

# Chief Customer Advocate Report on Customer Vulnerability

### **Acknowledgement**

I acknowledge the Traditional Custodians of the land on which I live and work - the Gadigal and Bidjigal people of the Eora Nation. I recognise the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands and waterways across the Australian continent. I am grateful for the knowledge shared with me and generosity extended to me by First Nations friends, family and colleagues. At Telstra, we are enriched by Aboriginal and Torres Strait Islander peoples' contribution to our organisation, and we commit to working with you to build a prosperous and inclusive Australia.

#### About the artwork 'Connection'



Created by Bobbi Lockyer, a passionate Aboriginal artist hailing from Kariyarra Country in Port Hedland. This artwork represents Telstra's commitment to its customers, community, and the power of connection. The artwork combines the hand painting storytelling and symbols of the

oldest continuous culture in the world with the modern digital graphic design of the satellite sky.

#### Terms used

Throughout this report, the terms Aboriginal, Torres Strait Islander and First Nations are used interchangeably to reference Australia's First Peoples. The term Indigenous is used where it relates to a program name or is a preferred term.



# About this report from the Chief Customer Advocate



The Chief Customer Advocate Report on Customer Vulnerability 2025 builds on my last two reports summarising initiatives Telstra has in place to support customers in vulnerable circumstances. This report offers an overview of the progress made in financial year 2025.

As with my previous reports, the discussion seeks to hold the company to account and encourage further action in key areas where Telstra could demonstrate continued leadership. The goal is to transparently foster public discussion on consumer vulnerability.

The perspectives in this report are my own as Chief Customer Advocate (CCA) and while I am supported by Telstra to be independent in my role, Telstra may take different positions on some matters.

This year, my report incorporates a special focus on digital inclusion because reliable phone and internet services are now crucial for access to education, healthcare, government services, working from home and maintaining social connections. As Australia's largest and oldest telecommunications company, it is in Telstra's DNA to build and deliver the latest technology. It is also a strong part of its story to strive to give everyone access to the opportunities technology can provide.

Many of the initiatives outlined in this report are detailed further in the Telstra 2025 Sustainability Report.

Please note that the Sustainability Report is published alongside a Data Pack. The data in this report has been reviewed by Telstra subject matter experts but has not been externally audited.

I hope this third report continues to show Telstra's responsiveness to customer needs, especially when extra care is required.

**Teresa Corbin** 

**Chief Customer Advocate** 

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### The Chief Customer Advocate role serves three main purposes:

- 1 Provides an independent 'voice of the customer'
- 2 Champions the needs of customers that are in vulnerable circumstances
- 3 Holds Telstra to account in treating customers in a fair, reasonable and responsible way.

### 1.1 Fairness still the key

The CCA is guided by the principles first and foremost of fairness, inclusion and independence. Using this framework, the CCA advises Telstra on how to be more customer-centric. The CCA priorities are aimed at elevating the voice of customers, particularly those who maybe otherwise unheard and who may be lost in the averages.

As CCA, I help identify issues for customers in vulnerable circumstances early and bring them to the attention of senior leadership, as well as providing reports regularly to the Board and CEO. I work closely with the Chief Risk Officer and Chief Compliance Officer to support a strong and accountable compliance culture. By bringing the voice of the customer to decision-making forums at Telstra, I can assist with systemic issues. While I do not resolve individual complaints, I may be involved at times by exception.

The independence of the CCA is maintained by not participating in Telstra's employee incentive structure.

# 1.2 Telstra's understanding of vulnerability in 2025

In my previous reports I detailed Telstra's understanding of vulnerability. In this report I highlight that Telstra's approach to vulnerability is linked to its commitment to digital inclusion. It is integral to Telstra's purpose to build a connected future so everyone can thrive and is reflected in the T25 strategic goal to 'Help keep one million customers in vulnerable circumstances connected each year from FY22-FY25'. In section 2.1 of this report, I outline how Telstra's support for customers in vulnerable circumstances has grown year on year, exceeding this target in FY25. As a result, Telstra has delivered better outcomes for customers in vulnerable circumstances at risk of digital exclusion through its initiatives to keep them connected.

Ongoing discussions with policymakers, regulators, consumer advocates, community organisations and academics have helped shape Telstra's responses to vulnerability. Telstra has a long history of listening to customer voices. Through its advisory councils and forums Telstra hears about the impacts of its approach from diverse stakeholders, including people with disabilities, regional consumers, First Nations people, financial counsellors and representatives of low-income customers. Customer experiences and stories shared by these stakeholders contribute to the development of better products and improved services.

Telstra is strengthened by its partnerships, such as with the ARC Centre of Excellence for Automated Decision-Making and Society, RMIT University and Swinburne University of Technology to track and report on digital inclusion in Australia through the Australian Digital Inclusion Index (ADII)<sup>1</sup> and in remote First Nations communities through the Mapping the Digital Gap<sup>2</sup> project.

#### The ADII (2023) tells us:



#### **Digital inclusion**

in Australia is improving at the national level, but areas outside capital cities are less digitally included. **9.4% of the population is highly excluded.** There is a notable digital divide between First Nations and non-First Nations people



#### Access

has increased nationally **but remains below average** for First Nations people in remote communities, people over 75 and those on low-incomes



#### **Affordability**

has improved yet people with disabilities, those in public housing, over 75 and people who are unemployed face greater affordability stress



#### **Digital ability**

nationally continues to improve, with high scoring groups experiencing steady gains.

However, lower scoring groups have declined including those on low-incomes and those over 75

The next ADII is due to be published in FY26.

External research enriches Telstra's understanding of vulnerability. For example, the latest Household, *Income and Labour Dynamics in Australia (HILDA) survey*<sup>3</sup> noted that economic inequality has reached a high not seen in more than 20 years. Although average household expenditure on telephone and internet charges as a percentage has declined, telecommunications prices are just one of many other goods and services prices going up.

