

AGE CONCERN NEW ZEALAND

Submission: Review of the Telecommunications Dispute Resolution Scheme

To: Commerce Commission

From: Age Concern New Zealand
He Manaakitanga Kaumātua Aotearoa

Date 27 September 2021



Serving the needs of older people

Age Concern New Zealand: Who we are

Age Concern New Zealand is a registered charity working for the wellbeing, rights, respect, and dignity of the 750,000 people aged 65 and above that call New Zealand home.

Our vision:

Older people live valued lives in an inclusive society

He pāpori e whai whakaarohia ana, e whakanuitia ana, e tautokona ana, e whai mana anahoki te hunga kaumātua

Age Concern New Zealand provides expert information and support services in response to older people's needs through our network of 29 local Age Concerns, seven branches and a national office. We have 40 front doors as well as delivering services in older people's homes, over the phone and in community venues throughout Aotearoa.

Age Concern provides key services for older New Zealanders including:

- Advocacy and public awareness
- Services to enhance social connection, including a visiting service
- Elder abuse and neglect prevention
- Health promotion programmes

We provide leadership on issues affecting older New Zealanders and represent their perspectives by making submissions on national policy and providing input on national working groups. We are active and vocal on relevant issues and work to assist older people to stay connected with their whānau / family, friends, and community.

We want everyone's contribution to society valued and respected regardless of age.

The mahi we do is only possible through the generous support of all our donors, sponsors, and funders.

Introduction

Age Concern New Zealand thanks the Commerce Commission for the opportunity to provide feedback on the *Review of the Telecommunications Dispute Resolution Scheme*. We are keen for all New Zealanders to benefit from a well-known, respected and effective disputes scheme that meets everyone's needs, including people aged 65 and older.

1. What are your views on our recommendations in our draft report?

- a. We support dividing the recommendations into four phases so that changes that will make the most difference for consumers are prioritised over other changes that will take more time, and potentially have less direct impact on consumers.
- b. In particular, we support early action to raise awareness of the disputes resolution scheme, removing barriers to accessing the scheme, and the speedy resolution of complaints.
- c. We support DR4 about raising awareness of the disputes scheme. We recommend the Commerce Commission ensures information is disseminated in a variety of formats so that older people, people with disabilities and those on low incomes are aware of the scheme. These population groups may not be online and may be best reached through local newspapers, television and written materials.
- d. We support DR5 that states that the customer complaints code establishes clearer guidelines and obligations for Retail Scheme Members, along with establishing regular compliance testing to raise awareness of the TDRS among their customers.
- e. We support DR13 resetting the deadlock period for the TDRS from six weeks to ten working days. We hear from older people that long wait times and unresolved issues are key concerns.
- f. We support DR16 which revises the TDRS internal complaints handling process so that consumers do not need to submit their complaint more than once. We also support a variety of ways to make a complaint being available to consumers. Taking the step of making a complaint is a major step for many older people. They typically do not want to be a nuisance or cause others any bother. The complaints process needs to be streamlined while also allowing older consumers to tell their story.

2. The draft report sets out timing for TCF implementation of the recommendations, do you have any feedback on the timeframes?

- a. We support the recommendations that are aligned to phase one of implementation.
- b. We support recommendations related to raising awareness of the disputes resolution scheme being implemented as part of phase two.

- c. We support recommendations about the complaints handling process being implemented in phases one and two.

3. Do you have any other feedback?

- a. We recommend the Commerce Commission uses an equity lens when finalising and implementing the review recommendations. Not all population groups have the same outcomes and benefits of other groups. Changes need to reduce inequities, not perpetuate or widen them.
- b. We urge the Commerce Commission and telecommunication providers to recognise that telecommunications are an essential means by which older people, as well as the wider population, stay connected with others. Increasing numbers of older people live alone. By 2034, it is estimated that people aged 65 and over living alone will make up 55% of all people living alone. Loneliness is a growing and significant issue that impacts on people's health and wellbeing. Telecommunications are not simply a technical product or business venture, they are how people keep in touch with one another and access services, including everyday requirements such as banking, shopping and medical services.
- c. We recommend the Commerce Commission ensures people living in rural and provincial New Zealand are as well served as those in major urban areas. Postcode variations place many older people and rural dwellers at a disadvantage over city dwellers. Those living away from our main centres can miss out on many benefits that are taken for granted by city dwellers; they rely on telecommunications to stay connected to friends and whānau, for entertainment, and to access information, goods and services.

Closing comment

Thank you for the opportunity to make a submission on the *Review of the Telecommunications Dispute Resolution Scheme*.

We value the opportunity to comment and welcome any questions or clarification you may require.

Kind regards



Stephanie Clare
Chief Executive
Age Concern New Zealand