

 UNITI	MAIN HEADING:	Customer Service Agreement – Customer Service -
	SUBJECT:	Customer Service – Complaint Handling
	POL	Complaint Handling Process
DATED: 14/8/2019	REVIEW DATE: 1/7/2020	VERSION 3

COMPLAINT HANDLING PROCESS

Introduction

Uniti Group Limited (**Uniti**) aim to provide strong, reliable and consistent broadband internet services to every member of the Australian population we can reach. Uniti aim to empower and enrich people’s lives with access to the on-line community and the digital economy.

Uniti realise that when we operate our broadband Internet network and provide broadband internet services to customers, sometimes the needs and expectations of customers may not be met, or may seem like they are not being met, and in those cases, people may need to make a complaint.

Feedback from our customers is always welcome, it is great if that feedback is positive, but it is also helpful to us if that feedback constitutes a complaint and we can learn from mistakes and if we can resolve the reason for the negative feedback.

Uniti intend that this complaint handling process be easy for customers to understand and to use. However Uniti’s Complaint Handling Process is detailed because it must comply with the Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (Cth) and the Telecommunications (Consumer Complaints) Record-Keeping Rules 2018 (Cth), and the requirements of the Telecommunications Consumer Protections Code C628:2015 (TCP Code).

Responsibility for compliance with the Complaint Handling Process lies with Uniti’s Chief Executive Officer.

What is a complaint?

For the purposes of this Complaint Handling Process, **Complaint** means – **an expression of dissatisfaction** made by customer, in relation to telecommunications products or the complaints handling process, where a response or resolution is expected by the customer.

A complaint does not include an initial call to request information or support or to report a fault or service difficulty, except if the customer advises that they want the request treated as a complaint.

A complaint does not include an issue that is the subject of legal action.

You may wish to make a complaint where you are not satisfied with the services or products that Uniti provide, or if you are not satisfied with the way Uniti has handled an inquiry or complaint that you have made.

If You are dissatisfied with telecommunications services provided by Uniti, or with Uniti’s complaints handling process, then You have a right to make a complaint.

No Fee for making a complaint

Uniti's Complaint Handling Process is free of charge for any consumers of Uniti's services to use. Uniti will not charge you any fee for dealing with a complaint.

How you can contact us to make a complaint

You can contact Uniti to make a complaint by either: email, on-line, by telephone, by posting us a letter or by attending the Uniti office in person.

If you wish to present a complaint, Uniti's contact details are:

Contact point:

Customer Service
Complaints Officer

By mail:

Customer Service
Complaints Officer
Uniti Group Limited
Level 1 / 44 Currie Street,
Adelaide SA 5000

By telephone:

Phone: 1300 847 201

By email:

Email: complaints@unitiwireless.com

Online:

Online: www.unitiwireless.com/contact/complaints

When you can make a complaint

Uniti's Customer Service Team are available from 7.30am – 8pm Monday to Friday, and from 10am to 4pm Saturday/Sunday/Public Holidays, Australian Central Standard (Adelaide) time.

You can speak with our Customer Service Team and you can make a complaint either in person during normal office hours (9am-5pm Monday – Friday, or by phone from 7.30am – 8pm Monday to Friday, and from 10am to 4pm Saturday/Sunday/Public Holidays, or by email or online at any time.

Assistance with preparing, lodging and progressing your complaint

You may request that Uniti provide you with assistance to help you write up, present and progress your complaint. Uniti can provide you with assistance, or we can refer you to other sources of support who can provide you with assistance. This may be beneficial or necessary for customers with special needs, a disability, those who are suffering financial hardship, or are from a non-English speaking background.

If you need assistance with your complaint you may discuss it with us together with your advocate, an interpreter, or through an authorised representative.

You may consider enlisting the assistance of the National Relay Service: TTY/National Relay Service 133 677 - Speak & Listen 1300 555 727 - SMS Relay 0423 677 767 (24 hour relay service).

Authorised Representative

You can appoint a representative to make and handle a complaint on your behalf. Uniti's Customer Service Team can provide you with a form for you to complete to nominate an Authorised Representative. Or you can access the form directly - <https://unitiwireless.com/pdf/Authorised-Representative.pdf>

Uniti's Customer Service Team can assist you to complete an Authorised Representative form.