### The HILDA Survey (2024) shows the changing face of social equity in Australia:





Average percentage of household expenditure on telephone and internet charges has continued to decline





Access to the internet at home being regarded as essential has significantly increased over the same period





Inability to pay telephone, electricity or gas bills at all or on time was the most common financial stress indicator for participants

The Australian Communications Consumer Action Network's (ACCAN's) 2025 Consumer Sentiment research highlights:





Nearly nine in ten consumers say their home internet connection is vital (89%)





Most consumers agree that affordable, reliable mobile is an essential service, to which every Australian should have access (78%)

I believe that access to connectivity provides the platform to deliver many outcomes that can help address inequality in Australia. There is now widespread discourse in policy arenas that telecommunications providers could do more to support customers in vulnerable circumstances to stay connected and many stakeholders increasingly refer to telecommunications as an 'essential service'. This sentiment underlies recent additions to the telco regulatory landscape including the new Financial Hardship Industry Standard, requirements to protect the safety of those experiencing Domestic and Family Violence (DFV) and rules about communications with customers during and after outages. Telstra has a strong history of supporting customers in vulnerable circumstances, but there is more that could be done to further its leadership.



# 2.1 Trends behind the metrics

In my last report, I shared that Telstra was reaching the end of its digitisation strategy to simplify and enhance experiences for its consumer segment customers. It has been migrating its final groups of customers which includes those who may be in vulnerable circumstances to the new digital platform and Telstra Upfront plans. Measuring the performance of its products, services and programs enables Telstra to evaluate trends over time and identify if customer experience has improved due to the transition. By design, Telstra Upfront plans are simpler. Feedback and tracking shows that customers on the new digital platform have a better experience, leading to higher satisfaction and fewer complaints. Telstra has worked to ensure that alternative support options are available where possible in the new digital platform before moving customers over.

circumstances has grown year on year from FY22-FY25

2.0
1.8
1.6
1.4
1.2
1.0

Telstra's support for customers in vulnerable

Unique customers supported each financial year

FY23

0.8

0.6 0.4 0.2 0.0 Telstra's supported over 1 million customers in vulnerable circumstances every year since FY23. In FY25 Telstra supported more than 1.9 million customers in vulnerable circumstances, exceeding the previous three years. The increase was largely driven by greater disaster relief support and growth in customers taking up the support options in the new digital platform This shows building concession discounts and flexible payment arrangements in the new digital platform was important to enable migration for customers in vulnerable circumstances. I commend Telstra for acting on feedback from consumer groups and myself by offering this solution before it was required by regulation.

It is important that Telstra continues to deliver equivalent affordable and accessible products, services and programs for customers on the new digital platform. Telstra's work here is not yet done. In FY25, programs in the legacy digital platform accounted for over 500,000 unique customers of the total 1.9 million. Not all of these programs have equivalents in the new digital platform, in some cases programs have been stopped and customers have been moved to alternative plans. However, as the year progressed the number of customers on programs in the legacy digital platform has significantly reduced and the number of customers on programs in the new digital platform have grown. In some cases, programs have changed due to requirements in the Telecommunications (Financial Hardship) Industry Standard 2024 with some older programs replaced by new measures.

FY24

FY25

I have played an ongoing role in reviewing and considering the impact of these changes on consumers, particularly on customers in vulnerable circumstances. In section 3.1.2 of this report, I outline the treatments that Telstra has developed for customers moved to alternative plans.

As Telstra has reached the end of its T25 strategy, it is important that it does not lose focus on all the good work done so far. Telstra's new strategy 'Connected Future 30'. Telstra Exchange – Connected Future 30 has a new digital inclusion target that is shared in the 2025 Sustainability Report. I encourage Telstra to continue improving and evolving its product offering for customers in vulnerable circumstances.

# 2.2 Other important indicators

The following Telstra data is collected by the CCA to monitor other important indicators of vulnerability. This data is approximate, based on assumptions, and should be viewed as indicative of trends rather than definitive. The data in this report has been reviewed by Telstra subject matter experts but has not been externally audited.



#### **ECONOMIC**

### **Payphones**

14,193 Payphones

located throughout Australia



25,458,110

Calls were made from payphones in Australia

2.302

TB of Data was transferred from public phone Wi-Fi



21,779 Telstra Top Ups were provided \$3,745,580 in value was provided

713,210 Unique customers were supported by Telstra's **low-income Package** 



### **Indicators** of vulnerability in FY25

#### DISABILITY

6,322 Unique customers

supported with disability equipment or services

2,550 Calls

were made to the disability enquiry hotline



#### DIGITAL EXCLUSION

### **Payphones**

Payphones >

were located in remote communities 87 of those payphones had Wi-Fi



were located in remote **First Nations communities** 56 of those payphones had Wi-Fi



756,323 **Customers** were over 80 years old

2.9m

consumer segment customers didn't use the My Telstra App

#### 3.5m

Paper bills were produced for consumer segment accounts with fee exemptions, which was approximately 245,416 customers

Payments were made by cash or post office from consumer segment accounts with fee exemptions, which was approximately 110,500 customers

#### SAFETY & SECURITY

**Through its Cleaner Pipes initiative** Telstra blocked on average:

- >18m scam calls per month
- 8m+ scam sms every month
- Tens of millions incoming scams and potentially unwanted BigPond emails per month

Crisis lines called from payphones

**Payphones** 

were made to crisis lines from payphones







🔵 Triple 0 💮 Men's Line Australia 🛑 Lifeline 🥟 13YARN 🥟 National Debt Helpline 💮 Kids Help Line 🬑 1800RESPECT



This year, Telstra delivered significant changes by closing its 3G Network to expand 4G and 5G capacity and finalising its digitisation strategy for the majority of its consumer segment customers. Evolving Telstra's technology offering is essential for improving connectivity for all and enhancing customer experience.

