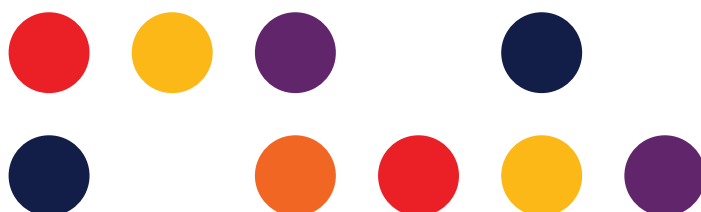


Response to draft Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025

Australian Communications and Media Authority

April 2, 2025

Confidential



Submission

TPG Telecom welcomes the opportunity to provide a submission in response to the draft Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025 (**the Standard**).

We contributed to and supported the submission by Communications Alliance.

About TPG Telecom

TPG Telecom is Australia's third-largest telecommunications provider and home to some of Australia's most-loved brands including Vodafone, TPG, iiNet, AAPT, Internode, Lebara and felix.

We own and operate nationwide mobile and fixed networks that are connecting Australia for the better.

Executive summary

We acknowledge the importance of this issue and have taken a proactive approach to supporting individuals affected by domestic, family, and sexual violence (**DFSV**). This includes our internal business practices, industry guidance regulation, and our support of best practices to assist those affected by DFV.

TPG Telecom takes its role in supporting consumers affected by DFSV extremely seriously. We have been active in finding ways to ensure that affected individuals can easily access and connect with us, our specialists, and others in our industry to assist them with safe, suitable, trauma-informed solutions tailored to their circumstances. We are proud of the work our frontline teams have achieved and the range of ways they have supported affected customers. We hope our practical experience and demonstrate passion for support on this topic will be used to develop safe and effective rules on this critical issue.

We have also chaired the Communications Alliance's domestic and family violence working group since its establishment in 2018. This group drafted and now maintains the G660 Assisting Consumers Affected by Domestic and Family Violence Industry Guideline (**the Guideline**). Additionally, as chair of both the C525 Handling of Life-Threatening and Unwelcome Communications Industry Code working group and C566 Number Management – Use of Numbers by Customers Industry Code, we were instrumental in ensuring consideration for domestic and family violence was provided in technical Codes. This includes reducing timings for warning letters and service suspension and clarifying the role effective number management plays in supporting ongoing connection for end users affected by domestic and family violence.

In addition to our work with Communications Alliance, TPG Telecom is a proud Telco Together Foundation (**TTF**) member. We have pledged to join this collaborative industry effort to tackle domestic and family violence (**DFV**). TPG Telecom is a signatory to the TTF DFV Framework, which sets a pathway for Australian telcos of all sizes and types to better support their customers and employees experiencing DFV. We assisted in developing the TTF DFV Framework and are working with TTF to complete our alignment to the Framework. We report our progress to TTF annually.

TPG Telecom was a founding and remains an active member of TTF's DFV working group and

engages in the newly established technology-facilitated abuse (TFA) working group. This work includes participation in TTF's DFV and tech-facilitated abuse forums, including DFV Member Networking, DFV Roundtables, the DFV/TFA Best Practice Forum, and the DFV Insight Series.

Risk to CSP staff

We wish to emphasise to the ACMA that consideration must be given to how this Standard will impact the safety and security of our staff. Recent regulatory requirements have not always accounted for the impact the changes will have on aggressive customers, which can place our staff in a position of risk when managing members of the public.

Case Study: Customer ID issues (verbatim from staff)

The customer entered the store with a prepaid simcard, which he wanted to activate. He didn't have any ID on him, so [staff member] told him that unfortunately, he couldn't assist him without. He offered the solution, that when he is at home and has his ID, that he could activate it at home, but this wasn't taken well. I stepped in when he became aggressive, and he started to move towards [staff member], as I thought he would get physical with him. He grabbed one of the laptops and smashed it on the ground, breaking it. He also grabbed both of the monitors on the POS [Point of Sale] desk, breaking them.

He was on his way out of the store, when one of the elderly customers swore at him, which made him come back and he tried to approach her. I stepped in between, so he grabbed the laptop from the front desk, which I managed to grab back before he could do anything. He left, and it took 5 minutes before the center security was here. They found him, but for some reason, he came back to the store again when I was on the phone with [redacted]. I rushed back into the store, where he grabbed the same laptop, threw it on the floor, and stomped on it.

We are concerned that this Standard, without consideration on the risk to CSP staff and the need for timeframes to develop the training and supporting materials in line with the new mandatory obligations to reduce that risk, will further increase the pressure of frontline staff. Given the topics and the types of consumers this Standard will impact, we strongly recommend the ACMA work to ensure safety, for consumers, staff, and third parties, is incorporated into all elements of the rules.

