

17 January 2020



Jessica Curtis
Manager – Policy & Regulation
Communications Alliance
via email: j.curtis@commsalliance.com.au

Dear Jessica,

Re: Review of Guideline G660:2018, Assisting Customers Experiencing Domestic and Family Violence

The Australian Communications Consumer Action Network (ACCAN) would like to thank Communications Alliance for the opportunity to contribute to the review of Industry Guideline G660:2018, Assisting Customers Experiencing Domestic and Family Violence.

Firstly, ACCAN supports the feedback provided by both the Economic Abuse Reference Group (EARG) and WESNET in their submissions. ACCAN is particularly concerned by the mixed experiences of advocates, and fears that this demonstrates that the Guideline is not being used by telecommunications providers. As such, ACCAN is keen for this review process to assess and increase the utility of the Guideline, and in turn help ensure that people who are experiencing domestic and family violence are able to receive appropriate and timely assistance from their telco provider.

The review must first consider the extent to which the Guideline is being implemented by providers or helping to guide practice in situations relating to domestic and family violence. In order to achieve this, the review could include asking providers to report on which of the action items (identified in bold, blue text throughout the Guideline) they have implemented or considered since the Guideline was developed. This could include, for instance, outlining which method of case management¹ the provider has implemented to better support consumers and prevent them from having to repeat their story to multiple people; or whether providers have a set procedure in place to allow domestic and family violence victim survivors to keep their mobile number.²

Once there is a greater understanding of the current use of the Guideline, it would be prudent to consider its intended audience. Currently some parts of the Guideline relate to customer service staff, whereas other sections (e.g. staff training) relate to

¹ Discussed in section 5.4.1 of the Guideline

² As set out in part 9 of the Guideline

human resources staff. Clarifying the audience of different sections of the Guideline could help to make this document more user friendly. For instance, there are many areas of the Guideline that relate to customer service staff, but these are scattered throughout the document. These should be consolidated with a greater focus on practical advice, checklists or tools for customer service staff to use in their interactions with consumers experiencing domestic and family violence.

Alternatively, if the audience of areas of the Guideline is the providers' regulatory teams, then these should be consolidated and include greater advice as to how the actions are to be incorporated into the provider's policies and procedures.

Assessing the target audiences of the Guideline may in turn impact the length of the document. We note that the EARG and WESNET have identified other industry guidance notes regarding domestic and family violence which tend to be shorter than this current Guideline. Shorter and more concise guidance may increase the likelihood that telecommunication providers (and/or specifically targeted teams or personnel within providers) are implementing the Guideline. This should also be given careful consideration throughout the review process.

ACCAN believes that focusing this review on the current use, audience and length of the Guideline, including whether it contains the right type and amount of information for its intended audience, will ultimately make the Guideline more user friendly for providers, and more impactful on consumers.

We look forward to being involved in the next stages of the review process.

Yours sincerely,

Meredith Lea
Disability Policy Adviser