These changes were underpinned by Telstra's approach to digital inclusion. While there are still opportunities for improvement, I have observed that Telstra has made considerable efforts to help ensure no customer is left behind. At the same time, Telstra has navigated enormous regulatory change and has been acknowledged for bridging gaps for customers in vulnerable circumstances. Many stakeholders, including the government, regulators and consumer organisations look to Telstra as the largest telco in Australia to be an example of best practice for other telcos and corporations. I observe that the staff at Telstra also aspire to this goal wherever possible.

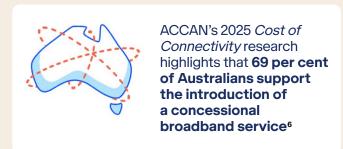
#### 3.1 Digital inclusion

Telstra is at the forefront of digital inclusion in Australia. Telstra's partnership on the ADII, as outlined in section 1.2 of this report, helps identify where investment is needed to support those who are at risk of digital exclusion. In addition, because ADII is publicly available, it also allows government and industry to use the information in a way that can make collective impact on improving digital inclusion for the community.

Working toward a fully digitally included nation, addressing affordability, access and digital ability, must be a multi-sector effort. Digital inclusion is a challenge that confronts governments, industry (including banks), telecommunications providers, suppliers of online services, individuals, families and communities.

The Australian Government's allocation of nearly \$100 million to remote digital inclusion projects<sup>4</sup> and its extension of the School Student Broadband Initiative (SSBI) until 2028 are positive steps toward improving digital inclusion.

Yet with so many still missing out, more needs to be done to provide everyone with an affordable connection. ACCAN's No Australian Left Offline campaign<sup>5</sup> highlights this. Through the NBN Co Low-Income Digital Inclusion Forum, Telstra backed ACCAN's proposal for a targeted wholesale 'low-income' broadband product.



Raising the rate for those receiving income support payments or increasing the government telephone allowance and expanding it to include internet services would also provide those on low-incomes with fairer access to telecommunications.

Support for co-investment programs such as the Regional Connectivity Program and Strengthening Telecommunications Against Natural Disasters Program has been, and will continue to be, critical to improving regional access. Updates to the Universal Service Obligation would pave the way for opportunities for new technologies that are necessary for Telstra to make the right investments for Australia and migrate regional and remote communities to more reliable and diverse connectivity choices that have better capability to support our modern digital needs.

Working with communities is also crucial to build digital skills is the last element to solving the digital inclusion challenge. Telstra has partnerships, such as with Microsoft and Good Things Australia building AI literacy with women from migrant and refugee backgrounds and with Justice Connect building digital skills and legal resilience alongside disaster preparedness. Both are making a significant contribution to a digital skills uplift. Telstra can also play a role in supporting the 'last 10 per cent' of the population to get online by teaching its customers digital skills. Not only will this support customers transition to the new digital platform, but it fosters a thriving digital economy in Australia.

# 3.1.1 Addressing affordability

Telstra provides a variety options to help customers manage the costs of its products and services.

Telstra Upfront plans have no lock-in contracts, no excess data charges or hidden fees and customers can change their plan once a month or cancel at any time. Pre-paid plans are also available, offering flexibility. Many crisis lines and Services Australia numbers are free to call, see: free calls to crisis lines - Telstra and the website Ask Izzy is free to visit on the Telstra mobile network, so even without an active recharge customers can access essential support services. For remote community customers, a bespoke pre-paid remote community mobile plan priced at \$25 which is equivalent to \$1 per 1GB was launched in October 2024.

#### Telstra remote community plan



More details on Telstra's remote community plan can be found in section 2.2.1 of my last report.



Telstra-owned brands Boost and Belong offer low-cost alternatives. Boost provides choice in remote parts of Australia. However, while these brands offer good alternatives, they are digital-first brands. This means they may not always be a suitable solution for those who are digitally excluded. Telstra also has a role in offering low-income products and is currently the only telco with a requirement to offer a low-income package. Telstra is actively collaborating with stakeholders, industry partners and Low-Income Measures Assessment Committee (LIMAC) to develop solutions that provide more options for low-income households.

The ADII suggests that households that would have to pay more than 5 per cent of their household income to access the internet are considered to have 'low affordability' and would be experiencing affordability stress. For those experiencing hardship, telecommunications prices are just one of many other goods and services prices increasing in a cost-of-living crisis. A difference of \$10 a month can tip a well-balanced budget stretched among other essentials to an overspent one.

Meanwhile, those plans that lower-income customers or financially vulnerable customers choose because of affordability reinforce the 'poverty premium'<sup>8</sup> where lower-income customers face higher living costs and 'pay more for less'.

# Telstra's mobile Starter plan with concession discount is \$31 a month

5GB

\$31

\$50 without credit month to month

Plan prices may change.

#### Includes

- No lock-in contract
- ✓ No excess data charges in Australia
- Unlimited standard national calls and texts
- Enjoy uncapped download speeds

In FY25, the Telstra Foundation funded WorkVentures to increase the device donations from government agencies and businesses to the National Device Bank, a new piece of social infrastructure tackling digital exclusion. The National Device Bank is a joint initiative between WorkVentures, Good360 Australia, and Good Things Australia. Telstra also supported the SSBI through its Belong brand, which provides 30,000 NBN services at no cost to eligible low-income families without home internet access.

As of FY25 **Belong has connected 6,295 families through the SSBI,** with these families continuing to benefit from a \$0 plan until June 2028.

# 3.1.2 Bringing every Telstra customer along

In FY25 Telstra implemented price changes on its fixed services, as well as across its postpaid mobile, pre-paid mobile and mobile broadband pricing. The prices of Telstra's internet Starter plan and mobile Starter plan did not increase, the mobile concession discount was retained, and more data was added to the mobile Starter plan. There were no changes to Telstra's two most popular pre-paid mobile plans. Telstra also has a range of options to help customers who need payment assistance.

