



# **TCF Code Compliance Framework**

## **Half Year Report**

**May 2025**

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# CCF Report

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This report contains information on the operation of the TCF Code Compliance Framework (CCF) for the period from 1 October 2024 to 31 March 2025.

The information in this report has been compiled by the TCF Compliance Officer for the TCF Board.

## Recommendations

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It is recommended that the Board:

- **Note** this report.

## Overview

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- The end of the Compliance Year is 31 March.
- There is one TCF member in breach of compliance due to unreturned annual certification forms for the year ended 31/03/2025: Kordia.
- There is one non TCF member in breach of compliance due to an unreturned annual certification form: Greater Bay Group Aotearoa, who are a signatory to the TCF Customer Care Code as a TDR member. TDRL have noted that Greater Bay Group Aotearoa's TDR membership is being terminated, however, and once that is confirmed they will be removed from the list of code signatories.
- There have been no Code compliance issues raised through the CCF.

### Compliance Statistics at a Glance

Category	Amount this half-year	Amount this year
Allegations of Breach Received	0	7
Code Signatories found in breach	0	1
Code Signatories complained about, but found not in breach	0	6
Code Signatories that have resolved breaches within proposed resolution timeframes	0	1
Code signatories that have had sanctions applied	0	1
Active Compliance Management Issues on hand	0	0

# Annual Compliance Overview

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Annual self-certification forms were due back on 2 May 2025.

As part of the annual self-certification request, I offered specific TCF Members the option of opting out of the mandatory codes that I had identified were not relevant to them, to align with the new definition of mandatory code in the CCF. Most members chose to opt out of the non-relevant codes, but some chose to remain as signatories. We do now have a small number of members who are not signatories to any TCF Codes.

Overall, the annual compliance exercise went smoothly this year, which I think was helped by the mandatory code definition change. There were very few compliance issues noted on self-certification forms this year.

There are two companies who have not yet submitted their annual compliance forms, as noted above: Kordia and Greater Bay Group Aotearoa.

# Code Reviews

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## New codes developed

The following new code has been developed and is being presented for approval by the TCF Board at the May meeting:

- Vulnerable Consumer Code

The purpose of this code is to set out best practice standards when dealing with vulnerable consumers across both fibre and copper services, including but not limited to fault management and installation of services.

## Code reviews completed

There have been no code reviews completed since the last Compliance Report.

## Existing codes under review

The following codes are currently under review by Working Parties:

- Emergency Calling Code
- Broadband Marketing Code
- Copper and PSTN Transition Code.

## Codes due for review

In accordance with the TCF's Code review policy, the following codes are due for review. The TCF will prioritise the Code reviews in the coming year. Some codes will not require any amendment and therefore will rollover to the following cycle, subject to TCF member approval.

- Broadband Product Disclosure Code – review of this Code will follow the upcoming publication of the Commission's Product Disclosure Guideline
- Disconnection Code
- Co-Siting Code
- Fibre Customer Transfer Code
- Mobile Messaging Services Code
- Product Stewardship Re:Mobile Scheme Code – this code will be reviewed as part of the product stewardship scheme accreditation work.
- Unauthorised Use of Mobile Phones in Prisons Code

## Code Summary

A summary of the TCF Codes and signatories is set out in the Appendix to this Report.

# Compliance Issue Management

## Compliance Management at a Glance

The table below provides a full breakdown of the number and percentage of Compliance Issues, split across a number of metrics.

The Compliance Officer has not received any Notices of Potential Breach during the second half of the compliance year (1 October 2024 to 31 March 2025).

