

Friday 20 March 2026

Authority Secretariat
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616
Via consultation website: acma.gov.au

To the Authority Secretariat,

RE: ACMA's Compliance and enforcement priorities 2026-27

I am writing on behalf of Financial Counselling Victoria (FCVic), the peak body for financial counsellors in Victoria.

We welcome the opportunity to provide a submission to Australian Communications and Media Authority's (ACMA) consultation on compliance priorities for 2026-27. Our submission focuses on areas that are relevant to our work in Victoria and ACMA's remit and is informed by what our members have told us about the needs of vulnerable Victorian clients.

In line with our submission for Compliance Priorities [2024-25](#) and [2025-26](#), we recommend that the following focus areas continue to be maintained as a priority for ACMA.

Financial hardship: Monitoring of telco compliance with existing obligations should continue with a focus on systemic changes and improvements in hardship practices that will benefit all consumers. Importantly, ACMA should reject the revised Telecommunications Consumer Protections Code submitted by industry, and instead commit to implementing direct regulation for essential consumer protections.¹

Further, we consider that ACMA should prioritise monitoring and enforcement of telco sales practices, particularly in relation to the promotion and bundling of add-on products that may not be necessary or appropriate for consumers' needs. Based on feedback from financial counsellors, vulnerable clients are being sold additional products or service features such as device upgrade or protection plans without clear explanation of cost, suitability or alternatives.

We recommend that ACMA assess whether such practices comply with current obligations and broader consumer protection requirements, including transparency, informed consent and responsible selling. Proactive oversight in this area would help address systemic risks of

¹ Reference: https://www.accan.org.au/_files/ugd/f3b93a_e11891dd86fe4d678f2f8d6c3075f7d0.pdf

consumer detriment and ensure that vulnerable consumers are not disproportionately impacted by inappropriate or poorly explained sales practices.

Domestic and family violence: Monitoring compliance with the new Domestic, Family and Sexual Violence (DSFV) Standard. This should focus on the remaining requirements that commenced on 1 January 2026 (for larger telcos) or will commence on 1 April 2026 (for smaller telcos). We have a particular interest in monitoring for evidence of consultation with experts in the development and implementation of policies, procedures and training.

Gambling harm: Addressing and implementing with consultation the relevant recommendations of the Report of the Statutory Review of BetStop – the National Self-Exclusion Register™, published December 2025.² We consider that ACMA has a significant role to play in advising government about the legislative amendments that may be required to enhance ACMA's role in regulating gambling provider compliance.

We also encourage ACMA to monitor and address emerging risks from 'scambling' – scams that mimic online gambling platforms to induce consumers to deposit funds with the promise of winnings that never materialise. Financial counsellors across the country are increasingly hearing from clients who have lost significant amounts through these schemes, which often operate through websites, messaging apps and social media advertising.

Given ACMA's role under the *Interactive Gambling Act 2001* and its powers to investigate and disrupt illegal online gambling services, we encourage ACMA to continue monitoring and blocking illegal gambling websites and to work in collaboration with other regulators, finance, telco and digital platforms to adopt new technologies and identify risks faster to protect Australian consumers, particularly First Nations communities.

Thank you for your consideration of the above feedback. Please contact FCVic's Advocacy Manager Amanda Chan on [REDACTED] if you have further questions.

Regards,

[REDACTED]

Zyl Hovenga-Wauchope
Chief Executive Officer
Financial Counselling Victoria

² Reference: <https://www.infrastructure.gov.au/sites/default/files/documents/report-of-the-statutory-review-of-betstop-the-national-self-exclusion-register-december-2025.pdf>