



Feedback on the Digital Australia Strategy

Submission by the Australian Communications Consumer Action
Network to the Digital Technology Taskforce

9 April 2021

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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Introduction

ACCAN thanks the Digital Technology Taskforce (the **Taskforce**) for the opportunity to provide input into the development of a Digital Australia Strategy. ACCAN is in strong support of the strategic objectives of the Taskforce: a well-managed and thriving digital economy is fundamental to the national interest and supports Australians' economic, social and civic wellbeing.^{1 2}

As the peak body for consumers of phone and internet services, ACCAN takes a keen interest in efforts to lift the digital capability of Australian communities and sectors. It is essential that those efforts are informed by the needs and experiences of consumers of communications products and services, to maximise the effectiveness of policies and programs, and to ensure no Australian is left behind. Indeed, the 2019 Australian Infrastructure Audit highlights the centrality of phone and internet services to Australians' lives, and describes the need to improve access and uptake of these services.³

This submission is structured around the five themes of the Digital Australia Strategy identified by the Taskforce:

- Moving more businesses to the digital frontier,
- A digitally capable and inclusive Australia,
- Building digital trust,
- Digital-first Government,
- Lifting sectors through digital technology.

¹ Deloitte Access Economics 2015, *The Connected Continent II: How the internet is transforming the Australian economy*, <https://www2.deloitte.com/au/en/pages/economics/articles/connected-continent.html>

² Australian Digital Inclusion Alliance 2020, *A National Digital Inclusion Roadmap*, <https://www.digitalinclusion.org.au/wp-content/uploads/2020/10/ADIA-A-National-Digital-Inclusion-Roadmap.pdf>

³ Infrastructure Australia 2019, *Australian Infrastructure Audit – Telecommunications*, <https://www.infrastructureaustralia.gov.au/australian-infrastructure-audit-2019-telecommunications>

List of recommendations

- **Recommendation 1:** The Digital Technology Taskforce should consider the unique needs and challenges of small businesses when planning for the digital enabling of the Australian economy.
- **Recommendation 2:** When addressing telecommunications affordability, the Digital Technology Taskforce should examine the need for an affordable home broadband product for households on limited incomes, while considering the nature and challenges of the wholesaler-retailer relationship.
- **Recommendation 3:** That the Digital Technology Taskforce advocates for the Government's to act as a key co-ordinator of national solutions to digital literacy, and the affordability of devices and services, in consultation with key stakeholders and affected communities.
- **Recommendation 4:** That the Digital Technology Taskforce considers the need for all Australians, including people with disability, to have access to the communication services that they want and need, when developing its Digital Australia Strategy.
- **Recommendation 5:** The Digital Technology Taskforce should recommend strategies to the Federal Government to support digital participation in remote Indigenous communities, to ensure that these communities do not miss out on the economic benefits associated with full connectivity.
- **Recommendation 6:** When considering strategies to lift digital access, the Digital Technology Taskforce should consider the need for improved consumer protections rules relating to customer service and financial hardship.
- **Recommendation 7:** That the Digital Taskforce address the importance of informed consumer decision-making in lifting digital access and capability, particularly in the context of the expansion of the Consumer Data Right to telecommunications.
- **Recommendation 8:** That the Digital Technology Taskforce should consider the need for policy intervention where the market has failed to support consumer confidence and digital trust in emerging technologies and digital platforms.
- **Recommendation 9:** That the Digital Technology Taskforce acknowledges the circumstances in which consumers are not able to access government services digitally, and recommends that non-internet based access to services is always made available.
- **Recommendation 10:** That the Digital Technology Taskforces considers vital improvements to the delivery of phone and internet services in the regions as it addresses lifting sectors through technology.