For TPG Telecom, risk relating to DFV affected-people and our staff is particularly stark - our contact centre in Hobart recently experienced an DFV event: <https://7news.com.au/news/qantas-staff-member-injured-call-centre-evacuated-after-car-drives-into-building-in-goodwood-tasmania--c-18162608>.

Case Study: Hobart event (staff safety)

On 26 March 2025, a man drove a stolen vehicle through the front entrance of our call centre in Hobart. TPG Telecom co-share this location with Qantas. The impact from the car crashed through two security doors and the reception desk, into the back spaces of the lobby. The man then entered the adjoining Qantas office armed with a weapon. He made his way through the call centre and moved to a lunch space shared with TPG Telecom (that was being used as an emergency exit, due to the unknown damage from the impact to the front of the building).

A female Qantas employee, believed to have been known to the man, received minor injuries and

was transported to Royal Hobart Hospital for treatment. The man was apprehended by staff members of both Qantas and TPG Telecom, until Tasmania Police attended the location. He has now been charged with attempted murder.

Our staff are still navigating the after-effects of this event and have not yet returned to the office.

Finally, there must be flexibility in all active clauses to enable a CSP staff member to choose not to act where they are concerned about their safety, the safety of the affected person, or the safety of any third party.

Issues for comment

Question 1: Does the draft DFSV Standard fulfil the objectives and requirements of the Direction? If not, please explain why and provide any alternative and/or additional approaches or requirements that could be used to meet the objectives of the Direction.

Amendments are needed for the draft to meet the Direction's objectives and requirements more effectively. The recommendations are provided in response to relevant questions listed below.

Question 2: Should the DFSV Standard, in part or whole, apply to not-for-profit and/or small business customers? If so, please provide details on which parts of the DFSV Standard should apply and why.

No. The definition of consumers within the draft Standard is appropriately targeted to meet the objectives of the Direction. [REDACTED]

Question 3: Are there any classes of carriers or CSPs that should be exempt from requirements in the DFSV Standard? If so, please provide details on which classes of carriers or CSPs should be exempt, the requirements they should be exempt from and why.

No. The current draft definition of consumer is the appropriate method to enliven the protections contained within the draft DFSV Standard.

Question 4: Should there be exceptions or conditions placed on the application of certain obligations? If so, please provide details on the specific obligations you refer to and what exceptions or conditions you think would be suitable and why.

We strongly encourage the ACMA to be clear that the obligations within the Standard can only be applied to activities within the jurisdictional limits of Australia; this is particularly important as it relates to numbering and unwelcome or life-threatening communications. This would include suppression of calls to support services outside of Australia.

Question 5: Do the benefits of having expert-informed policies, statements and training outweigh the additional demands placed on the DFV sector by the proposed provisions that require consultation?

It would be beneficial if the ACMA was clearer on the intent behind 'consult with'. The current drafting is unclear the activity required to fulfil the requirements of 'consult'. If the intention is for CSPs to review and utilise materials published by the entities listed in s22(1) when developing training, policies, and procedures, it is our view that this should be made more explicit.

If the intention is that CSPs must formally consult with external providers in developing and reviewing the materials, this would be a significant burden not only on CSPs, but on the stakeholders required. We are particularly concerned that there would be limitations on access to relevant stakeholders, placing a CSP in a position of potential non-compliance for reasons beyond the control of the CSP.

To highlight the complexity of formal consultation, we will provide two case studies on training materials TPG Telecom has developed with external providers.

Managing Customer Aggression: Jan-April 2017

The training was developed in-house, in response to an increase in customer aggression (particularly in Retail). To ensure the content was sound from a psychology perspective, we consulted with psychologists from [REDACTED] to create content that provided a foundational understanding of aggressive customer behaviour.

The psychologist both contributed and reviewed the content as it was developed. Due to the consulting period being the rate-limiting factor, the full development of the training took about 10 weeks, with the consult process taking up about eight weeks.

This does not include time training rollout timeframes or the development of associated processes and procedures to manage escalations due to aggressive behaviour.

Customer Aggression & Disrespectful Behaviour: Sept 2024 - Present

This project is currently in the early stages of development. To modernise the Customer Aggression training referenced above, TPG Telecom tendered and selected a consulting vendor, who were selected in September 2024.

They have submitted two draft outlines for the refreshed training with the consultation. Content creation process still ongoing after five months.

[Note - there will now be delays incorporating DFV content, given the interdependency with customer aggression. We will need to assess current training materials to ensure no conflicting information/duplication.]

Further, training content for consumer issues has 3 components:

- Context - Explaining why the training is important, including any cultural context we need to add for offshore contact centres.
- Soft Skills - how to talk to a customer in this situation
- Process - any new system or procedure processes that are developed.

While we can begin developing training for context and soft skills quickly, a CSP cannot begin to develop training for systems and processes until said systems and processes are built.

