



Chief Customer Advocate Report on Customer Vulnerability

2024



Acknowledgement

I acknowledge the Traditional Custodians of the land on which I live and work – the Gadigal people of the Eora Nation. I recognise the existing, original and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways and sky country 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.

Terms used

Throughout this report, the terms Aboriginal and 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 2024 provides an update on last year's report and summarises the initiatives Telstra has in place to support customers in vulnerable circumstances. This report is not an exhaustive list of all action taken but highlights key efforts made during 2024.

The report aims to offer an overview of the progress made in keeping customers connected by addressing affordability, enhancing customer service and improving sales practises. Additionally, it seeks to provoke further action in key areas where Telstra could demonstrate continued or additional corporate leadership, including disrupting technology-facilitated abuse and providing assistance for victim survivors of domestic and family violence, building customer trust and safety by protecting customers against scams, driving further action on digital inclusion and considering the ramifications of AI for customers.

While Telstra is increasingly being associated with the cutting-edge technologies that are shaping our world, such as AI and cloud computing, its core impact remains in keeping people connected. In today's world, being connected is not a choice, it is a necessity. As the digital economy accelerates, it is important that we ensure even the most vulnerable in our communities can participate. This is how we will stay true to our purpose of building a connected future so everyone can thrive.

Many of the initiatives outlined in this report are integral to Telstra's purpose and align with the Telstra T25 strategic goal of keeping 1 million customers in vulnerable circumstances connected. More detailed information can be found in the [Telstra 2024 Sustainability Report](#).

The perspectives in this report are my own as Chief Customer Advocate. While supported by Telstra to be independent in my role, Telstra may take different positions on some matters. This report aims to foster public discussion on customer vulnerability, transparently reflect Telstra's approach and hold the company accountable to its commitments. It builds on what I reported in the [2023 Chief Customer Advocate Report on Customer Vulnerability](#). Increased openness is key to Telstra's commitment to responsible business. Publishing more data on supporting vulnerable customers can help establish best practices. I hope this second report continues to show Telstra's responsiveness to customer needs, especially when extra care is required.

I appreciate the feedback from consumer advocates, financial counsellors and policymakers on how the industry can better support customers during tough times. I look forward to ongoing robust discussions on how Telstra can continue to put customers at the centre.

A handwritten signature in black ink that reads "Teresa Corbin". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Teresa Corbin
Chief Customer Advocate

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1. Customer Advocacy at Telstra

1.1 Chief Customer Advocate – fairness at the heart

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.

The primary focus is to provide a customer voice on products, services, policies and processes. This role emphasises identifying “weak signals” that might otherwise be overlooked and offering insights to advise the business for better customer outcomes. While not handling complaints directly, the role assists with systemic issues and related escalations, reporting regularly to the Board and CEO. Its independence is further maintained by excluding it from Telstra’s employee incentive structure.

Guided by principles of fairness, inclusion, independence and customer-centricity, the Chief Customer Advocate Strategy aims to elevate the voices of customers who are often unheard. This perspective has already fostered more effective two-way conversations with consumer representatives, enhancing mutual understanding. Establishing governance protocols to ensure Telstra is being customer-centric and ensuring consideration of fairness is also critical to embedding the independent perspectives of the Chief Customer Advocate.

1.2 Hearing the customer voice

Telstra has a long history of listening to customer voices. In 1989, Telecom Australia (Telstra’s predecessor) established a consumer advisory council. This initiative led to the establishment of Australian Communications Consumer Action Network (ACCAN), the peak consumer advocacy body in the telecommunications sector (of which I was CEO). Over the years, Telstra has created several advisory councils and forums to hear from diverse consumer groups, including people with disabilities, regional, First Nations, with Financial Counsellors and representatives of low-income customers.

Telstra highly values their input because their contributions have led to significant changes.

The Chief Customer Advocate also plays a crucial part in identifying issues early and bringing them to senior leadership’s attention, supporting the broader compliance culture. This role works closely with the Chief Risk Officer and Chief Compliance Officer, attending relevant meetings and providing perspectives on matters affecting customers, advocating for the customer voice to be considered in decision-making processes.



2. Reflecting on 2024

Telstra has made substantial progress in further digitising its services for consumer and small business customers. This involves migrating customers to a new digital platform with the goal of enhancing their experience and Telstra's operational efficiency.

Customers on the new digital platform have a better experience leading to higher satisfaction and fewer customer service calls. This improvement is reflected in higher Net Promoter Scores (NPS) and fewer complaints.

Overall, at the end of FY24, 77% of service transactions are now fully digitised and there are over 5.7 million Telstra Plus members, marking a significant T25 Strategy milestone.

This year, Telstra began migrating more customers who may be experiencing vulnerable circumstances to the new digital platform. These customers have been among the last customers to be migrated to allow for existing tailored capabilities to be built on the new platform such as the provision of braille bills for existing braille bill customers who are migrating to Telstra Bill. It has also ensured that there is appropriate processes and frontline training in place to support customers through the transition.

I have played an on-going role in reviewing and considering the impact on customers of this enormous transition as it has been rolling out. While this has presented many challenges along the way, I'm pleased to share many customers are now benefiting from the enhanced service experience.

Against this background of digitisation, in the following sections, I will share more about how Telstra views vulnerability, how we are keeping customers connected and several initiatives that have improved customer service and sales practices.

2.1 Telstra's understanding of vulnerability in 2024

In my last report I explained in detail how Telstra recognises that vulnerability can affect anyone at any time due to various circumstances such as payment difficulties, health issues or social isolation. Telstra is committed to ensuring that all customers, especially those in vulnerable situations, have accessible and appropriate products, services and programs they need to stay connected. If an organisation does not act with appropriate levels of care, vulnerability can increase risk of harm or disadvantage.

The continued rising cost of living is further exacerbating financial vulnerabilities, with many Australians struggling to afford necessities. The Consumer Action Law Centre's *At the front line of the cost-of-living crisis, Insights from a Telephone Counselling Helpline (2024)*¹ reported the Helpline in Victoria received 22,272 calls in FY22 and 30,000 in FY23 marking a 25% increase. Furthermore, the number of people visiting the Helpline's website almost doubled over the same period.

