



Australian Communications Consumer Action Network

Small Business Advisory Forum

Meeting Report

Wednesday, 24 May 2023, 10:30am – 12:00pm
by videoconference

PRESENT:

Michael Lewis	.au Domain Administration Limited - auDA
Dominic Schipano	Australian Digital and Telecommunication industry - ADTIA
Cameron Dyson-Smith	Australian Small Business & Family Enterprise Ombudsman Office - ASBFEO
Simon Moore	Business NSW
Will Harris	Council of Small Business Organisations Australia - COSBOA
Andrew Stewart	Hearing Connections
Laurence Redaelli	NSW Small Business Commissioners Office
Robert Mallett	Small Business Council of Tasmania
Alexi Boyd	Small Biz Matters

ACCAN:

Keith Besgrove	ACCAN Board and SBAF Chair
Andrew Williams	Chief Executive Officer
Gareth Downing	Deputy Chief Executive Officer
Kelly Lindsay	Consumer Engagement and Membership Lead
Con Gouskos	Policy Officer

APOLOGIES:

Greg Alchin	Alchin Consulting
David Borger	Business Western Sydney & Business NSW
Gavin Freeman	Business Olympian Group
Matthew Addison	Council of Small Business Organisations Australia - COSBOA
Rebekah Godbold	Department of Employment, Small Business and Training QLD
Karen Finch	Legally Yours

Chris Young	National Farmers Federation - NFF
Debbie Barwick	NSW Indigenous Chamber of Commerce
Elizabeth Skirving	Rural Business Tasmania
Carolyn Jeffrey	Women in Business Regional Network
Fleur Anderson	89 Degrees East

The purpose of ACCAN's Small Business Advisory Forum (SBAF) is to identify the most important telecommunications consumer issues from the perspective of key representatives in the small business environment and the people they represent. This then informs the development of ACCAN's future policy priorities for the 2023-24 year.

SBAF participants are welcome to use this document in reporting back to their organisations. This report will also be sent to invited representatives who were unable to attend.

1. Background

ACCAN's consumer consultation is ongoing and multi-format. We hold our formal advisory forums annually and aim to meet regularly with our member organisations. We regularly review the advisory forum format and content to support effective engagement.

Our aim is to provide an opportunity for genuine two-way communication that best allows us to hear from our members and other stakeholders about their communities' communications issues. This allows us to ensure that our work priorities and policies address issues of concern and meet our member's needs.

The objective of the forum was to inform the development of our 2023/24 policy priorities, and our policy themes.

2. Complaints

The TIO received around almost 11,000 complaints in the 2021-22 financial year from small businesses, which was a 44% decrease on the previous year and the lowest of small business complaints in the last three years.

Complaints about a provider being uncontactable reduced in 2021 and 2022. Poor mobile coverage has come into the top 10 of issues faced by small businesses. Complaints about mobile services accounted for 26% of small business complaints.

The implementation of a complaint handling standard by the Australian Communications and Media Authority (ACMA) is believed to have contributed to at least part of a structural decline in complaints.

Attendees were asked to indicate if they thought that the decrease in complaint figures was normalising back to a pre-COVID level or if it reflects a genuine decrease. Attendees feedback was that like the energy sector, they would conclude that the complaints were normalising.

ACCAN representatives detailed the top five issues in small business complaints as reported by the TIO in 2021-22. The complaint figures detailed below saw significant decreases from 2020-21 levels.

- No or delayed action by service providers, which saw a 36% decrease from 2020-21.
- Service provider and equipment fees.
- No phone or internet service.
- Delaying establishing a service.
- Business loss.

Looking forward to more recent, quarterly complaint data, the top five issues for small businesses between January and April 2023 were:

- No or delayed action by service providers.
- Service and equipment fees.
- No phone or internet service.
- Business loss.
- Intermittent service or dropouts.

Attendee feedback on complaints data

Small business definition

Concerns were raised that small business complaint data is often bundled into households, purely because of their size, and thereby impacting the small business complaint figures.

Small business definition standardisation

It was agreed that the definition of small business needs to be standardised to reconfigure information for the future around internet connectivity and availability of communications. Specifically mentioned by SBAF participants were disruptions to business during natural disasters due to the lack of identification and implementation of business level service standards, network resilience and financial hardship criteria.

Satellite service data

There was concern about satellite service data being forgotten about due to the relatively small size of the service and the lack of complaints handling support available.

Action for ACCAN: Approach the TIO to see if a breakdown of satellite complaints data can be made available.

3. 2023-24 small business communications issues with participant feedback

The following prevalent issues were raised for discussion.

Scams

Participants agreed that scams are an ever-increasing burden to business. More recently, small and micro businesses have been actively targeted. It is multi-channeled and often goes unreported. It was agreed that the ACCC Scamwatch data is useful, but not truly reflective of the true impact on the small business economy. The COSBOA [Cyber Wardens](#) Program is collecting further data which will help support the ACCC Scamwatch data.