Another aspect to consider are the indicative timeframes to roll out learning. Face-to-Face, e-Learn, Frontline Stores, and Small and Large Contact Centres all have different windows for delivery.

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]				
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

However, if the ACMA intends for consultation under s22 to include reference to materials published by relevant providers under s22(1), this would change the timelines:

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] m Standard publication

Finally, it is unclear the benefit (or likelihood) that personnel within the energy sector, the water sector or the banking sector would review a CSPs training, policies, or processes. Instead, we recommend this concept of consulting with other regulated entities be captured as part of s22(2).

Recommended drafting

Part 9—Consultation and collaboration

22 Requirement to consult

- (1) In developing and reviewing its DFV policy, DFV statement and DFV training, a provider must **either** consult with **or refer to material published by** at least two of the following:
- (a) a national or state based domestic and family violence support service or organisation;
 - (b) a panel comprised of people with lived experience of domestic and family violence or representatives of people with lived experience of domestic and family violence; **or**
 - (c) a national or state-based organisation that represents a group who are or may be disproportionately affected by domestic and family violence, for example, individuals with disabilities, First Nations people, people from culturally and linguistically diverse backgrounds and people who identify as LGBTQIA+; ~~or~~
 - ~~(d) in relation to the energy sector, the water sector or the banking sector, personnel within:~~
 - ~~(i) a regulator of the sector;~~
 - ~~(ii) an industry body representing the sector; or~~
 - ~~(iii) a company providing retail services to consumers within the sector;~~**that have experience in developing or implementing responses to domestic and family violence.**
- (2) ~~Consultations undertaken for Activity~~ under subsection (1) may include:
- (a) **consultations or materials published** on behalf of a provider by an industry group or body that represents the provider; or
 - (b) in relation to the energy sector, the water sector or the banking sector, consultations or materials published by:
 - (i) a regulator of the sector;
 - (ii) an industry body representing the sector; or
 - (iii) a company providing retail services to consumers within the sector.
- ~~(3) A provider must take into account the responses to consultations conducted under this Part when developing and reviewing its DFV policy, DFV statement and DFV training.~~

Question 6: Is the definition of DFV in the draft DFSV Standard broad enough to adequately capture the potential circumstances of a consumer who is, or may be affected by DFV and may seek support or assistance from a CSP? If not, please suggest how it could be improved.

Yes. At TPG Telecom, we are supportive of the general framing that DFV is the use of power, control, and coercion by one party against another to create a dependency, isolate, monitor, or control over them.

Question 7: Recognising that sexual violence also occurs outside the circumstances of DFV, are there any situations where the requirements under the draft DFSV Standard should apply to CSPs in circumstances where sexual violence has occurred outside of a DFV situation?

No. Acknowledging the intent to align the Direction with the *National Plan for Ending Violence against Women and Children 2022–2032* (the National Plan), we strongly recommend careful consideration of the implications the inclusion of sexual violence as a stand-alone set of obligations would have on the definitions and associated rules within the Standard.

To date, the focus has been on the impact of DFV, particularly the use of power, control, and coercion by one party to create dependency, isolation, monitoring or restriction of another, in the context of telecommunications services. This primarily pertains to abuse occurring between two (or more) parties

known to each other.

While recognising that sexual violence is a facet of DFV abuse, sexual violence in the context of telecommunications services necessarily extends to scenarios involving strangers or the use of carriage services to perpetrate tech-based abuse on a larger scale. Such acts include the creation and dissemination of child sexual exploitation material, sexual grooming or abuse, image-based abuse, sexual extortion ('sextortion'), technology-facilitated abuse (TFA), tech-based gendered violence, the sharing of deep-fake pornography, and online sexual harassment. Many of these issues are already addressed under federal and state legislation, including the *Online Safety Act 2021* and its associated Standards and Codes.

Additionally, under the Guideline, significant effort was made to ensure the term 'domestic and family' encompasses more than just immediate family or those within the domestic home. It recognises that DFV can occur across a wide range of personal relationships, including intimate partnerships, immediate and extended family ties, communal and extended kinship relationships, and carer or guardianship arrangements. It is also crucial that the visibility of diverse forms of abuse, as highlighted in the Guideline - such as the abuse of older people, LGBTQIA+ individuals, and people living with disabilities - is not diminished.

Therefore, we strongly recommend the focus of the Standard remain on 'domestic and family violence', to ensure the rules remain centred on abuse occurring within relationships where the parties are known to each other.

Question 8: Are there other terms in the draft DFSV Standard:

- a) where the definition could be improved? Please explain how.**
- b) that should be left undefined? Please explain why.**
- c) that should be defined? Please explain why and provide suggestions.**

Yes.

Affected person

Our concern lies in the obligations that follow this definition, not the definition itself. While we acknowledge the role of proactive identification (and we speak to that in the Guideline, particularly around sales and the role of coercive control), currently in the Standard there are mandatory rules for staff to manage identified customers in a particular manner.