In November 2024, Lifeline reported receiving 110,000 calls related to financial distress this calendar year, covering issues such as financial management, employment and homelessness. The service's highest-ever daily demand was recorded on October 7, when it received 4405 calls and messages. Eight of the all-time 10 record days for demand have now been recorded within 2024. In addition, Lifeline's online Financial Stress Toolkit has been visited almost twice as much as it was in the corresponding period last year, with webpage views up 183 per cent. There is a robust and growing body of evidence that financial hardship is associated with increased risk of suicide.

Thriving Communities Australia highlighted the following insights:

- In 2024, **32% of Australian households (an estimated 3.4 million households) experienced food insecurity**², exceeding the combined number of households in Sydney and Melbourne. Food insecurity is being felt more acutely in the regions (37%) compared to metropolitan areas (30%)
- Hardship searches on Ask Izzy, the Infocchange directory that connects people with emergency hardship services, is seeing record levels of demand for food, housing, mental health, family violence and other urgent support. **Demand rose 30% over the past 12 months, with the month of June 2024 seeing a record 30,000 searches for help.**³
- The ANZ Roy Morgan Financial Wellbeing Indicator (Sept 2024)⁴ reports that **financial wellbeing in Australia continues to decline**, impacting those in the 'struggling' segment the hardest.
- Buy Now Pay Later (BNPL) services are now commonly used for essentials such as food, clothing, petrol and to pay utility bills with Financial Counselling Australia reporting⁵ on average, **62% of financial counselling clients have BNPL debts.**

The increasing frequency and intensity of climate-related disasters have also heightened social vulnerabilities, particularly in regional and remote areas. These challenges underscore the importance of Telstra's commitment to supporting customers in vulnerable circumstances.

While there are clearly increasing numbers of customers experiencing circumstances that may fit the definition of vulnerability, most customers in these situations do not perceive themselves necessarily as vulnerable and nor do they always ask for extra support. Sometimes this means that they may not highlight what they are experiencing to our frontline teams either. This could be for a multitude of reasons from relevance to awareness, to feelings of shame or even mistrust in disclosing too much information to Telstra. If a customer is very digitally literate, then self-servicing can help in some of these situations but other times it might serve to be a barrier for getting the support required and this has been in the forefront for these redesigning the payment assistance webpages for example.



As Chief Customer Advocate I regularly undertake frontline immersions in stores, at call centres and on field services visits to customers' homes and businesses. I have observed the importance of Telstra adopting a flexible and empathetic approach to cater to customers facing vulnerability. This experience has solidified my conviction that telecommunications services are crucial in addressing vulnerability in Australia, particularly as connectivity increasingly becomes an essential aspect of daily life.

2.2 Keeping customers connected

Telstra is dedicated to supporting customers in a way that meets their individual needs, regardless of their location, circumstance or socio-economic status. Telstra has demonstrated this commitment through the implementation of a range of initiatives aimed at ensuring customers can stay connected and access important services. Below, I outline some of the ways Telstra has achieved this in 2024.

2.2.1 Addressing Affordability

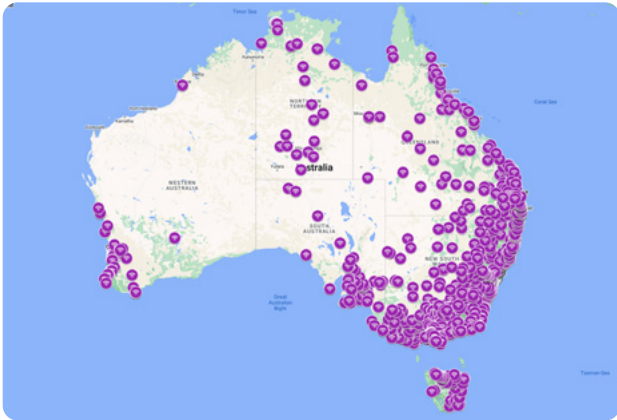
Telstra has continued to expand its range of solutions to support customers needing help to afford products and services. Telstra Upfront plans have no lock-in contracts, allowing customers to change their plan once a month or cancel at any time. Pre-paid plans are also available, offering more flexibility for those on limited incomes.

A range of devices are now available to meet various budgets and usability needs. Devices can also be made more affordable through Telstra Plus (points + pay), trade-in offers and repayment plans.

Free calls to standard national numbers have been provided for three years now from all Telstra public payphones and free Wi-Fi access is at designated payphones. Several crisis lines are free-rated⁶ to call on the Telstra network, and Ask Izzy is whitelisted⁶ to enable access to essential support services. This year, Telstra also introduced free calling for all Pre-Paid customers to the First Nations Connect Hotline and National Debt Helpline.

Spotlight: Free payphones have become a lifeline for Australians in need

Back in August 2021, Telstra made all standard national and mobile calls from payphones free. It was a way of stepping-up support, especially for those in need. Since that change, payphone usage has more than tripled. In the past year alone, over 25 million free calls were made, including more than 300,000 to Triple Zero and other emergency services. Now, over 4,000 Telstra payphones also provide free Wi-Fi access.

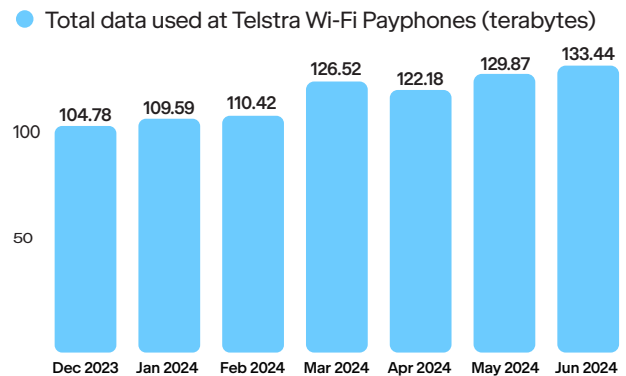


The free Wi-Fi service is being used by a range of people for a variety of reasons. Remote Indigenous communities use the free Wi-Fi to stay connected to essential health and government services. During natural disasters, people gather around payphones with free Wi-Fi to communicate with loved ones and

access recovery resources. Individuals experiencing homelessness or fleeing domestic violence use the free Wi-Fi to access safety and support services.

