter 6 of the 2016 Annual Report, which attributes decreased complaints to industry without providing evidence:⁸

"Issues in mobile complaints

Complaints about mobile services dropped 28.8 per cent in 2015-16 to 41,269, the lowest level since 2006-07.

We have noticed a steady improvement in some of the most publicised issues over the past five years, including mobile coverage, excess data and roaming charges and drop outs. New complaints about mobile services now make up 36.6 per cent of our workload, compared to 63.4 per cent in 2011-12. The reasons behind this decrease include:

- More investment in mobile infrastructure

⁸ Telecommunications Industry Ombudsman, TIO 2016 Annual Report, http://annualreport2016.tio.com.au/#Analysing_complaint_data

- Better product offerings, such as increased included values and data allowances
- Stronger industry code rules on advertising and spending alerts
- The International Mobile Roaming standard.”

2.4. Systemic Issues

Do you have any views on the TIO’s work in this area or any ideas for improvement?

The TIO needs to increase the transparency of how it identifies and investigates systemic issues, and what its processes are for reporting systemic issues to industry and regulators. As noted in the Issues Paper, the 2016 Annual Report identified 47 systemic issues, however there is no transparency over how the quarter of those that were investigated were chosen. To increase transparency the TIO should be required to report regularly on what it is doing to address systemic issues.

ACCAN’s members have reported that the TIO has been ineffective in dealing with systemic issues. The general impression is that the same issues keep arising with the same RSPs and it is unclear what the TIO is doing to ensure that RSPs are following its advice and addressing systemic issues. However, it must be acknowledged that little improvement in systemic issues is not solely attributable to the TIO as the regulator and industry also have large roles to play, particularly when the TIO is unable to find a solution.

The TIO needs to commit to identifying, monitoring, and resolving systemic issues and to do this should be given increased powers to compel service providers to address systemic issues. The TIO also needs to work more closely with and apply more pressure to the regulator when it is unable to change industry behaviour.

2.4.1. Example: credit assessment

The approach to customer credit assessment in the telecommunications industry is outdated and does not provide vulnerable consumers with the same protections as are afforded in the financial services industry. This is because RSPs are not classed as credit providers and therefore are not subject to the same responsible lending criteria.

In a survey conducted by the Financial and Consumer Rights Council, financial counsellors identified post-paid contracts for mobile phones as the biggest contributor to clients’ telecommunications debts. Due to the higher risk of consumer detriment, the *Telecommunications Consumer Protections Code* requires that a credit assessment is undertaken before a post-paid contract is sold.⁹

However, evidence provided by financial counsellors who responded to the survey suggested that RSPs only conduct cursory assessments that are not adequate to protect consumers from purchasing unaffordable services. RSPs look at credit default listings but not at income or capacity to afford a service.¹⁰

Coupled with undertrained sales staff and the practices of up-selling and commission-based selling, inadequate credit assessment leads to vulnerable consumers being sold plans they cannot afford. A

⁹ Communications Alliance Ltd, *C628:2015 Telecommunications Consumer Protections Code Incorporating Version No.1/2016*, p. 45.

¹⁰ Financial and Consumer Rights Council, above n. 7, p. 13.

relatively small amount of debt can therefore lead to a negative credit rating and have a serious impact on the customer into the future.

These practices not only harm consumers, but RSPs as well. Inadequate credit assessment is a systemic issue in the telecommunications industry. Although the TIO has developed a guideline for how it approaches complaints about inadequate credit assessments,¹¹ it should do more to influence and change industry practice.

2.5. Stakeholder engagement

ACCAN engages with the TIO on a number of levels, and benefits greatly from the interaction. We highly value the TIO complaints data and analysis of complaints in general, and our engagement on systemic issues. Recent examples are TIO's engagement with ACCAN's consultations on future consumer safeguards; and the difficulties consumers are experiencing navigating the problematic relationship between nbn and retail service providers. We also value the TIO's input to public inquiries, with notable recent examples being the Treasury's Review of the Australian Consumer Law, and the Joint Parliamentary Committee on the National Broadband Network.

However, we have received consistent feedback from Consumer Action Law Centre, Financial Counsellors Australia (FCA), Legal Aid Queensland, and the Financial Rights Legal Centre, that the TIO could improve its frontline engagement with consumer bodies.

All parties would benefit from increased regularity and quality of engagement – the TIO by ascertaining likely upcoming issues, and consumer bodies in understanding how best to work with the TIO on behalf of their clients.

The TIO also has a continued role to play with industry to support adoption by all RSPs of similar financial hardship and family violence policies. This would build on the good work the TIO has already done to develop and revise the Financial Hardship Guidelines in conjunction with the industry and consumer representatives. One of the biggest problems still faced by consumer representatives is that RSPs' approaches and responses to financial hardship and family violence situations are not uniform and this makes it harder to help vulnerable clients and predict outcomes.

