FIRST NATIONS
DIGITAL INCLUSION
ADVISORY GROUP

7/03/2025

Telecommunications Performance and Regulation Section
Australian Communications and Media Authority
PO Box Q500
Queen Victoria Building NSW 1230

To whom it may concern,

Thank you for the opportunity to provide feedback on the draft Telecommunications (Domestic, Family and Sexual Violence Consumer Protections) Industry Standard 2025. We are writing to you as co-chairs of the First Nations Digital Inclusion Advisory Group (the Advisory Group).

As you may know, the Advisory Group was established in January 2023 by the Minister for Communications to provide advice on Target 17 of the National Agreement on Closing the Gap: that First Nations Australians have equal levels of digital inclusion by 2026. This underpins Outcome 17 of the National Agreement, which is focused on ensuring First Nations Australians have access to information and services to enable informed decision-making regarding their own lives and communities.

In developing our advice, including the *First Nations Digital Inclusion Roadmap: 2026 and beyond* which we launched in December 2024, we have considered the link between digital technologies and domestic and family violence. This includes how Target 17 can support progress against Target 13 in the National Agreement, which aims to ensure that by 2031, the rate of all forms of family violence and abuse against Aboriginal and Torres Strait Islander women and children is reduced at least by 50 per cent, as progress towards zero.

Overall, we recommend that the updated DFVS standard consider how domestic violence can be perpetuated through the use of and withholding of digital technologies, the role that improved digital inclusion can play to mitigate and prevent harm, and the risks of technology-facilitated abuse. We strongly believe that there needs to be a strong focus on specific cohorts, particularly First Nations women, given evidence that First Nations women report higher levels of online threats, including harassment and stalking. Partly, this is related to the reliance of many in remote communities being on shared mobile phones and on community Wi-Fi which may only be available in public areas.

For example, the 2023 Wadeye community report published as part of the Mapping the Digital Gap research project noted a number of concerns, including:

- that in domestic violence situations, phones are being damaged by partners or other family members, forcing victim-survivors to buy new phones with money that could be spent on other necessities
- phones can be used by perpetrators to track family members.

In line with this, Recommendation 14 in the Roadmap recommends that government "establish a national device bank to provide households with refurbished devices". This includes a recommendation that government work with not-for-profit organisations to collect and donate mobile phones to victims of domestic violence, who may have fled without their belongings when seeking safety.

The Advisory Group also recognises the importance of reliable connectivity being available in women's shelters in regional and remote communities, as well as across the community, so that people can contact emergency services when needed. The 2023 Wadeye community report also noted that:

- although the government has provided outstations with a small number of satellite phones, there is conflict and a lack of transparency around who has control over access to the phone, meaning that domestic and family violence is being underreported
- there was an opportunistic increase in violence across Wadeye when perpetrators realised that no one could report domestic violence due to a lack of access to the satellite phone and poor connectivity and access to devices across the community.

We recommend that the updated DFVS standard emphasises the importance of government and service providers to design and deliver programs in close collaboration with community organisations, so that they are responsive to the needs of each community. This place-based approach is central to advocacy to government so that policies deliver the best outcomes for First Nations people and communities.

In line with this, Recommendation 22 in the Roadmap notes that First Nations communities have told the Advisory Group that many government and industry initiatives are not reaching their intended audience, from scam warnings to new telecommunications products that aim to address the digital divide. Current government and industry websites can be difficult to navigate and use overly bureaucratic language that is not appropriate in a First Nations community context. Local First Nations radios, online content creators and TV which provide community news and entertainment in local languages are underutilised.

In the immediate term we recommend that ACMA engages with telecommunications providers on strengthening provisions in the Telecommunications Consumer Protection Code for translation/accessibility of information and seek the assistance of First Nations language interpreter services for victims of domestic violence. We further suggest that the updated DFVS standard encourages telecommunications providers to offer appropriate assistance to victim-survivors, including addressing issues around cultural and language barriers for First Nations Australians. Recommendation 18 in our Roadmap sets out immediate and medium-term recommendations for limiting digital exclusion for victims of domestic violence.

Thank you for this opportunity to provide feedback. If you would like to discuss our submission further, please contact our secretariat at firstnationsdigitalinclusion@infrastructure.gov.au

Yours sincerely

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