The data usage on these payphones is substantial, equating to streaming over five years of 4K TV or sending emails to every Australian 102 times each month. Furthermore, usage is increasing, highlighting the critical role these payphones play in providing connectivity to those in need.

How much data are Aussies using at Telstra payphones every month?



Telstra is committed to expanding and improving this service. Plans include upgrading 1,000 payphones to enhance their functionality, adding USB charging facilities and improving power backups. These upgrades will ensure that payphones remain a reliable means of communication, especially during emergencies when the power goes out.

In October, Telstra extended its Top Up program, adding \$5.4 million in prepaid phone credit for those in need. The program was a \$160 recharge and now provides a \$180 recharge with 70GB of data and unlimited calls and texts for six months. By June 2025, Telstra aims to help 30,000 Australians stay connected. When the news was announced, it drew significant attention, with Telstra's article: [Up to 6-months of free pre-paid credit to ease cost of living pressures for Aussies in need](#) generating 8,000 views in just three days. This indicates a strong public interest in the program and a desire for more information.

Telstra Top Up can be accessed by contacting Telstra or over 1000 state-based organisations, including: Safe Steps, Anglicare, Salvation Army, Save The Children and Uniting Care offer the program.

In FY24, Telstra provided 16,000 Top Ups to those in need, but around \$3 million of assistance went unclaimed. I strongly encourage community organisations to help raise awareness of this program, so that those in need can take advantage of this assistance.

“ More and more Australians are being impacted by the cost of living crisis and reaching out for our support. Every day, we hear about people having to make difficult decisions and sacrifices to stay afloat. Providing our clients with the Telstra Top Up program is helping more Aussies stay connected to loved ones and maintain access to important services and information so they can focus on getting back on their feet. ”

Kasy Chambers,
Anglicare Australia Executive Director

Support for Low-Income Customers

Telstra's Access for Everyone package offers a range of products and concession arrangements, including Centrepay and part payment options, and supported 543,000 customers in FY24.

During this time Telstra launched concession offers on Upfront plans enabling a cohort of **27,599 customers to take up these new concessional plans and 468,533 customers supported** in total by our concession offers.

In 2024 Telstra increased the data from 2Gb to 5Gb on concessional post-paid mobile plans and increased the concession discounts on post-paid, home phone, and home internet plans to offset price increases for low-income customers over the last two years. Speed caps on 4G and 5G were also removed (within plan allowance) on Starter and Basic plans. This was an acknowledgement that low-income households feel cost of living pressures more than others.

Collaboration and Community Support

Telstra is actively collaborating with stakeholders, industry partners and nbn Co to develop solutions that provide more options for low-income households. Through the nbn Low-Income Digital Inclusion Forum, Telstra has provided input on which customers have the greatest need of support, the level and kinds of support needed and a framework for effective delivery of programs.

Telstra's Belong brand is participating in the Australian Government's School Student Broadband Initiative (SSBI) which is delivering nbn services at no cost to 30,000 eligible low-income families without home internet access. As of October 2024, Belong has connected 3,654 families. We look forward to further announcements from the Government about the future of this program.

The Telstra Foundation is supporting Work Ventures to establish a National Device Bank which is aiming to distribute 10,000 refurbished devices to low-income students by end 2025.

Remote community initiatives

Telstra has responded to feedback from customers, the First Nations Digital Inclusion Advisory Group and the government on the affordability of Pre-Paid for remote community customers. In FY24 Telstra conducted trials to address these challenges.



Spotlight: Data Bestowal Trial

Telstra bestowed up to 70GB of free data for frequent rechargers in remote communities, resulting in a 40% reduction in spend.

Spotlight: Increasing awareness of Boost in remote communities

Telstra expanded the marketing of Boost in select remote channels, educating communities on affordability options and network accessibility parity through our community check-in program and delivery partners.

As a result of consultation with First Nations stakeholders and the outcomes of the trials, Telstra launched a new **Pre-Paid community mobile plan offering 25GB for \$25**. This 14-day plan, introduced in October 2024, is available to customers who live in remote communities and is available for purchase in select remote community stores and via Telstra contact channels. Based on recharge habits, it is expected that for remote customers with high data usage, monthly costs should be halved for customers using this plan. It is anticipated it will take at least 6 months for the plan to gain traction due to the wet season and new things needing time to gain momentum in communities

\$25 Pre-Paid Community Mobile plan.

- 14 days expiry
- 25GB data allowance
- Unlimited calls + text + MMS + MessageBank
- Continuous data rollover
- 150Mbps 4G and 5G download speed cap

All inclusions for use in Aus. Excludes calls and SMS to standard numbers only.



2.2.2 Implementing the Financial Hardship Standard

Telstra implemented the *Telecommunications (Financial Hardship) Industry Standard 2024* in March. It builds upon the measures outlined in the industry-developed Telecommunications Consumer Protections Code and aims to put the onus on telcos to better identify those in need of payment assistance and provide a wider range of support options. Clear online information is important as Telstra's data indicates that nearly 30% of all customers seeking help apply online. Telstra has since added the option to text "Help" to 4222 from any Telstra mobile phone service to receive the Payment Assistance Policy.

The level of assistance that Telstra provides under the new regulation changes the way Telstra addresses cases. Previously customers that were assisted by our Specialised Assistance Team were classified as "hardship" cases, whereas customers that received help from all other agents were not. So, whilst the number of "hardship" cases appears to have increased, the total number of customers that are receiving assistance hasn't substantially changed. I am looking forward to having data over a full 12-month period to better understand the outcomes for customers. I'm also pleased that the Standard means that all customers will receive the same high level of support regardless of how they contact Telstra. However, I note that Telstra remains the only telco required to offer low-income products and Priority Assistance.

