

## Appendix 4:

This is an online document accessed via page 85 of the DFV Action Framework. If you have printed or saved this, check the IIH website for updated versions at [industryimpacthub.org/domestic-and-family-violence/dfv-action-framework-resources/](http://industryimpacthub.org/domestic-and-family-violence/dfv-action-framework-resources/). The version number is in the header.

# DFV Training Framework

## Introduction

### Training Framework Overview

- The Telco Industry DFV Training Framework correlates with the Telco Industry DFV Action Framework.
- There are four Elements in the DFV Training Framework.
  - A structure and guidance for the first three elements (DFV Awareness, Support and Specialised Support) have been developed.
  - A structure and guidance for the fourth Element (DFV Product) will be considered after the launch of the DFV Action Plan and Training Framework.
- The DFV Training Framework is stakeholder-focused, to ensure that training is role-specific, leading to the best possible opportunity for improved experience of customers or employees who experience DFV.

Element	Training Focus	Internal Stakeholders
E1	DFV Awareness	All employees and members of The Board
E2	DFV Support	All customer-facing employees All employee-facing employees/managers
E3	DFV Tailored Support	All employees who develop or deliver tailored DFV support

For further consideration:

E4	DFV Product	All employees whose role involves the development of a telco product.  "Product Definition: Any telco service offering and customer-facing interaction points that are part of the service delivery, eg product and app development, billing, collections, systems-development."
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### Training development and delivery:

- You must consult with a DFV specialist when developing your training. Give them a copy of this Training Framework.
- It is strongly recommended that the training is delivered by or with a DFV specialist, however this is optional.
- It is essential that provision for employee support that might be required from vicarious trauma (as a result of training or providing support to DFV-impacted customers and employees) is put in place before the training takes place.
- Training in DFV Support, for your customer-facing employees (Element 2) might be for employees who provide support to customers on a range of subjects. Alternatively, these employees might be a specialised DFV team, with a deeper knowledge of DFV.
- Training in DFV Tailored Support (Element 3) is applicable if your company enables and authorises your customer-facing employees who are providing DFV support to deviate from your mainstream support processes, ie tailoring the support to the specific customer being aided. (Note, this tailored support is wider than that relating to tailored financial hardship support).
- Training needs to take place before directing customers (or employees) to support.
- You might choose to implement training of these three elements at the same time, or spread-out over a time-period defined by your company.
- You will need to schedule employee 'refresher' training, to ensure their knowledge is consistent with new developments.

### Training Framework Content

- This DFV Framework is **NOT** training content, the examples are intended to provide insight to telcos and show the importance and relevance of applying a DFV lens across the business, reflected in their approach and support to customers, employees, policies and priorities.
- The Training Framework content is guidance and is a starting point for telcos.
- The training framework is not aiming to tell telcos how to train.
- With the exception of five mandatory subjects within DFV Awareness training and DFV Support/Tailored Support training, the Training Framework doesn't **prescribe** content. Instead it is **guiding** telcos regarding content and outlining what is important when a telco designs its training.
- The content reflects advice, suggestions, guidelines from the organisations listed in the Useful Resources List. These organisations include deidentified case studies and further detail that is directly relevant to telcos; hence the requirement in the DFV Action Plan for telcos to consult these documents, when planning their DFV training.
- The DFV Training Framework includes the subjects of: Primary Prevention, Financial Abuse, Privacy and Safety and Technology Facilitated Abuse.

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### Important considerations

- Include DFV training as part of new Employee Induction.
- Some of your employees will be perpetrators. The language in your training content therefore needs to be 100% against violence.
- Be aware that DFV perpetrators (customers) may seek your telco's assistance. Any training or resources, for all employees, but particularly customer-facing employees should include tips or considerations to provide employees with an understanding to ensure that they are not inadvertently supporting the abuse, through the delivery of their support/decisions.
- Some of your employees will be victim-survivors. It is therefore essential to ensure that you have support structures in place to support these employees, before training starts, for the duration of and following the training.
- It is important that your support teams receive guidance about what to say as well as what not to say.
- It is good practice for your frontline employees to use the term 'technology facilitated abuse' rather than TFA when responding to victim-survivors. Incorporate this requirement into your training.