Complaints alone, will not be used as a reason to discontinue service

Uniti will not cancel your service, for the sole reason that you have a complaint, you have been unable to resolve the complaint by speaking directly with us, or that you have then pursued options for external dispute resolution.

Resolution of Complaints

Procedure

Uniti has implemented this **Complaints Handling Process** to identify, manage and resolve all complaints, and particularly urgent complaints

Uniti will endeavour to deal with your complaint fairly, courteously and deal with your complaint in a timely manner, we will consider all of the circumstances of the complaint and we will consider any special needs you may have.

Our goal is to always fix any problems raised during your first contact with us. Sometimes this is not possible, and we may need some time to develop a plan to resolve the matter.

First point of contact

Uniti's first point of contact – the **Customer Service Team** - are experienced and are aware of what remedies are available to assist with the resolution of an issue before it becomes necessary to progress to a complaint. The Uniti Customer Service Team will use our best efforts to resolve an issue on first contact.

Even if our Customer Service Team are able to resolve the complaint in that first contact, we will create a file with a unique reference number.

If you wish to raise this matter in future, if you can refer us to this number we will be able to access the file and the detailed records we will retain on the matter.

Second point of contact

Where it is not possible for Uniti's Customer Service Team to assist with resolution of an issue, then Uniti's second point of contact – Uniti's **Complaints Officer** - is also experienced and aware of what remedies are available to assist with the resolution of an issue, and also with resolution of a complaint, and can take the matter forward, hopefully toward resolution. Uniti's Complaints Officer will use their best efforts to resolve a complaint and to otherwise assist with the progress of the matter toward resolution.

Receipt of complaint

Any complaint will be referred to Uniti's Complaints Officer. Uniti's Complaints Officer is a senior manager, their role is to maintain the effective and efficient operation of the Complaint Handling

Process and to ensure efficiency and effectiveness of, and compliance with, Uniti's Complaint Handling Process.

Acknowledgement of complaint

We will acknowledge that we have received your complaint:

- if the complaint is received by our Customer Service Team by telephone, then immediately;
- if the complaint is received by email, on-line, by post, or where you have contacted us by telephone and left a recorded message, within 2 working days.

As part of this acknowledgment, we will also give you a unique reference number or similar to enable you to track and easily follow up on your complaint.

Process for classifying complaints

Uniti's Complaints Officer compiles complaints into the following categories:

- Damage to customer's property;
- Service - disruption, outage or fault;
- Hardware supplied by Uniti;
- Location of equipment - antenna/cabling;
- Customer service;
- Sales service;
- Fees for service, early cancellation fee or equipment.

Investigation

Our goal is to always fix any problems raised during your first contact with us. Where it is not possible to resolve a complaint to a customer's satisfaction at first contact or without investigation, Uniti will conduct investigations into a complaint commensurate with the seriousness of the complaint. Complaints which require further investigation may take longer to resolve. In this case we will explain why and give you a new expected time frame

Confirmation of completion of investigation

Uniti will provide confirmation to a consumer that a complaint has been investigated, and the outcome of the investigation, as soon as practicable after Uniti has completed the investigation.

Appropriate remedies

Where Uniti is able to address a complaint by offering a remedy, Uniti will tailor any remedy offered to a customer so that the remedy will address the main cause of the complaint and the individual circumstances of the matter.

Proposal and resolution of complaints – billing

Uniti will resolve complaints about alleged billing errors by the end of the billing period immediately following a complaint.

Proposal and resolution of complaints – not urgent

Where Uniti propose a resolution to a complaint, Uniti will provide confirmation of the proposed resolution of the complaint within **15 business days** of receiving the complaint.

Where Uniti has proposed a resolution to complaint, then Uniti will implement the proposed resolution within **10 business days**, except where:

- The customer agrees otherwise;
- The customer has agreed to undertake actions to implement the proposed resolution by a specified time, but has not completed the actions as agreed; or
- The complaint is urgent.

Proposal and resolution of complaints – urgent

Where Uniti propose a resolution to an urgent complaint, Uniti will provide confirmation of the proposed resolution of the urgent complaint, and will implement the proposed resolution, within 2 business days of receiving the urgent complaint.