#### **Bolstered support in FY25**





**Increased the data** from 2GB to 5GB on mobile Starter plan





Removed speed caps on 4G and 5G (within plan allowance) on mobile Starter and mobile Basic plans





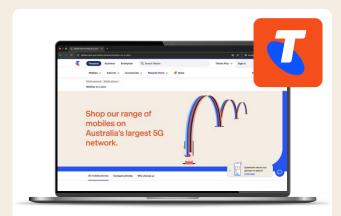
**Increased Telstra's pre-paid Top Up program** to \$180

I remain focused on the impacts of price changes on consumers, including those who are migrated off legacy plans to Telstra Upfront plans. I am pleased I was consulted and Telstra agreed on migration principles for customers in vulnerable circumstances. For example, to offset cost increases Telstra provided discounts for customers in vulnerable circumstances whose payments increased due to the transition. It is important that Telstra continues to evolve its product offering to respond and adapt to its customers' needs, particularly its products targeted for those on low-incomes.

Last report, I shared the progress made by Telstra to develop Telstra Bill, an alternative to Autopay in the new digital platform. This was a true example of ensuring customers with payment flexibility needs were brought along on its digitisation journey. In late 2024 the government announced it was considering mandating cash payments for essential items, including telco. Telstra will continue to accept cash payments for bills through third party providers like Australia Post. Without this option the impact on some customers in vulnerable circumstances, such as unbanked customers, could mean the difference between having access to a telephone and being left behind.

For Telstra customers who have the ability to use digital services, Telstra's approach to accessibility is an enabler. Telstra ensures its consumer digital services can be used and accessed by every customer. For those 21 per cent of Australians with disability<sup>9</sup>, the My Telstra App and Telstra.com.au website are within the 3 per cent of digital experiences that are accessible<sup>10</sup>. Telstra's website also has a dedicated webpage Online Accessibility – Telstra explaining how users can leverage their assistive technologies to best use its digital services.

In FY25 the My Telstra App and Telstra.com.au website received certifications for the Web Content Accessibility Guidelines (WCAG) 2.2 level A/AA. Alongside meeting the latest WCAG standards, Telstra also focuses on inclusive design to meet accessibility best practice.



In the Centre for Accessibility Australia's Australian Access Awards 2023-2024, the **Telstra.com.au website was awarded the corporate website of the year** and the My Telstra App was a finalist.

However, some users who are less confident with digital tools may still face challenges. Community feedback indicates a high demand for informal, on-the-spot technology support, especially among seniors, people with disability, those on low-incomes and regional customers. Telstra could play a pivotal role by providing a network of trusted advisors in store to offer on-the-spot assistance with using devices, connectivity literacy, online safety and basic digital tasks. This would support customers to build confidence in using technology and encourage them to use Telstra's digital services.

#### 3.1.3 Trust in online spaces

As reported in section 2.2 of this report, Telstra's Cleaner Pipes initiative is blocking millions of suspicious SMS, voice and digital scams from ever reaching customers each day. The number of scam calls blocked has increased compared to FY24. This is due to Telstra's increasing ability to identify and block scams faster. However, scammers are constantly adapting so Telstra is continuing to invest in technologies designed to protect customers and keep the digital world a safer place for everyone.

Digitally excluded Australians are increasingly concerned about privacy and scams<sup>11</sup>. For example, 30 per cent of highly excluded people have reduced their internet use because of their concerns about privacy and scams. That's why it's important that alongside its efforts to prevent scams, Telstra also works to create safe spaces to enhance digital wellbeing that enable Australians to build digital resilience skills and have open conversations about the risks of being online.

For example, the Telstra Foundation is empowering safe, inclusive and enriching digital spaces, creating opportunities for children and young people to have their say in shaping their digital world. In November 2024, the Telstra Foundation launched its Australian Youth Digital Index. The Index can be found at:

Australian Youth Digital Index.

### Ensuring the online safety of younger generations is crucial.

While **94 per cent** of young people feel confident online and know how to manage their privacy, **44 per cent** worry about scams, **and one in five** struggle to identify suspicious content<sup>12</sup>.

Community trust in service providers is also part of bolstering digital inclusion in Australia. The Government's SMS Sender ID register will also assist in supporting customers to restore confidence in branded SMS communications by reducing the opportunity for organised crime syndicates to impersonate respected brands to scam Australians. Telstra's ongoing support for the SMS Sender ID Register and the Australian Communications and Media Authority's (ACMA's) wider 'Fighting Scams' initiatives reflects Telstra's dedication to addressing the issue of scams.

While reporting of scams has increased over time, scams remain severely underreported compared to other forms of personal fraud. Consumer Policy Research Centre's 2024 briefing note *Beyond reporting: The experience of scams in Australia* highlights that banks continue to be the primary platform scam victims use to report scams. In section 3.2 of my last report, I shared Telstra's partnership with the Commonwealth Bank on 'Scam Indicator', that enabled real-time detection and prevention of scams.

New legislation like the 2025 Scams Prevention Framework (SPF) highlights that everyone has a role to play in preventing scams. Telstra should continue to collaborate across industry to combat scams. By working together, organisations can more effectively identify and mitigate scam threats, leading to a more secure and trustworthy environment for consumers and businesses alike.



# 3.1.4 Connecting regional Australia

Telstra's commitment to regional Australia is reflected in its investments and services. A thriving and digitally connected regional Australia is fundamentally important to Australia's success both socially and economically. A thriving regional Australia is also important to Telstra. Findings in the ADII, as outlined in section 1.2 of this report, show that digital inclusion levels decline the more remote a customer is located<sup>14</sup>.

After first announcing its plan to shutdown its 3G network five years ago, Telstra closed the 3G network this financial year. In section 3.2.1 of this report, I highlight Telstra's initiatives to provide extra care to customers through the transition and post the 3G closure.