**Your training content and provision will need to be refreshed periodically, to ensure it reflects updated industry requirements, processes and DFV insights.**



## Appendix 4:

# MINIMUM CONTENT

<p><b>Training Audience:</b></p> <ul style="list-style-type: none"> <li>• Whole Company, including Executives and Board Members</li> <li>• New Employees, as part of induction (Training Element 1 – DFV Awareness)</li> </ul>	
<p>DFV Awareness Training <b>must</b> include these five topics: (The content depth will depend on the employee role):</p>	
Minimum Content: DFV Content	Minimum Content: Telco Specific
1. How to seek support as an employee, if affected by the training and/or when supporting customers/employees.	2. What is DFV - Myths and Facts.
3. The importance of Primary Prevention, understand the drivers of DFV. (See <a href="http://ourwatch.org.au/change-the-story/">ourwatch.org.au/change-the-story/</a> )	
4. How telecommunications services and devices can be a tool for good and a tool for abuse (overview).	
5. Employee perpetrator behaviour and support options.	
<p>Add 'DFV Awareness' training content for your whole company based on further topics suggested by the DFV specialist training organisation you consult with for the development of your training. Also see guidance listed below arranged under internal stakeholder groups/teams.</p>	

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<p><b>Training Audience:</b></p> <ul style="list-style-type: none"> <li>• All front-line employees, including:             <ul style="list-style-type: none"> <li>- Financial Hardship team (Training Element: 2 – DFV Support)</li> <li>- Customer Complaints team (Training Element: 2 – DFV Support)</li> <li>- Employees who develop or deliver Tailored DFV Support (if this applies to your telco). (Training Element: 3 – DFV Tailored Support)</li> </ul> </li> </ul>	
<p>DFV Awareness Training <b>must</b> include these five topics: (The content depth will depend on the employee role):</p>	
Minimum Content: DFV Content	Minimum Content: Telco Specific
1. Intersectionality and vulnerable customers.	2. How to recognise, respond appropriately and refer customers that may be experiencing DFV for support and further information.
	3. The importance of Privacy and DFV Safety processes.
	4. At what point to refer customers to DFV/TFA specialist support and where to refer these customers to.
	5. The appropriate level of DFV support and TFA information to provide customers, verbally and on your website.
<p>Add 'DFV Support/Tailored Support' training content for your relevant teams based on further topics suggested by the DFV specialist training organisation you consult with for the development of your training. Also see guidance listed below arranged under internal stakeholder groups/teams.</p>	

## Appendix 4:

# CONTENT GUIDANCE

In addition to the whole-company minimum training content above, add training content for specific audience(s) based on the following guidance and/or add further topics suggested by the DFV specialist training organisation you consult with for the development of your training:

<b>Training Audience:</b>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<ul style="list-style-type: none"> <li>Executives and Board Members (Training Element: 1 – DFV Awareness)</li> </ul>	
<p><b>This guidance about suggested training content supports recommendations from workplace, telco industry and DFV-specialist organisations.</b></p>	
The importance of DFV as part of core business, similar to H&S, D&I, RAP, Gender Equality.	
DFV in the workplace, including Workplace Equality and Respect.	

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Training Audience:	
• Executives and Board Members (Training Element: 1 – DFV Awareness)	
Training Guidance: DFV Content	Training Guidance: Telco Specific
<p>The benefits of being able to provide a tailored DFV response deviating from standard business responses and processes, ie the importance of flexible customer support options.</p>	<p><b>Example Issue:</b> (Source: TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020):</p> <ul style="list-style-type: none"> <li>• Ensuring automated processes do not exacerbate safety risks.</li> </ul> <p><b>Industry example of good practice that supports the TIO’s recommendations.</b> (Source TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020):</p> <p>Empowered employees could, for example, ask the consumer what parts of a plan they may need to retain or offer to convert a post-paid service to a prepaid service.</p> <p>Authorising employees to offer highly flexible payment arrangements. This should recognise a consumer experiencing family violence may need more time than usual to pay off a debt, may only be able to pay very small regular amounts, or may not be able to start paying off a debt straight away.</p> <p>Unilaterally transfer the mobile number from the perpetrator to the consumer if the perpetrator will not voluntarily agree to a change of ownership ... or ... set up a new service for the consumer and exercise discretion where the consumer’s credit history has been affected by actions of the perpetrator.</p> <p><i>Note: When assessing/implementing processes for changing ownership of a mobile phone see Communications Alliance Guideline G660:2018 Chapter Nine.</i></p>