If we are considering these obligations from a safety and trauma informed perspective, where there is a rule, CSP staff are expected to follow those 100% of the time – there is little space for grey in compliance.

Complete compliance to the rules as drafted will result in consumers in complex or unsafe situations being spoken to or treated as a DFV affected customer, in circumstances where it may not be safe for that individual, other people, or our staff.

Example – Identification and the security and privacy of an affected person

While visiting a retail store, Kim and their partner Chris exhibit behaviour that indicates Kim may be affected by DFV.

The current draft s16 would mandate the CSP retail staff member speak with Kim to ask if they are the account holder and if they have any safety concerns. It is likely in these circumstances that Chris is within proximity of Kim and our staff member, able to overhear the question asked and Kim's responses.

This is incredibly unsafe, placing Kim and our staff member in real, physical risk in the moment and Kim is risk once they leave the store.

Failure to ask these questions would be a breach of the rules as drafted, placing the CSP in direct non-compliance with the Standard.

The draft rules in s16 are very different when limited to circumstances where Kim attends a store and identifies as a DFV affected person; Kim clearly feels safe enough to initiate the conversation and staff can manage this interaction in a way that supports Kim's needs.

Recommended drafting

affected person means ~~an individual consumer~~ that identifies as an individual who is, or may be, the subject of domestic and family violence; ~~or~~

~~(a) the provider, suspects is, or may be, the subject of domestic and family violence, including a past, prospective or current consumer.~~

Consumer contract

In addition to the customer, the current definition of 'consumer' includes the end-user and any authorised representatives. Only the customer has a contract with a CSP.

Recommended drafting

~~consumer~~ **customer contract** means an arrangement or agreement between a provider and a consumer for the supply of a telecommunications product to that consumer, including a standard form of agreement formulated by a provider for the purposes of section 479 of the Act.

+ update relevant clauses with reference to consumer contract within the Standard

Warm transfer

The current definition of warm transfer includes the term 'forward' on online written chat functions. This terminology has the potential to limit or add complexity to the method for the warm transfer process. We recommend that the term is updated to 'make available', to capture the intent without mandating the process via a definition.

Recommended drafting

warm transfer occurs when a member of the provider's personnel (the transferor) answers a query from an affected person and transfers the query to another member of the provider's personnel (the transferee), and:

(a) where the affected person has made a telephone call to the transferor – the transferor explains the details of the affected person's query to the transferee on behalf of the affected person; or

(b) where the affected person is using an online written chat function on the provider's website or through the provider's mobile application – the transferor **forwards make available** the written details of the affected person's query to the transferee on behalf of the affected person, before transferring the query, to avoid the affected person having to repeat their circumstances.

Question 9: What is a reasonable timeframe for implementation of the DFSV Standard to allow CSPs to consult and collaborate with DFV experts in developing and implementing the systems, policies, processes and training required? Question 10: Are there any provisions in the draft DFSV Standard that should start immediately upon commencement? For example, are there any barriers to the protections in proposed section 15 starting immediately on commencement or very soon thereafter (such as by 1 July 2025)?

See response to question 5.

Additionally, any systems changes require time to implement once the process is updated. As with training, system changes are a lagging activity. Any additional time provided to training requirements should also be considered for system or technical change requirements (i.e., quick-exit functions under s16(5), warm transfer requirements under s15(5)).

Given the importance of safety for this consumer group, rushed changes by CSP to hit unrealistic deadlines within a regulatory instrument may place people in genuine risk. While acknowledging the desire to create enforceable rules and the requirements of the Direction, time has to be provided to CSPs to deliver effective, safe, and compliant change.

Finally, we point the ACMA to the tremendous amount of regulatory change occurring in 2025, including revised TCP Code, NBN Access Transfer Code, new Online Safety Codes, Scam Prevention Framework updates, ongoing Bean Review updates (including Customer Comms in an Outage Standard and Complaint Handling Standard updates), review of the *Telecommunications Service Provider (Customer Identity Authentication) Determination 2022* (the **CID Determination**), Connect Outstanding Code, and SMS Sender ID Register. Ensuring the Standard aligns with the timings of these regulatory changes is essential, to avoid the important changes this Standard is delivering from being impacted by the sheer volume of change driven by regulation this year.

Question 11: How can the needs of people who are, or may be, disproportionately affected by DFV be best addressed by CSPs when training staff and tailoring systems, policies and processes?

Identification is the most complex part of DFV support. With different jurisdictions using different terminology, even customer presenting with 'clear' language that they are affected by DFV may be missed.

Well developed staff training and supporting materials are a key requirement to address this gap; rushing this activity to meet arbitrary dates will limit the effectiveness of the proposed changes.

