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REVIEW OF THE *BENCHMARKS FOR INDUSTRY-BASED CUSTOMER DISPUTE RESOLUTION SCHEMES* (the *BENCHMARKS DOCUMENT*)

The Australian and New Zealand Ombudsman Association (ANZOA) appreciates the opportunity to contribute to the review of the *Benchmarks for Industry-based Customer Dispute Resolution Schemes* (*Benchmarks Document*) by the Commonwealth Consumer Affairs Advisory Council (CCAAC).

ANZOA is a professional association and the peak body for Ombudsmen in Australia and New Zealand. A listing of ANZOA Members is included as Attachment 1 to this submission.

We note the terms of reference for the CCAAC review, as set by the Council of Australian Governments (COAG) Governance and Legislative Forum on Consumer Affairs:

- review the current function and use of the *Benchmarks Document*;
- consider for each Benchmark, the ongoing relevance and usefulness of the underlying principles, purposes and key practices;
- assess whether the *Benchmarks Document* is meeting the objective of acting as a guide to effective practice for those industry sectors with customer dispute resolution schemes; and
- consider how the *Benchmarks Document* could be modernised or enhanced, including through the development of implementation guidance.

ANZOA'S EXPERIENCE WITH THE *BENCHMARKS DOCUMENT*

ANZOA brings to this submission a long history of practical experience in the application of the *Benchmarks Document* (also commonly known as the *National Benchmarks*).

Amongst other things, for an Ombudsman (including a Complaints Commissioner) to be admitted to ANZOA membership, his or her office must meet detailed key criteria based largely on the *Benchmarks Document*. These criteria are interpreted with sufficient flexibility to encompass the considerable range of Ombudsman offices in the public and private sectors and the variations in their constitutions, jurisdiction, powers and accountability.

That ANZOA's membership includes both industry-based and parliamentary Ombudsmen is a positive indication that the *Benchmarks Document* has the potential for broader application, beyond dispute resolution in service-based industries, to provide a framework for the resolution of disputes in government and other services.

ANZOA also uses the *Benchmarks Document* as a clear marker against which it assesses, and encourages government and other stakeholders to assess, proposals for new external dispute resolution (EDR) offices.

In May 2009, given the importance of the Benchmarks, ANZOA commenced its own internal review of the *Benchmarks Document*, drawing on the collective experience of ANZOA members since the Benchmarks were developed and published by the Commonwealth Government in 1997. In undertaking its review, ANZOA looked to developments since 1997 in relation to the approval of EDR schemes, including:

- the regulatory guides and other documents prepared by the Australian Securities and Investments Commission (ASIC)
- the international standard setting out guidelines for dispute resolution external to organisations (ISO 10003)
- the New Zealand guidelines (at that time in draft) to assist schemes to become approved under the *Financial Service Providers (Registration and Dispute Resolution) Act*.

Positively, ANZOA's 2009/10 internal review established that the *Benchmarks Document* remained as relevant as it was in 1997, providing a rigorous framework for offices providing EDR services. It was the unanimous view of ANZOA members at the time that the Benchmarks reflected contemporary good practice.

That said, ANZOA's review also highlighted how language and practices evolve with time and experience. It concluded that the *Benchmarks Document* could be improved by changes to make some of the language more contemporary, broaden the application of some parts to make them more widely relevant, provide more explicit obligations around accessibility, strengthen the independence criteria and broaden the application of the fairness criteria.

An outcome of ANZOA's review was the preparation of a 'marked-up' version of the *Benchmarks Document*—a copy accompanies this submission as a separate attachment. The 'marked-up' version reflects this incremental approach to improvement, while endorsing the generally robust framework of the *Benchmarks Document*.

ADDRESSING CCAAC'S CONSULTATION QUESTIONS

This submission addresses CCAAC's more general consultation questions, before moving on to ANZOA's suggestions for updating the individual Benchmarks.

The Benchmarks' role and purpose

- 2.1 How widely are the Benchmarks used by industry schemes? Are there any examples of how the Benchmarks are used?
- 2.2 To what extent do the Benchmarks act as a useful guide for industry schemes as well as consumers and industries that access such schemes? Are there any ways in which they could be improved to more effectively fulfil this role?
- 2.3 Are there any other standards or guidelines that are commonly used by industry schemes to deliver and determine best practice operations? If so, how are they applied in conjunction with or as an alternative to the Benchmarks?
- 2.4 Are the Benchmarks consistent with other standards or guidelines and if not, in what respect are they inconsistent?