Complaint Metric	Total this half-year	Total Annual
<b>Complaints by TCF Code</b>		
Customer Care Code	0 (-%)	6 (86%)
Broadband Marketing Code	0 (-%)	1 (14%)
<b>Complaints by Type</b>		
Complaints against TCF Members	0 (-%)	7 (100%)
Complaints against Non-TCF Members	0 (-%)	0 (-%)
Self Reported Breaches	0 (-%)	0 (-%)
Complaints made by One Signatory against Another	0 (-%)	0 (-%)
Complaints Raised by a Valid Third Party	0 (-%)	6 (100%)
Breach raised by Compliance Officer	0 (-%)	0 (-%)
<b>Stage 1-4 Notices</b>		
Notice of Potential Breach Received (Stage 1)	0	7
Complaints Determined to be Invalid (Stage 1)	0 (-%)	2 (29%)
Compliance Issues Notices Issued (Stage 2)	0 (-% of Stage 1 notices received)	5 (71% of Stage 1 notices received)
Investigations where No Breach is Found (Stage 3)	0 (-% of Stage 1 notices received)	3 (43% of Stage 1 notices received)
By Compliance Officer	0 (-%)	3 (100%)
By Enforcement Agent	0 (-%)	0 (-%)
Notices of Confirmed Breach Issued (Stage 4) (excludes Stage 3 notices where decisions are pending)	0 (-% of Stage 1 notices received)	1 (14% of Stage 1 notices received)
By Compliance Officer	0 (-%)	1 (100%)
By Enforcement Agent	0 (-%)	0 (-%)
<b>Escalation</b>		

Complaints Investigated by Compliance Officer	0 (-%)	5 (100%)
Complaints Investigated by Enforcement Agent	0 (-%)	0 (-%)
Audits Carried Out	0	0
Appeals Raised	0	0
<b>Sanctions</b>		
Sanctions Applied	0	1
Compliance Issues Resolved	0	1

## Sanctions

There are currently **0** sanctions in effect.

## Additional Compliance Activities

The Compliance Officer has carried out a mystery shopper exercise to assess compliance with the following TCF Code:

- Customer Care Code.

This was the first mystery shopper exercise undertaken on the Customer Care Code. It was primarily a check of the websites of TDR RSP members and their retail brands to confirm that a Customer Care Policy was available that covered the requirements in the Code, as well as checking that it was easy to find out how to make a complaint. The websites of third-party TDR members were checked to confirm that information about how to make a complaint was available, as well as a statement of their being a TDR member.

In addition to the website checks, members were requested to directly confirm that their complaints processes complied with requirements to provide information about TDR. TDRL has requested a summary of compliance with the Code requirements specifically relating to TDR, to inform their audit of TDR awareness activity by members.

Compliance with the Code requirements was generally good, although there were some cases where Customer Care Policies were missing some required information, and a couple of retail brands did not have Customer Care Policies available.

The Compliance Officer wrote to each TDR member outlining any issues that needed remedying, with a request that this be undertaken as part of the annual self-certification process. Members have engaged well with this process and have taken action to ensure they were compliant prior to submitting self-certification forms where possible. Any outstanding issues have been acknowledged as work in progress on the forms, with confirmation to be provided once complete.

# Appendix – TCF Code Summary Report

<b>Code Name:</b>	Broadband Marketing Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	1/08/2022, with the
Subject to CCF:	Yes	Date Endorsed:	30/04/2022
Code Status:	Active	Next Review Date:	30/07/2023
Number of Signatories:	6	Review Notes:	To be reviewed 12 months

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Sky		No	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Broadband Product Disclosure Code
<b>Report Year:</b>	2025

Code Type:	Mandatory	Date Effective:	7/07/2022
Subject to CCF:	Yes	Date Endorsed:	7/04/2022
Code Status:	Active	Next Review Date:	7/07/2023
Number of Signatories:	10	Review Notes:	To be reviewed 12 months

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Awaiting Response
Mercury NZ Limited	Auckland	Yes	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Co-Siting Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	1/12/2007
Subject to CCF:	No	Date Endorsed:	1/12/2007
Code Status:	Active	Next Review Date:	1/12/2021
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
Fortysouth	Auckland	Yes	Current
Kordia Limited	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current

<b>Code Name:</b>	Copper and PSTN Transition Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	7/05/2022
Subject to CCF:	Yes	Date Endorsed:	7/04/2022
Code Status:	Active	Next Review Date:	7/05/2023
Number of Signatories:	5	Review Notes:	To be reviewed 12 months

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Prodigi Technology Services Limited		No	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Customer Care Code
<b>Report Year:</b>	2025

