



Telecommunications Consumer Protections
Code Compliance Plan

BlueReef Connect

October 2018



PART 1 – OBJECTIVES AND RESPONSIBILITIES

Objectives of this Compliance Plan

This compliance plan sets out the general principles that BlueReef Connect will apply to its telecommunications activities in order to promote and maintain a culture of compliance with all requirements of the Telecommunications Consumer Protection Code C628:2015 (the Code). This compliance plan does not establish specific compliance targets or metrics but aims to establish the core compliance principles that are to be adhered to in the day to day operations of BlueReef Connect.

Statement of commitment

BlueReef Connect confirms its commitment to effective compliance with the Code at all staff and management levels. This commitment to compliance with the Code is aligned with the strategic and business objectives of BlueReef Connect and is endorsed by the Company Director. Appropriate resources will be allocated to develop, implement and maintain a company-wide culture of compliance with the Code.

Key Responsibilities

Compliance with the Code will be the joint responsibility of all staff of BlueReef Connect. All employees will perform their duties in a manner that ensures that compliance with the Code is a key driver and are encouraged to be vigilant and proactive in fostering a commitment to compliance among all staff.

PART 2 – IMPLEMENTATION OF COMPLIANCE MEASURES

Training and Awareness

BlueReef Connect will ensure that competence and training needs are identified and that appropriate measures will be taken to address these needs in order to enable employees to fulfil their Code compliance obligations.

Practices and behaviours that support compliance will be encouraged and behaviour that compromises compliance efforts will not be tolerated.

Where necessary, BlueReef Connect may choose to allocate specific staff with the responsibility for ensuring that compliance with the Code is adhered to and training on Code awareness is provided, be that in addition to their existing roles, or in the form of a dedicated Compliance Manager role.

Mitigation of non-compliance

All staff of BlueReef Connect must report any instances of non-compliance with the Code to management or to the delegated Compliance Manager.

In the event that BlueReef Connect identifies a risk of ongoing non-compliance, it will identify the risk to Communications Compliance and will engage with Communications Compliance to consider options for mitigating the identified risk.

Recent /ongoing compliance initiatives



In order to fulfil its commitment to Code compliance, BlueReef Connect has implemented the following initiatives:

- Any changes to website content, e.g. changes to existing content or the addition of new products should be cross-referenced with the Communications Compliance Compliance Attestation Questionnaire to ensure that the changes/additions comply with the Code.
- Ensuring awareness of the TCP Code guidance material provided by Communications Compliance and the Australian Communications and Media Authority (ACMA).
- Ensuring that compliance documents are lodged with Communications Compliance by the required date on an annual basis.
- Regular staff review of policies, procedures and changes in the industry.

PART 3 – MONITORING AND REPORTING

Customer Complaints

BlueReef Connect will use information on customer complaints made either directly to BlueReef Connect or made via the Telecommunications Industry Ombudsman as a means of measuring the effectiveness of processes that have been introduced to ensure Code compliance. BlueReef Connect is committed to the satisfactory resolution of customer complaints in a timely manner that is reflective of its commitment to Code compliance.

BlueReef Connect will utilise annual reporting to determine a measurement for Code compliance.

Records of Compliance

BlueReef Connect will fulfil its obligation under the Code to keep a record of all complaints received from its customers. This record will be reviewed at regular intervals to measure levels of Code compliance and to identify where certain processes may lack appropriate Code compliance measures.