Moving more businesses to the digital frontier

The COVID-19 pandemic has posed unprecedented challenges to Australian small businesses, the impacts of which continue to be felt. Business NSW's December 2020 Telecommunications Survey reported that service speeds and reliability remain the primary concern for NSW businesses, and that a lack of publicity and business owners' competing priorities meant that any telecommunications support that became available to them during the pandemic has been under-utilised.⁴ In fact, in an October survey of small to medium sized enterprises (SMEs), ACCAN found that a third of respondents were not aware that financial hardship assistance was available to them from their telco provider.⁵

Through consultation with our members and our Small Business Advisory Forum, ACCAN has identified the following priorities to lift the digital capability and uptake for small businesses, to ensure they get the most of their essential phone and internet connections:

- Ongoing funding to support small businesses' digital transformation,
- Extending and improving financial hardship relief measures offered by telecommunications retailers to residential and small business consumers,
- Implementation of arrangements to support greater network reliability, including wholesale level service standards regulated by the Australian Communications and Media Authority,
- Improved information resources to guide better service choice and improved self-help skills,
- Consideration of an automatically applied small business internet subsidy.

ACCAN understands that the NBN COVID-19 small business support package⁶ announced in April 2020 was not taken up by RSPs. Opportunities to improve the wholesaler-retailer relationship must be addressed to ensure that wholesale benefits such as this are passed on to the community. We acknowledge the operational challenges faced by RSPs at the onset of the COVID-19 pandemic; however, ACCAN is disappointed that the small business community was not able to access NBN's offers designed to support them.

Recommendation 1: The Digital Technology Taskforce should consider the unique needs and challenges of small businesses when planning for the digital enabling of the Australian economy.

⁴ Business NSW 2020, *Telecommunications Survey*, <https://www.businessnsw.com/content/dam/nswbc/businessnsw/pdf/Telecommunications%20Survey;%20December%202020.pdf>

⁵ ACCAN 2020, *Telco service essential to small business*, media release, <https://accan.org.au/media-centre/hot-issues/1819-telco-service-essential-to-small-business>

⁶ NBNCo 2020, *NBN Co creates \$150 million COVID-19 relief and assistance package*, media release, <https://www.nbnco.com.au/corporate-information/media-centre/media-statements/nbn-co-creates-covid-19-relief-and-assistance-package>

A digitally capable and inclusive Australia

Telecommunications are essential services. As of June 2019, 89% of Australian adults accessed the internet, with 74% of adults going online three or more times a day.⁷ There were 7.8 million fixed voice services in operation, and 35.8 million mobile data and voice services in operation.⁸

Australians wholly rely on their phone and internet connections for a multitude of functions including:

- Work and education,
- Access to government services,
- Economic participation, like engaging in e-commerce and banking,
- Physical and mental health service delivery,
- Social and community participation, and
- Emergency services, and essential life-saving supports for people with disability and older people.

The Taskforce has identified a range of barriers to inclusive and equitable access to connectivity in Australia.⁹ ACCAN wishes to provide additional information on those barriers to inform the development of a Digital Australia Strategy. Any efforts to lift the digital capability of the Australian public that do not adequately these barriers will have reduced effectiveness in increasing economic participation across the board.

Affordable broadband for all

Adoption of communications services is explicitly linked with the financial position of those seeking to use services, and the infrastructure available to them. Although the quality and variety of services on offer in Australia have increased significantly over time, and there have been improvements in affordability more generally, affordable communications continue to be a challenge for many consumers.¹⁰

⁷ Australian Communications and Media Authority 2020, *Australian Communications and Media Authority Communications Report 2018-2019*, ACMA, <https://www.acma.gov.au/sites/default/files/2020-09/Communications%20report%202018-19.pdf>

⁸ Ibid.

⁹ Digital Technology Taskforce 2020, *A Digitally Capable and Inclusive Australia*, <https://pmc.gov.au/digital-technology-taskforce/digitally-capable-and-inclusive-australia>

¹⁰ Productivity Commission 2017, *Telecommunications Universal Service Obligation*, Canberra, p. 24.

For many households the consequence of high communications cost has been financial stress, with 15.6% of consumers in the lowest income quintile indicating that they had been unable to pay their utility bills on time in the year prior to the census.¹¹ ACCAN has undertaken research into which groups face the greatest affordability challenges and identified the following groups as being particularly vulnerable:

- Individuals and families with members on JobSeeker payments;
- Individuals and families on Disability Support Pension payments;
- Individuals on Youth Allowance payments;
- Families on Parenting Payments;
- Individuals and couples on the Age Pension;
- Indigenous Australians on low incomes;
- Families on Family Tax Benefit A.