2.2.3 Digitisation and Payment Flexibility

When Telstra first started its digitisation journey and platform upgrade, the only option on Upfront plans was to pay by automated direct debit. Consumer representatives gave Telstra very strong feedback that customers in vulnerable circumstances were being adversely impacted by the approach to direct debit and the lack of flexibility with payment methods. I supported these concerns when I was the CEO of ACCAN before I joined Telstra, and I continued this advocacy as Telstra's Chief Customer Advocate. Telstra listened and based on this and other feedback from consumer organisations, made the decision to

no longer require customers to have a direct debit arrangement for Upfront plans.

Last report, I announced that by July 2024, Telstra customers would be able to choose to have a direct debit arrangement or receive a bill and pay via debit/credit card, BPay or cash at Australia Post, as well as make part payments, including using Centrepay. This decision was made ahead of commitments by industry to include payment flexibility in the revised TCP Code which is still to be finalised. Telstra has made significant strides to increase payment flexibility and deliver on its commitment for new customers. In March 2024, Telstra introduced Telstra Bill, a new payment method available to customers on Upfront plans.

For new customers purchasing through assisted channels (in-store, calling and messaging), both Telstra Bill and AutoPay (direct debit) are offered. However, for online purchases via Telstra's website, AutoPay is the default payment method unless the customer already has Telstra Bill. Customers on Autopay who prefer Telstra Bill can choose to contact Telstra via an assisted channel to set it up.

Spotlight: More than 485,000 customers on Telstra Bill

Along with Telstra Bill the following payment flexibility functions were launched:

- **Move AutoPay payment date by up to 10 days**, providing customers with the flexibility to control the date of the direct debit.
- **Extend the payment cycle from 30 days to 60 days**, meaning if a customer does miss a payment, they have up to 60 days before their service will be disconnected.

In addition to the new billing options, Telstra has updated its website to provide clearer information about AutoPay, including how it handles one-off charges. For example, if a customer wants to downgrade their plan, the change is processed on the next payment date. Conversely, if a customer needs more data, they can upgrade their plan, and the change takes effect immediately. Importantly, customers do not pay for the time from when the upgrade takes effect to their next payment date. Telstra has improved its communication materials for customers migrating to AutoPay, clearly stating how charges will be debited and instructing customers on how to update their payment details. These changes have resulted in an improvement in customer experience.

There is still more work to be done to provide this level of payment flexibility to existing customers who are migrating to the new plans, with more improvements coming in the year ahead.

2.3 Customer Service

Telstra aims to provide exceptional customer service. However, despite recent improvements this is often still an issue that gets raised in the media and on social media. Stories are shared around the office water cooler and at weekend BBQs. Even if the stories are not current, a bad experience with your telco can take a long time to get over because of its impact and our dependency on connectivity. Since joining Telstra I have been able to see firsthand how the company is continuously working to raise the bar on customer service. Some of this effort is reflected in the lower numbers of complaints as well as highlighting where more improvements can be made. There is also a focus on accessibility and support for those in need of more care. Below I explain improvements in complaint handling and provide an update on the care that is provided for customers who have suffered a bereavement or with disabilities. There is also an outline about how Telstra has worked to help customers in vulnerable circumstances transition from 3G to newer network technologies.

2.3.1 Resolution Focused Service – Complaint trends

For the first time, Telstra published complaint metrics on its website in November 2024. By openly sharing complaint metrics, Telstra is reinforcing its commitment to improving customer service and fostering trust through openness and accountability. It provides customers with valuable information about customer service levels, enabling them to make better informed decisions, and helps shift the focus from just product and price to a more comprehensive view of the overall customer experience. Telstra also wants to drive positive change in attitudes across the telco sector and potentially influence other industries such as energy and banking, where no other retailer has taken this step yet.

Telstra's complaint metrics provide a view of performance over time and can be found here: [Complaints handling reporting - Telstra](#).

So far this year Telstra has seen a greater than 10% reduction in complaints in Q1 FY25 from the same period last year. Telstra also achieved quicker resolution times quarter on quarter due to fewer fault-related complaints that historically take longer to resolve. It's important to note that although the total complaint volumes may seem high, less than 1% of Telstra customers make a complaint. As Chief Customer Advocate, my role is to keep track of these statistics and make sure the business is doing its best to make continuous improvements.

The FY24 Annual Report⁷ from the *Telecommunications Industry Ombudsman (TIO)* contains some important metrics:

- Telstra recorded a **15.7% reduction in complaints** volume year-over-year
- Complaints about Telstra accounted for 39.9% per cent of all complaints, **decreasing from 40.4% per cent** in the previous year.
- The TIO have highlighted a **decline in Financial Hardship cases** across industry by 20.4 % YoY with 1,373 received.
- The TIO referenced that they conducted **40 systemic investigations last year with six issues referred to regulators** including unfair contract terms, engaging in misleading or unconscionable sales practices, misrepresented themselves as another provider or failed to interact with disadvantaged or vulnerable customers appropriately due to inflexible authentication practices. None of the issues referred related to Telstra.

Overall, my biggest concern as the Chief Customer Advocate remains at the amount of focus on recording all expressions of dissatisfaction as complaints, at the expense of focussing on how effectively complaints are resolved. I work closely with the team to understand the work being done to be more efficient and effective in responding to customer complaints.

Snapshot of our Q1 FY25 results

Complaints
↓10.6% 

Reduction in complaints

There's been a 10.6% drop in the total number of complaints received by us in the first quarter of FY25 compared to the first quarter in FY24.

10 days
Resolution 

Resolution time

Complaints we receive directly are resolved in 10 days on average, while those escalated through the Telecommunications Industry Ombudsman (TIO) take an additional 17 days.

56.0%
in 5 days 

Quick resolution for most complaints

56% of complaints were resolved in 5 days. We focus 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 our customers escalated a matter to the TIO when we were unable to resolve the complaint to their satisfaction or within their expected resolution time.



Another issue raised this year by consumer representatives about complaint handling has been a concern that perhaps the number of complaints has reduced because fewer customers know about the TIO. Since the release of the *Barriers to Effective Dispute Resolution in the Telecommunications Industry*⁸ report from the *Consumer Policy Research Centre (CPRC)*, Telstra has updated its complaint handling policy to make sure that all the points at which a customer is told about the TIO are clear. On the newly published complaints data page there is also a link to the TIO. Finally, I am very pleased that calls to the TIO on Telstra Pre-Paid mobiles are now free. Telstra is also an active participant in the recently established TIO Accessibility Taskforce. I look forward to seeing the outcomes from this important industry and consumer forum.