Code Type:	Mandatory	Date Effective:	15/06/2023
Subject to CCF:	Yes	Date Endorsed:	15/06/2023
Code Status:	Active	Next Review Date:	15/06/2025
Number of Signatories:	19	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Awaiting Response
Mercury NZ Limited	Auckland	Yes	Current
MyRepublic	Auckland	No	Current
Northpower Fibre	Whangarei	Yes	Current
Nova Energy		No	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Primo Wireless	Inglewood	No	Current
Sky		No	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current
Vector Communications	Auckland	Yes	Current
VoIPLine Telecom Pty Ltd	Auckland	No	Current
Greater Bay Group Aotearoa Ltd	Auckland	No	Awaiting Response

<b>Code Name:</b>	Disconnection Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	21/10/2016
Subject to CCF:	Yes	Date Endorsed:	21/10/2016
Code Status:	Active	Next Review Date:	21/10/2018
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
Devoli	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Emergency Calling Code
<b>Report Year:</b>	2025

Code Type:	Mandatory	Date Effective:	21/10/2022
Subject to CCF:	Yes	Date Endorsed:	21/07/2022
Code Status:	Active	Next Review Date:	21/07/2024
Number of Signatories:	11	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Awaiting Response
Mercury NZ Limited	Auckland	Yes	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Symbio Networks		Yes	Current

<b>Code Name:</b>	Fibre Customer Transfer Code - non-regulated
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	26/08/2022
Subject to CCF:	Yes	Date Endorsed:	26/05/2022
Code Status:	Active	Next Review Date:	26/05/2024
Number of Signatories:	9	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
Northpower Fibre	Whangarei	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current

<b>Code Name:</b>	Fibre Installation Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	
Subject to CCF:	Yes	Date Endorsed:	2/04/2020
Code Status:	Active	Next Review Date:	2/06/2025
Number of Signatories:	8	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
Northpower Fibre	Whangarei	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current

<b>Code Name:</b>	IMEI Block Listing Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	15/09/2023
Subject to CCF:	Yes	Date Endorsed:	15/06/2023
Code Status:	Active	Next Review Date:	15/06/2025
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	International Mobile Roaming Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	30/07/2023
Subject to CCF:	Yes	Date Endorsed:	30/04/2023
Code Status:	Active	Next Review Date:	30/04/2025
Number of Signatories:	4	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Mercury NZ Limited	Auckland	Yes	Initial Compliance Period

<b>Code Name:</b>	Mobile Messaging Services Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	18/11/2021
Subject to CCF:	Yes	Date Endorsed:	18/11/2021
Code Status:	Active	Next Review Date:	18/11/2023
Number of Signatories:	8	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Bulletin.Net	Auckland	No	Current
Connexus Interactive		No	Current
Modica Group		No	Current
One New Zealand	Auckland	Yes	Current
Sinch		No	Current
Soprano Design		No	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Product Stewardship Scheme
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	8/07/2016
Subject to CCF:	Yes	Date Endorsed:	8/07/2016
Code Status:	Active	Next Review Date:	8/07/2021
Number of Signatories:	3	Review Notes:	Review underway

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

<b>Code Name:</b>	Scam Prevention Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	10/02/2023
Subject to CCF:	Yes	Date Endorsed:	10/11/2022
Code Status:	Active	Next Review Date:	10/11/2024
Number of Signatories:	10	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Bulletin.Net	Auckland	No	Current
Compass Communications	Auckland	No	Current
Connexus Interactive		No	Current
Devoli	Auckland	Yes	Current
Modica Group		No	Current
One New Zealand	Auckland	Yes	Current
Sinch		No	Current
Spark	Wellington	Yes	Current
Symbio Networks		Yes	Current

<b>Code Name:</b>	Unauthorised Use of Mobile Phones in Prisons Code
<b>Report Year:</b>	2025

Code Type:	Voluntary	Date Effective:	7/11/2008
Subject to CCF:	No - implementa	Date Endorsed:	7/11/2008
Code Status:	Active	Next Review Date:	30/06/2021
Number of Signatories:	4	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Kordia Limited	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current