In this financial year, in collaboration with Starlink, Telstra also launched its Telstra Satellite Messaging product. Telstra Satellite Messaging enables eligible customers to send and receive text messages from their compatible mobile phone via satellite when beyond the range of the Telstra mobile network. The service is included in all Telstra Upfront mobile plans for consumer and business customers. Customers need a compatible device with the latest software and line of sight to the sky. This is an important development that provides additional connectivity options, particularly for regional and remote customers living and working outside the terrestrial mobile network.

Given so many customers depend on the quality of Telstra's network, when outages or natural disasters disrupt Telstra's services, the impacts can be profound. This is why Telstra's communications on disruptions to customers need to be clear, timely and easy to access. Commonly, unplanned outages are caused by power outages. This can impact the

ability to maintain and restore services. It can also make it hard to estimate how long it will take before services can be restored. However, Telstra is committed to keeping customers in the loop while it works to restore services during emergencies and outages. When outages are planned, for example, to make improvements to its network, Telstra aims to gives customers time to prepare.

#### For planned mobile outages:

 Telstra's systems are set up to send out text messages to any device connected to the base station planned to be offline. Information on planned outages is also published on the Telstra website

#### For unplanned mobile outages:

- Information is published on the Telstra website within ten minutes of the outage being identified by its network
- Telstra communicates directly with impacted customers via its app, SMS and email
- Where there are community wide impacts
   Telstra takes extra measures, utilising the
   media to get information out to customers
   and the wider community as quickly and
   broadly as possible

I am pleased to see Telstra working to strengthen its existing communications models to provide extra care for customers as required by the new rules in the Telecommunications (Customer Communications for Outages) Industry Standard 2024<sup>15</sup>.



# 3.2. Commitment to customer service

In this report so far, I have focused on Telstra's digitisation and digital inclusion. But this is also underscored by continuous improvements in customer service. It is disheartening to see findings from research commissioned by  $ACCAN^{16}$  (2025) that reports deep mistrust in the telecommunications industry.

#### ACCAN's consumer research found:

- 41% of consumers report having limited faith in their telco to act in their best interest
- 24% (1 in 4) say they felt pressured into signing up for a more expensive plan than they wanted
- 32% (1 in 3) received different coverage than they were led to expect by their telco
- 39% experienced unexpected changes to their contract

Telstra's initiatives are important for assisting customers in vulnerable circumstances, meeting regulatory obligations and building trust within the Australian community. Data like ACCAN's highlights that if organisations do not act with appropriate

levels of care, they may put consumers at risk of harm or disadvantage. In my previous reports I have outlined Telstra's work to minimise the risk of potential mis-selling to customers and especially to Aboriginal and Torres Strait Islander customers.

#### 3.2.1 Extra care

Telstra aims to provide exceptional customer service. It is focused on accessibility of products and support for those in need of more care. Staff are trained to have ongoing conversations about customers' circumstances with respect to cultural or social requirements, to find the best flexible approach to assist. There are also several dedicated support teams that are skilled in complex areas to help with sensitive issues. In this section I outline some of the initiatives where Telstra provides extra care when times are tough.

In section 2.3.4 of my last report, I shared that Telstra gave away 19,000 free mobile phones to those in difficult situations to support customers through the 3G closure. Along with Optus, Telstra also extended the closure of its 3G network to provide the public more time to get prepared. In January 2025 Telstra launched a 3G helpline (1800 990 853) to help with 3G closure related issues and to support regional and remote customers who require support with connectivity.



#### Telstra's 3G helpline

- Customers can call 1800 990 853 between 8am to 7pm AEST Monday to Friday.
- The helpline provides customers with more specialised support related to queries regarding connectivity, including the 3G transition and troubleshooting why mobile experiences might have changed.

In addition, Telstra proactively reaches out to some customers who through the helpline's diagnostic process, it identifies may benefit from a coverage extension device and organises field technicians to install a Telstra GO Repeater or a Smart Wi-Fi Internet extender. In FY25 it also arranged for field technicians to attend certain stores, so customers had an opportunity to have an appointment with a technician for in person 1:1 support. The Tech 2 Store program utilised local social media and geotargeted advertising to reach customers in the store locations.



#### **Tech 2 Store support**

From April – July 2025 Telstra field technicians attended selected stores to provide in person 1:1 support for customers to get the most out of their mobile service and to assist with any 3G transition related concerns.

This program assisted around 100 customers with their connectivity concerns over the 4-month period. Customers could book appointments via the Telstra Website. It is important that Telstra continues to support customers with these unique issues, as not every customer has the technology skills or connectivity literacy to navigate these technical changes alone. It can be frustrating when your experience of connectivity changes. Telstra must remain vigilant on faults and complaints that relate to the transition.

# 3.2.2 Promising complaints data

Telstra's complaint trends are promising. In my time as CCA, I have seen the company's commitment to reducing complexity in products and processes result in better experiences, a reduction in complaints, faster resolution times and fewer escalations to the Telecommunications Industry Ombudsman (TIO).

I am also seeing the positive impact of digitisation for customers. The most common complaint issues relate to billing. Historically, unknown or unexpected charges have been the main drivers of complaints. For customers who have moved to Telstra's Upfront plans complaints have decreased by more than 50 per cent this financial year.

Telstra's Upfront plans have no excess data charges, which means customers are less likely to experience bill shock. Changes like this are not only good for the customer, but good for the business. Simplifying billing issues results in easier experiences for customers and enables time and resources to be dedicated to ensuring effective resolution for more complex cases.

I am aware that some Australians don't believe that making a complaint will help resolve the challenges they face with their telco service and that trust is lacking with consumers that internal and external complaints processes will help. Connectivity is an essential part of life, and when things go wrong its impact can be frustrating and can leave customers feeling exasperated. One negative experience can sully your views of your provider for a long timeand finding the courage to reach out again can be difficult.

