



# ADAPT

## DOMESTIC & FAMILY VIOLENCE (DFV) ACTION PLAN REPORT



**TPG Telecom**

Submitted to Telco Together Foundation on 01 March 2024



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# FOREWORD

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TPG Telecom is pleased to present our Domestic and Family Violence Action Plan Report.

We are a founding member of the Telco Together Impact Hub, and as part of our ongoing commitment to inclusion and belonging and gender equality, we have taken the Telco Industry Domestic and Family Violence Pledge to make a sustained and meaningful impact on domestic and family violence (DFV) across Australia.

At TPG Telecom, we take our role in supporting consumers affected by DFV very seriously. We have been proactive in finding ways to ensure our people and customers can easily connect with us, so we can assist them with suitable, trauma-informed arrangements to match their circumstances. We are proud of the work we have done to support awareness of how DFV presents for our people and our customers, and we will continue to support this important area of work.

Over the last three years, we have been working hard with other leading Australian telcos to identify areas of collective action and responsibility within the industry that will have the greatest impact on reducing DFV, including technology-facilitated abuse, while also supporting people affected by DFV.

We are proud to have completed our first Domestic and Family Violence (DFV) Action Plan, in line with the 'Adapt' level of the Telco Together Framework. We have explored how DFV affects our customers and employees and considered how our business will support those affected. As a result, we have established a Steering Committee to provide governance, reviewed policies and procedures and ensured appropriate support is available for people when they need it.

This is just the first stage for us, and we look forward to implementing further action in the future.

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# PROVIDE

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**We provided support for our employees before undertaking any work regarding our DFV Action Plan.**



Before involving employees in any DFV work we firstly investigated the services provided by our employee Assistance Program to ensure they were equipped to support employees with DFV related matters. We confirmed that our EAP provides confidential counselling, support and access to resources for all employees and their families. The service also includes leader support and coaching on how to respond and/or support others. Their counsellors are trained to handle DFV related cases and there is a dedicated section on their support app for DFV guidance and resources.

Prior to commencing any work, we communicated with the teams who may be involved in the development of the Action Plans and related activities. We explained our relationship with TelcoTogether Foundation and why it was important for us to develop a DFV action plan. We openly recognised that working on DFV initiatives may be challenging for people and we encouraged employees to seek support if required. We provided contact details for the EAP and other DFV specialist support services.

Additionally, we introduced our DFV paid leave policy and updated our flexible work policy to reference DFV, so employees understood the options available to them should they need support. As part of the DFV leave policy launch, we included educational resources and links to expert supports services. These have been re-promoted since the launch and are also available on our Intranet.

# EXPLORE

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**We have undertaken a discovery process of Government and Industry Expectations of Telcos regarding DFV and references in the Suggested Resource List.**



# CONSULT

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**We have formed a cross-business working group to plan our approach to responding to the issue of DFV, for our customers and employees.**



We have numerous employees and leaders working on TPG Telecom's response to DFV for our customers and employees, covering a cross section of teams, including:

- People Experience (Inclusion & Belonging, Employee Relations, WHS, Capability and Partnering)
- Compliance & Risk
- Customer Operations, including Financial Hardship
- Consumer
- Marketing

# REVIEW

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We have reviewed our pathways from our business areas to our team responding to DFV victim-survivors and ensured there is a clear process for internal referral.

We have reviewed our corporate culture and approach to Workplace Equality and Respect.

We have applied a DFV lens across our organisation and understand all DFV interaction points.

We have reviewed our training programs to ensure those that are related to DFV are flagged to incorporate information about the subject.

We have reviewed our policies and will include the subject of DFV in the following ones:

**Financial Hardship**  
Date reviewed: 26 Jan 2024  
Next review date: 1 Dec 2024

**Complaints Handling**  
Date reviewed: 30 Jan 2024  
Next review date: 1 Dec 2024

**Employee Induction**  
Date reviewed: 30 Jan 2024  
Next review date: 31 Dec 2024

**Diversity & Inclusion**  
Date reviewed: 1 Jun 2022  
Next review date: 30 Jun 2024

**Code of Conduct**  
Date reviewed: 19 Aug 2023  
Next review date: 31 Aug 2024

**Harassment & Bullying**  
Date reviewed: 1 Feb 2022  
Next review date: 30 Jun 2024

**Flexible Work**  
Date reviewed: 22 May 2023  
Next review date: 22 May 2024

**Paid Leave**  
Date reviewed: 30 Sep 2023  
Next review date: 30 Sep 2024

**Human Rights Policy**  
Date reviewed: 1 Feb 2022  
Next review date: 31 Dec 2024

# DECIDE

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The development of our Plan sits within this team:



Supporting Vulnerable People Steering Committee

We have decided how we will manage the development and implementation of the DFV Action Plan.