ACCAN considers that the most effective way to achieve affordable broadband for all Australians is for NBN Co to offer a 50 mbps service at a wholesale price of \$20 available to households receiving financial support from government.

We believe that a concessional service at the wholesale level will enable retail service providers to make competitive offerings available to low income consumers and allow consumers to shop around for the best offer for their needs. However, safeguards must be put in place, so it is sold as a standalone product for only those that need it (e.g. prevent bundling with other services such as content) and to ensure that the full value of the concession is passed through to consumers.

The creation of appropriate safeguards will allow consumers to shop around and will support regulators, consumer groups and the media to benchmark offers in the market to preclude potential abuse.

The effects of being unable to afford broadband are significant and extend beyond mere inconvenience. ACCAN is particularly concerned about the potential for the affordability challenge to constrain the opportunities of young Australians from low income families. A failure to ensure affordable access for more than 1.8 million children and young adults has the potential be both inequitable, and a stifling influence on Australia's economic growth and productivity potential for decades to come.¹²

Recommendation 2: When addressing telecommunications affordability, the Digital Technology Taskforce should examine the need for an affordable home broadband product for households on limited incomes, while considering the nature and challenges of the wholesaler-retailer relationship.

¹¹ Australian Bureau of Statistics, Government Benefits, Taxes and Household Income, Australia: Summary of Results 2015-16, 20 June 2018.

¹² Department of Social Services, 2020, *DSS Payment Demographics June 2020*, Canberra, figure obtained by combining the total number of FTB A recipient children and youth allowance recipients.

Digital skills and device provision

The experiences of school-aged children

As the Taskforce has identified, challenges to digital adoption and equity extend to digital skills and access to devices, especially for school-aged children. While recent efforts from the telco industry, governments and schools to keep students connected during the COVID-19 outbreak are commendable, ACCAN continues to receive extensive feedback from local community workers and educators regarding the significant volumes of students who did not have access to devices during the learning-from-home period, due to cost barriers.

A 2020 Australian Education Union report found that 125,000 public school students live in dwellings without internet access. Public school students were 2.5 times as likely as Catholic and independent school students to live without home internet access.¹³ Disproportionate numbers of First Nations students and those from families on limited incomes did not have internet access at home. This raises serious questions regarding to the equity of online learning and the need for policy intervention.

Additionally, after undertaking desktop research, ACCAN found that there is a highly inconsistent approach across states and territories regarding provision of devices and internet services to students in need of them.¹⁴ ACCAN continues to advocate for a national co-ordinated approach, led by the Federal Government, on access to devices and internet services in the context of online learning.

Other areas of need

Additionally, we have concerns about the narrow scope of current Government approaches to digital skills, which primarily focus on tertiary education, SMEs, and older people. While each of these groups should continue to benefit from digital skills investment, ACCAN routinely receives feedback from its members about the dire and urgent need for digital skills support for remote Indigenous communities, newly-arrived migrants and people from culturally and linguistically diverse (**CALD**) communities, groups that are largely overlooked in current government programs for digital skills

Local community organisations generally take on the role of digital mentors for clients as best they can, though they are rarely resourced to do so. It is important to note that the economic benefits driven by digital skills are not limited to specific sectors or groups – the more people who are able to use digital technologies with confidence, the greater the net economic benefit.¹⁵

¹³ Australian Education Union, *Addressing digital inclusion for all public school students report*, AEU, <https://www.aeufederal.org.au/news-media/news/2020/addressing-digital-inclusion-all-public-school-students-report>

¹⁴ ACCAN 2020, *Online Learning and Access to Devices*, <https://accan.org.au/media-centre/covid19-telco-services-and-technology/1708-covid-19-supporting-families-and-households#OnlineLearning>

¹⁵ Deloitte Access Economics 2015, *Digital government transformation*, <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economics-digital-governmenttransformation-230715.pdf>

The Taskforce already understands that ‘there is a role for Government to create and manage coordination of national solutions to address, progress and measure digital capability, affordability and accessibility ...’ and ACCAN unequivocally supports this approach.¹⁶

Recommendation 3: That the Digital Technology Taskforce advocates for the Government’s to act as a key co-ordinator of national solutions to digital literacy, and the affordability of devices and services, in consultation with key stakeholders and affected communities.

