

24 November 2023

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**Re: Consultation on the *Telecommunications (Financial Hardship) Industry Standard 2024***

We are writing to make a brief comment on the proposed *Financial Hardship Industry Standard 2024* (the Standard). We will leave more detailed comments to ACCAN and other consumer representatives, but we do want to acknowledge that overall the Standard is a considerable step forward on the current vague and inadequate protections contained in the *Telecommunications Consumer Protection Code (TCP)*.

In a brief submission on the Ministerial Direction that gave rise to this standard, we noted that the term “financial hardship” may alienate some customers needing support and was too reactive – awaiting hardship or default before any action was taken. While that language and framework remain, we do not want to re-litigate that argument here. Rather, we want to note and welcome the expansion from the limited definition in the TCP of the circumstances listed as instances of financial hardship. We also particularly welcome the proposed s15 of the Standard which puts a positive obligation on telecommunications service providers to be proactive in identifying customers who may be in financial hardship. This partially addresses our original concern, and again, it is a big step forward from the vague and reactive system under the TCP.

The only other point we want to raise in relation to the detail in the proposed Standard is that the information provision requirements for customers seeking “long term assistance” outlined in s16, could present a barrier to people accessing supports. The information requirements go beyond those applicable to energy customers experiencing payment difficulty, and may be unnecessary when relatively low levels of support are required (e.g. a payment plan). We recognise that subsections (2)(c) and (6) seek to ensure that information can only be requested when strictly necessary, but it is not clear how this will be interpreted and monitored.

This feeds into a broader issue in relation to the whole standard in that there is little requirement on service providers to provide information to the regulator on hardship customers, debt levels, supports offered and outcomes. Such information is essential to enable monitoring of the effectiveness of the Standard, and to ensure compliance. Again, the lack of information from telecommunications service providers is in contrast to the extensive reporting requirements imposed on energy retailers.

Beyond these few points, we will leave further comment to other organisations, but we did want to put on record our support for the Standard overall.

If you would like any further information, please contact please contact me at SACOSS as above.

Thank you for your attention to this matter.

Yours,

A handwritten signature in black ink, appearing to read 'G. Ogle', with a stylized, cursive script.

Dr Greg Ogle  
Senior Policy and Research Analyst, SACOSS