

MEDION Australia Pty Ltd
ACN 105 611 330

The Manager
Telecommunications Performance and Regulation
Section
Australian Communications and Media Authority
Delivered by online upload

Suite 802, 11 Help Street
CHATSWOOD NSW 2067

02 April 2025

Dear Manager

Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025.

MEDION Australia Pty Ltd (**MEDION**) welcomes the opportunity to provide feedback on the proposed *Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025*. MEDION's submission follows below.

MEDION supports the intent of the *Proposed Telecommunications (Domestic, Family and Sexual Violence) Consumer Protections Industry Standard 2025*, and welcomes the establishment of consistent protections for customers affected by domestic, family, and sexual violence. However, we wish to raise several key considerations to ensure the Standard is effective, provides clarity and is implemented across the industry.

MEDION have identified the below sections as key areas of risk for further consideration;

- **Section 9(2)(e):** We believe that a centralised list of specialist domestic violence support service phone numbers maintained by the ACMA would support the industry to ensure accuracy, consistency, and ease of reference for all providers.
- **Section 12(4):** Preventing providers from requesting evidence in high-risk transactions may enable bad actors to circumvent the process leading to fraudulent activity. Where an alleged victim is the account holder but cannot verify their identity, we currently use supporting documentation to make informed decisions. The draft standard removes this option, increasing risk to the customer and enabling potential fraud to occur.
- **Section 16(e):** The proposed toggle-based approach for suppressing calls to services such as 1800 RESPECT presents significant operational complexity. We recommend a default suppression model with guidance from ACMA on which numbers should be excluded from bills and usage records.
- **Section 22(1):** The requirement to consult with multiple domestic, family, and sexual violence support bodies during the drafting and review of policies, processes, and training would place a significant burden on smaller providers, like MEDION. To ensure consistency and support across the industry, we believe it would be highly beneficial for ACMA to publish and maintain a list of recognised service organisations that providers can engage.

We thank ACMA for the opportunity to provide input on the proposed Standard and remain committed to working collaboratively throughout its implementation.

Yours sincerely



Head of Customer and Compliance, MEDION Australia

MEDION SUBMISSION
Telecommunications (Domestic, Family and Sexual Violence) Consumer Protections Industry
Standard 2025

Part 3 – Section 9

Section 9 (2) (e) – ‘Requirement to prepare and publish a DFV statement’

Ensuring that customers are aware of where they can seek help is an important part of a trauma-informed approach.

We recognise that in supporting our customers we are uniquely placed to identify and assist customers experiencing domestic, family, or sexual violence by advising them of relevant support services.

There are, however, practical and operational challenges associated with maintaining up-to-date, accurate information about third-party support organisations. These challenges include:

- **State-based differences:** Support services may vary significantly across states and territories, including in eligibility, contact methods, and service types.
- **Changes within in the sector:** Organisations may change names, restructure, or cease trading altogether, which can lead to published information out-of-date or misleading.

It is also important to acknowledge that the obligation to advise customers where they may seek help sits outside the core business of a carriage service provider, which it is providing carriage service providers. This requirement adds additional operational complexity to supporting customers, which smaller providers will find more challenging to absorb and would be overcome by the ACMA (or other appropriate body such as the TIO) playing a role in helping us support these requirements by maintaining a centralised, up-to-date list of recognised domestic, family, and sexual violence support organisations that service providers can reference and share with customers. Telecommunications providers are not experts in this field, and without a standardised and vetted reference list, there is a risk that organisations being referred to may lack the necessary expertise or capability to adequately support victim-survivors. A centralised list would help ensure consistency, accuracy, and access to appropriate support across the industry.

Part 4 – Section 12 (4)

Section 12 (4) (5) – ‘subject to subsection (5), a provider must not require evidence or support material which demonstrates that an individual is an affected person’, and

‘subsection (4) does not apply where a provider is under a legal obligation to obtain evidence or supporting material in relation to a claim that an individual is an affected person.’

We acknowledge and support the intent of the DFSV Standard to reduce barriers for individuals seeking assistance in the context of domestic, family, or sexual violence. In particular, we understand the need to provide flexible, trauma-informed support without requiring victim-survivors to repeatedly disclose or prove their experiences.

MEDION are concerned that these requirements may have unintended consequences when managing high-risk customer transactions (HRCTs) such as SIM swaps from account holders identified as victim-survivors and who are unable to meet the verification requirements under the Telecommunications Service Provider (Customer Identity Authentication) Determination 2022.

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[REDACTED]

[REDACTED]

[REDACTED]

Commercial-in-Confidence – Ends

We also believe there is a missed opportunity in the Standard to address scenarios where the victim-survivor is the end user but not the account holder. In such cases, our ability to support the end user is constrained, as HRCTs require authority from the account holder—who may be the alleged perpetrator. The Standard should provide clear guidance for managing these situations, including how providers can support the end user in accessing or regaining control of services.