The practices and principles in the *Benchmarks Document* are absolutely reflected in the processes of EDR offices in Australia and New Zealand. Examples include:

- Telecommunications Industry Ombudsman (TIO)—embedded in the TIO's Constitution; underpin TIO functions, powers and complaints handling procedures; the basis for independent reviews
- Public Transport Ombudsman (Victoria) (PTO)—underpin PTO's principles and processes and independent reviews

- Financial Ombudsman Service (Australia)—underpin FOS’s approval by ASIC under Regulatory Guideline 139 and independent reviews
- Energy and Water Ombudsman NSW (EWON)—underpin EWON’s planning and success measurement processes and independent reviews
- Energy and Water Ombudsman (Victoria) (EWOV)—underpin EWOV’s policies and processes and independent reviews
- Energy and Water Ombudsman Queensland (EWOQ)—as measures for EWOQ’s overall performance and independent reviews
- Insurance & Savings Ombudsman New Zealand (ISO)—underpin ISO’s approval by the Minister of Consumer Affairs and independent reviews
- Banking Ombudsman New Zealand (BO)—underpin BO’s approval by the Minister of Consumer Affairs and independent reviews
- Electricity and Gas Complaints Commissioner New Zealand (EGCC)—underpin EGCC’s approval by the Minister of Consumer Affairs and independent reviews

ANZOA’s 2009/10 internal review of the *Benchmarks Document* took account of a number of guides and other documents and how they address similar content/principles. It concluded that the clear and practical focus of the *Benchmarks Document* on independent, accessible, fair, accountable, efficient and effective EDR—with the format of a principle, purpose and outline of key practices for each Benchmark—made the *Benchmarks Document* the stand-out for the purpose of a best practice framework for EDR offices.

Modernising the Benchmarks

- 3.7 Could any element of the Benchmarks, including terminology or key practices, be modernised in the light of subsequent developments in ADR processes or technologies?
- 3.8 Do each of the six Benchmarks remain appropriate as part of a best practice framework for industry-based dispute resolution services, and are there any additional Benchmarks (and associated key practices) that could be included?

Drawing on the experience of its members, and in light of developments in dispute resolution processes and technologies since the Benchmarks were introduced in 1997, ANZOA believes there are opportunities to modernise language and introduce new concepts.

For overall modernisation and improvement, ANZOA suggests the following:

- Change the use of the word ‘scheme’:
 - A number of terms are used for providers of independent external dispute resolution services— ‘scheme’ is the term used in the *Benchmarks* at present. ANZOA suggests adoption of the term ‘office’—defined as “A position to which certain duties are attached, especially a place of trust, authority or service under a constituted authority” [Shorter Oxford English Dictionary, 3rd Ed] —on the basis that ‘office’ covers the various terms currently used, without being overly specific. ‘Office’ is also the term now used in the *ANZOA Rules & Criteria*
- Change the use of the term ‘members’:
 - The *Benchmarks Document* currently refers to organisations within jurisdiction as scheme members. ANZOA suggests the term ‘participating organisations’. This is also generally consistent with the terminology in ISO 10003.

- Broaden the Benchmarks to make them more widely relevant:
 - Make changes to recognise that some offices have a statutory basis, and that some make recommendations and not binding decisions. This is reflected in the suggested changes to the individual Benchmarks.