Question 12: Are there requirements in the draft DFSV Standard where varying the specificity is desirable? If so, please explain:

a) why it would it benefit the DFV-affected consumer?

b) how the intended protection could be better delivered?

Yes.

TPG Telecom is very concerned about the lack of focus on safety and consumer-lead action in the within various parts of the Standard. While we acknowledge the desire to mandate actions by CSPs, there must be flexibility in all active clauses to enable a CSP staff member to choose not to act where they are concerned about their safety, the safety of the affected person, or the safety of any third party.

Additionally, we are concerned about the focus on 'first occasion' and 'interacting', rather than upon identification. By linking identification and safety, the CSP would have an obligation to provide appropriate support, with the flexibility to choose not to act where there was a safety concern.

Finally, communication of information should be limited to what is necessary to inform the affected person; information overload about administrative processes will not deliver appropriate support. This is particularly true where the administrative information is contained within a policy. It is always more appropriate to inform the consumer about the policy and where to locate it, so they can self-serve in the future when that administrative detail is of interest.

The provisioning of all information must be appropriate to the needs and circumstances of the affected person when they contact the CSP, not an arbitrary, mandated checklist.

Currently, when first interacting with an affected person a CSP would have to:

1. Tell them how the CSP can assist in accordance with its policy
2. Tell them about any specialist DFV teams
3. Tell them about case management processes
4. Tell them about case management timeframes
5. Ask them about their preferred contact method
6. Ask them if they are the account holder or end user
7. Ask them what concerns they have about their privacy
8. Ask them what concerns they have about their safety
9. Ask them what concerns they have about their security
10. If they identify a concern in response to 7-9, discuss the option available to protect them
11. Ask them which option identified in 10 they would like to choose for support
12. Ask them if they want certain calls suppressed [note, see response to Question 18]

This is a lot to ask of an affected person making contact with a CSP for the first time. There must be an element of flexibility included, to ensure the CSP is not overwhelming the affected person and we are being trauma-informed in our support and customer-led in our response.

Lastly, the current drafting pre-supposes that all contacts are made in relation to active services. This is not the case. It would not be appropriate to ask the questions contained in s16 for a long-disconnected defaulted account where the customer is the affected person disputing a debt created by the perpetrator. There must be flexibility to not ask questions where it is not relevant to the affected-persons concerns.

Recommended drafting

Part 3—Requirements relating to availability of DFV support information

11 Requirement to advise affected persons

~~When On the first occasion~~ a provider ~~interacts with~~ identifies a consumer ~~who~~ is an affected person ~~and it is safe and appropriate to do so~~, the provider must advise the affected person:

(a) that the provider can assist the affected person in accordance with the provider's DFV policy; ~~and~~

(b) if the provider has personnel/a specialised team that provide tailored assistance to affected persons – about that team; ~~and~~

~~(c) if the provider has a case management process and associated timeframes – about the provider's case management process and associated timeframes.~~

Part 4 —Requirement to provide support

12 Requirement to provide support to affected persons

(1) Where an affected person has sought assistance from a provider ~~and it is safe to do so~~ – the provider must keep the affected person informed via the communication method, if any, which has previously been identified and agreed with the affected person under paragraph 16(1)(d).

Part 7—Security and privacy

16 Requirements relating to the security and privacy of an affected person

(1) ~~When On the first occasion~~ a provider ~~interacts with~~ identifies a consumer as an affected person ~~and it is safe and appropriate to do so~~, the provider must:

Question 13: Does the draft DFSV Standard adequately balance the need to keep records to demonstrate compliance with the obligations of the Standard with the need to protect an affected person's privacy and security? If not, please explain why and describe any alternative and/or additional approaches or requirements that could be used to better balance these needs.

There is a level of duplication of requirements across ss 12(7), 16(3), 18, and 20(2), and conflict with retention expectations across ss21(1)(a), 21(2)(a), and 12(7).

We encourage the ACMA to consider pulling together the data protection, retention and destruction clauses into a single section, to support compliance with the goal of keeping and protecting records and information collected under the Standard.

Question 14: To what extent, if any, should the DFSV Standard impose obligations on a CSP in relation to its dealings with perpetrators and alleged perpetrators of DFV?

Perpetrators will be customers of CSPs. It is TPG Telecom's view that the ACMA has the balance correct in the Standard.

However, we would also point the ACMA to other regulatory instruments that provide protection for affected persons, including the *C525 Handling of Life Threatening and Unwelcome Communications Industry Code*, which provides protection and further capability for CSPs to prevent perpetrators from using carriage services for abuse.

Question 15: Keeping the safety of both the DFV-affected person and CSP staff in mind, what should these obligations be?

Please see above response to Questions 8 and 12.

Greater consideration should be given to how the current mandatory clauses can be redrafted to promote safety as the core principle of the Standard, particularly where there are mandated, proactive actions required by CSPs.