Accessibility and inclusion

Accessible Telecoms

Access to telecommunications has now become essential for participation in all aspects of Australian life. This is even more so for people with disability, many of whom have struggled to engage with and benefit from telecommunications. A significant barrier to telecommunications access for people with disability is the paucity of up-to-date and independent information about the accessibility features of both mainstream and assistive equipment and services.

In 2018 ACCAN, funded by an NDIA Information, Linkages and Capacity Building grant, developed, and implemented the Accessible Telecoms service. This service is a nationwide free service which provides up-to-date and independently verified information about the accessibility features of digital communications equipment, services, and training resources. While the NDIA grant was essential to set-up and operate the Accessible Telecoms service for its first 2 years, the NDIA does not provide ongoing funding for successful grants projects.

Accessible Telecoms represents a marked step forward in the provision of information to Australians with disability and seeks to close the information gap between consumers and equipment providers. Importantly, this service is provided at no cost to the consumer, and in an accessible format, to reduce the cost and imposition on consumers of acquiring this vital information.

In 2020 ACCAN engaged with the Federal Government and the telecommunications industry to determine a long-term sustainable funding mechanism for the service. This engagement has resulted with an in-principle commitment to maintain the Accessible Telecoms Service. However, only limited funding for the 2021 calendar year has been secured from the telecommunications industry. Furthermore, to continue to provide this essential information about accessible digital communications for people with disability and seniors, the service needs an ongoing funding commitment of \$590,000 per annum.

ACCAN accordingly believes that an enduring publicly funded commitment should be made to the Accessible Telecoms project to ensure that all Australians can have access to the communication services that they want and need.

¹⁶ Digital Technology Taskforce 2020, A Digitally Capable And Inclusive Australia <https://pmc.gov.au/digital-technology-taskforce/digitally-capable-and-inclusive-australia>

Audio description

Audio description is an essential accessibility feature that enables many people who are blind, or vision impaired to better understand and enjoy television. However, there continues to be no audio description on commercial free-to-air Australian television, leaving hundreds of thousands of Australians who are blind, or vision impaired without functionally equivalent access to our foremost medium for news, information, and entertainment. This contrasts with comparable countries such as the United Kingdom, the United States and Canada where audio description is mandated.

To date, the only government commitment to audio description in Australia has been the 2019 one-off funding allocation of \$2M to both national broadcasters, the ABC and SBS, to provide audio description.

ACCAN believes that a permanent Federal Government financial commitment to audio description is needed to ensure that Australians who are blind or vision impaired have equitable access to television.

Recommendation 4: That the Digital Technology Taskforce considers the need for all Australians, including people with disability, to have access to the communication services that they want and need, when developing its Digital Australia Strategy.

Communications in Remote Indigenous Communities

ACCAN is deeply concerned that remote Indigenous communities (RICS) are being left behind when it comes to investment in telecommunications infrastructure and last-mile access.¹⁷ As some of the most deeply disadvantaged parts of Australia, the true extent of digital exclusion facing RICs is unclear due to significant data and knowledge gaps, and a patchwork of piecemeal policy responses from successive state, territory and Federal governments.

Last year ACCAN commissioned the *Remote Indigenous Communications Review*, which found that there are pervasive and complex barriers that prevent many Indigenous people living in RICs from full or even partial digital engagement.¹⁸ These barriers include:

- Last-mile delivery to enable household or individual access,
- Affordability of services,
- Improved quality and reliability of services,
- Unmet demand for increased broadband speeds and data limits, especially to enable use of streaming services and high-bandwidth applications,
- Providing community access facilities for those without personal devices,

¹⁷ Last-mile access involves the infrastructure in and around a premises that is needed to physically connect an internet user.

¹⁸ Featherstone D 2020, *Remote Indigenous Communications Review: Telecommunications Programs and Current Needs for Remote Indigenous Communities*, for ACCAN, <https://accan.org.au/our-work/research/1821-remote-indigenous-communications-review-telecommunications-programs-and-current-needs-for-remote-indigenous-communities>

- Timely technical support and effective response times for installation and repair of equipment,
- Appropriate IT systems to address congestion and latency for remote servers and two-way high bandwidth applications such as telehealth,
- Digital skills and cyber-security issues,
- Accessibility of online services for people with limited English/text literacy or disabilities, and
- Cultural and contextual awareness of service providers working with remote communities.