A complaint will be treated as **urgent** under the following circumstances:

- If you have applied for, or have been accepted as being, in financial hardship under Uniti's Financial Hardship Policy, and the issue about which you are complaining directly contributes to the financial hardship you are experiencing, or
- If your service has been disconnected or is about to be disconnected and due process has not been followed.

If there is a delay in the resolution of an urgent complaint, within **2 business days** we will provide a written explanation as to why this is and provide you with a new time frame. If it is a longer delay, we will also inform you of your options for external dispute resolution such as the TIO.

Confirmation of completion of resolution of complaint

Uniti will provide confirmation to you that the proposed resolution to a complaint has been implemented as soon as practicable after Uniti has completed the action proposed as a remedy, and the complaint has been officially closed.

If we are successful in making contact, you will be asked to confirm whether you are satisfied with the proposed resolution.

Closure of complaint

Uniti will close a complaint, or an urgent complaint, only with the consent of the customer, or where:

Complaint prioritisation, escalation and external dispute resolution

- The customer has communicated dissatisfaction with the progress or resolution of a complaint – the customer has inquired about options to take the matter further Uniti has advised the Customer about Uniti's internal escalation procedure – and – Uniti has advised the customer about options for external dispute resolution process including the TIO;

Frivolous or vexatious complaints

- Uniti has considered the complaint carefully, and appropriately escalated the complaint and Uniti then concludes that - Uniti can do nothing more to resolve the complaint or assist the customer, and the customer's behaviour is frivolous or vexatious, Uniti may then decide to not deal or not deal any further, with the complaint.
- Uniti will, within 5 business days of deciding not to deal or deal further with a complaint on the basis that Uniti can do nothing more to resolve the complaint or assist the customer and the customer's behaviour is frivolous or vexatious, advise the customer of the reasons for its decision and options for external dispute resolution including the TIO;

Attempt to make contact

- Uniti has, in the course of endeavouring to respond to and address a complaint, been unable to contact the customer to discuss the complaint or to advise them of the proposed resolution of the complaint – and Uniti has written to the customer advising that we were unable to contact them, provide details of attempts made to contact the customer and provide an invitation to contact Uniti to discuss the complaint within at least 10 business days from the date of the invitation.

Process to refer a complaint to the TIO for external dispute resolution

If Uniti have been given a reasonable opportunity to resolve your complaint, and we are unable to resolve the complaint, and if you wish to progress the complaint beyond the resolution that we propose, then you have the right to contact an external organisation for support advice and options for external dispute resolution.

These external organisations include the Telecommunications Industry Ombudsman but you may also seek and obtain assistance from other organisations.

You may obtain support and advice and you may seek external dispute resolution from the following external organisations:

- General matters about your telecommunications service - Telecommunications Industry Ombudsman (TIO) - Phone: 1 800 062 058 - Online: <https://www.tio.com.au/making-a-complaint>
- Privacy - Office of the Australian Information Commissioner (OAIC) – Phone: 1300 363 992 – Online <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>
- Scams (money or data) - Australian Competition and Consumer Commission (ScamWatch) – Online <https://www.scamwatch.gov.au/report-a-scam>
- Finance and insurance services – Australian Financial Complaints Authority - (formerly the Financial Ombudsman Service (FOC)) – Phone 1800 931 678 - Online - <https://www.afca.org.au/make-a-complaint/>
- Broadcast matters, content & spam – Australian Communications and Media Authority (ACMA) – Phone 1300 850 115 - Online - <https://www.acma.gov.au/Citizen/Phones/Mobile/TCP-code> - <https://www.acma.gov.au/Citizen/Complaints/TV-and-Radio-complaints>

The services of the TIO are free of charge for you. Uniti may be required to pay a fee if the matter progresses to the TIO.

Broader / systematic issues

Uniti has in place processes, procedures and systems to monitor and analyse our record of complaints to identify broader or systematic issues or problems.

Where a complaint indicates a broader or systemic problem or issue, Uniti will seek to resolve the main cause of that problem or issue.

Uniti will also endeavour to prevent the broader or systematic issue, problem or related complaint from recurring.

