

**Isolated Children's Parents' Association of Australia Inc.**

**"Access to Education"**



**Submission**

to the

**Review**

into

**Consumer Safeguards – Part C: Choice and Fairness**

from the

**Federal Council**

of the

**Isolated Children's Parents' Association of Australia Inc.  
ICPA (Aust)**

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to the *Consumer Safeguards Review Consultation – Part C Choice and Fairness*.

Since 1971, ICPA (Aust) has represented families living in rural and remote regions of Australia, who are passionate about the sustainability and prosperity of the industries they work in. Research indicates that the ability to access affordable and appropriate educational services plays a major factor in determining if a family will remain in rural and remote locations. The goal for our 2700 member families is to achieve equity of educational opportunity for all children living in rural and remote areas, ensuring they have access to a continuing and appropriate education determined by their aspirations and abilities rather than the location of their home. Remote and isolated locations in Australia provide the greatest challenges for improving provision of education options and pathways for children and families. In terms of educational and social development and to make sure their educational outcomes are not compromised, rural and remote students need the opportunity to an education that is commensurate to their needs allowing them to realise their educational potential and presenting a pathway which provides educational parity with their urban peers.

Many of the families that ICPA (Aust) represents have limited communication services where they live. A majority rely heavily on landlines for a voice service and have no mobile coverage at all. A small percentage of families are able to access limited mobile service with the assistance of antennae and boosters but can only receive the coverage in set positions. Some families living in rural and remote areas who have the Sky Muster satellite internet service are utilising options such as Wi-Fi calling, but it is currently not seen as an adequate replacement for their main landline service. Internet service for a large number of our members is provided by nbn Sky Muster satellite, with a smaller portion being able to use mobile broadband and even fewer with fixed wireless.

It is essential that geographically isolated students have ongoing access to reliable, affordable and appropriate communications to ensure fair and equitable access to educational opportunities. This includes access to adequate data requirements to meet their needs and maintain the educational outcomes of these students.

- Geographically isolated students who study via Schools of Distance Education or Schools of the Air due to the distance they live from a school, rely heavily on telecommunications to access daily lessons, via both telephone and internet. Most of these children would be in the 0.7% of the population that do not have access to any mobile network and the majority would also be in the 3% of the population that will rely on satellite services to access the internet.
- Our member families also attend small rural schools that are dependent on internet for schoolwork, research, teacher assistance/mentoring, specific needs sessions as well as landlines for contact for teacher support, emergencies and general administration tasks of a school. There are quite a few rural small schools which are not in mobile coverage areas and struggle with receiving adequate internet service.
- Data limitations can be a cause for concern in rural and remote areas. Where in urban centres unlimited data plans may be available, this is not available for rural and remote customers. When the educational opportunities of students, such as those studying via Distance Education are dependent on internet connectivity, this can cause issues with data use. Unmetering of educational sites or increased data allocations would ensure a fairer telecommunications experience for these families whose students require internet connectivity to access an education.

The majority of families that ICPA (Aust) represents are very limited in the choice of telecommunications service available to them. Many of our member families rely on a landline for telephony, with limited reliable communications available outside of their homes. To promote fair and equitable telecommunications for these families, it is essential that safeguards are in place and the following considerations are taken into account:

- Services are reliable, appropriately maintained and faults repaired in a timely manner, especially when there is limited access to alternative telecommunications.
- Readily available access to telecommunications support services including advocacy, education and problem solving with technology issues, advice and publications to ensure these families are adequately informed. It is essential that accurate and timely advice and service are available to rural and remote consumers to ensure they have access to an informed and fair telecommunications experience.
- Where limited choice of suppliers of the telecommunications options are available, the USO is maintained to ensure these suppliers maintain the telecommunications services on which these families rely.
- Rural, regional and remote families also face the inability to utilise any telecommunications over vast distances between homes or townships due to no connectivity being available in the areas they reside. Where in an urban environment telecommunications connections are readily available, in rural and remote areas, a lack of infrastructure means that telecommunications are not. Often in order to expand telecommunications in these areas, residents require equipment which comes at a significant personal cost to them and this needs to be recognised.

