

Licence conditions D – customer service

The Interment Industry Scheme introduces industry-wide standards for how cemeteries and crematoria provide customer service (licence conditions D.1–D.6).

Although many operators provide a great service to customers, for the first time, all operators will be held to the same clear standards for how they engage with customers.

This will make it easy for people to know what to expect from operators and for operators to meet community expectations. Clear standards will also make it easier for CCNSW to monitor and support the industry to meet them.

These conditions address findings in a recent [statutory review of the Cemeteries and Crematoria Act 2013](#), highlighting the importance of customer service to the sustainability of any business. The review also outlined that the Scheme should include customer service requirements to ensure operators engage appropriately with people and communities.

The customer service conditions were developed based on existing customer service requirements in this and other industries, in consultation with industry and consumer and community representatives.

Who is required to comply?

Operators will be subject to licence conditions in one of 4 categories. See our fact sheet on [licensing and categorisation on our website](#) for more information. Operators with Category 1 licence conditions will have more customer service requirements than other operators.

	Licence condition	Category 1	Category 2 (including cremation only operators)	Category 3	Category 4 (Caretaker)
D. Customer service	D.1	Yes	Yes	Yes	No
	D.2	Yes	No	No	No
	D.3	Yes	Yes	Yes	No
	D.4	Yes	No	No	No
	D.5	Yes	Yes	Yes	No
	D.6	Yes	Yes	Yes	No

Licence conditions summary

Please note this is a summary of the proposed Scheme and licence conditions. For more details read the Licence Conditions for Operators of Cemeteries and Crematoria [on our website](#).

D.1 Operators must meet industry-wide customer service standards

Operators must take all reasonable steps to ensure their organisation and staff comply with the Customer Service Principles which have been developed by CCNSW. All operators must comply with this condition. The Principles include:

- the personal choices of customers must be respected
- when asked by a customer, the operator must provide all information about the products and services they provide
- compliance with discrimination, competition and consumer, and privacy legislation
- operating competently, with integrity, and not bringing the industry into disrepute.

A copy of the Customer Service Principles must be made available to all customers.

Operators must have systems and processes in place to ensure compliance with the Customer Service Principles.

CCNSW will be developing a Customer Service Charter that operators may adopt as a way of operationalising the Principles, or operators may choose to do this in some other way. Adopting this Charter would meet the requirement to have appropriate systems and processes in place.

D.2 Operators must make sure all workers and volunteers are appropriately trained

Category 1 Operators must also:

- ensure all workers are trained appropriately for their everyday activities, and hold any qualifications that are required for those activities
- are honest and accurate with customers
- are trained on how to familiarise themselves with cultural and religious requirements of different groups and act respectfully towards all cultures and faiths
- perform their duties using best practice.

These things remain best practice for all operators.

D.3 Operators must ensure proper disclosure of information

Operators must:

- make efforts to ensure customers fully understand all the details of what they are buying, and help customers who do not speak English or have specific communication needs
- be transparent if they recommend another provider that the operator or staff member has a financial or personal relationship with
- make sure customers are aware of their consumer rights and have up-to-date information.

D.4 Operators must promote high standards for customer service

Category 1 Operators must also:

- promote awareness of the Customer Service Principles internally
- foster a commitment to customer service, including by effectively communicating the Principles to staff.

These things remain best practice for all operators.

D.5 Operators must establish a dispute resolution process

Operators must establish a process of resolving disputes between operators and customers which:

- ensures complaints are managed respectfully in an appropriate timeframe
- provides information to customers about how complaints will be managed.

Operators must also let people know about what to do if they are not satisfied with how their complaint has been handled, including the ability to refer complaints to CCNSW.

D.6 Operators must have a complaints register

Operators must establish and maintain a register of all written complaints. The register should contain all relevant details as specified in the licence condition, and records should be kept for 7 years. The register must be provided to CCNSW on request.

How will CCNSW support operators?

CCNSW is developing a customer service charter template, which will illustrate that an operator has the systems and processes in place to support the Customer Service Principles in line with Condition D.1. Operators may adopt this charter, or adapt it to suit their organisation.

CCNSW is also developing a complaints register template which operators may choose to use to meet Condition D.5.

As with each set of licence conditions, CCNSW will provide explanatory material in relation to these requirements prior to their commencement.

Relevant FAQs

What will CCNSW look for to see evidence that an operator complies with the Customer Service principles, as per D.1?

Operators should have documented procedures and policies that evidence their commitment to the customer service principles. This could include a customer service charter (using an existing document, using the CCNSW template, or developing a bespoke charter) and training logs showing how staff are trained in relevant activities.

Systems and processes could include the use of Customer Relationship Management (CRM) systems to manage customers and complaints.

It is expected that larger operators will need more sophisticated systems and processes.

If there is already a customer service policy and/or a complaints register at a higher level (for example, for a council) which includes cemeteries, does an operator need to create a new one?

No, CCNSW will be able to assess existing procedures and documentation. If the existing procedures meet the licence requirements then they will be accepted as compliant with the requirements.