2.3.2 Compassionate Care

Telstra has moved to address issues raised last year about its care for customers who have suffered a bereavement. This occurred after the story on the ABC about a customer who was trying to change ownership and account details for a deceased relative for many years. The death of a customer or their loved one is an extremely distressing event. I observe that Telstra takes its responsibility for caring for customers during this time very seriously. Telstra apologised to the customer for the stress, and she accepted the offer of compensation in August 2023. After this, there was an ACMA investigation that reported that there had been no code breaches. Despite no rule being broken, clearly the level of care provided for this customer was not adequate, and it highlighted some areas for improvement.

Since then, Telstra has introduced a process to better manage authorised representatives in bereaved circumstances and has also established a dedicated Compassionate Care line (1800 775 932) to support customers when a loved one dies. Customers deserve enhanced care at a time that can be deeply distressing. Telstra must continue to go beyond what it is obligated to do to provide the best support possible for customers.

2.3.3 Accessibility and Enhanced Care

Telstra has a longstanding commitment to supporting customers with disabilities, formalised in 1996 with one of the first Disability Action Plans lodged with the Australian Human Rights Commission. This dedication continues with the current [Accessibility and Inclusion Action Plan \(AIAP\)](#) for FY23 to FY25. Over the last 5 years, Telstra has worked hard to ensure we sit within the 3% of experiences that are digitally accessible.

In FY24 the Disability Enquiry Hotline (1800 068 424) service was moved to the Telstra Contact Centres (TCC) Business Unit and into the Telstra Ruby team. The Telstra Ruby team is transforming service delivery for customers with disabilities, diverse needs and those in crisis. This team consists of agents with diverse skills, including those with lived experiences and backgrounds in counselling or allied health. They all receive additional specialised training, including a section on disability inclusion co-created with the Australian Disability Network.

Spotlight on Team Ruby: No Ordinary Call Centre



In the October edition of [Link Magazine](#) (pages 38-39) Telstra's Team Ruby showcased how it is transforming customer care with their empathetic approach and innovative solutions, ensuring every customer feels heard and supported.

“ When you hear about Telstra in the news, it’s so often about the company’s profits or workforce changes. No one talks about the human side of our business – about the deep levels of care that our staff bring to their work. ”

Roanna Stedman,
Enhanced Care and Support Lead, Telstra

As this initiative evolves, I look forward to reporting on its impact for customers in future reports.

2.3.4 Support through 3G transition

Telstra took steps to support its customers through the transition from 3G to 4G and 5G networks. Telstra and Optus extended the closure of their 3G networks until October 28, 2024. This extension was accompanied by a comprehensive public safety awareness campaign aimed at ensuring all Australians were informed about the necessary actions they needed to take. The campaign underscored the urgency for 3G users to transition to newer network technologies to avoid service disruptions.

Over the past five years, Telstra had been proactive in communicating the impending 3G network closure to its customers and stakeholders. This extensive communication strategy included multiple letters, bill messages, SMS notifications, public awareness campaigns, advertising, and even door-to-door outreach. This multi-faceted approach highlighted Telstra's commitment to ensuring that no customer was left behind during this transition.



Spotlight: 18,000 free mobile phones to those in difficult situations

To support customers in vulnerable circumstances, Telstra gave away 18,000 free mobile phones to those in difficult situations, such as needing payment assistance, recovering from natural disasters or living with life-threatening medical conditions.

This initiative was particularly aimed at elderly customers and those living in rural areas, ensuring they could stay connected and access emergency services after the 3G network shutdown.

2.4 Ongoing work Improving Sales Practices

My first Chief Customer Advocate Report on Customer Vulnerability in 2023 summarised Telstra's work to minimise the risk of potential mis-selling to customers generally and especially First Nations customers. Telstra also took a number of steps to address the harm caused to customers including paying remediation.

The improvements to sales practices included:

- **changing customer contracts so that all of Telstra service contracts are month to month**, with only device payment contracts triggering a longer contract;
- **removing excess data fees** from mobile plans to avoid extra charges and bill shock;
- **changing credit assessment policies**, including placing a monetary limit on monthly repayments for new customers;
- **devices can now only be purchased after a customer answers questions about income levels**, and all new customers for Upfront Plans and devices are subject to a real-time credit assessment;
- **placing limits on the number of devices that can be sold** to an individual and the dollar value of devices sold;
- **ceasing sale of customer debt to third party debt collectors**, although we still refer customer debt for recovery in some circumstances;
- introducing extensive **staff mandatory training on cultural awareness and the Australian Consumer Law** and locking team members out of our systems if this training has not been completed;
- engaging an external company to **undertake regular mystery shopping to check compliance and cultural awareness** within stores and contact centres;
- **establishing a dedicated First Nations Hotline in Darwin**. This centre is staffed with local First Nations people; and
- **changing how Telstra sells by removing individual sales targets in stores**. Sales commissions were also restructured to move away from individual incentives to a store-based system across the whole team. These are not just focused on sales but also on meeting compliance requirements and getting positive feedback directly from customers.

In addition to these efforts, specific stores named in Telstra's Enforceable Undertaking with the ACCC relating to historical sales practices continue to have restrictions (for example, they are not able to sell accessories to consumers on repayment plans). The improper selling occurred in our licensee stores and, while they were licensed to sell services, the stores were not owned by Telstra at the time.

To deliver a better customer experience, Telstra bought all licensee stores so that all Telstra-branded retail stores are operated by Telstra employees and are Telstra owned. The last store was transitioned in July 2022.

Despite all of the steps taken over the last 3-4 years, Telstra knows that there remain some historical cases of this conduct that are yet to be redressed.

The remoteness of some of the communities, the time since the conduct took place and the lack of documentation has made it challenging to identify and address any harm quickly.

I reported last year that Telstra had funded Financial Counsellors working in remote communities to help identify cases and support these customers through the process of remediation. This funding was extended this year and while in some areas there has been less support required, in other areas Telstra has increased its support.