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Training Audience:	
• Executives and Board Members (Training Element: 1 – DFV Awareness)	
Training Guidance: DFV Content	Training Guidance: Telco Specific
<p>How telecommunications services and devices can be a tool for good and a tool for abuse (detail), including perpetrator behaviour and surveillance techniques.</p>	<p><b>Example Issues:</b> (Source Communications Alliance Guideline 2018:G660):</p> <p><b>Misusing telecommunications devices and/or services to abuse</b> (also referred to as ‘technology facilitated abuse’ or TFA)</p> <ul style="list-style-type: none"> <li>• Monitoring phone calls, social media and emails without the knowledge and approval of the victim.</li> <li>• The perpetrator loading spyware onto a computer or mobile phone so as to monitor the person impacted without their knowledge.</li> <li>• Using telecommunications devices and/or services to track the location of a survivor, for the purposes of monitoring, control, stalking, or other, including by installing monitoring software on the phone. Parental monitoring and security services can be used for these purposes.</li> <li>• Accessing accounts such as email, social media, or messaging to monitor or impersonate.</li> </ul> <p><b>Abuse via telecommunications service</b></p> <ul style="list-style-type: none"> <li>• Making repeated phone calls, sending text messages or leaving messages on social media in breach of Intervention Orders or Apprehended Domestic Violence Orders.</li> </ul> <p><b>Access to the telecommunications account</b></p> <ul style="list-style-type: none"> <li>• The abuser logging in – or impersonating, eg on web chats (without permission or legitimately) and closing services, thereby cutting the victim off from contacts.</li> <li>• Monitoring account activity, including information on phone bills and data usage.</li> <li>• Fraudulently accessing the personal details of the victim, such as new contact details, and continuing harassment or abuse with this new information.</li> <li>• Abuse through porting, from one provider to another</li> </ul>

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Training Guidance: DFV Content	Training Guidance: Telco Specific
<p>How telecommunications services and devices can be a tool for good and a tool for abuse (detail), including perpetrator behaviour and surveillance techniques.</p>	<p><b>Financial Abuse via a telecommunications account</b></p> <ul style="list-style-type: none"> <li>• The abuser being an end user or authorised representative of the Customer’s account and using the service in a way that creates a financial or other obligation on the Customer without their permission.</li> <li>• Securing additional products or services or destroying products and services (with or without coercion) under the name of the victim.</li> <li>• Putting a service in the sole name of someone impacted by domestic and family violence through fraud or coercion, and then through this putting them into debt.</li> <li>• A perpetrator holding the account in their own name and not paying bills, resulting in disconnection of the survivor.</li> <li>• The perpetrator cancelling the telecommunications service of the person impacted by domestic and family violence if or when they try to leave.</li> </ul> <p>These situations can lead to an adverse credit report which can adversely affect the ability of a survivor to re-establish financial independence by hampering attempts to get a loan, secure rental accommodation, or access other services. This can result in someone impacted by domestic and family violence, and their children, becoming homeless.</p>
<p>The benefits of providing a specialised DFV support team (for customers and employees).</p>	
<p>The importance of an expedition option.</p>	

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• Executives and Board Members (Training Element: 1 – DFV Awareness)	
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How to support employees including flexible arrangements in the workplace and Employee Policy regarding work entitlements, eg leave, as a result of DFV.	<p><b>Industry example of good practice</b> (Source: <u>Male Champions of Change: 2016 Playing Our Part, Lessons Learned Report</u>):</p> <p>Contact information screening, flexible work time, support from security personnel, on site parking, safe devices at work, free confidential counselling and Employee Assistance Program in place.</p>
The importance of preventing service loss.	