¹¹ TIO (2016), *Position Statement: Assessing Credit for a Service*.

3. Supplementary comments

3.1. Consumer outreach and engagement

While complaints handling must always remain the first priority of the TIO, ACCAN is concerned at reports that the TIO has cut back on its outreach functions. Indeed, no data or information on awareness and outreach has been reported since the 2014 Annual Report.¹² It is important to engage with consumers, particularly those from more vulnerable groups, who are otherwise unlikely to find out about the TIO without targeted promotion.

The TIO should work collaboratively with other industry ombudsmen to engage with vulnerable communities, such as Indigenous, newly arrived, deaf, and culturally and linguistically diverse communities. The TIO should also increase its engagement with regional, rural, and remote communities, to promote a better understanding of consumer rights to redress.

Financial services ombudsman schemes such as FOS and the CIO are known to work collaboratively with Legal Aid and similar community organisations on community outreach. Other schemes, such as the Energy and Water Ombudsman of NSW, employ Aboriginal engagement officers to do outreach in Indigenous communities and assist consumers to lodge complaints on-site.¹³ This goes beyond simply promoting a service and demonstrates an active commitment to vulnerable consumers. This type of engagement increases community buy-in and improves the accessibility and take-up of EDR schemes.

Data collection and analysis for better outreach

The TIO could improve the targeting of outreach and promotional activities by collecting demographic data about the people who contact it (e.g. age, gender, Aboriginal and Torres Strait Islander status, cultural background), thereby getting a clearer picture of who is, and who is not, accessing its services.

In addition the TIO could make better use of the data that it does collect, such as postcode. Currently statistical reports only list complaints by state or territory; however an analysis of postcode data by remoteness indices would provide richer data and enable more meaningful targeting in areas where fewer complaints are originating.

Availability of information about the TIO complaints process

ACCAN has previously advocated for information about the TIO such as its role, contact details, and website, to be printed on all bills issued by RSPs. Currently this information is provided in the critical information summary (CIS) the customer is given when signing up for a service. Following consultation with its members, ACCAN would now go further and recommend that this information must be provided not only on bills, but all important points of contact the consumer has with RSP, such as when they sign up for a service, make a complaint, or receive a warning or reminder notice.

¹² Telecommunications Industry Ombudsman, 2013-2014 Annual Report, http://www.tio.com.au/__data/assets/pdf_file/0005/162662/TIO-2014-Annual-Report-WEB.pdf

¹³ Energy & Water Ombudsman NSW, <https://www.ewon.com.au/page/publications-and-submissions/annual-reports/2015-16/aboriginal-engagement-and-access>

The TIO should also provide and publicise better information about the complaints process, with clear step-by-step instructions on how to make an effective complaint. Information currently available on the TIO website is inadequate and can be confusing for consumers. For example, consumers will often withhold payments from their RSP if in a dispute as they feel this is the only thing within their power to do. Consequently the consumer ends up with a larger amount owing, and potentially negatively affecting their credit rating.

3.2. TIO customer service

In its consultation ACCAN received the following comments and observations about customer service:

- Recently TIO complaints staff have become less patient and more judgemental and clients report that staff are rude to them. They feel as though the onus is on them to prove they are not in the wrong.
- A solicitor who helps clients through the TIO process reported that they would rate the TIO 2/10 while they would rate the Financial Ombudsman Service 8/10.
- Some consumer representatives were of the view that a major issue is staff training at RSPs rather than at the TIO. The TIO should therefore invest more resources into training RSP staff to deal more appropriately with difficult or frustrated consumers.
- In addition the TIO should invest more in its own staff training so that staff are better equipped to deal with vulnerable consumers.

3.3. Reporting

A stated function of the TIO is “providing information and analysis to community, government, and members.” The current periodic statistical reports provide only limited information and analysis about complaints. More transparency in statistical reports would be useful not only to assist in identifying systemic issues, but would also provide guidance for RSPs to improve.

An additional benefit of more detailed reporting would be to provide consumers with the appropriate ‘language’ with which to articulate their complaints. This is particularly important for vulnerable consumers who may struggle to identify or describe technical issues when dealing with RSPs, or where they are attempting to engage in alternative dispute resolution.

It would be useful if the TIO published more granular data more regularly than every six months. Reports should also contain more information about systemic issues – currently the number of issues identified is given but no extra detail is provided on their substance.

ACCAN finds the statistics and other reports released by the TIO highly valuable for its work, however has the following suggestions:

- Provide detail on how each complaint resorted on was resolved – i.e. was there a remedy?
- Provide the number of enquiries received each month
- Provide a breakdown of complaints by postcode

- Increase the scope of 'complaints in context' to cover a larger range of RSPs.