Research in the Consumer Policy Research Centre's 2024 *Barriers to Effective Dispute Resolution in the Telecommunications Industry*<sup>17</sup> report states people are most frustrated when telcos fail to fulfil promises or take a very long time to fix problems.



#### **Reduction in complaints**

There's been a further 1.2% drop in the total number of complaints received by Telstra in the fourth quarter of FY25 compared to the fourth quarter in FY24.



#### **Resolution time**

Complaints Telstra received directly were resolved in 9 days on average, while those escalated through the TIO took an additional 44 days.

50% in 5 days



# Quick resolution for most complaints

50% of complaints were resolved in 5 days. Telstra focuses on resolving complaints as fast as possible at the highest standard with billing disputes being the quickest to resolve.

0.02% Escalated



#### **Escalation to TIO**

Only 0.02% of Telstra's customers escalated a matter to the TIO when Telstra was unable to resolve the complaint to their satisfaction or within their expected resolution time.

Telstra has a quick resolution time for most complaints. 52 per cent of complaints were resolved in 5 days. From FY24 to FY25 resolution times have been reduced by 25 per cent. 80 per cent of complaints were closed as resolved, 12 per cent were closed as unresolved, and 8 per cent were closed uncontactable. Only 0.02 per cent of Telstra customers escalated a matter to the TIO when Telstra was unable to resolve the complaint to their satisfaction or within their expected resolution time.

It's no surprise that the TIO receives the most complaints from Telstra customers, as Telstra has the largest customer base. However, the number of complaints referred to the TIO by Telstra customers dropped by 3.4 per cent compared to FY24. Unfortunately, many consumers lack awareness of the TIO<sup>19</sup>. It is recognised across the industry that more could be done to educate customers on the role of the ombudsman. Telstra promotes the TIO to customers when issues cannot be resolved and includes its contact details at several points.

### Telstra makes customers aware of the TIO:







On it's bills

On the Telstra website

On its complaints resolution email

Telstra wants to drive positive change in attitudes across the telco sector and lead by example fostering trust through openness and accountability. In November 2024 Telstra published complaint metrics on its website Complaints handling reporting — Telstra. No other retailer has taken this step yet.

Even with these improvements, Telstra can do better. This is acknowledged within Telstra and is being addressed through a companywide complaints transformation program to uplift complaints handing efficiency and customer outcomes. I will continue to partner with the complaints team as they progress this work. I would encourage everyone to speak up if something is not right and if you are not satisfied with Telstra's response, escalate to the TIO.

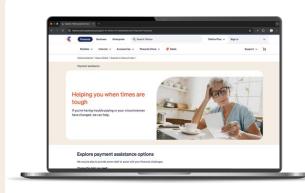
For providers, complaints provide information about gaps or failings in processes or training and are vital intelligence about customer experience and expectations. I am committed in my role to help identify root causes of any systemic issues uncovered by complaints and implement plans to address them.

#### 3.2.3 Industry Standards

Through the Australian Telecommunications Alliance (Previously Communications Alliance), Telstra has engaged with regulators, consumer advocates, ombudsman and industry on the Telecommunications Consumer Protection (TCP) Code review process. While Telstra has maintained a position through the TCP Code engagement that co-regulation is enforceable and effective, this view is not shared by most consumer advocates. The 'Fair Call Campaign', supported by 23 consumer organisations, demands stronger enforceable rules in the telco sector. Policymakers have also stepped in to enhance consumer protections.

In FY24 Telstra and the telecommunications industry became subject to the Telecommunications (Financial Hardship) Industry Standard 2024 among other regulatory and legislative changes. In FY25 the Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025, was also announced to commence from July 2025.

Telstra had existing processes in place to support customers in these circumstances. It already had case management teams supporting customers with financial hardship and dedicated support for those experiencing DFV. However, Telstra has implemented changes as part of the Telecommunications (Financial Hardship) Industry Standard 2024, such as updating its payment assistance webpage, as outlined in section 2.2.2 of my last report.





Since the implementation of the Telecommunications (Financial Hardship) Industry Standard 2024 visits to the payment assistance webpage Payment Assistance – Telstra have increased from 15,000 to 25,000 per week.

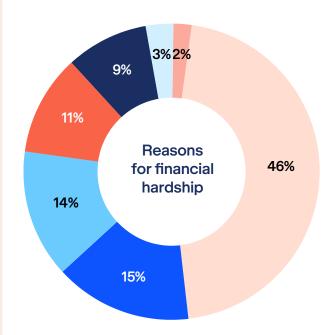
This demonstrates that providing customers the webpage link through various channels, such as in Telstra's communications and on its bills, is assisting customers to seek support when they need it most.

### Telstra's payment assistance includes:

- Giving customers more time to pay for their services
- A tailored payment plan to meet customers' abilities to pay
- Reviewing customer accounts to see if they might benefit from:
  - Moving to a more affordable plan or product, or
  - removing any services or features they don't need
- If customers receive benefits or allowances from Centrelink, they may be able to use Centrepay as a bill-paying service
- Offering a limited number of recharge credits for a Telstra pre-paid service.
- In some cases, Telstra will also consider waiving some fees or charges, discounting a charge or applying a credit on an account.

# Since the implementation of the Telecommunications (Financial Hardship) Industry Standard 2024 until the end of FY25 (March 2024 - June 2025) Telstra's dedicated payment assistance team:

Supported **98,000 customers** with cases of payment assistance and **71,000 unique customers** with financial hardship support.



In FY25 the top drivers of financial hardship were changes in financial circumstances (46.44%), medical/illness (15.36%) and loss of employment (13.69%). DFV has been excluded from this data as privacy assessment recommendations restrict agents from recording this information.