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<p><b>Training Guidance: DFV Content</b></p>	<p><b>Training Guidance: Telco Specific</b></p>
<p><b>This guidance about suggested training content supports recommendations from workplace, telco industry and DFV-specialist organisations.</b></p>	
<p>How to recognise indicators of DFV.</p>	<p><b>Example Issues:</b> (<u>Source Communications Alliance Guideline 2018:G660</u>):</p> <p>These signs may include when a customer of a telecommunications service:</p> <ul style="list-style-type: none"> <li>• Expresses concern about their privacy, safety or the disclosure of information to another person on the account;</li> <li>• Expresses concern regarding the possible existence of spyware on their mobile phone, computer or tablet;</li> <li>• Expresses concern in relation to the ability of another party to track their location;</li> <li>• Appears reluctant to involve another party associated with the service, such as the Customer, another Authorised Representative, or end user of the account;</li> <li>• Mentions that an intervention order/apprehended domestic violence order (or equivalent) is, or has recently been, in place.</li> </ul>
<p>What to do if unsure if family violence is a factor.</p>	

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<p>How to interact with consumers if DFV is suspected/mentioned, including:</p> <ul style="list-style-type: none"> <li>• When to ask further questions</li> <li>• How to advise the customer</li> <li>• When to record information and risks</li> <li>• What to say and what not to say</li> </ul>	<p><b>Good Practice:</b> Source: <a href="#">Communications Alliance Guideline 2018:G660</a>: Run through the Checklist on page 13 of the Comms Alliance Guideline G660:2018</p>
Perpetrator behaviour and surveillance techniques	
The benefit of collaboration between teams (eg, Customer Support, Financial Hardship, Customer Complaints).	

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Training Guidance: DFV Content	Training Guidance: Telco Specific
<p>Be perceptive to the possible situation.</p>	<p><b>Example Issues:</b> (Source: Communications Alliance Guideline 2018:G660):</p> <ul style="list-style-type: none"> <li>• Someone impacted by domestic and family violence may at different times be in the presence of their abuser. This may lead to them answering questions differently than previously, or being unable to discuss their case at the moment.</li> <li>• They may not wish to be contacted, but prefer to contact the provider, so they can discuss their account when they are in a safe place.</li> <li>• It may be difficult for a customer to provide a mailing address, or other contact details including email addresses and phone numbers, if they are in the process of leaving their home and are relying on community resources or friends.</li> <li>• Someone experiencing domestic and family violence may only be contactable through advocates or authorised representatives, or alternatively may rely strongly on an advocate/ authorised representative to handle their account, as they may be continuing to live with their abuser, having to move between locations, or otherwise be uncontactable for safety reasons.</li> </ul>

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<p>How to protect privacy.</p>	<p><b>Example Issues:</b> (Source: <u>Communications Alliance Guideline 2018:G660</u>):</p> <ul style="list-style-type: none"> <li>• Perpetrator having access to the victim’s email accounts, a letter being sent to a shared address, or a text message to a phone that the perpetrator has access to.</li> </ul> <p><b>Good practice:</b> (Source: <u>Communications Alliance Guideline 2018G660, Section Three</u>):</p> <p>Check with the customer how they wish to proceed.</p> <p>Verify with the Customer that the information will be sent in a safe way.</p> <p>Carrying out additional checks when setting up new accounts or changing account information.</p> <p>Provide the option to limit automatic communications, such as emails or SMS.</p> <p><b>Example Issues:</b> (Source: <u>Communications Alliance Guideline 2018:G660</u>):</p> <ul style="list-style-type: none"> <li>• Typical’ security identification procedures used when communicating with a customer about their account can be easily bypassed by an abuser who is a family member or intimate partner. This is further discussed under the next Chapter on Customer Accounts: Privacy and Safety.</li> </ul>

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	<p><b>Example Issues:</b> (Source: <a href="#">Communications Alliance Guideline 2018:G660</a>):</p> <ul style="list-style-type: none"> <li>• Protecting customers can be complex, but should be a priority.</li> </ul> <p>This is an area where specialist assistance and training are important, as there are potential consequences that would often not be considered.</p> <p>For example, it should not be automatically assumed that if domestic and family violence is involved, the perpetrator should be denied access to the account, as this may inform the perpetrator that the victim is planning on leaving. On the other hand, some survivors face risks when a perpetrator can access their personal details. It is important to <b>verify with the victim what they wish to do</b>, as any action taken without their consent may result in an unsafe situation.</p>
How to record notes and referrals appropriately.	<p><b>Industry example of good practice that supports the TIO's recommendations.</b> (Source: <a href="#">TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020)</a>):</p> <p>Make a note that future requests to change contact and representative details should be checked carefully.</p>
When and how to record sensitive information.	