In addition, there is a gap in the draft Standard around the rights of use where the account holder performs an HRCT—such as a SIM swap—that directly impacts an end user who is a victim-survivor. We believe that the Standard include specific direction on managing rights of use, particularly where the end user is affected but lacks account-level control. This clarity is essential to ensuring the safety of all users, especially where the service is being misused as a means of control or abuse.

Part 7 – Section 16 (e)

Section 16 (e) – ‘ask the affected person if they want calls made using telecommunications service to 1800 respect not to be recorded on the bill

We support suppressing sensitive service numbers, such as 1800 RESPECT, from appearing on customer bills and usage records, particularly where disclosure could pose a safety risk to victim-survivors of domestic, family, or sexual violence.

However, we raise concerns regarding the operational complexity of offering an opt in/opt out functionality for this suppression on a per-customer basis. The ability to switch this functionality on or off would require significant back-end development and systems integration, particularly as billing and call record systems are often managed at the network level, separate from front-end customer interactions.

Implementing real-time, customer-controlled suppression of individual service numbers

would likely be resource-intensive, costly, and complex to support at scale, especially for small service providers such as MEDION.

MEDION also note that any implementation would require development, implementation and support from carriers to ensure compliance.

To achieve the intent of this obligation in a practical and industry-consistent way, we would like to see ACMA provide guidance on the following:

- A definitive list of support service numbers (e.g., 1800 RESPECT and others) that must be suppressed from call and usage records visible to customers;
- Whether this suppression should be enabled by default, with the option for customers or Law enforcement agencies to request visibility where needed.
- How this requirement interacts with obligations to retain call data for legal or compliance purposes at a network and law enforcement level.

A standardised, ACMA-maintained list of service numbers to be excluded from customer-facing materials would provide clarity and ensure customers are protected without undue implementation burdens on providers.

Part 9 – Section 22 (1)

Section 22 (1)– ‘ In developing and review its DFV policy, statement and training a provider must consult with at least two; DFV support services or organisations, panel of people or representatives who have lived experienced or sectors that have experience in developing and implementing responses to DFV.’

We support the principle that DFSV-related policies, processes, and training should be informed by organisations and individuals with experience supporting victim-survivors. Embedding expertise from DFV support services and those with lived experience helps ensure responses are trauma-informed, survivor-centred, and fit for purpose.

However, we also wish to highlight the practical and financial challenges this requirement will present—particularly for smaller providers with limited resourcing. The obligation to independently consult with at least two entities, such as DFV organisations or panels of lived-experience representatives, may be burdensome for providers that do not have established relationships with these groups or the capacity to engage them on an ongoing basis.

To support consistent implementation, particular for smaller CSPs, we believe it would be beneficial that ACMA develop, publish and maintain a reference list of recognised DFV support organisations and consultation bodies that providers may approach for the purpose of fulfilling this requirement.

This would:

- Reduce uncertainty for providers about who qualifies for consultation;

- Assist smaller providers in meeting their obligations in a compliant and meaningful way.

Response to ACMA questions

Question 8 ‘ terms in draft standard that could be improved or defined

We acknowledge and support the inclusive intent behind extending protections to people who *may be experiencing* domestic, family, or sexual violence. However, we note that the current drafting of this language introduces ambiguity, particularly in terms of how providers are expected to identify or respond to individuals.

Without clearer criteria or indicators, there is a risk of inconsistent interpretation across the industry.

We would like the definitions in the standard to provide greater clarity and guidance on:

- How providers are expected to determine when a person *may* be experiencing DFSV, especially in the absence of a disclosure;
- Whether specific obligations differ in cases of confirmed DFSV versus perceived or suspected DFSV.

Response to ACMA questions

Question 9 ‘ reasonable time to implement’

We support a reasonable and structured approach to implementation that allows CSPs to comply while ensuring minimal disruption to customers and operations.

MEDION would support a three-month implementation timeframe from the date the final Standard is published, allowing CSPs sufficient time to update internal policies, procedures, and staff training.

For any components that require technology changes or system development—such as suppression of billing information or integration of new support pathways—we would require a minimum lead time of six months from the date of publication. This accounts for the complexity of system architecture, vendor coordination, testing, and rollout.

4. Conclusion

MEDION supports the draft of the *Telecommunications (Domestic, Family and Sexual*

Violence) Consumer Protections) Industry Standard 2025 and welcomes the ACMA's guidance in establishing stronger, enforceable protections for victim-survivors. We support the industry's role in responding to the needs of affected customers with empathy, urgency, and care and acknowledge the significant work that has already been undertaken to reduce fraud and protect customers.

Our submission highlights a number of areas where the draft Standard, in its current form, intersects with existing legal obligations—particularly under the *Customer Identity Authentication Determination 2022*. In practice, this may create implementation challenges or introduce risk where guidance is unclear or conflicting.

We encourage ACMA to consider the operational impacts on smaller providers—particularly where new consultation, training, or technical suppression requirements may be difficult to implement. Where possible, we believe the development of centralised guidance, reference lists, or industry-supported resources ensure consistency, reduce duplication, and support all providers in meeting the Standard's requirements.