



Essential Services Commission Victoria  
Level 8/570 Bourke St,  
Melbourne VIC 3000

Submitted online: <https://engage.vic.gov.au/building-strategy-regulate-consumer-vulnerability-mind>

8 June 2021

### [Telstra response to the \*Getting To Fair\* – Vulnerable Consumer Strategy developed by the Essential Services Commission of Victoria](#)

Telstra Corporation Limited (Telstra) welcomes the opportunity to participate in the Essential Services Commission of Victoria (ESC) consultation on the draft vulnerable consumer strategy *Getting to Fair* (draft strategy). We support the ESC work to develop this strategy, and the three-year plan to effect change to benefit customers in a range of different ways across government, retailer, and broader industry initiatives.

In late 2020, we announced our intention to enter the energy retail market and are currently going through the process to receive the appropriate retail licences and authorisations. We want to provide customers with innovative solutions that leverage our experience, capabilities, and technologies, this includes our experience with customers and their lived experience.

We know firsthand the importance of ensuring consumers are engaged, informed and able to participate within the market in a way that best suits their needs and circumstances, and the significant impacts that can happen if a company gets it wrong. This is true irrespective of the sector being considered.

We support the ESC's draft strategy direction, in particular:

1. Recognition of the potential disparity of treatment and access for First Nation customers and the importance in ensuring they receive appropriate care and support.
2. A need to ensure consistency in support for customers across different channels, and across customer facing staff.
3. The importance of delivering information in a way that is accessible to a range of audiences and the experiences they are facing.

We believe that every customer, no matter who they are, where they live, or what their circumstance, deserve to be confident that the company they are dealing with is acting in their best interest.

Telstra recently acknowledged the damaging effects on our customers when we do not meet our obligations and community expectations.<sup>1</sup> We committed to do better by our customers (including Indigenous customers) in the future, including introducing a customer advocate to help us better identify and respond to such issues in the future and a range of other activities. We provide further information on our current telecommunications business services and supports for customers in the below attachment.

We are committed to learning from our experience, and to help uplift the broader market to deliver better outcomes for all customers. We believe that our experiences, programs, and approaches can be applied in other sectors such as energy and water to help improve the customer experience.

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<sup>1</sup> <https://www.telstra.com.au/aboutus/media/media-releases/telstra-accv-media-statement>



We look forward to working with the ESC, consumer groups and industry to develop effective, sustainable, and meaningful solutions for customers experiencing vulnerability.

If you have any questions, please contact Kat Burela at [REDACTED] or [REDACTED].

Regards

A handwritten signature in blue ink, appearing to read 'Iain Little', is located below the 'Regards' text.

Iain Little  
Director of Equivalence - Regulatory Affairs  
Sustainability, External Affairs & Legal  
[REDACTED]



**Attachment**

## **TELSTRA CORPORATION LIMITED**

### **How Telstra addresses customers in vulnerable circumstances**

8 June 2021



## Introduction

Telstra Corporation Limited (Telstra) supports our customers in a range of ways.

We have prepared the following information in response to the Essential Services Commission Victoria's (ESC) draft strategy *Getting To Fair*.

This represents a high-level overview of ways Telstra currently supports customers in vulnerable circumstances in our telecommunication business. We welcome the opportunity to speak with the ESC further on these matters to find ways to leverage our experiences across to the utilities sector.

We also encourage the ESC to consider our 2020 Sustainability Report *Bigger Picture* which includes more detail of how we are looking to achieve outcomes for our customers.<sup>2</sup>

## How we talk about vulnerability

Telstra's purpose is to build a connected future so everyone can thrive. Through this, we recognise that we need to ensure customers in vulnerable circumstances are appropriately recognised and supported.

We commonly use the term "vulnerable customer" to refer to a customer whose circumstances places them at risk of harm or disadvantage if an organisation does not act with appropriate levels of care. We recognise that vulnerability can impact anyone at any time and can be permanent, long-term or temporary. We look at vulnerable circumstances through four dimensions:

- **Economic** – limited financial means and access, where financial commitments, payments and planning are difficult
- **Disability** – physical, cognitive, sensory or other impairment that limits usability of and access to resources
- **Digitally Excluded** – limited or no access to digital environments due to skill, location, access type or language barriers
- **Safety & Security** – compromised personal safety circumstances where security needs are heightened

We use these dimensions as a way of reporting and reviewing our progress and work towards greater inclusion and support for all our customers.