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<p>When and how to advise customers of risks, and possible options.</p>	<p><b>Example Issue:</b> (Source: TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>• An authorised person can disconnect the service.</li> </ul>
<p>Awareness of the telco's obligations regarding customers, Authorised Representatives, Advocates, and end users under the Telecommunications Consumer Protections (TCP) Code, Chapter 3. Survivors may access assistance from a domestic and family violence advocate, legal advocate, or financial counsellor, and these services can be vital to them.</p>	
<p>Know when to ask the supervisors for assistance or information if unsure about the appropriate procedures, or think domestic and family violence may be impacting the customer.</p>	
<p>When to escalate and how.</p>	

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<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<p>When and how to check contact information and authorised representative details.</p>	<p><b><u>Industry example of good practice that supports the TIO’s recommendations.</u></b> (Source: TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020):</u></p> <p>Offering alternative ways to verify identity, for example, by sending a unique verification code to the consumer’s phone number or an additional PIN or password of the consumer’s choosing as an additional security measure.</p> <p>Make a note that future requests to change contact and representative details should be checked carefully.</p> <p>Using one-time-password authentication via SMS where practical.</p> <p>Placing system restrictions on a mobile number being disconnected or ported where there are safety risks.</p>
<p>The importance of preventing service loss and solutions to stay connected, eg prepaid mobile or internet services.</p>	<p><b><u>Industry example of good practice that supports the TIO’s recommendations.</u></b> (Source: TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020):</u></p> <p>Implementing a change of ownership process where the family violence affected customer is the end-user of a phone number, but the perpetrator is the account holder.</p>

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<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
How to verify the customer's identity in circumstances where the customer has escaped a domestic and family violence situation with no belongings and has no access to paperwork or other account information.	
Identify where special steps are required to protect the confidentiality of the customer by restricting access to account information and the appropriate procedure for restricting account access.	
Identify circumstances where a customer has requested for a person to be removed as an authorised representative on an account and know the procedure for removing that person as an authorised representative.	

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<p>Assess if a survivor is aware of ways the abuser could be accessing her/his account, and provide options on how to prevent the abuser from finding out the survivor has opened a new account (i.e. suggesting the survivor may want to set up a new private email).</p>	
<p>Identify when it is appropriate to take action under the Handling of Life Threatening and Unwelcome Communications Code in relation to unwanted communication to those who have experienced or may be receiving life threatening or unwelcome communications.</p>	
<p>How to put measures in place to ensure fast reconnection can be provided if a DFV impacted customer tries to transfer to a new provider but no validation request is received.</p>	

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Understand the range of financial hardship options which may be appropriate for those impacted by DFV, such as granting relief from debt, when that is appropriate, and the procedure for granting such relief.	
Facilitate the process for survivors to be represented by a DFV advocate, legal advocate or financial counsellor in relation to discussions regarding their account.	
The importance of an expedition option.	
Know how and when to refer victims to specialist DFV support services (including specialists in technology facilitated abuse).	<p><b>Source: Communications Alliance Guideline 2018:G660:</b></p> <p>Resources for the customer to learn about TFA:</p> <ul style="list-style-type: none"> <li>• Techsafey.org.au, the Women’s Services Network (WESNET) Safety Net Australia project: <a href="https://techsafey.org.au/">techsafey.org.au/</a></li> <li>• The eSafety Commissioner’s website: <a href="https://esafety.gov.au/women">esafety.gov.au/women</a></li> </ul>

**Appendix 4:**

<b>Training Audience:</b>	
<ul style="list-style-type: none"> <li>• All front-line employees, including:               <ul style="list-style-type: none"> <li>- Financial Hardship team (Training Element: 2 – DFV Support)</li> <li>- Customer Complaints team (Training Element: 2 – DFV Support)</li> <li>- Employees who develop or deliver Tailored DFV Support (if this applies to your telco). (Training Element: 3 – DFV Tailored Support).</li> </ul> </li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
Know how to accept relevant forms and documentation in a range of easily accessible methods (as each circumstance will be different, there is no one method which will be appropriate for each customer).	
Vicarious Trauma: What it is and how to access support.	