- Respond to the negative impacts of ‘competition’ among EDR offices:
 - ANZOA members recognise the value of competition for consumers in the provision of services. Indeed, in most of the industries in which ANZOA’s members operate, there are markets for services that provide demonstrable cost, service and choice benefits for consumers. However, any possible benefit of competition in providing EDR services is outweighed by potential substantial detriment—to consumers, service providers and the community more broadly. ANZOA’s considered view, after substantial consultation amongst ANZOA members, is that ‘competition’ in EDR is inconsistent with the spirit of the Benchmarks, and undermines principles of independence and effectiveness at the heart of the Benchmarks. Reasons for this include:
 - It is not in the interests of consumers/citizens or their advocates, as it may not be clear where to take complaints or which is the most appropriate service to deal with particular issues.
 - It is likely to add unnecessary and inefficient costs to Ombudsman services, e.g. inefficient duplication of infrastructure/resources/services/information systems, mechanisms to establish a ‘common door’ approach, and the need to provide information to consumers about different offices.
 - It may lead to manipulation of dispute resolution services, differing standards, and inconsistencies in decision making which could be adverse for consumers and participating organisations.
 - Poor performing organisations may choose to join an alternative EDR office that they believe is not as rigorous in its approach to complaints.
 - ‘Competition’ among EDR offices may encourage forum shopping by participating organisations, over which their customers (and consumers generally) have no control and no opportunity for any input.
 - An EDR office may focus more on participating organisations rather than on complainants or consumers in order to keep or grow its membership.
 - Where EDR offices are subject to regulatory approval and/or other regulatory mechanisms, regulators may need to set up separate reporting and communication systems for different offices, potentially about the same issues.
 - The value of the Ombudsman’s office as a source of information and analysis to contribute to the ongoing improvement of an industry or service area will be diluted, to the detriment of consumers, service providers and the wider community.

For these reasons, ANZOA’s stated public position is that there should be one external dispute resolution office only for any industry or service area. Other appropriate mechanisms can be used to provide a proxy for the benefits that can otherwise be derived from competing services. These mechanisms include appropriate governance arrangements, independent reviews and public reporting, matters that the *Benchmarks Document* already provides for.

- Introduce a regular review of the *Benchmarks Document*
 Even in the few years since ANZOA’s internal review of the *Benchmarks Document*, there have been new developments in EDR, including the introduction of ‘competition’ among EDR offices, as discussed above. ANZOA recommends that, once the CCAAC review process has been completed, a regular review of the *Benchmarks Documents* (at, say, intervals of seven years) would help ensure it remains relevant to current best practice.

Implementation guidance

- 4.1 Would industry schemes benefit from additional implementation guidance and if so, how?
- 4.2 Are there any elements of the Benchmarks where additional implementation guidance would be particularly beneficial?
- 4.3 Are there any principles or processes that if followed, would improve the quality and usefulness of implementation guidance materials?
- 4.4 Who should be involved in the development of additional implementation guidance?

ANZOA believes a real strength of the *Benchmarks Document* is that it is not overly specific—striking the right balance between principle and practice, while allowing for industry adaptation and implementation guidance to suit the needs of consumers and the operations of participating organisations.

The review contemplates additional guidance on implementation, rather than the introduction of strict implementation requirements. This is consistent with the current approach, under which practices other than the stated key practices may be used to meet benchmarks. We believe this flexible approach should continue and that making key practices more far-reaching and prescriptive would be counter-productive.

If adopted, ANZOA’s suggested changes (inclusive of explanatory footnotes) would provide greater guidance within the *Benchmarks Document* itself. We believe this ‘in context’ guidance to be the most efficient and effective way to achieve the aims of assisting interpretation and implementation.

Accessibility

- 3.1 To what extent do the underlying principles and key practices under the Benchmark of Accessibility remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices of the Accessibility Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have been very successful in ensuring participating organisations tell consumers about EDR options, in securing cost-free EDR for consumers, and in promoting informal dispute resolution practices within EDR offices.

For modernisation and improvement, ANZOA suggests the following:

- Reword the ‘principle statement’ to:
 - The office makes itself readily available by promoting knowledge of its services, being easy to use and having no cost barriers.
- At 1.4, greater specificity (with explanatory footnotes) about how participating organisations should inform customers about the office:
 - The office requires participating organisations to inform people affected by the organisation’s services about the office. This may include providing information at the point of service (for example, in displays or brochure stands), in contracts, codes of practice and customer service charters, on websites and in newsletters and correspondence forwarded to customers.
 - Two explanatory footnotes:
 - Participating organisations refers to any organisations which are within the jurisdiction of the office.

