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## Submission

3 April 2023

The Office for Women  
Department of the Prime Minister and Cabinet  
Online form for organisations

### Re: National Strategy to Achieve Gender Equality

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Office for Women for the opportunity to comment on the National Strategy to Achieve Gender Equality (**the strategy**).

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

Domestic and Family Violence (**DFV**) is a widespread social problem that impacts approximately 1 in 6 women and costs the Australian economy \$26 billion annually (Dragiewicz et al. 2021:378; KPMG 2016:4). Furthermore, it is estimated that 8% to 48% of DFV cases in Australia include technology-facilitated abuse (Dragiewicz 2021:6).

ACCAN recommends the strategy should prioritise Gendered violence arising from technology-facilitated abuse. ACCAN recommends The Office for Women consider technology-facilitated abuse a vital component of the strategy, further supporting the Australian Government's National Plan to End Gender Violence, which highlights the various ways:

Technology-facilitated abuse can cause victim-survivors to feel increased levels of fear and trauma, a sense of being trapped and a fear of or disengagement from technology. This can compound isolation, restrict access to support and services and further reduce their full economic and social participation. Technology and internet access are essential for victim-survivors of gender-based violence to access vital health and social services, as well as law enforcement and legal services (Commonwealth of Australia 2022:54).

Technology-facilitated abuse is of material risk to public safety and intersects with vital issues, such as economic abuse, financial hardship, compromised security, and privacy (ACCAN 2023:1; TIO n.d.). Discussions with ACCAN stakeholders and members have revealed concerning reports regarding the experiences of women and children affected by DFV.

For example, ACCAN became aware of a consumer who entered a women's refuge for DFV with her children. Whilst in the women's refuge she incurred data and device debt leading to them becoming disconnected from their telecommunications service. A direct result of them becoming disconnected led to her children being unable to access remote educational programs. In response, the provider waived the communications debt and offered a monthly repayment plan for the device, which the consumer accepted. This case study demonstrates a material risk to public safety, along with the

importance of communications service providers having a uniform approach to supporting victim-survivors from both hardship and non-hardship related disconnections.

Furthermore, research undertaken as part of ACCAN's grants program has illustrated how technology-facilitated abuse can arise in the communications sector through family plans (see Sulikowski et al. 2022), consumer spyware (see Molnar and Harkin 2019), and devices (see Dragiewicz et al. 2019; WESNET 2019; Woodlock 2015).

ACCAN also notes that at present, there appears to be a lack of uniformity across communications service providers on how they respond to DFV-related issues. Noting the immediate and direct risk to public safety posed by technology-facilitated abuse arising from DFV, we consider uniformity across communications service providers as one of the key issues that should be outlined in the strategy.

We thank the Office for Women for the opportunity to comment on the strategy. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at 02 9288 4000.

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*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.*

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## References

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