

[REDACTED]  
Telecommunications Performance and Regulation Section  
Australian Communications and Media Authority

**RE: Telecommunications (Financial Hardship) Industry Standard 2024**

Dear [REDACTED]

We appreciate that the Australian Communications and Media Authority (ACMA) is reviewing and proposing a new regulatory environment to enhance protections for telecommunications consumers experiencing financial hardship and we thank you for the opportunity to engage in this consultation process on the Telecommunications (Financial Hardship) Industry Standard 2024.

Uniting Vic.Tas (Uniting) is the principal community services organisation of the Uniting Church in Victoria and Tasmania. We are more than 3,500 employees and 2,200 volunteers delivering over 650 programs and services across the full spectrum of community services, intervening early to help people avoid crisis, as well as supporting those who live life at the margins.

Uniting's Enterprise Development and Partnerships team has been successfully partnering with the business sector for over 25 years. We work to build understanding of consumer need and capability through consulting, training, and development, bringing the lived and living experience of consumers into focus. Through our work over the last two decades, we have consistently found a lack of understanding of financial hardship and vulnerability across the business sector including the telecommunications sector. While Uniting supports the intent of the review, our experience and delivery of programs and services in this area in this area consistently reveals inadequate and inconsistent responses to consumers facing a diverse range of vulnerabilities. Despite telecommunication companies frequently expressing their 'best intent,' this commitment is often not translated into tangible actions and outcomes.

It is Uniting's view that all hardship programs and provisions must adopt a strengths-based approach, fostering an understanding and appreciation of the unique capabilities and resilience of individuals. This approach aims to enhance the industry's ability to provide a tailored and empathetic response to consumers. For example, the language in this area has evolved in recent years and the term "hardship" is not frequently used in the community services sector but rather peoples lived and living experiences are more accurately described as a spectrum of vulnerabilities, including financial distress.

There is a prevailing assumption that individuals in “hardship” will be easily identified for support and early intervention. However, it is unrealistic to expect an individual experiencing a complex range of difficult life circumstances, including financial distress, to describe their financial capability in such terms in order to access support from a telecommunication company. The onus should not be on the individual to self-identify as experiencing ‘hardship’ and rely on them using a set of prescribed terms in order to gain access to supports. Businesses must create a space for individuals to explore their needs and identify any additional support required. There is an opportunity to empower and uplift customers in vulnerable circumstances by offering them extra care. A commitment is necessary to safeguard telecommunications users by integrating extra care throughout the entire product and service journey. This commitment is grounded in the understanding that assumptions about a customer's vulnerability should be avoided, and interactions should be based on a premise of respect and dignity, offering assistance and support.

Telecommunications, as an essential service, comes with the expectation of a Social Licence to Operate. Ensuring reliable and affordable access to phone and internet services is essential, and this draft Standard presents an opportunity to empower and uplift customers in vulnerable circumstances by providing them with extra care.

We recognise the need for appropriate, specialised training to build capability within telecommunication business, to respond to their customer base. We know from our experience that vulnerability is a continuum where individuals and families require different assistance at different times. There is not an expectation that staff become counsellors, but that staff are equipped with the necessary skills to identify, engage, and respond to customer issues and make appropriate referrals and linkages to external agencies with expertise in the relevant presenting issues, as required.

We do have concerns with call centres being offshore where there is an expectation that they identify and manage calls where vulnerability is present. From our extensive work in international settings, we have found this is a complex environment in which to prepare and adequately train staff who operate within a different cultural context that means they may understand and respond to issues very differently from what is currently expected in the Australian context such as recognising and responding to family violence. If telecommunication businesses continue to deliver call centres offshore, it requires close monitoring, a consistent application of Quality Assurance frameworks and standards from the Australian context that is not just based on compliance. We would also recommend that the training be provided by an external service or organisation with demonstrated and comprehensive knowledge of both the subject matter and the cultural nuances.

Prior to the current challenges related to the cost of living, consumers faced substantial hurdles in obtaining outcomes that could have offered them the necessary support. There has been ongoing deficiency in programs, options, and support. This deficiency is now exacerbated by the increasing economic challenges faced by millions of Australians. Organisations across the welfare

sector are witnessing presentations from all segments of the community, with more than 50 percent of presentations to financial counsellors being 'first-time' service users. Correlating this with our other services, we observe a reduction in numbers pre-COVID but a significant increase in complexity of presenting issues. This underscores the urgent need to address the evolving needs of the community and implement robust support mechanisms in the telecommunications sector.

Uniting firmly agrees with the urgent need for a re-evaluation of the telecommunications industry's approach to consumers in vulnerable circumstances. We advocate for a strengths-based paradigm in crafting vulnerability support/hardship programs that recognise the diverse vulnerabilities consumers face. Committing to extra care throughout the entire service journey, grounded in respect and dignity is crucial. The telecommunications sector, as an essential service, must proactively ensure not just reliable and affordable access, but actively prioritise customer support.

We look forward to seeing the outcome of this consultation and would be prepared to assist in any way we can.

Yours sincerely

A handwritten signature in blue ink, consisting of a stylized, cursive 'S' followed by a horizontal line that tapers to the right.

**Shannon Bell**

General Manager

Partnerships, Training & Enterprise