Question 16: Do the specific and enforceable obligations in the draft DFSV Standard adequately embed an underlying focus on safety in developing and reviewing systems, processes and products? Question 17: Are there other evidence-based DFV safety matters relevant to the telecommunications sector that should be incorporated into the draft DFSV Standard?

Please see above response to Questions 8 and 12

Question 18: What is the best way to achieve the overarching objective for CSPs to limit or prevent the disclosure of information on invoices, bills and other customer-facing materials?

- a) If the possibility of suppressing a broader list of services from bills etc is merited, what should be the process for determining the scope, and a list, of support services?
- b) Should the suppression of information about DFV services on bills, invoices and customer-facing materials be opt in or opt out?
- c) What specific, phone numbers, if any, should be suppressed?

Please see the Communications Alliance submission on the interconnections between the draft Standard, the Telco Act, the TIA Act, and the Telecommunications Consumer Protections Code.

On suppression of defined number, at a technical level it is not possible to suppress calls as the ACMA have outlined in ss16(1)(e) and 16(6). They should be removed from the Standard. Suppression occurs at a network level and cannot be customised in the way the ACMA have

described.

Finally, it is not appropriate for identified numbers to be included in the Standard. Support number can change and update, and the most effective way of managing such lists is in a separate document. While the Standard can contain a general rule that certain numbers be suppressed from being recorded on a bill, record, or other customer-facing material for a service, the suppression must be:

- managed at a network level,
- based on a defined list produced by the ACMA,
- with consideration of the expectation in the Telco Act, the TIA Act, and the Telecommunications Consumer Protections Code, and
- as well as any commercial agreements between carriers, CSPs, and other intermediaries; and
- consideration of the cost of suppression or free rating (see agreements associated with Lifeline).

Recommended drafting

Part 7—Security and privacy

16 Requirements relating to the security and privacy of an affected person

- (1) On the first occasion a provider interacts with a consumer as an affected person, the provider must: [...]

~~(e) ask the affected person if they want any calls made using their telecommunications service to the telephone number 1800 737 7328 (“1800 Respect”) not to be recorded on any bill, record or other material issued in relation to the service.~~

~~(6) If, pursuant to paragraph (1)(e), an affected person requests that any calls made using their telecommunications service to the telephone number 1800 737 7328 (“1800 Respect”) not to be recorded on any bill, record or other material issued in relation to the service, a provider must give effect to that request.~~

(6) Calls made using a providers telecommunications service to a telephone number included on [list name TBC] must not to be recorded on any bill, record or other customer-facing account materials.

Question 19: Are there any other free national hotlines, other than 1800 RESPECT, used by DFV-affected persons that should be included in the draft DFSV Standard?

A list of possible numbers is provided in Appendix 1 of the Guideline. However, it is TPG Telecom’s view that the ACMA should develop a centralised list and that no one service should be included in the Standard.

Question 20: Are there any requirements in the draft DFSV Standard that overlap or cause potential conflicts for compliance with existing regulations? If so, please:

- a) identify the existing regulation

b) explain how the draft DFSV Standard would affect compliance

c) include suggestions for how the intended protection may be better delivered.

The ACMA have identified several instruments with interconnected obligations. As the volume of regulatory rules for consumers increases, there will be complex matters that cross between existing rules.

The Standard will operate within an increasing focused and legislated anti-scam environment for telecommunications providers; customer friendly equals fraud friendly. While exemptions to authentication requirements for those affected by DFV exist within the CID Determination, as protections to support affected people become more widely known, bad actors will seek to take advantage of these 'loopholes'. It is inevitable that restrictions and anti-fraud activity will occur for those seeking to accessing DFV support. This will particularly be true where the support required linked to the management of numbers, SIM swaps, or porting. The Scam Prevention Framework Act 2025 will cause further conflict between support for consumers experiencing vulnerability and protecting such customers from unauthorised activity on their account.

TPG Telecom also strongly supports a review of the *Telecommunications (Service Provider — Identity Checks for Prepaid Mobile Carriage Services) Determination 2017* to guarantee the 'safety of customers, including former customers, affected by domestic, family and sexual violence is prioritised'. The key concern for the Prepaid ID Determination is access to accounts where physical ID or other forms of identification under the Determination are unavailable for people who have fled their homes. The current exemptions under 3.2 are narrow and are of need of review.

Question 21: Should the DFV protections allowed for in industry code C566:2023 Number Management – Use of Numbers by Customers be incorporated into the draft DFV Standard, thereby attracting a broader suite of enforcement powers¹⁰ for non-compliance?

There is no need to incorporate C566 into the Standard, as the proposed changes under the *Telecommunications Amendment (Enhancing Consumer Safeguards) Bill 2025* will ensure the rules under C566 will be caught under the same enforcement capabilities as a Standard.