- Change in financial circumstance
- Medical/Illness
- Loss of employment
- Cost of living
- Low or reduction in income
- Family death
- Impacted by disaster





In FY25, Telstra's dedicated DFV support team:



Supported **8,951 unique** customers



Referred **5,968 customers** through the 'Safe Connections' program

Even with a strong foundation for supporting customers in vulnerable circumstances, I have witnessed first-hand the considerable time, effort and resources committed by Telstra to meet obligations and ensure compliance.

My view is that we should be working across industry towards continuous improvement. There is real opportunity for telcos to take leadership and demonstrate how they can deliver on better outcomes for customers.

I commend Telstra for continuing to innovate in their approach to supporting customers beyond minimum requirements. Initiatives like Telstra's participation in the One Stop One Story (OSOS) hub, collaborating with the e-safety commission on Tech Facilitated Abuse, and embedding 'safety by design' are examples of this leadership.

#### **One Stop One Story**

A client escaping a DFV relationship moved to a private rental with her children but struggled to pay rent and bills. Juggling her diagnosis with a life-ending illness, with little left for food, she sought emergency relief. A worker referred her to various services through the OSOS Hub, without the client having to retell her story. Including a financial counsellor and to Telstra, which helped address her overdue telco bill. Grateful for the support, she said, "We're humbled by your dedication to helping others. You're a shining example of humanity! You're our hero".

### In FY25 through the OSOS hub Telstra supported:

1,106 Total Telstra OSOS cases

#### Of the cases Telstra received:

- 74% were related to DFV
- 26% were related to financial hardship

#### Of the cases Telstra created:

- 43% were related to DFV
- 58% were related to financial hardship

Now that these Standards are implemented across all providers, my hope is that Telstra will look to what's next to show continued leadership in these vital areas.

#### 3.2.4 Compliance lessons

Regulations are in place to protect customers. As CCA, I am dedicated to assisting Telstra's leadership team to build an effective compliance culture within Telstra.

Telstra's been the focus of several regulatory investigations across a range of issues which have impacted customers. Where Telstra identifies a material issue, it proactively self-reports to regulators and promptly remediates customers. For Telstra, self-reporting material breaches is best practice. While this is not easy, it demonstrates a deep commitment to doing the right thing for customers.

## Telstra pays \$3 million penalty for Triple Zero outage

People rely on Triple Zero in their greatest times of need. In March 2024, 473 Triple Zero calls were disrupted. The disruptions were caused by a technical fault and issues with backup processes. The series of failures that occurred in March were unacceptable and we let these customers down by not being prepared enough for the situation.

Telstra reported the incident to the ACMA and in December 2025 paid a \$3 million penalty. Telstra has rectified the issues and improved the process for future.

Telstra continues to refine key processes as it uplifts its compliance, addresses issues as they are found, self-reports significant breaches and remediates with customers.

For example, Telstra engaged KPMG to conduct an independent review to validate the effectiveness of its controls against obligations within the Telecommunications (Financial Hardship) Industry Standard 2024. This demonstrates Telstra's dedication to continuous improvement and commitment to compliance uplifts.





In FY25, Telstra has continued to focus on responsible business practices, becoming more customer-centric and enhancing support for customers in vulnerable circumstances. Telstra's challenge is to remain at the forefront of digital inclusion and continue to demonstrate leadership in consumer vulnerability. Particularly as stakeholders increasingly consider telecommunications as an essential service, critical for work, education, healthcare and social outcomes. Telstra has a unique position in Australia due to its history and being the largest provider in a critical industry such as telecommunications. This raises expectations and it presents challenges and opportunities.

I encourage Telstra to continue improving its product offering for customers in vulnerable circumstances particularly, its affordable products for those on low-incomes. Support of the pre-paid Telstra Top Up recharge program and its increase to the data allowance on its Starter mobile plan are encouraging. However, given the levels of affordability stress in Australia, together with rising cost pressures for essential household goods and services, continued close attention needs to be given to the pricing and appropriateness of services.

For most households, mobile services do not provide a sufficient alternative to fixed broadband connections. The increasing shift towards digital services and the demands for faster connections and more data for work, learning and entertainment create new pressures. These pressures are not felt equally, especially by mobile-only internet users, with regional, remote and very remote communities particularly at risk of falling behind<sup>20</sup>. It is therefore important that we understand affordability in terms of the costs of both mobile and fixed broadband, rather than one or the other in isolation. Customers may be relying on mobile-only access, particularly pre-paid due to its lower price point. However, mobile data is often significantly more expensive per gigabyte than fixed broadband.

Pricing for both mobile and fixed services is a critical concern for low-income Australians. A range of initiatives, such as Telstra's free payphones with Wi-Fi, its support of the device bank for low-income students, and its contribution to connecting families through the SSBI, all contribute to relieving affordability pressures. However, affordability is a continuing challenge. Further action directly addressing the needs of low-income Australians for both fixed and mobile services will be necessary from both government as well as providers to disrupt cycles of digital disadvantage. It should consider the affordability needs of consumers particularly for those groups that the insights of the ADII identify as experiencing greater affordability stress and are less digitally included<sup>21</sup>.

Further, Telstra could take the lead in defining what affordability for low-income customers could look like — a service that meets customers' critical connectivity requirements that are necessary to participate in the digital economy and for them to stay connected to essential services. This work should be done in partnership with stakeholders, particularly groups like the LIMAC and developed through co-design.

Doing this proactively would enable Telstra to set a framework that is directly targeted to achieve better outcomes for customers. Telstra offering such a service for customers in vulnerable circumstances would appeal to a large group of consumers. It would also position Telstra even better as leaders in digital inclusion. Digital inclusion is fundamental to growth and to Australia's prosperity. The future will bring more dependency on technology, and as Australia's largest telecommunications services provider, Telstra's role will also grow as it rolls out the latest technology. I recognise this approach won't be easy, but I think it is worth exploring for the reasons outlined.