What needs to be done;

- Clean pipes Initiative – Telcos are reporting that they are highly active in this space, but more information and transparency would help small business to understand what protections are in place and if the telcos are ramping up protections. Small business would like to be aware of the specifics of what's being done by the industry to determine if ACCAN should be advocating for more protections.
- Telcos to provide information about what happens with data – e.g., when a caller is blocked, is the data used to track scammers and trigger 'protections' – or is there really no point?
 - ACCAN reported that the ACMA are looking at options through the numbering system and a SMS sender ID registry that support moves towards a future of cybersecurity by design where the onus isn't always on small business to have system/processes to work around things that could be made safer in their design.
- Telcos could look to implement something similar to the banking industry model of recognising suspicious communications and triggering a warning to consumers. For example: *"This number is suspected spam because it's been reported as spam or as a scam"*. It was agreed that it would be ideal if the registry put the onus on the telcos to identify and intercept potential threats before they get to the person.
- Practical consumer education is needed with clear actionable steps that small businesses can take to reduce their risks. Participants suggested that this would be something ACCAN could be involved in.
- The reporting of incidences needs to be easier and encouraged to build an incident database.
- There is value in empowering smaller industry associations to deliver tailored, practical, and implementable tips. Small Business Council of Tasmania recently ran a tailored webinar to their members. 40 small businesses made the time to attend.

Action for ACCAN: ACCAN to be an advocate for the Clean Pipes Initiative.

Action for ACCAN: ACCAN to highlight to the ACMA that a presence such as ASBFEO and/or COSBOA should be part of any conversation or meetings around any numbering rights framework to ensure that it won't be too onerous on small business. Nor should it be difficult, create impediments or be anti-innovative.

Security and privacy

Cybersecurity continues to present challenges for small business.

- Small businesses won't always know the data they hold. Support is needed to help businesses understand what they hold, what to be wary of and if they need or should hold onto certain types of data.
- Changes to the Privacy Act – implications for small businesses.
 - Proposed compliance changes are potentially challenging for small businesses in terms of IT systems preparation and legal advice/support needed.
- Business NSW offer training materials <https://www.mybusiness.com.au/how-we-help/our-services/business-cyber-security-training-and-resources>.

Action for ACCAN: ACCAN to continue engagement with the Attorney-General's Department on the Privacy Act.

Action for ACCAN: ACCAN to monitor the changes to the Privacy Act and to support the small business community with awareness and information relating to online data and allocation of responsibility.

Digital platform issues, including online fake reviews.

Participants have strong concerns with the use of digital platforms due to the:

- Availability and quality of the internal dispute resolution processes and/or
- Lack of an internal dispute resolution standard for small businesses.
- Lack of reporting of instances as small business are unsure who to contact.

SBAF participants reported numerous instances of disruption to business, including the following:

- Algorithms incorrectly banning businesses, leaving them with no recourse to get their business back online (Amazon).
- Businesses reporting delays in payments, impacting cashflow.
- Fake reviews and/or scams with platforms claiming there is no way to get them down (despite being the platforms being the gatekeepers).
- 'Trusted' accounting platforms being spoofed and being used for invoicing scams – Contact details for large platforms like Xero, MYOB are not available to verify.

ASBEFO has had some success with establishing points of contact with some of the bigger platforms. However, the issue is often that once you are locked out of the platform, you no longer have access to the dispute resolution options.

What needs be done:

Small businesses need to know where to go next, they need it to be resolved quickly and efficiently without the cost burden. If they don't have a relationship with ASBEFO / COSBOA etc, they are stranded.

Phone number issues

Participants agreed that there had been some improvements with this issue in part due to the trend to the use of mobile devices and the abandonment of landlines. However, there are, and always will be, businesses who can't access mobile networks or have a need for fixed landline services.

Participants agreed that there are issues around dated, signed contracts that roll over year to year with the original signatory having long departed the organization. It can be a cumbersome process to update or revise such contacts. Participants thought that the recently introduced Director ID process might help towards a solution.

3G Switch-off

While participants were mostly aware of the pending 3G switch-off, they agreed that a lot of businesses wouldn't know the range of equipment that it might apply to. Most would identify that it was applicable to mobile phones, but most would benefit from information on other types of equipment that it could impact, and how to identify what network this equipment might run on. Tailored programs run by Telstra have worked well in regional areas.

Specific concerns remain around the 3G switch off. These include:

- A lack of knowledge that EFTPOS terminals, medical and healthcare devices could be impacted due to providers typically saying it's a set and forget set up.
- Small business being unable to immediately identify that it might apply to their operational equipment.
- Small businesses being unsure where to find more information on the 3G switch off.
- Online information isn't tailored to small business, making it difficult to identify potential small business impacts.
- Telcos fail to acknowledge that more needs to be done to prepare small business for the switch-off.

Action for ACCAN: ACCAN to continue to raise awareness of the 3G switch off and to interpret the implications for small business. Further work is needed to convince telcos that more needs to be done to identify small businesses at risk of equipment being impacted.

Satellite services

Despite improvements, latency and weather continue to be an issue causing significant problems for online meetings for rural Australia. Advocacy is needed for cheaper opposition to Starlink and for NBN to put out a low-earth orbit satellite to allow for real-time presence for consumers using satellites services.

Action for ACCAN: ACCAN to advocate via the Government's Low Earth Orbit Satellite Working Group for improved satellite services.

4. Next steps

The ongoing, small business specific issues are acknowledged as particularly disruptive to small business consumers. ACCAN will continue to work with small business stakeholders on these priorities throughout 2023-24.

ACCAN will continue to actively engage with members and small business stakeholders. Our engagement is intended to be ongoing. Regular member and stakeholder meetings will complement the advisory forums and we strongly encourage our small business stakeholders to contact us should you seek support or assistance on existing or emerging communication issues.