The technical Code should retain this information, to support the technical solutions to incorporate the requirements.

Question 22: Do you agree with the proposal to make a subsequent amendment to the definition of an urgent complaint in the Complaints Handling Standard to incorporate a complaint made by a person who is or may be experiencing DFV if the subject matter of the complaint may reasonably be considered to impose a direct threat to that person's, or their children's, safety? If not, please explain the reasons why.

No. Urgent complaints should focus on matters that require urgency or immediate action; while some DFV matters fulfil this, not all do. This is particularly true for financial or economic abuse matters, where the debt is older or the service is long disconnected (i.e., default disputes for account several years old). While such matters need to be handled with sensitivity and compassion, there isn't an immediate risk to be address or alleviated.

Additional comments

TPG Telecom propose the following additional updates:

Section	Current draft	Concerns	New draft
8(1)(c)(i)	(c) require that, where an affected person expresses or indicates concern about their safety – : (i) the person's telecommunications service is not disconnected, unless disconnection is requested by the person; or	It may not be the affected person's telecommunications service.	(c) require that, where an affected person expresses or indicates concern about their safety – : (i) the person's relevant telecommunications service(s) is not disconnected, unless disconnection is requested by the person; or
8(1)(c)(ii)	(ii) if the person's telecommunications service has been disconnected – the person's service must be reconnected as a matter of urgency, if requested by the affected person	There may be technical limitations to reconnecting an account, including the age of the disconnection (i.e., for mobile the number may be in quarantine) or the service type is no longer available. An exemption process should be included, in alignment with similar concepts in the draft TCP Code updates.	if the relevant person's telecommunications service(s) has been disconnected – the person's service must be reconnected as a matter of urgency, if requested by the affected person (unless otherwise agreed with the customer or where reconnection is not practical).
8(1)(h)	(h) in relation to its personnel who are dealing with affected persons – clearly identify: (i) those personnels' responsibilities; (ii) escalation channels that those personnel can use; (iii) when the escalation channels should be utilised by those personnel; and (iv) the support that is available to those personnel to assist affected persons;	These are procedure requirements and should be moved to s8(2)	Create a new s8(2)(h) with the same clauses
9(2)(b)	(b) an express statement that the provider is	It may not be the affected person's	(b) an express statement that the provider is

	<p>committed to:</p> <p>(i) keeping affected persons connected to their telecommunications service or,</p> <p>(ii) if relevant, where affected persons express or indicate concern about their safety – reconnecting affected persons to their telecommunications service as a matter of urgency;</p>	<p>telecommunications service.</p> <p>Safety considerations should not be limited to the affected person.</p> <p>There may be technical limitations to reconnecting an account, including the age of the disconnection (i.e., for mobile the number may be in quarantine) or the service type is no longer available.</p>	<p>committed to:</p> <p>(i) keeping affected persons connected to their a relevant telecommunications service or,</p> <p>(ii) if relevant, where affected persons express or indicate concern about their safety – reconnecting a relevant affected persons to their telecommunications service as a matter of urgency (unless otherwise agreed with the customer or where reconnection is not practical);</p>
12(2)	<p>(2) Where the end user of the service has been identified as an affected person – prior to restricting, suspending or disconnecting a telecommunications service, a provider must review the affected person's records to ensure that any action agreed to has been undertaken, including, for example, that payment plans have been set up correctly or payment extensions have been processed.</p>	<p>End users do not have payment plans for their services, as they are not account holders.</p>	<p>(2) Where the end user of the service has been identified as an affected person – prior to restricting, suspending or disconnecting a telecommunications service, a provider must review the affected person's records to ensure that any action agreed to has been undertaken, including, for example, that payment plans have been set up correctly or payment extensions have been processed.</p>
13(2)	<p>(2) The DFV training referred to in subsection (1) must cover:</p>	<p>This should focus on training as relevant to a staff members role.</p>	<p>(2) The DFV training referred to in subsection (1) must cover as applicable to the role of its personnel:</p>
13(2)(d)	<p>(d) recognising how intersectional issues may impact affected persons and the support they require;</p>	<p>Should be limited to action taken in relation to telecommunication products.</p> <p>It is not appropriate to set a requirement for a CSP to consider all support a DFV affected person may require – it should be explicitly limited to telecommunications.</p>	<p>(d) recognising how intersectional issues may impact affected persons and the support they require in relation to telecommunications products;</p>