## Appendix 4:

<p><b>Training Audience:</b></p> <ul style="list-style-type: none"> <li>• All Managers</li> <li>• All employees whose role it is to support employee DFV victim-survivors (Training Element 2: DFV Support)</li> </ul>	
<p><b>Training Guidance: DFV Content</b></p>	<p><b>Training Guidance: Telco Specific</b></p>
<p><b>This guidance about suggested training content supports recommendations from workplace, telco industry and DFV-specialist organisations.</b></p>	
<p><b>Can be added to by the telco/training provider</b></p>	
<p>Flexible arrangements in the workplace.</p>	<p><b>Industry example of good practice</b> (Source: <u>Male Champions of Change: 2016 Playing Our Part, Lessons Learned Report</u>):</p> <p>Contact information screening, flexible work time, support from security personnel, onsite parking, safe devices at work, free confidential counselling and Employee Assistance Program in place.</p>
<p>Policy regarding employment requirements, eg leave as a result of DFV.</p>	
<p>How to respond to a team member who discloses, or is affected by DFV.</p>	
<p>Why DFV is a workplace issue that managers can make a difference on.</p>	
<p>Manager roles: to refer and facilitate access to support, not to attempt to provide therapeutic support themselves.</p>	
<p>Referral pathways: internal and experts resources available.</p>	

**Appendix 4:**

<b>Training Audience:</b>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<ul style="list-style-type: none"> <li>• All Managers</li> <li>• All employees whose role it is to support employee DFV victim-survivors (Training Element 2: DFV Support)</li> </ul>	
Relevant policies: support for victims including paid leave, policies on dealing with perpetrators.	
Warning signs that might indicate that someone is experience DFV, including aspects of intersectionality.	
Difficult conversations and how to have them.	
Common concerns (e.g., is it really my business? What if I do the wrong thing?)	
Emotional resilience: information about support available for managers who might confront these situations.	
How to respond to a team member who is violent in the workplace.	
Vicarious Trauma: What it is and how to access support.	



## Appendix 4:

<b>Training Audience:</b> <ul style="list-style-type: none"> <li>Financial Hardship Team (Training Element 2: DFV Support and Training Element 3: DFV Tailored Support)</li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<b>This guidance about suggested training content supports recommendations from workplace, telco industry and DFV-specialist organisations.</b>	
<b>Can be added to by the telco/training provider</b>	
<p>The dangers of standard response options.</p>	
<p>The different points at which the consumer can experience financial hardship.</p>	<p><b>Example Issue:</b> (Source: TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence</u> (Dec 2020):</p> <ul style="list-style-type: none"> <li>The impact of family violence has left the consumer with limited funds, financial instability (short or long term), new and existing debt, or poor credit history. These factors all have an adverse effect on a consumer's financial capacity.</li> </ul>
<p>DFV is recognised as a contributor to financial hardship. This is set out in the <i>Telecommunications Consumer Protections Code and the guide to Assisting and responding and responding to customers in financial hardship</i>.</p>	

## Appendix 4:

<b>Training Audience:</b>	
<ul style="list-style-type: none"> <li>Financial Hardship Team (Training Element 2: DFV Support and Training Element 3: DFV Tailored Support)</li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<p>Examples of when standard options for addressing financial hardship are not appropriate because of the consumer's unique financial limitations.</p>	<p><b>Example Issue:</b> (Source: <u>TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>For example, when a consumer leaves a violent relationship, the perpetrator may steal a handset that the consumer is paying off. When the consumer reports the stolen handset to their provider, the consumer can cancel the contract, but this usually incurs outstanding handset repayment charges which must be paid immediately. Consumers have told us their provider is only willing to waive the charges if the consumer returns the handset. While this is a reasonable request for most consumers, a consumer impacted by family violence may not be able to return a handset. Contacting the perpetrator could put their safety at risk and cause further harm to the consumer. This leaves consumers in a vulnerable position because they cannot continue paying for the handset, pay the outstanding charges, or return the handset.</li> </ul>
<p>When to provide flexible financial solutions and how.</p>	<p><b>Industry example of good practice that supports the TIO's recommendations.</b> (Source: <u>TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <p>Looking at the essential parts of a service for the customer to be safe and be able to afford services to adopt the right solution</p> <p>Offering to waive charges and cancel contracts where a customer has been coerced into signing up for products or services</p>

