



WESTERN AUSTRALIA POLICE FORCE

OFFICE OF COMMISSIONER OF POLICE

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The Manager
National Interests Section
Australian Communications and Media Authority
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BY EMAIL:

Dear Sir

**RESPONSE TO PROPOSED AMENDMENTS ON WELFARE CHECKS DURING
TELECOMMUNICATIONS OUTAGES**

Dear Manager

The Western Australia Police Force (WA Police Force) appreciates the opportunity to provide a response to the Australian Communications and Media Authority (ACMA) *Emergency Call Service Determination – Proposed Amendments to Improve the Operation of the Emergency Call Service Consultation Paper* (February 2025).

We acknowledge the consultation paper includes 16 questions requiring feedback, covering a broad range of issues. Our response specifically addresses Questions 4 and 5, which relate to law enforcement responsibilities, particularly the requirement for police to conduct welfare checks during significant local telecommunications outages.

The WA Police Force recognises the critical importance of public safety and supports measures aimed at enhancing the reliability and effectiveness of emergency call services. We have significant concerns regarding the proposed amendments that would increase the requirement for police to conduct welfare checks on missed emergency calls during major local telecommunications outages.

WA Police Force cannot support these amendments without corresponding obligations placed on telecommunications carriers to share the responsibility for mitigating the impacts of service disruptions. Additionally, the data referenced in Question 3 of the Consultation Paper, which relates to the nature and volume of outages in telecommunications networks, should be made available to state and territory police as soon as practicable to enable an informed assessment of the frequency, severity, and operational impact of such outages, particularly in regional areas.

The ACMA proposed determination represents a step toward improving consumer access to information about outages, enhancing emergency service reliability, and increasing accountability for telecommunications providers. However, requiring police to assume greater responsibility for welfare checks on missed emergency calls presents serious operational challenges, particularly in Western Australia.

Response to Question 4:

The proposed definition of a significant local outage would likely lead to a substantial increase in police referrals for welfare checks. In Western Australia, such outages frequently occur across vast and remote regions where telecommunications infrastructure is already limited. Given the geographic scale, frequency of disruptions and constrained policing resources, this amendment would present significant operational challenges for law enforcement agencies.

The WA Police Force remains committed to its core front line policing duties, including crime prevention, emergency response and criminal investigations. An increased responsibility for welfare checks in remote areas, where police capacity is already stretched, would negatively impact service delivery. Without a structured framework to manage referrals and additional resourcing to support these efforts, it places overwhelming risk to regional policing services, delaying critical emergency responses and compromises community safety.

Response to Question 5:

While ensuring the welfare of individuals who may have attempted to contact Triple Zero is a priority, placing sole responsibility on police is neither reasonable nor sustainable. Telecommunications carriers must assume a greater role in mitigating the effects of network failures by:

- Implementing redundancy measures to enhance service resilience and prevent outages.
- Establishing dedicated response teams to conduct welfare checks on affected customers before escalating cases to police.
- Providing alternative communication pathways to ensure consumers can report emergencies when network failures occur.

Western Australia has the largest geographic area classified as Remote and Very Remote in Australia, as defined by the Australian Bureau of Statistics. While the exact frequency of telecommunications disruptions remains unclear, power outages and severe weather events in regional Western Australia will inevitably lead to multiple significant local outages.

It is critical that telecommunications carriers assume greater responsibility for service continuity and direct management of outage impacts. Holding providers accountable for proactive solutions will help reduce unnecessary police referrals, allowing law enforcement to focus on core front line police functions to best serve the community.

The WA Police Force requests ACMA to adopt a structured and balanced approach that equitably distributes public safety responsibilities between police and telecommunications providers. We welcome further engagement on this matter and look forward to collaborating on practical solutions that safeguard community safety while ensuring the efficient use of police resources.

Thank you for the opportunity to provide feedback on these proposed regulatory changes.

Yours sincerely

**COL BLANCH APM
COMMISSIONER OF POLICE**

13 March 2025