Recommendation 5: The Digital Technology Taskforce should recommend strategies to the Federal Government to support digital participation in remote Indigenous communities, to ensure that these communities do not miss out on the economic benefits associated with full connectivity.

Customer service and supports for people in financial hardship

The Taskforce has invited views on the further actions that should be taken to overcome the challenges of digital access, affordability and ability, as well as ways in which the needs of vulnerable communities can be better reflected in the design and delivery of digital technology.

ACCAN’s view is that lifting the quality of customer service and improving supports available to people experiencing financial difficulty are important ways of addressing challenges to accessing services.

Financial hardship

The Australian Communications and Media Authority (ACMA) oversees the development and enforcement of consumer protection rules, including rules about how telcos offer customer service, and manage and respond to customers experiencing financial hardship. These rules are set out in the [Telecommunications Consumer Protections \(TCP\) Code](#) and in the ACMA Complaints Handling Standard.

The phrase ‘financial hardship’ refers to the experience of having difficulty meeting financial obligations, and can come about because of illness, unemployment, domestic or family violence, or another reason. Someone can be in financial hardship for a short or long period of time, and it can happen to anybody. It is vital that a Digital Australia Strategy considers how the telco industry can support customers in financial difficulty, who need to be kept connected not just to help them get back on their feet, but also to keep them physically safe and connected to essential supports.

The ACMA has recently released key figures pertaining to the experiences of telco customers in financial hardship.¹⁹ These figures demonstrate:

- The high level of variability in industry’s management of financial hardship customers
- That current financial hardship rules and obligations are not keeping consumers connected or on top of their payments, and
- There is a desperate need for a directly regulated and standardised approach for managing customers in financial hardship.

The true cost of poor customer service

Additionally, it is ACCAN’s view that poor customer service – both through telco providers’ insufficient allocation of resourcing to customer service teams, and through inadequate policies, procedures and employee conduct – lies at the heart of a significant proportion of consumers’ phone and internet problems.

No phone or internet service, delays in establishing a service, intermittent service dropouts and slow data speeds were respectively the 3rd, 4th, 6th and 7th most common issues raised in Telecommunications Industry Ombudsman (TIO) complaints last financial year.²⁰ These issues were raised a cumulative total of over 55,300 times at the Ombudsman level, illustrating both the prevalence of these issues, and the extent of industry’s failure to adequately address them at an internal customer service level.

ACCAN commissioned research to understand and cost the time it takes consumers to resolve issues with their telco. The research found that consumers who phoned their provider to resolve an issue spend over half of the call time on hold. On average, respondents needed to call their provider 2.4 times before the issue was resolved. This equates to an average total time of 65 minutes and 5 seconds spent on the phone to resolve a single issue.²¹

By our calculations, 6.9 million consumers contacted their telco about at least one issue during this period, and took an average of between 13 minutes and 65 minutes to resolve it. This amounts to a massive total of 7.6 million hours, costing consumers between \$106 - \$130.2 million in time forgone.²²

¹⁹ ACMA 2021, *Customer financial hardship in the telco industry: State of play report 2019–20*, <https://www.acma.gov.au/publications/2021-02/report/customer-financial-hardship-telco-industry-state-play-report-2019-20>

²⁰ TIO 2020, *TIO Annual Report 2019-20*, https://www.tio.com.au/sites/default/files/2020-09/TIO%20AR2019-20_High-Res.pdf

²¹ Colmar Brunton 2020, *Still Waiting ... Costing Wait Times for Telecommunications Consumers*, prepared for ACCAN, <http://accan.org.au/our-work/research/1805-still-waiting-cost-wait-times-for-telecommunications-consumers>

²² ACCAN 2020, *Still Waiting ... the cost of customer service*, blog post, <https://accan.org.au/media-centre/hot-issues/1825-still-waiting-the-cost-of-customer-service>

Recommendation 6: When considering strategies to lift digital access, the Digital Technology Taskforce should consider the need for improved consumer protections rules relating to customer service and financial hardship.