- People affected by an organisation’s services will include customers or consumers who purchase goods or services from the organisation, but may also include others affected by services the organisation provides.
- At 1.5 and footnote 6, adding a definition for complaint:
 - A ‘complaint’ is an expression of dissatisfaction about an organisation, related to its products and services, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected; see the Standards Australia Standard *Customer Satisfaction – Guidelines for complaints handling in organisations* AS ISO 10002 – 2006.
- At 1.5, require participating organisations to provide information to persons when a reasonable time has passed for the organisation to resolve the complaint:
 - The office also ensures that this information is made available by participating organisations:
 - (a) when a person states they are not satisfied in whole or in part with the outcome of their complaint; or
 - (b) when the organisation refuses to deal with a complaint; or
 - (c) when a reasonable time has passed for the organisation to resolve a complaint, and the complaint remains unresolved;
 whichever occurs first.
 - Explanatory footnote: What is a reasonable time will depend on a number of factors including the requirements of any internal dispute resolution procedure, the nature of the complaint and the inquiries required.
- At 1.6, specify how the office will promote its existence in an way to be sensitive to the needs persons with special needs:
 - The office promotes its services in such a way as to be sensitive to needs of those who are disadvantaged, and those with special needs. This includes making information available in appropriate languages, and in alternative formats such as large text and audio.
- At 1.8, specify appropriate facilities to maximise participation of persons making complaints:
 - The office provides appropriate facilities and assistance to maximise the participation of persons making complaints, including those who may be disadvantaged or have special needs—for example, allowing contact in a range of modes (in person, by telephone, by email or online, by fax) and providing interpreter services.
- At 1.9 and 1.14, remove the requirements that complaints be reduced to writing
- At 1.21, reframe the legal representation clause:
 - Legal representation will generally only be allowed with the permission of the office. Unless legal representation is required, having regard to the nature of the dispute and issues involved, it will generally be discouraged by the office. Where an office agrees to one party being legally represented:
 - (a) the office will provide the opportunity for the other party to be legally represented
 - (b) the office will require the participating organisation to pay the legal costs of complainants where the participating organisation is the first party to be legally represented.
- Under heading of ‘Legal Proceedings’, add a clause to discourage participating organisations taking legal action on complaints before an office:

- Unless exercising a right conferred by a statutory provision to clarify the Ombudsman’s jurisdiction, a participating organisation will not commence legal proceedings before a court, tribunal or other forum in respect of a complaint before an office, except in special circumstances. Special circumstances may include:
 - a) where the legal limitations period for bringing legal proceedings is about to expire
 - b) where the complaint is to be used as a test case in legal proceedings

Independence

3.2 To what extent do the underlying principles and key practices of the Benchmark of Independence remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices in the Independence Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have been very successful in ensuring the processes and decisions of EDR offices are objective and unbiased (and seen to be that way) and that an EDR office’s decision-making and administration is independent of participating organisations.

For modernisation and improvement, ANZOA suggests the following:

- Reword the ‘principle statement’ to:
 - The decision-making process and administration of the office must be independent from participating organisations.
- At 2.5, make it clear that it is the office that selects staff:
 - The office selects its own staff. The office’s staff are not answerable to participating organisations for the operation of the office.
- At 2.6, make the requirements for the overseeing entity more general, to encompass relevant statutory arrangements and include an explanatory footnote:
 - There is a separate entity set up formally to oversee the independence of the office’s operation.
 - Explanatory footnote: There are a range of arrangements which may be put in place to meet this requirement:
 - An overseeing entity may include a council, board or other body consisting of an independent chair, consumer member or members, member or members from participating organisations and, where relevant, other stakeholder member or members.
 - Offices set up under statute may have specified the arrangements to make sure the office is independent, and these offices may be subject to arrangements including accountability to a Parliament, Parliamentary Committee or Minister, in addition to or instead of an overseeing entity.
 - Smaller industry sectors or those with few complaints may not have the ability or need to devote large resources to setting up such an entity. Other types of overseeing entities are not precluded as long as they allow for the relevant independence or a balance of competing interests.
- At 2.8, remove the function of the overseeing entity to take action on systemic problems:
 - (f) receiving information about systemic problems
- At 2.8 and 2.10, amend the phrase ‘terms of reference’ to have a more generic phrasing ‘jurisdiction, rules and procedures’, which would include terms of reference, constitutions and charters