Telstra is currently working with Financial Counsellors, the TIO and the ACCC using a co-design approach to improve the process to identify and address any harm to customers in vulnerable circumstances quickly and fairly. The focus on this and supporting teams engaging in this work is fundamental to ensuring Telstra does the right thing by customers.

This ongoing work to improve the processes has already reduced the need for escalations to the Chief Customer Advocate.

Telstra needs to ensure its processes are robust and have longevity because it is likely that while the bulk of the cases will be addressed over the next few years, the reality is that for many reasons some may not be raised with Telstra in the short term. Telstra has committed to remediate all customers affected by mis-selling regardless of when they are raised with Telstra.





3. Looking beyond to show corporate leadership

Many stakeholders including the government, regulators and consumer organisations look to Telstra as the largest telco in Australia to show leadership for other telcos and corporations. This is an important role especially when it comes to providing support for customers in vulnerable circumstances. My view is that this is not an area that should be driven by competition alone, but it is one where we should be working across industry towards continuous improvement. To strive for corporate leadership, Telstra must continue to take action in several key areas. By focusing on these critical issues, Telstra demonstrates its commitment to keeping all customers connected and ensuring access to many essential services. This is also how Telstra can build trust with customers and Australians more broadly. The following sections outline where Telstra can continue or enhance its efforts to working towards new standards of excellence.

3.1 Keeping Customers experiencing Domestic and Family Violence Safe

Telstra's frontline services are often the first point of contact for people dealing with Domestic and Family Violence (DFV). How Telstra responds can make a difference in ensuring that customers not only stay safely connected to Telstra services but are also able to access other support services. Importantly we must remember that for some customers this is a life and death matter.

In FY24, Telstra's SAFE team received an increasing number of contacts from customers affected by DFV.

- The team answered **27,023 calls and handled 8,587 messaging conversations**, reflecting a substantial increase from the 26,551 contacts in FY23.
- As a result, they supported **15,428 unique customers through a SAFE case**, marking a 33% increase from the 11,555 customers assisted in FY23.
- **6,478 of these cases were referred** from the Safe Connections program.

In October, I had the honour of delivering the keynote address at the Wesnet Techsafety Summit, highlighting Telstra's decade-long partnership with Wesnet on Safe Connections. I shared how Telstra's understanding of DFV has matured, leading to an evolved response. In 2017, Telstra updated its financial hardship policy to better support those affected by financial abuse, a form of DFV. In 2020, Telstra launched the Safe Team to provide consistent, compassionate support to customers affected by DFV. More recently, Telstra has helped improve the telco industry's response to tech facilitated abuse by actively contributing to Communications Alliance's *Assisting Consumers Affected by DFV Guidelines* and also helping develop Telco Together Foundation's DFV Action Plan Framework to support smaller and less mature telcos build effective DFV response strategies.

Telstra is committed to:

- 1 **Ensuring employees are adequately trained and supported** to identify and support customers affected by DFV.
- 2 **Providing a safe and respectful environment for customers** to disclose their situation and seek assistance.
- 3 **Providing appropriate and flexible solutions** to address the specific needs and circumstances of consumers affected by DFV.
- 4 **Protecting the privacy and confidentiality of consumers** affected by DFV and ensuring that their personal information is not disclosed to perpetrators or third parties without their consent.
- 5 **Collaborating with other providers, regulators, government agencies, and community organisations** to share best practices and improve outcomes for consumers affected by DFV.
- 6 **Ongoing monitoring and regular review** of the overarching system for supporting customers affected by DFV issues.

Looking ahead, Telstra is focusing on integrating Safety by Design principles throughout its organisation and products. One initiative includes developing a framework to hold perpetrators accountable by updating terms and conditions to allow for the suspension, restriction, or termination of services if there are reasonable grounds to believe that a customer is using a service to abuse, harass, stalk or intimidate another person.

Also, if there are reasonable grounds to believe the end user of a service to be the victim-survivor of DFV which is perpetrated by the account owner, we may cancel the service and re-issue it to the end user without providing notice or getting consent from the account owner. These changes are expected to take effect in the coming months.

The Department of Communications has recently commenced a targeted consultation on a Draft Direction from the Minister of Communications to the Australian Communications and Media Authority (ACMA) to establish an enforceable industry standard to support telecommunications customers experiencing domestic and family violence. The Minister has stressed the importance of telecommunication services being safe, secure, and reliable for victim-survivors to access information, plan for safety, and seek support, while staying connected with their support networks.



The Minister acknowledged the Communications Alliance's Guideline, however noted that a voluntary guideline is insufficient and must be developed into an enforceable industry standard. The Minister also indicated that the review of the Telecommunications Consumer Protections Code has shown it to be ineffective in providing necessary protections.

Following consultation on the direction, the Minister will direct the ACMA to develop the industry standard, expected to be implemented mid-2025. Telstra is committed to collaborating and making a significant impact in this critical area.

This approach responds to calls from consumer organisations for directly regulated safeguards on DFV and address the serious issues faced by victim-survivors in accessing support from their telcos when they need it most. These safeguards could include minimum standards for policies, staff training with compliance reporting, exclusion of alleged perpetrators from discussions, and guarantees of privacy, safety, and account security. They also aim to reduce the need for victim-survivors to provide evidence, or repeat their story, recognise DFV as a potential cause of payment difficulties, and consider the impact of service suspension or disconnection.

Given Telstra's large customer base, we have a significant opportunity to work constructively with stakeholders to assist the regulator to develop an effective Industry Standard that thoroughly addresses customer needs. Communication service providers can unfortunately be part of the problem, but they can also be a vital part of the solution.

3.2 Building Customer Trust and Safety

Telstra is actively working to address the pervasive issue of scams. The Cleaner Pipes initiative is blocking millions of suspicious SMS, voice and digital scams each day from ever reaching customers. While it cannot eliminate the risk, Cleaner Pipes works to reduce instances of customer data being compromised through malware, ransomware and phishing.

Scams are becoming more common, but there has also been a massive increase in the number of scams Telstra is blocking.