#### **Endnotes**

- 1 Key Findings and Next Steps. (2023). *Australian Digital Inclusion Index*. Available at https://www.digitalinclusionindex. org.au/key-findings-and-next-steps/
- 2 2024 Outcomes Report. (2024). *Mapping the Digital Gap.* Available at https://mappingthedigitalgap.com.au/about/publications/
- 3 The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 22. (2024).
  Melbourne Institute of Applied Economic and Social Research. Available at https://melbourneinstitute.unimelb.edu.au/\_data/assets/pdf\_file/0003/5229912/2024-HILDA-Statistical-Report.pdf
- 4 First Nations Digital Inclusion. (2023) *National Indigenous Australians Agency*. Available at https://www.niaa.gov.au/sites/default/files/documents/publications/first-nations-digital-inclusion-plan-2023-2026\_0.pdf
- 5 No Austrailian Left Offline. ACCAN Available at https://www.accan.org.au/noaustralianleftoffline
- 6 Australians want affordable, reliable internet for all. (2025) ACCAN. Available at https://www.accan.org.au/research/australians-want-affordable%2C-reliable-internet-for-all.
- 7 Case study: Breaking the Inequality Cycle Examining Affordability Barriers to Digital Inclusion. (2023). Australian Digital Inclusion Index. Available at https://www.digitalinclusionindex.org.au/case-study-breaking-the-inequality-cycle-examining-affordability-barriers-to-digital-inclusion/#:~:text=A%20person%20with%20the%20highest,would%20be%20 experiencing%20affordability%20stress
- 8 Australia Fair Series The Poverty Premium. (2023). *Anglicare Austrailia*. Available at https://www.anglicare.asn.au/publications/the-poverty-premium/
- 9 Disability, Ageing and Carers, Australia: Summary of Findings (2024). *Australian Bureay of Statistics*. Available at https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/latest-release#:~:text=In%202022%2C%205.5%20million%20(21.4,million%20(17.7%25)%20in%202018
- 10 The WebAIM Million. (2025). WebAIM. Available at https://webaim.org/projects/million/
- 11 Measuring Australia's Digital Divide. (2023). *Austrailan Digital Inclusion Index*. Available at https://www.digitalinclusionindex.org.au/wp-content/uploads/2023/07/ADII-2023-Summary\_FINAL-Remediated.pdf
- 12 Australian Youth Digital Index: Five Key Findings. (2023). Australian Digital Inclusion Index.

  Available at https://australianyouthdigitalindex.com/australian-youth-digital-index-five-key-findings/
- Briefing Note Beyond Reporting: The experience of scams in Australia. (2024) *Consumer Policy Research Centre.*Available at https://cprc.org.au/submission/the-experience-of-scams-in-australia/
- 14 Digital inclusion: the Australian Context in 2023. (2023). Austrailan Digital Inclusion Index. Available at https://www.digitalinclusionindex.org.au/digital-inclusion-the-australian-context-in-2023/
- 15 Telco industry rules for major outages. ACMA. Available at https://www.acma.gov.au/rules-significant-and-major-outages#:~:text=emergency%20service%20agencies.-,Frequently%20asked%20questions,SMS%2C%20social%20and%20 other%20media
- New research finds telco sign-on pressure, plan changes, low trust, poor coverage: ACCAN calls for urgent action. (2025) ACCAN. Available at https://www.accan.org.au/accan-s-media-releases/new-research-finds-telco-sign-on-pressure%2C-plan-changes%2C-low-trust%2C-poor-coverage%3A-accan-calls-for-urgent-action
- 17 Barriers to Effective Dispute Resolution in the Telecommunications Industry. (2024). *Telecommunications Industry Ombudsman*. Available at https://www.accan.org.au/accan-s-media-releases/new-research-finds-telco-sign-on-pressure%2C-plan-changes%2C-low-trust%2C-poor-coverage%3A-accan-calls-for-urgent-action
- Barriers to Effective Dispute Resolution in the Telecommunications Industry. (2024). *Telecommunications Industry Ombudsman*. Available at https://www.accan.org.au/accan-s-media-releases/new-research-finds-telco-sign-on-pressure%2C-plan-changes%2C-low-trust%2C-poor-coverage%3A-accan-calls-for-urgent-action
- 19 Barriers to Effective Dispute Resolution in the Telecommunications Industry. (2024). *Telecommunications Industry Ombudsman*. Available at https://www.accan.org.au/accan-s-media-releases/new-research-finds-telco-sign-on-pressure%2C-plan-changes%2C-low-trust%2C-poor-coverage%3A-accan-calls-for-urgent-action
- 20 Measuring Australia's Digital Divide. (2023). *Australian Digital Inclusion Index*. Available at https://www.digitalinclusionindex.org.au/wp-content/uploads/2023/07/ADII-2023-Summary\_FINAL-Remediated.pdf
- 21. These include people with disability, people living in public housing, people over the age of 75, and people who are currently unemployed. Affordability is also affected by remoteness, with over half of people in remote First Nations communities surveyed 'sometimes', 'often' or 'always' having to sacrifice other essentials (such as food or bills) to afford internet costs.

# **Contacts for specialist support**

Support	About	Webpage	Contact
3G helpline	To help with 3G closure related issues	Telstra Support - 3G Closure	1800 990 853
Disability Enquiry hotline	Assistance with specialised equipment and services for customers with a disability	Telstra - Accessibility and disability	1800 444 403
Domestic and family violence assistance	Anyone can be affected by domestic and family violence. Our dedicated support team is here to help	Telstra - Support in times of need	1800 452 566
First Nations Connect hotline	Our Australian-based phone line is dedicated to helping Aboriginal and Torres Strait Islander customers, respecting culture and community.	Telstra - First Nations Customer Support	1800 444 403
Payment Assistance	If you're having trouble paying or your circumstances have changed, we can help	Telstra - Support adversity financial hardship	132200 Call us and say 'payment assistance'
Telstra Multilingual Service	For assistance in languages other than English	Telstra - Multilingual services	1800 241 600