- Under Funding, include a ‘not-for-profit’ requirement (with explanatory footnote):
 - The office operates on a not-for-profit basis.
 - Explanatory footnote: By not-for-profit, it is meant that the objects of the office are a public purpose (for example the receipt, investigation and resolution of complaints) and that an object of the office is not private gain.
- Change ‘Terms of Reference’ header to ‘Jurisdiction, rules and procedures’
- Under Jurisdiction, add a clause to prevent participating organisations from vetoing changes to documents such as Constitutions:
 - Participating organisations do not have a power or right to veto a proposed change to the jurisdiction of the office or to significant rules and procedures.

Fairness

3.3 To what extent do the underlying principles and key practices under the Benchmark of Fairness remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices in the Fairness Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have very successfully promoted procedures and decision-making that is fair and seen to be fair, and founded on the principles of procedural fairness and information-based decision-making.

For modernisation and improvement, ANZOA suggests the following:

- Reword the ‘principle statement’ to:
 - The procedures and decision-making of the office are fair and seen to be fair. And broaden the requirement to include all procedures, and not only decision making (principle and purpose):
 - To ensure that the office performs its functions in a manner that is fair and seen to be fair.
- Add ‘Final’ before ‘Determinations’ header
- Update 3.1 to be more general:
 - ... having regard to matters including good practice, relevant codes of practice and the law.
- In footnote 14 to 3.1, broaden ‘final determinations’ to include recommendations
 - Explanatory footnote: The term ‘final determination’ is used to refer to the final decision made by the decision-maker when determining a complaint. For some offices, a final determination may be in the form of a recommendation to a participating organisation. For other offices, a final determination may be binding upon a participating organisation.
- At 3.2, add an explanatory footnote about ‘office’s decisions’:
 - The term ‘decision’ is used to refer to any decision made by the office’s staff other than a final determination.
- At 3.6, change ‘determination’ to ‘decision’
- At 3.8, add an explanatory footnote to qualify ‘compel’:
 - An exception to this requirement may occur where an office has been set up under a statute, and the statute provides for the office to compel the production of information.

- Remove clause 3.12 and the requirement that parties agree not to disclose information gained during and mediation, conciliation, negotiation etc.

Accountability

3.4 To what extent do the underlying principles and key practices under the Benchmark of Accountability remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices in the Accountability Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have been very successful in developing public confidence in the EDR offices, in facilitating community assessment of industry performance and in driving service improvements.

For modernisation and improvement, ANZOA suggests the following:

- Reword the ‘principle statement’ to:
 - The office publicly accounts for its operations by publishing its final determinations and information about complaints and highlighting any systemic problems.
- Change footnote 28 to the ‘principle statement’ to recognise that systemic issues may also arise from just one complaint:
 - Systemic problems can refer to issues or trends arising out of many complaints about one participating organisation, many complaints (which are essentially similar) about more than one participating organisation, or even one complaint.
- Include a new section as the first under Key Practices:
 - Procedures: The office makes available to participating organisations, complainants and other interested bodies its guidelines and policies for dealing with complaints.
- At 4.3, facilitate public reporting by limiting the ‘not naming’ to public reports of final determinations. It is not EDR office practice to name complainants, but some EDR offices do publish decisions in which participating organisations are named. The following wording will address that, while not requiring a published decision to identify the participating organisation where the office chooses not to.

Amended wording:

 - Public reports of final determinations do not name the complainant.
- Change the ‘Reporting’ header to ‘Annual Report’.
- At 4.3, specify that annual reports must include certain information on complaints about participating organisations:
 - Information about complaints
 - (a) the number and types of complaints the office receives and their outcome, including information outlining the complaints received and outcomes for the participating organisations
- At 4.4, extend to require that the annual report be made public:
 - The annual report is to be made public, including distribution to participating organisations and relevant stakeholders, and otherwise made available upon request.

Efficiency

3.5 To what extent do the underlying principles and key practices under the Benchmark of Efficiency remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices in the Efficiency Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have very successfully built stakeholder confidence that EDR offices are dealing with complaints in a timely, appropriate manner, and against key performance indicators.