In 2023, Cleaner Pipes **blocked an average of 11 million scam SMS messages and 10 million calls every month**, an increase of 69% and 11% year-on-year respectively.

And the trend continues unabated: in the first quarter of 2024, it blocked approximately 25% more SMS scams on average compared to the second half of last year.

This data shows both the impact of Cleaner Pipes and the sheer scale of the scam problem, but is only one part of the Telstra's fight against scams. Telstra is working tirelessly to develop new ways to cut scams off at their source so that they never reach customers, and is in constant dialogue with regulators and industry to help keep Australians safe.

Telstra does not publicly detail the specifics of its anti-scam measures to avoid assisting the cyber criminals whose operations it disrupts, ensuring that strategies remain effective against increasingly sophisticated scam operations. I am reassured by my view of the behind-the-scenes operations that Telstra is working hard to prevent customers being adversely affected.

The development of the [Scam Indicator](#) has greatly advanced the fight against fraud by enabling real-time detection and prevention of scams. It can detect suspicious calls and alert CommBank's fraud team, which can then block transactions and warn customers through the CommBank app. Initially launched for mobile phone calls in October 2023, the Scam Indicator was expanded to cover landlines in August 2024. This expansion is crucial because landlines are frequently used by seniors, who are often targeted by scammers. More than 85% of residential landline services are registered to Australians over the age of 60. Additionally, those aged over 65 lost more money to scammers in 2023 than any other age group and were the only group that did not experience a decrease in reported losses during that year. Phone calls were the number one contact method used by scammers in 2023, based on the amount lost.

The development of the Scam Indicator underscores the power of industry collaboration, as it brings together diverse stakeholders to share critical information and intelligence. 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. The collective effort enhances the efficiency of scam detection and fosters a culture of cooperation and shared responsibility within the industry.

Telstra has also improved overall customer security and scam defence with the introduction of passkeys for the MyTelstra app. This modern technology replaces passwords with a simple biometric sign-in process that weaves in leading-edge security and analysis of data points behind the scenes to make accounts easier to secure and access while being much more resistant to common scams like phishing. Uptake of this technology has been extraordinary with more than 1.2 million customers setting up their passkeys for the app in the first eight months to November since its launch. For comparison, it took 18 months to gain as many customer registrations for the deployment of comparable and much-lauded two-factor authentication account security.

It is crucial that Telstra continues to build on these efforts to ensure the safety and trust of its customers. The threat of scams is constantly evolving and those who can least afford it are often disproportionately affected. This emphasises the need for Telstra to maintain vigilance and adaptability in its approach. One key area for further action is fostering open conversations about scams. Encouraging customers to seek help without shame is vital, as scams can affect anyone.

As such, **Telstra leads multiple initiatives across Australia that promote awareness and education**, helping customers recognise and report scams more effectively.

In addition, the tech safety of customers must be considered not just a responsibility but an important aspect of how Telstra does business. This year, Telstra launched a new digital hub to support parents, families, children and others in staying safe online. The [Online Safety and Wellbeing Hub](#) provides resources to protect users from cyberbullying, harmful online content, and other cyber abuse. It also offers information on how users can report harmful online content and behaviour to the eSafety Commission. The Hub is aligned with the Online Safety Act 2021, which expands Australia's protection against online harm. Telstra should make sure every family knows about the hub to maximise its impact and ensure widespread online safety.

3.3 Improving Digital Inclusion – a call for greater action on boosting basic digital skills

Telstra has demonstrated leadership in digital inclusion over many years. It is a strategic priority for the organisation and underpins its purpose of building a connected future where everyone can thrive. It aims to drive better social, educational, financial and health outcomes for those at risk of digital exclusion. Telstra's efforts are crucial in serving customers in vulnerable circumstances, complying with regulatory requirements and building trust within the Australian community.

Central to Telstra's digital inclusion strategy is the [Australian Digital Inclusion Index \(ADII\)](#), developed in partnership with RMIT and Swinburne Universities. The ADII tracks progress on digital inclusion across Australia, providing a critical evidence base to guide action and investment. Despite overall improvements, rapid digitisation is increasing exclusion for those not online, with 9.4% of the population highly digitally excluded, highlighting the need for targeted interventions.

Telstra's investment in the ADII and several other initiatives demonstrates its corporate leadership in this space, but there is more to be done. The Australian Government's recent allocation of nearly \$100 million to remote digital inclusion projects and the impact of Low Earth Orbit (LEO) satellites for regional and remote customers are positive steps. However, we still need a permanent, low-income broadband solution from nbn to address affordability and I believe this would be the real game changer for digital inclusion in Australia, as highlighted by ACCAN's No Australian Left Offline campaign.

Community feedback indicates a high demand for informal, on-the-spot technology support, especially among seniors, people with disabilities, those on low-incomes and regional customers. Many lack someone to help them with basic digital tasks and this is negatively impacting their lives. At present, even though numerous customers look for help in stores, the staff often cannot allocate sufficient time to teach them additional skills or assist with a wider array of needs.

Telstra could play a pivotal role by providing a network of trusted advisors to offer on-the-spot assistance with using devices, Telstra products, connectivity literacy, online safety and basic digital tasks. Common areas where help is needed include setting up a Telstra ID, creating and using email, understanding and using apps like My Telstra, identifying scams and managing online services.



This proposal places digital inclusion at the heart of Telstra's customer support, embedding sustainability in the business and driving genuine social impact. It promises improved social, educational, financial and health outcomes for customers in vulnerable circumstances, enhanced confidence in using technology, better online safety and a deeper understanding of Telstra services.

Corporate Australia has the opportunity to support the "last 10%" of the population to get online by doing more to help their customers learn how to perform the tasks they are asking them to do digitally, such as banking, shopping, monitoring electricity usage and managing health. Digitising and assuming all customers can follow is a mistake. Collaboration among Corporate Australia in building digital skills for those most in need would drive greater impact, ensuring everyone benefits from the digital economy.