Informed consumer decision-making

Deep information asymmetries exist between telecommunications providers and consumers. This is a result of the increasing complexity of communications services and the telco market, coupled with unsatisfactory levels of customer service as demonstrated by TIO complaint levels, ACMA reports of complaints received by telecommunications providers, research, and regular feedback from ACCAN members.^{23 24 25}

To support informed consumer decision-making about digital products and service, ACCAN advocates for an unbiased and independent information and plan comparison tool for phone and internet products and services, similar to energymadeeasy.gov.au. This would allow consumers to easily search and compare available products and services, free from the commercial incentives that govern existing popular online plan comparison tools.

We acknowledge the Consumer Data Right (CDR) will be expanded to the telecommunications sector in due course. The CDR gives consumers greater access to and control over their data, allowing them to instruct their bank, energy provider or telco to send their data to a competitor. This is intended to improve consumers' ability to compare and switch between products and services, and encourage competition between service providers, leading not only to better prices for customers but also more innovative products and services.

It may be that the CDR will address the need for improved consumer information and decision-making in the telecommunications market. In order to do so, the CDR must be implemented in a way that is simple and straightforward for consumers to use, with robust mechanisms in place to protect the privacy and security of consumers' personal data and information.

Recommendation 7: That the Digital Taskforce address the importance of informed consumer decision-making in lifting digital access and capability, particularly in the context of the expansion of the Consumer Data Right to telecommunications.

²³ Telecommunications Industry Ombudsman 2019, *Telecommunications Industry Ombudsman Annual Report 2018-19*, TIO, <https://www.tio.com.au/sites/default/files/2019-09/TIO%20Annual%20Report%202018-19.pdf>

²⁴ Colmar Brunton 2018, *Can You Hear Me? Ranking the customer service of Australia's phone and internet companies*, prepared for ACCAN, <https://accan.org.au/our-work/research/1523-can-you-hear-me-ranking-the-customer-service-of-australia-s-phone-and-internet-companies>

²⁵ Roy Morgan, *Net Trust Score Monitor June 2019*, <http://www.roymorgan.com/findings/8199-roy-morgan-risk-monitor-november-2019-201911110700>

Building digital trust

Digital platforms and online safety

In the context of a rapidly changing technological landscape, it is vital that regulations and policy settings are continually revised to ensure that consumers continue to be protected. The emergence of new platforms and services means social media platforms are now just one avenue via which consumers can potentially be exposed to harm, whether it be via online abuse, scams, or privacy breaches. Consumer confidence in communications services is rooted in trust and safeguards, so it is essential that the Digital Australia Strategy acknowledges and reflects the importance of robust regulatory frameworks and consumer protections rules in the areas of privacy, security and online safety.

Internet of Things

In Australia, and worldwide, the demand for consumer Internet of Things (IoT) devices and appliances is soaring as they become more affordable. Smart appliances like fridges, washing machines and coffee makers, and smart devices like internet-enabled televisions, watches and security cameras are now part of modern life. IoT is heavily incorporated into agribusiness and many other business and civil sectors.

The extent to which the Australian public relies on IoT, and consequently the need to cultivate consumer trust and confidence in the privacy and security of IoT, should be a key focus for the Taskforce.

There are limited market-based incentives for Australian IoT device manufacturers to provide consumer protection measures. As a result, the Australian Government needs to ensure consumers are protected from the risks of IoT technology through the development of an Internet of Things enforceable regulatory framework that mandates:

1. **Transparency and informed consent** - Consumers have the right to make informed choices about the use of IoT devices, with a full understanding of any security risks and loss of privacy entailed.
2. **'Explainability' and consumer education** - Industry needs to take responsibility for providing consumers with enough easy-to-understand information to enable them to make informed decisions in purchasing and using IoT devices.
3. **Data privacy and cybersecurity protections** - Industry should be required to provide adequate privacy and cybersecurity protections for all consumers who use IoT devices.
4. **Device and network resilience** - IoT devices must provide a continuous and secure service to all consumers, unaffected by external interruptions to the network.
5. **Durability and fitness for purpose** - Industry must ensure that IoT devices offered on the market are durable, fit for purpose and will be technologically functional for a reasonable period.
6. **Accessibility** - IoT devices must be designed with accessibility in mind, to enable ease of use for consumers with disability and from non-English speaking backgrounds.