We also have our company-wide principles available on Telstra Intranet for staff awareness and practice. Our Customers in Vulnerable Circumstances Principles have been developed to ensure our products and services are accessible, affordable and suitable for vulnerable customers. Through them, we commit to building a deeper organisational understanding of customer vulnerability, to take action to be more inclusive and to provide better support for customers by understanding their needs including through consultation with community stakeholders.

These principles help our staff to understand customer vulnerability to ensure that sales and service approaches are appropriate. This includes ensuring that our products and services are accessible by a greater number of individuals and improving the quality of customer interactions.

## Ways to support

### Staff information

- **Customers in Vulnerable Circumstances and Introduction to Indigenous Cultural Capability 2021 training**– this course aims to equip staff with knowledge and skills to provide an appropriate level of customer care to customers in vulnerable circumstances and Indigenous customers.
  - For the purposes of this training, we state that *A customer in vulnerable circumstances is someone whose circumstances put them at risk of harm or disadvantage if an organisation doesn't act with appropriate levels of care. We use this summary to help ensure staff recognise that vulnerability can come in a range of different ways to our customers.*

<sup>2</sup> <https://1u0b5867qsn1ez16a1p2vcj1-wpengine.netdna-ssl.com/wp-content/uploads/2020/09/Telstras-Bigger-Picture-2020-Sustainability-Report.pdf>



- In this training, staff learn about different types of vulnerability, how to identify if a customer may be in a vulnerable circumstance, and what to say and do. Staff also learn about Indigenous culture including family and community structures, communication and language preferences, gratuitous concurrence and the value Indigenous cultures place on family and how that influences their obligations.

### Partnerships overview

- We partner with more than 2,000 local community organisations across Australia to develop and deliver programs to assist our most vulnerable customers and communities. Our Access for Everyone programs help people on a low income or facing financial hardship to stay connected. Since its inception in 2002, we have provided benefits to the value of more than \$3 billion through targeted products and services, concessions and other programs.
- We continue to work with financial counsellors and other customer advocates to improve sales outcomes; have invested more resources into our specialised customer care teams; and improved our website with more information and guidance on Telstra assistance for customers in vulnerable circumstances. This includes having a specialised assistance team for financial counsellors with direct phone and email access to help them support their clients.
- We also have a partnership with on-the-ground organisations to help deliver locally relevant training resources, tools and content with and for the community, known as inDigiMOB. To-date we have 6000 workshop places filled, benefiting more than 1400 people.<sup>3</sup>

Some of our other partnerships are captured in other sections below.

### First Nations

We recognise the importance of ensuring we support First Nations customers to help minimise any harm or exclusion they may experience when engaging with Telstra.

- First Nations Connect – A dedicated support phone line and service centre available for Indigenous customers, particularly those living in remote areas across Australia. The hotline is managed by a specialist team that has a deeper understanding of Indigenous customers, taking into consideration their specific needs and cultural consideration.<sup>4</sup>
- First Nations Service Guidelines to help ensure our customer facing staff understand First Nations, Aboriginal or Torres Strait Islander people's needs and circumstances, including the ability to transfer these customers to the First Nations Connect Hotline.
- We also have a range of information available on the Telstra website on Community Programs and Indigenous Australians.<sup>5</sup> This includes information on **Mobile My Way** which is for people who live in remote Indigenous communities or who work with them.