3.4 AI and Customers

Telstra is at the forefront of integrating AI into its operations, demonstrating a commitment to leveraging technology for both business efficiency and customer satisfaction. The company's Responsible AI Policy, aligned with Australia's [AI Ethics Principles](#), underscores its dedication to ethical AI deployment. This policy, coupled with a clear governance system which is being used now, ensures that AI applications are developed and used responsibly, protecting customers while fostering innovation. As a consumer representative I contributed to the debates that eventually led to these principles and standards, so I am very pleased to now see them being used on a daily basis at Telstra.

AI is already transforming Telstra's business processes. The goal set in 2021 to enhance or improve 100% of key business processes by FY25 is ambitious, yet **Telstra has achieved approximately 67% of this target.**

AI applications range from reducing network energy consumption to protecting customers from scams. Notably, the "Ask Telstra" initiative, a ChatGPT-like tool, is being used to improve frontline staff's access to the most current information with the ultimate goal of enhancing customer interactions. Telstra is also using AI in to better understand customer experiences and proactively fix nbn issues using smart modems.



In addition to these advancements, there are several areas where Telstra can further its leadership and corporate citizenship in AI:

- 1 Enhancing Digital Inclusion: Telstra's efforts to bridge the digital divide are commendable, but more can be done** to ensure AI benefits all Australians, particularly vulnerable communities. Telstra's partnership with Microsoft and the Good Things Australia to develop an AI literacy program called [Digital Sisters](#) is a step in the right direction. Expanding such initiatives to include more diverse groups can help mitigate digital inequality.
- 2 Building Trust and Understanding: Trust in AI is crucial.** Telstra should focus on transparent communication about AI's capabilities and limitations, demonstrate safeguards to build public trust and ensure AI systems respect human rights, diversity, and individual autonomy. Additionally, promoting AI literacy and data literacy as part of basic digital skills programs can empower more people to engage with AI confidently. Telstra's partnership with Justice Connect exemplifies this approach. Through the [SmartAssist](#) video and tool, individuals are taught how to use AI in a safe and supported manner, providing them with the opportunity to engage with AI technologies effectively.
- 3 Addressing Bias and Ethical Considerations: Ensuring that AI systems do not perpetuate societal biases is essential.** Telstra should continue to involve under-represented and socially disadvantaged communities in the co-design and development of AI systems. This inclusive approach can help create fairer and more equitable AI systems.
- 4 Expanding AI Applications for Social Good: Telstra has the potential to use AI for broader social impact.** Exploring AI applications in areas such as disaster preparedness, support for the aged and people with disability, as well as educational outcomes for disadvantaged youth, can further Telstra's mission to build a connected future where everyone can thrive.



4. Concluding remarks

In 2024 Telstra has continued to focus on responsible business practices, becoming more customer-centric and enhancing support for customers in vulnerable circumstances. As reported last year, Telstra continues to pro-actively self-report compliance breaches to relevant regulators while working on identifying and mitigating root causes. While this is not easy it demonstrates a deep commitment to doing the right thing for customers and being transparent. Reflecting on the past year, I see significant progress. While there is still much work to be done, Telstra's commitment is evident and will result in benefits for customers and the community long-term.

I have seen firsthand that Telstra's people and teams have a genuine commitment to do what's right by the customer. While we don't always get it right, the intent to do good is always there, and this is commendable. Telstra's continued commitment to my role as the Chief Customer Advocate, an independent voice within the company, exemplifies Telstra's dedication to transparency and accountability. This commitment reflects Telstra's resolve to improve customer outcomes, particularly for those in vulnerable circumstances.

The year ahead will see many changes in the regulatory environment for telcos including new requirements to ensure the safety of those experiencing domestic and family violence; new rules about communication with customers during and after outages; a new Telecommunications Consumer Protection Code and new legislation and framework on scams. Debate about essential service definitions, the future of universal service and networks in rural and remote areas will change with the impact of more LEO Satellite products and services.

As technology evolves, products and services change and AI based applications and solutions become more prevalent, my focus remains on achieving positive outcomes for all customers, especially those in vulnerable circumstances. The company's commitment to transparency and accountability, coupled with its strategic initiatives, positions it well to navigate the challenges ahead and continue making a meaningful impact.

Endnotes

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- 6 This means the data used to access the website is not counted toward any usage in a plan.
- 7 Telecommunications Industry Ombudsman (2024). *TIO Annual Report 2023-2024*. Available at: [https://www.tio.com.au/sites/default/files/2024-09/TIO Annual Report_2023-2024.pdf](https://www.tio.com.au/sites/default/files/2024-09/TIO%20Annual%20Report%2023-2024.pdf)
- 8 Telecommunications Industry Ombudsman and Consumer Policy Research Centre. (2024). *Barriers to Effective Dispute Resolution in the Telecommunications Industry*. Available at: [https://www.tio.com.au/sites/default/files/2024-07/TIO_CPRC_Telco Research Report.pdf](https://www.tio.com.au/sites/default/files/2024-07/TIO_CPRC_Telco%20Research%20Report.pdf)

Contacts for specialist support

| Support | About | Hours of operation | Contact |
|--|---|---|---|
| Payment Assistance service team | Assistance for customers finding it hard to pay for their services. | Phone: Call us and say 'payment assistance' between Monday to Friday 8am–6:30pm AEST Messaging: Monday to Friday 7.30am–9pm AEST Saturday & Sunday 9am–7pm AEST | 132 200 Link available on T.com or in app |
| First Nations Connect | Australian-based phone line dedicated to helping Aboriginal and Torres Strait Islander customers, respecting culture and community. Access to interpreter services for approximately 50 different First Nations languages and dialects. | Monday to Friday 9am–5pm (anywhere in Australia) | 1800 444 403 |
| Compassionate Care | Dedicated team to assist when experiencing bereavement or a loved one has a critical illness. | Monday to Friday: 8am–8pm AEDT Saturday & Sunday: 8am–5pm AEDT | 1800 775 932 |
| Multilingual Service | Translation service for assistance in languages other than English | Monday to Friday 8am–6pm AEST | 1800 241 600 |
| Disability Enquiry Hotline | Assistance with specialised equipment and services for customers with a disability. | Monday to Friday 8am to 5pm AEDT | 1800 068 424 |