7. **Protection for children, seniors and victims of domestic violence** – IoT devices should be designed to protect vulnerable consumers such as children, seniors and victims of domestic violence.²⁶

Recommendation 8: That the Digital Technology Taskforce should consider the need for policy intervention where the market has failed to support consumer confidence and digital trust in emerging technologies and digital platforms.

Digital-first Government

ACCAN understands that the movement towards digitising government services is gaining momentum. The vast majority of interactions with Government – whether it be managing income support, accessing services or participating in civil society – are encouraged or required to be done online and/or via phone. ACCAN acknowledges that the move to digitised services is convenient for many, and yields enormous benefits and savings for governments.²⁷

However, it is of the utmost importance for governments to maintain – or re-open – contact methods that do not require access to a phone connection or internet connection. ACCAN routinely receives feedback from members regarding the difficulties different cohorts experience accessing government services remotely, for example:

- People on limited incomes, who may not be able to afford consistent access to communications,
- Older people, who may not have the digital skills or access to suitable devices,
- Recently-arrived migrants and members of CALD communities, who may face additional language or digital skills barriers,
- People with disability, some of whom may also face additional language or digital skills barriers,
- People in financial hardship who may have their services disconnected for non-payment,
- People living in regional, rural and remote areas who may struggle with network reliability and the availability of services.

Digital poverty is pervasive and affects hundreds of thousands of Australians every year.²⁸ The digital divide will only worsen if governments continue to transition essential services to online-only channels, especially without additional investment in digital inclusion.

²⁶ ACCAN 2021, Internet of Things Policy Position, unpublished.

²⁷ Deloitte Access Economics 2015, *Digital government transformation*, <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economics-digital-governmenttransformation-230715.pdf>

²⁸ Thomas et al 2020, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020*, RMIT and Swinburne University of Technology, for Telstra, https://digitalinclusionindex.org.au/wp-content/uploads/2020/10/TLS_ADII_Report-2020_WebU.pdf

Recommendation 9: That the Digital Technology Taskforce acknowledges the circumstances in which consumers are not able to access government services digitally, and recommends that non-internet based access to services is always made available.

Lifting sectors through technology

While the issue of lifting sectors through digital technology largely falls outside of ACCAN's remit as the peak body for residential and small business communications consumers, it is important to address the need for improved connectivity in the regions as a means to growing Australia's employment and economic opportunities.

The National Farmers Federation in its 2021 Regionalisation Agenda states:

Telecommunications and digital connectivity that were historically impediments to regionalisation, are becoming key enablers in the continued regionalisation of Australia. Through rollout of the nbn network, and deployment of next generation mobile and IoT networks, more businesses can begin to remove digital connectivity from the list of barriers to regionalisation.²⁹

While significant improvements to regional digital connectivity have been made over the past decade, there is much more to be done to ensure that the regional Australians – and the industries that many regional Australians are employed in and rely upon – do not fall victim to the digital divide.

The Regional, Rural and Remote Communications Coalition, of which ACCAN is a founding member, has developed the following goals for communications services in the regions:

- Guaranteed access to voice and data services,
- Equitable voice and data services that meet minimum standards and reliability,
- Continued programs to expand mobile coverage,
- Digital capacity building for regional, rural and remote Australia, and
- Affordable communications services for regional, rural and remote Australia.³⁰

Recommendation 10: That the Digital Technology Taskforces considers vital improvements to the delivery of phone and internet services in the regions as it addresses lifting sectors through technology.

²⁹ National Farmers Federation 2021, *Regionalisation Agenda*, NFF, https://nff.org.au/wp-content/uploads/2021/02/NFF_A4_Regionalisation-Agenda_2021_V7-compressed_1.pdf

³⁰ Regional, Rural and Remote Communications Coalition, *Better Comms for the Bush*, https://mk0australianfa1qtvu.kinstacdn.com/wp-content/uploads/2019/09/RRRCC-brochure_LR.pdf