



3 November 2014

DR C628 TCP Code
Level 12, 75 Miller Street, North Sydney NSW 2060
Communications Alliance

Dear Mr Stanton,

Re: Proposed Changes to the Telecommunications Consumer Protections Code

1. We are writing to you because we are concerned about the proposed amendments to the Telecommunications Consumer Protection (TCP) Code 2012. Given the short period of time for public comment we are unable to make a full submission, and therefore lend our support in full to ACCAN's submission.
2. WLS NSW is a community legal centre that aims to achieve access to justice and a just legal system for women in NSW. We seek to promote women's human rights, redress inequalities experienced by women and to foster legal and social change through strategic legal services, community development, community legal education and law and policy reform work. We prioritise women who are disadvantaged by their cultural, social and economic circumstances. We provide specialist legal services relating to domestic and family violence, sexual assault, family law, discrimination, victims compensation, care and protection, human rights and access to justice.
3. We are particularly concerned about the amendments because as a state-wide service with limited resources, we rely heavily on telecommunications and on-line services to reach our clients and to assist them to obtain access to justice. In particular:
 - 3.1. We provide legal advice by telephone, including through 1800 numbers for disadvantaged women in regional rural and remote areas;
 - 3.2. We provide an online support service for community workers who support women escaping domestic violence (www.askLOIS.org.au) and
 - 3.3. We have recently developed a portable service directory and advocacy app, Speak Up (www.speakup.org.au).
4. Many of our clients who are dealing with domestic violence, family breakdown and discrimination are homeless or in insecure, temporary housing. They are likely to have difficulty maintaining commitments such as paying regular utilities accounts as their access to financial support is likely to have been disrupted; and many women experiencing domestic violence are increasingly also facing technology-facilitated stalking and abuse, which can take the form of identity theft and acquiring debts for which they were not responsible. Getting re-connected, re-establishing social contact and sorting out family finances can be overwhelming, hectic and hard to manage.

5. Women in these circumstances need to be able to rely on easy-to-find information about their circumstances and entitlements. Hardship programs need to be easy to access and be provided by trained staff who can show a sympathetic understanding of the women's circumstances, especially where she is in present danger and may need extra care to support the protection of her privacy and identity, as well as a facilitative processes for relieving her of debts that were incurred to her account without her knowledge or through circumstances beyond her control.
6. For these clients, and for all women in disadvantaged circumstances, the protections provided by the credit and debt management provisions of Chapter 6 of the code, are valuable and should not be diminished.
7. The provision of website information in the general rules in chapter 3 is especially valuable for the community workers who provide advice with our support through Ask LOIS are predominantly based in rural regional and remote areas with limited access to shopfront telecommunications provider services and are reliant on accessible web-based information to assist their clients to access information about hardship provisions.

We encourage Communications Alliance to reconsider these proposed TCP Code amendments in light of our concerns.

Yours sincerely
Women's Legal Services NSW.

Helen Campbell
Executive Officer