Retention of records

Uniti will retain records for two years from the date of creating the record.

The Telecommunications Industry Ombudsman (**TIO**) or the Australian Communication and Media Authority (**ACMA**) may from time to time seek access to those records, and in that event and if requested by the TIO or ACMA, pursuant to the various empowering legislation of those agencies, to do so, Uniti will make those records available to either the TIO or ACMA.

Privacy

Uniti will comply with all applicable and relevant requirements of the Privacy Act 1988 (Cth).

Uniti may, if the record is required by the TIO or the ACMA to manage a complaint, and if Uniti is requested to do so by the or the ACMA, disclose the record to the TIO or the ACMA.

If a customer provides express direction or consent in writing to Uniti to the effect that the customer wishes Uniti to disclose a record to a third party, Uniti will comply with that direction or consent.

Uniti will disclose a record to a third party where Uniti is obliged to do so as required or authorised by law.

Monitoring and analysis of complaints and Complaints Handling Process

Uniti will:

- at least every three months, classify and analyse complaints to identify, address and take steps to prevent, frequent problems and broader or systematic issues from recurring;
- at least every twelve months, review this Complaints Handling Process to:
 - ensure that Uniti's Complaints Handling Process is suitable, adequate, effective and efficient;
 - identify and record:
 - new issues;
 - deficiencies,
 - areas for improvement; and
 - areas that require change;
 - assess compliance with industry standards;
- monitor and evaluate changes that have been implemented to address – issues, deficiencies, areas for improvement and areas that require change;
- record all monitoring and evaluation of changes implemented to address – issues, deficiencies, areas for improvement and areas that require change;
- ensure that any significant complaint, problem or issue identified are managed efficiently and effectively;
- notify senior management of any significant complaint, problem or issue where appropriate;
- ensure that the personnel responsible for managing and analysing complaints and the Complaints Handling Process are aware of this Complaints Handling Process.

Complaints - Record Keeping

Uniti will keep systematic records of complaints which will include:

- the name and contact details of the customer making the complaint (or authorised representative if applicable);
- the unique file number created for each individual complaint;
- a description of the nature and issues raised by the complaint;
- the results of any investigation;

- a due date for a response;
- a description of the resolution proposed, including any associated commitments and the date of any communications to the customer;
- a description of Uniti's reasons for any proposed resolution;
- the response from a customer, and any reasons given, to any resolution proposed by Uniti;
- a record of any request made by a customer that a proposal for a resolution be provided in writing, and a record of that written statement, and a record of when that written statement was provided;
- a record of when any required actions were implemented; and
- copies of all correspondence to and from the customer.

Assistance to other telecommunications service providers

Uniti may, on occasions, be asked, by other telecommunications providers, for assistance in managing and resolving complaints. In those circumstances Uniti will provide reasonable assistance.

When asked by another telecommunications provider for assistance Uniti will:

- act through the nominated Complaints Officer;
- provide other retail carriage providers with a contact point for the Complaints Officer, including an email address;
- monitor the contact points each day;
- acknowledge any receipt of any request for reasonable assistance;
- advise timeframes for responding to each request;
- confirm any proposed resolution as soon as practicable after completing its investigation of the issues set out in any request; and
- otherwise provide assistance as soon as practicable to enable retail carriage providers to meet applicable timeframes.

Assistance to other telecommunications service providers and the TIO

Uniti may, on occasions, be asked, by the TIO, for assistance in managing and resolving complaints. In those circumstances Uniti will provide reasonable assistance.

Records

Pursuant to the Telecommunications (Consumer Complaints Handling) Industry Standard 2018 (Cth), the Telecommunications (Consumer Complaints) Record-Keeping Rules 2018 (Cth), and the Telecommunications Consumer Protections Code C628:2015 (TCP Code) Uniti will be required to retain records sufficient to demonstrate compliance with those regulatory frameworks.

Uniti will retain records to demonstrate compliance with those regulatory frameworks. Uniti will retain those records for at least two years from the date of creating the record. Uniti will make those records available to the ACMA upon receiving a written request to do so from ACMA.

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 Approved
 Mick Simmons
 CEO
 Uniti Group Limited