## Appendix 4:

<b>Training Audience:</b>	
<ul style="list-style-type: none"> <li>Financial Hardship Team (Training Element 2: DFV Support and Training Element 3: DFV Tailored Support)</li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<p>The importance of preventing service loss and financial payment solutions to enable the customer to stay connected, eg prepaid mobile or internet services.</p>	
<p>The negative impact of not being able to pay a debt:</p>	<p><b>Example Issue:</b> (Source: TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>Consumers who could not pay the debt remained vulnerable to losing their services, being contacted by the perpetrator, or the perpetrator being able to access their personal information.</li> <li>The negative impact of that debt can follow a consumer for years. A bad credit rating can prevent a consumer from taking back control of their financial situation for many years.</li> <li>Some consumers were not even aware they owed money to their provider because the perpetrator had taken out services in their name without their knowledge or consent.</li> </ul>
<p>Know what the tailored financial hardship options are, specific to customers impacted by DFV and when to apply them.</p>	

## Appendix 4:

<b>Training Audience:</b> <ul style="list-style-type: none"> <li>Employees who develop or deliver Tailored DFV Support (if this applies to your telco). (Training Element 3: DFV Tailored Support)</li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<b>This guidance about suggested training content supports recommendations from workplace, telco industry and DFV-specialist organisations.</b>	
<p>The importance/benefits of being able to provide flexible support options to a victim-survivor, ie a tailored response.</p>	<p><b>Example Issue:</b> (Source: <u>TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>Ensuring automated processes do not exacerbate safety risks.</li> </ul> <p><b>Industry example of good practice that supports the TIO's recommendations.</b> (Source <u>TIO Systemic Report: Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <p>Empowered employees could, for example, ask the consumer what parts of a plan they may need to retain or offer to convert a post-paid service to a prepaid service.</p> <p>Authorising employees to offer highly flexible payment arrangements. This should recognise a consumer experiencing family violence may need more time than usual to pay off a debt, may only be able to pay very small regular amounts, or may not be able to start paying off a debt straight away.</p> <p>Unilaterally transfer the mobile number from the perpetrator to the consumer if the perpetrator will not voluntarily agree to a change of ownership ... or ... set up a new service for the consumer and exercise discretion where the consumer's credit history has been affected by actions of the perpetrator.</p> <p><i>Note: When assessing/implementing processes for changing ownership of a mobile phone see Communications Alliance Guideline G660:2018 Chapter Nine.</i></p>

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<b>Training Audience:</b>	
<ul style="list-style-type: none"> <li>Employees who develop or deliver Tailored DFV Support (if this applies to your telco). (Training Element 3: DFV Tailored Support)</li> </ul>	
<b>Training Guidance: DFV Content</b>	<b>Training Guidance: Telco Specific</b>
<p>The importance/benefits of being able to provide flexible support options to a victim-survivor, ie a tailored response.</p>	<p><b>Example Issue:</b> (Source TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>When a consumer leaves a violent relationship, the perpetrator may steal a handset that the consumer is paying off. When the consumer reports the stolen handset to their provider, the consumer can cancel the contract, but this usually incurs outstanding handset repayment charges which must be paid immediately. Consumers have told us their provider is only willing to waive the charges if the consumer returns the handset. While this is a reasonable request for most consumers, a consumer impacted by family violence may not be able to return a handset. Contacting the perpetrator could put their safety at risk and cause further harm to the consumer. This leaves consumers in a vulnerable position because they cannot continue paying for the handset, pay the outstanding charges, or return the handset.</li> </ul> <p><b>Example Issue:</b> (Source TIO Systemic Report: <u>Meeting the needs of consumers impacted by family violence (Dec 2020)</u>):</p> <ul style="list-style-type: none"> <li>Consumers who could not pay the debt remained vulnerable to losing their services, being contacted by the perpetrator, or the perpetrator being able to access their personal information. The negative impact of that debt can follow a consumer for years. A bad credit rating can prevent a consumer from taking back control of their financial situation for many years. Some consumers were not even aware they owed money to their provider because the perpetrator had taken out services in their name without their knowledge or consent.</li> </ul>
<p>How telecommunications devices and services can be a tool for good and a tool for abuse (detail).</p>	