13(3)(a)(ii)	(ii) before they first start dealing directly with consumers, for personnel not covered by subparagraph (i); and	Retail staff shadow other staff as part of their onboarding, so may begin interacting with staff while undertaking their training.	(ii) before they first start independently dealing directly with consumers, for personnel not covered by subparagraph (i); and
7(3) and 14(3)	<p>7(3) A provider must review its DFV policy and its DFV procedures and make any relevant changes to ensure the policy and procedures are fit for purpose at least once in each period of 24 months after the day on which this industry standard commences.</p> <p>14(3) Not less than every 6 months starting from 6 months after the commencement of this industry standard, a senior executive of the provider must review and approve the assurance program developed for subsection (1).</p>	These requirements and interconnected and the timelines should be aligned.	<p>7(3) A provider must review its DFV policy and its DFV procedures and make any relevant changes to ensure the policy and procedures are fit for purpose at least once in each period of 24 months after the day on which this industry standard commences.</p> <p>14(3) Not less than every 6 24 months starting from 6 24 months after the commencement of this industry standard, a senior executive of the provider must review and approve the assurance program developed for subsection (1).</p>
15(2)	(2) When communicating with an affected person who has indicated that there is likely to be an imminent and direct threat to their safety, or their children's safety, because of domestic and family violence – the provider must prioritise taking action to assist the person with any needs they may have in relation to their telecommunications product.	This clause should be less specific for potential third parties impacted.	(2) When communicating with an affected person who has indicated that there is likely to be an imminent and direct threat to their safety, or their children's safety another person safety , because of domestic and family violence – the provider must prioritise taking action to assist the person with any needs they may have in relation to their telecommunications product.
15(1)	(1) When communicating with an affected person, a provider must not require the person to disclose the circumstances of the abuse as	Duplication of the requirement in 12(4), either this clause or 12(4) should be deleted.	(1) When communicating with an affected person, a provider must not require the person to disclose the circumstances of the abuse as

	a precondition to accessing support or assistance.		a precondition to accessing support or assistance.
15(3)	(3) A provider must not leave messages or send written communications to an affected person except by the communication method, if any, which has previously been identified and agreed with the affected person under paragraph 16(1)(d).	Guidance is required to clarify if this clause covers only messages relating to this instrument or all communications (noting that CSPs will have mandatory rules on some communication methods (for example, Consumer Communications in an Outage Standard)).	(3) A provider must not leave messages or send written communications associated with this Standard to an affected person except by the communication method, if any, which has previously been identified and agreed with the affected person under paragraph 16(1)(d).
16(5)	On: (a) its webpages; and (b) its mobile application, if any, which includes information relating to support for consumers experiencing domestic and family violence, a provider must provide a quick exit function.	Confusing drafting, consider restructuring	A provider must provide a quick exit function on: (a) its webpages; and (b) its mobile application, if any, which includes information relating to support for consumers experiencing domestic and family violence a provider must provide a quick exit function.
19	Where a provider is not subject to the requirements of the Privacy Act 1988, it must ensure that personal information it collects in connection this industry standard: (a) is not disclosed to a third party or otherwise used except: (i) as required to manage a complaint to the TIO or the ACMA; (ii) with the express consent of the consumer;	Given the sensitive information, consumer consent to share this information should be required. This is particular required where the perpetrator uses complaint mechanisms to access information about the affected person.	Where a provider is not subject to the requirements of the Privacy Act 1988, it must ensure that personal information it collects in connection this industry standard: (a) is not disclosed to a third party or otherwise used except: (i) as required to manage a complaint to the TIO or the ACMA; and (ii) with the express consent of the consumer;

	or		or
21(1)(b)	<p>(1) Subject to subsection (2), a provider must: [...]</p> <p>(b) make the records available to the ACMA within 5 business days after receiving a written request from the ACMA.</p>	<p>This is an unnecessarily quick timeframe for information requests. We are concerned that this may elevate the risk that sensitive information may be disclosed.</p> <p>Additionally, the ACMA have powers under s521 of the Telco Act to collect these records. There does not appear to be a reason to include this clause.</p>	<p>(1) Subject to subsection (2), a provider must: [...]</p> <p>(b) make the records available to the ACMA within 5 business days after receiving a written request from the ACMA.</p>
21	Data retention requirements under s20 for 2 years.	<p>The retention of data under s20 is very broad. We are concerned that sensitive information may be retain 'just in case', which is an ongoing issue around cyber risks. We strongly encourage the ACMA to consider limiting timeframes for certain clauses to reduce that risk.</p> <p>The customer account data will be retained under TCP Code requirements and does not need duplication in the Standard.</p>	<p>(1) A provider must keep records that are sufficient to demonstrate its compliance with:</p> <p>(a) Part 2;</p> <p>(b) section 10;</p> <p>(c) section 11;</p> <p>(d) subsections 12(1), (2) and (3);</p> <p>(e) Part 5;</p> <p>(f) subsection 15(6);</p> <p>(g) subsections 16(1), (2), (3) and (6);</p> <p>(h) section 19;</p> <p>(i) Part 9.</p>
General	All references to 1800 RESPECT	Rather than specifically say 1800 RESPECT it should say, 'such as 1800 RESPECT'	