

Brisnorth Communications

**Telecommunications
Consumer Protection
COMPLIANCE PLAN**

Telecommunications Consumer

Version 1.0
October 1, 2012

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Part 1 – General Terms and Objectives

Objectives of this Policy

This plan sets out the general principles which Brisnorth Communications will apply to its activities, to promote compliance with all requirements of the Telecommunications Consumer Protection Code (**Code**).

This policy does not set out specific targets or metrics, but instead provides the core guidance which apply to the operations of Brisnorth Communications.

Brisnorth Communications confirms its commitment to compliance with the Code at all levels of its staff and management.

Key responsibilities

Compliance management will be the joint responsibility of all staff of Brisnorth Communications, including the CEO. All employees must perform their duties in an ethical manner at all times.

From time to time, a Code compliance manager may be appointed (whether as a separate role or in addition to roles already held within Brisnorth Communications).

Updating and Reviewing this Policy

Compliance with this policy, and the effectiveness of this policy, will be reviewed by Brisnorth Communications annually, and this policy may be updated as a result of that review.

Brisnorth Communications will also monitor guidance and updates to the Code released by its upstream suppliers, ACMA and Communications Compliance, and may update this policy at any time in its sole discretion to reflect that guidance or update.

Part 2 – Implementation of Compliance Measures

Recent compliance initiatives

During 2012-2013, Brisnorth Communications has implemented a number of new operational steps to promote compliance with the Code.

Some key elements of this process include:

- replacing its publicly available complaint handling information with a new complaints policy summary;
- providing a revised procedure for customers to appoint authorised representatives;
- providing a revised financial hardship policy;
- revising its website to include disclosure of a variety of new information which the Code requires to be disclosed;
- alerting its customers to their rights under the Code with the flyer created by Communications Alliance titled “Protecting Our Customers” available here : http://www.commsalliance.com.au/_data/assets/pdf_file/0005/38363/Protecting-Our-Customers-TCP-Code-29Oct2012.pdf
- revising the format of its bills to customers;
- upgrading the functionality available to customers via the internet customer portal;
- including unit price advertising in the format recommended by Communications Alliance on its website and in its other advertising.

Corporate non-compliance or risk of non-compliance

All staff of Brisnorth Communications must report detected non-compliance with the Code to management.

In the event that Brisnorth Communications identifies an ongoing compliance problem or risk, it will liaise with Communications Compliance to advise it of that problem or risk (if not already involved), and will work with Communications Compliance to address the problem.

Measurement of Compliance, and External Controls

In addition to any feedback received from ACMA or from Communications Compliance, Brisnorth Communications will monitor compliance with the Code through the outcomes of any customer complaints made either directly to it, or to the Telecommunications Industry Ombudsman.

Brisnorth Communications will also monitor and analyse the results of customer complaints made directly to it or to third parties (including the Telecommunications Industry Ombudsman) to determine whether complaints generally are being resolved in an efficient and fair manner.

Brisnorth Communications will use the result of annual reporting which the Code requires it to carry out as the measurement for base compliance, and where appropriate Brisnorth Communications will seek to ensure that any formal requirements communicated to it are exceeded rather than met.

Outsourcing

Brisnorth Communications will outsource various activities, such as service provisioning or technical support, from time to time to third parties.

Where this occurs, Brisnorth Communications will require that the third parties comply with the obligations of the Code as if they were Brisnorth Communications.

If Brisnorth Communications outsources parts of its operations to third parties, it will ensure that they also provide ongoing reporting, to allow measurement of compliance by them.

Consequences of non-compliance by staff or contractors

If staff or contractors of Brisnorth Communications fail to comply with this policy, it is the intention of Brisnorth Communications that they be required to review this policy and the obligations of the Code.

Any further consequences which may arise as a consequence of either:

- (a) one or more single instances of serious non-compliance; or
- (b) repeated non-compliance;

with this policy will depend on the seriousness and consequences of the breach. In general, it is the intent of this policy that non-compliance be remedied by training and education rather than by sanctions imposed on staff or employees.

Training Objectives

Brisnorth Communications will provide additional training to its staff as necessary to achieve the following objectives:

- (a) all staff must be familiar with the obligations on them and Brisnorth Communications imposed by the Code;
- (b) all staff must be familiar with the content of this policy, and other relevant policies such as the privacy policy of Brisnorth Communications;
- (c) all staff should become familiar with any ongoing risk or failure of compliance, in order to address that issue across the organization.

To ensure that sufficient resources are available for training, Brisnorth Communications will seek to use training resources from its upstream suppliers and from Communications Alliance where these are available, in addition to monitoring communications from ACMA and other industry reporters.

Marketing Objectives

Brisnorth Communications uses, among other marketing materials, a local area marketing kit and other marketing materials created by its own marketing consultants.

Where new promotional material is created, Brisnorth Communications proposes that it will be reviewed by one of a range of qualified persons to satisfy the requirement of the Code, such as external marketing consultants, lawyers, or an experienced staff member trained in advertising laws.

Records of Compliance

Brisnorth Communications is obliged by the Code to keep a record of complaints received from its customers.

This record will be reviewed regularly in order for Brisnorth Communications to comply with its obligations under the Code.