We have decided how we will support our customers and employees.



We have decided how we will measure success.



We have decided which DFV Training Organisation we will work with to develop our training.



# REPORT

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**We will complete our DFV Annual Update and submit it to TTF on 31 May 2025**



Our first DFV Annual Update will be lodged on 31 May 2025, to align our Action Plan Reporting with our annual reporting cycle and inclusion calendar. Subsequent Annual Updates will be submitted to Telco Together Foundation in May each following year.

**We have decided how and where we will report our work.**



Sustainability Report





*Australian telecommunications companies that develop a Domestic and Family Violence (DFV) Action Plan have pledged to continually improve support for their customers and employees who are or may be DFV victims and survivors.*

*The pledge is signed by the company CEO and includes the commitment to develop a DFV Action Plan, and publish a public report, within two years of the date of signing the pledge.*

## **Background**

In 2022, The DFV Action Framework was introduced to the Australian Telco industry. Its core focus is to help telcos better understand how to provide appropriate support and provide an effective response to DFV victims and survivors.

The Framework was created by Telco Together Foundation's Industry Impact Hub, in collaboration with Foundation members Telstra, Optus, TPG Telecom, Vocus Group and Aussie Broadband.

Structured consultation was held with Government, Industry Organisations, frontline DFV service providers and smaller telcos to ensure the Framework content was able to deliver benefit to DFV victims and survivors. This guidance was assimilated into an easy to follow model, through the provision of DFV Action Plan templates, for adoption organisation-wide. Consultation included discussions with DSS Family Safety Branch, Australian Communications Consumer Action Network (ACCAN), eSafety Commissioner, Telecommunications Industry Ombudsman (TIO), and 1800RESPECT, amongst other key stakeholders.

The Industry Impact Hub is an initiative of the Telco Together Foundation, where complex social issues of relevance to the industry and our communities are collaboratively discussed, addressed and actioned.

## Framework Overview

This practical Framework consists of four Action Plan options relevant to any telco regardless of size or resources.

Telcos employ the Action Plan that best relates to their current knowledge or DFV strategy, choosing from the:

- Adapt DFV Action Plan
- Embed DFV Action Plan
- Tailor DFV Action Plan, or
- Influence DFV Action Plan

These Action Plans are not hierarchical and do not signify a telco 'league table' or ranking. Instead, they are progressive, providing a structured roadmap for continued reflection, improvement and adaptation over time.

Telcos must complete required minimum criteria, stipulated in the DFV Action Framework in order to complete their Action Plan, and their report.

A comprehensive response to the complex and critical subject of DFV takes time, requiring comprehensive planning across the organisation before execution.

## Action Plan Reports

In addition to the DFV Action Plan Report, the telco commitment includes submitting an Annual Update to Telco Together Foundation, documenting progress since their last Plan.

The DFV Pledge, Action Plan, Report and Annual Update are signed by the telco Chief Executive Officer.

## **The four DFV Action Plan Options**

### **The Adapt Action Plan**

*When planning, at an early stage, or reviewing your DFV Action Plan*

Even the most socially responsible telcos have to continuously adapt and evolve to ever-changing environments. The purpose of the Adapt Action Plan is to plan, review or revise your approach to domestic and family violence within the context of your employees, customers, products, services and business strategy.

### **The Embed Action Plan**

*When implementing your DFV Action Plan – within your mainstream processes*

Telco products and services are sometimes the only opportunity for customers to interact with employees. The Embed Action Plan places DFV victim-survivors at the centre of your products and services. With a DFV lens applied across your business you have a pathway to respond to customers and employees within your standard mainstream processes.

### **The Tailor Action Plan**

*When Implementing your DFV Action Plan – tailored to individual circumstances*

In some circumstances, a response that is appropriate to one DFV victim-survivor may be harmful to another. The Tailor Action Plan enables a telco to deviate away from its mainstream processes, with support team(s) authorised to provide customers and employees with a customised individualised response.

### **The Influence Action Plan**

*When extending your DFV Action Plan, wider than your customers and employees.*

As an industry we are unique in that we have direct access to nearly every Australian organisation and consumer. That provides an opportunity for a level of responsibility that goes beyond a telco's own business. The Influence Action Plan extends your sphere of influence beyond your employees and customer support, to the wider community.



The Industry Impact Hub is an initiative of Telco Together Foundation. We are the industry's foundation for collectively addressing some of the most complex social challenges within our increasingly connected world.



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