For modernisation and improvement, ANZOA suggests the following:

- Reword the 'principle statement' to:
 - The office operates efficiently by keeping track of complaints, ensuring complaints are dealt with by the appropriate process or forum and regularly reviewing its performance.
- At 5.1, qualify with 'generally':
 - The office will only deal with complaints which are within its jurisdiction. The office will generally not deal with complaints that have been dealt with, or are being dealt with, by another dispute resolution forum. The office will generally only deal with complaints: ...
- Include a new provision that requires any deadlock procedure to be reasonable:
 - Any provision in the internal dispute resolution mechanism of a participating organisation requiring a complaint to reach a deadlock before it can be dealt with by the office must be reasonable, and must allow the office to deal with a complaint where it is clear that it has not been resolved to the satisfaction of the person making the complaint in a reasonable time.
- At 5.3, provide for the investigation of systemic issues, as well as their referral elsewhere
 - The office has mechanisms and procedures for dealing with systemic issues that become apparent from complaints, including by investigating these issues or referring these issues to relevant participating organisations.

Effectiveness

3.6 To what extent do the underlying principles and key practices under the Benchmark of Effectiveness remain relevant and appropriate to the needs of industry scheme stakeholders? How can they be improved?

ANZOA believes the underlying principles and key practices in the Effectiveness Benchmark remain highly relevant and appropriate to the needs of stakeholders. They have been very successful in building confidence that EDR offices have sufficient scope and power to do the job they have been set up to do, to require the co-operation of participating organisations and to regularly review performance.

For modernisation and improvement, ANZOA suggests the following:

- Reword the 'principle statement' to:
 - The office is effective by having appropriate and comprehensive jurisdiction and periodic independent reviews of its performance.

- At 6.4, amend for referral to a regulator:
 - The office has mechanisms for referring systemic industry problems to an appropriate regulator for action if required.
- Under 'Office performance', include a requirement for appropriately qualified staff:
 - The office has appropriately qualified staff to undertake its functions, and provides ongoing professional development and appropriate resources and processes to allow staff to effectively undertake their functions.
- At 6.5, qualify referral of complaints about the office to the overseeing entity:
 - (b) where appropriate, referring complaints about the office to the overseeing entity for action.
- Amend the header 'Internal Complaints Mechanisms' to 'Internal Dispute Resolution Mechanisms'.
- At 6.7, also require participating organisations to inform those affected by the organisation's services about the mechanisms
- At 6.10, qualify as follows:
 - A final determination of the decision-maker that is not a recommendation is binding on the participating organisation if the complainant accepts the determination.
- At 6.12, amend the phrase 'terms of reference' to have a more generic phrasing 'Statute, Terms of Reference, Charter, Constitution or other document':
 - (f) the effectiveness of the statute, charter, terms of reference or other document establishing the office and its functions, and establishing its rules and procedures.

CONCLUSION

In summary, ANZOA confidently endorses the guidelines provided in the *Benchmarks Document* as important, and of continuing relevance to EDR offices and their stakeholders. At the same time, we believe the *Benchmarks Document* would be improved by some changes to modernise language, update and clarify key practices, and introduce relevant new concepts.

ANZOA would be very pleased to provide additional information and to assist further with CCAAC's review process. Please feel free to contact me directly on (02) 8218 5204 or through the ANZOA Secretariat at info@anzoa.com.au.

Yours sincerely



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Accompanying separate attachment: ANZOA's April 2010 mark-ups document

Members of the Australian and New Zealand Ombudsman Association (April 2013)

Leon Atkinson-MacEwan, Ombudsman Tasmania
Deborah Battell, Banking Ombudsman New Zealand
Richard Bingham, Ombudsman South Australia
George Brouwer, Ombudsman Victoria
Simon Cohen, Telecommunications Industry Ombudsman, Australia
Chris Field, Ombudsman Western Australia / Energy Ombudsman Western Australia
Philip Field, Ombudsman Banking and Finance, Financial Ombudsman Service, Australia
Cynthia Gebert, Energy and Water Ombudsman (Victoria)
Judi Jones, Electricity and Gas Complaints Commissioner New Zealand
Wayne Lines, WorkCover Ombudsman South Australia
Alison Maynard, Ombudsman, Financial Ombudsman Service, Australia
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