### Domestic & Family Violence

- Telstra Safe Connections assists women impacted by domestic and family violence by providing access to safe and secure communications. This has included a smart phone, \$30 pre-paid starter kit and information to help them stay safely connected. This is delivered in partnership with Women's Services Network (WESNET).<sup>6</sup>
- In 2018 we piloted a dedicated customer service entry point with trained agents and a 'high care' approach to our Safe Connection customers. As of March 2020, this service has been available to all customers impacted by domestic and family violence through a dedicated 1800 number.
- Information is made available to our customers, including through our website, which includes a 'quick exit' option for viewers.<sup>7</sup>

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<sup>3</sup> <https://indigimob.com.au/>

<sup>4</sup> <https://exchange.telstra.com.au/supporting-indigenous-customers-with-new-centre/>

<sup>5</sup> <https://www.telstra.com.au/aboutus/community-environment/community-programs/indigenous-australians>

<sup>6</sup> <https://wesnet.org.au/>

<sup>7</sup> <https://www.telstra.com.au/consumer-advice/domestic-family-violence>



## Homelessness or crisis

- Telstra provides free access to national crisis lines so that the cost of calling is not a barrier to seeking help from Lifeline, State Emergency Services (SES), Family Drug Support, Mensline Australia, beyondblue and Suicide Call Back Service. Over 833,000 Telstra-originated calls were made to these crisis lines from fixed, mobile and payphones in FY20, up 17 per cent on the previous year.
- We provide unmetered data access for those on the Telstra mobile network to the Ask Izzy mobile website, which connects people in need with housing, a meal, money help, family violence support and much more.<sup>8</sup> With over 2.1 million searches for help in the past year, including a sharp rise in requests since March 2020 due to COVID-19, around 50 per cent come from Telstra's networks.
- We provide the Telstra Top-up program in partnership with Infoxchange for community organisations assisting customers impacted by homelessness, domestic and family violence or natural disaster. Telstra Top-up provides an instant \$40 pre-paid mobile recharge through the agency's client and case management system.<sup>9</sup>
- We also regularly provide Phonecards to community agencies supporting people who have no reliable form of communications other than through accessing a public payphone.

## Digital Divide

- We continued to invest in the Australian Digital Inclusion Index and contribute to the national dialogue. Along with helping 2.6 million people to stay connected in COVID, we provided assistance to around 900,000 vulnerable customers and enabled 23,000 people to receive digital capabilities training through our Everyone Connected programs.
- Tech Savvy Seniors - supporting seniors being more confident with technology<sup>10</sup> – library sessions in NSW, QLD, SA. With this initiative, Telstra has partnered with Government to deliver training in hundreds of locations across Australia. This has reached 175,000 people since 2014.
  - Social Return On Investment (SROI) studies have shown that every \$1 invested in Tech Savvy Seniors delivers \$3.60 in social value (VIC and NSW 2017).
- Code Club Australia<sup>11</sup> is the nation's largest network of free, volunteer-led code clubs. It is aimed at young people, teachers and librarians and aimed at getting kids coding.

## Disability

- We have an Accessibility Action Plan which helps ensure that nobody is left behind. Our FY21 Accessibility Action Plan is available here <https://www.telstra.com.au/aboutus/community-environment/community-programs/disability/disability-action-plan>.
- We have a dedicated Disability Enquiry Hotline and Disability Equipment Program with specialised devices such as a TTY to help ensure the standard telephone service is accessible to all our customers.<sup>12</sup>

## Using data for support

- Data is helping us identify and respond to the needs of vulnerable customers. We've profiled the accounts of around 465,000 customers which we believe have indicators of some potential form of vulnerability or hardship, and have excluded these accounts from all direct

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<sup>8</sup> [www.askizzy.org.au](http://www.askizzy.org.au)

<sup>9</sup> <https://www.infoxchange.org/au/community-programs/telstra-top-up>

<sup>10</sup> <https://www.telstra.com.au/tech-savvy-seniors/register-for-training>

<sup>11</sup> <https://www.codeclubau.org/>

<sup>12</sup> <https://www.telstra.com.au/aboutus/community-environment/community-programs/disability>



mail, SMS, mail and telemarketing. We have also been working towards a process to allow customers to trade down or trade in devices when they are no longer affordable.<sup>13</sup>

### Language

- We have a **Multicultural contact centre**, which includes Arabic, Cantonese, Mandarin and Vietnamese supports. We also have many multilingual stores and partners across Australia who provide language support, with a full list of locations and languages supported available on our website.<sup>14</sup>

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<sup>13</sup> <https://exchange.telstra.com.au/challenging-ourselves-to-do-better-for-all-our-customers/>

<sup>14</sup> <https://www.telstra.com.au/contact-us/multilingual-services>