Although families living in rural and remote areas of Australia have typically in the past had very little choice in communication services, as competition grows and more opportunities become available, families who live in geographically isolated areas who previously had almost no choice, need to become aware that some choice is becoming available and they are able to consider different options for services. Customers should be able to access accurate information or have it presented to them to ensure they have the resources and understanding which allow them to utilise communications and the services available to them. Currently, sharing of information has been inconsistent and not widely undertaken. Consumers are often unaware of what is available or what services may work best for their given situation. Due to where they live, rural and remote customers have an extremely difficult time accessing any type of guidance or help, either directly from telecommunications companies or assistance services/suppliers.

Highlighting some situations that our members have reported:

- No telecommunications store near them with local knowledge. Families living in remote to very remote areas often wait until a trip to a larger city to visit a shop and try to sort their telecommunications problems or buy devices etc. However, the staff in these shops often do not have a sound understanding of where the customer lives and products that will work for them. They are often sold something that will not work in their area and to return products which are found to be unsuitable is challenging. A return trip may not occur for several weeks to months and in some cases, never happen. In the meantime, these customers have purchased an often expensive item that is not usable when they live.
- “Cold calls” – telecommunications sales people calling and convincingly speaking to rural customers to get them to switch to a different product that is not compatible in the rural area (i.e. ADSL for internet in a Sky Muster only area). Many rural customers do not know what

will and won't work in their area and if an "expert" is telling them that one particular product is the best way to go, they may take that advice and sign up for something that will not work for them.

- With so many "scam" calls occurring now, people are hesitant to make any changes to plans, services etc when called by sales teams out of the blue as the calls sound very similar. In this case, customers may miss out on switching to a more beneficial plan or device. Developments in customer service where information about new plans/services/tools/devices/equipment could perhaps be better understood if information was sent to customers and then followed up by a phone call. In addition, phone conversations around changing plans/devices etc. should not be insistent on the change happening immediately during the call. Customers might find it easier to have the information explained to them and an opportunity to call back at a time that suits them to make any changes or be given instructions as to how to go online and make the changes/sign up themselves if they wish to.
- Dedicated assistance numbers/chat/email options to get help or report faults. These can be very beneficial for customers living in geographic isolation. However, these customer service options need to include all service types for the given cohort of customers they are assisting. For example, Telstra's Remote Area Sales and Service Centres, which are designed to assist customers who are more than 100km from a Telstra store, do not include Rural and Remote Small Business Customers, however, many families living in rural areas have business plans for their only phone service as they are part of the family business, but these also include phone services for students for school etc...The Small Business services use the same technology and have the same issues as Residential Customers in the same location but do not receive the required support.
- Information about new and available plans and technologies can be very difficult to source, especially if customers do not realise something exists.

Some items that have been helpful for rural and remote customers:

- The (Telstra) "Blue Tick" which indicates a mobile device which has optimal mobile coverage in rural and regional areas. Specifically identifying devices that work well outside urban areas is information that rural and remote customers search for in their purchases.
- Telstra's Financial Hardship Policy <https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf/Telstra-Financial-Hardship-Policy.pdf> which offers flexible payment arrangements over a period of time as well as a waiver of late payment and/or cancellation fees. This has been very helpful to rural families throughout the recent drought and other tough times.

Other concerns raised by ICPA Members:

- Legacy services. Assurance of legacy technologies remaining in place until improved replacement services are available is paramount. A clear blueprint of how legacy services will be repaired, maintained, adjusted and move into the future is required. Landline voice services are an essential service for many rural families and are relied heavily upon for school, particularly in home based Distance Education classrooms. Landlines need to remain and be maintained until a proven, reliable, affordable option is widely available.

In order to improve customer outcomes and industry compliance, whatever process is put into place to strengthen the code-making process, it needs to be enforceable. If customer compensation for faulty or inoperable service exist in the regulations, then these types of compensation need to be done

automatically, and not rely on a request from the customer. In any decisions made regarding consumer safeguards, the unique circumstances of rural and remote families need to be considered to ensure choice and fairness are upheld.