



## **Telstra Submission to the House of Representatives Standing Committee on Indigenous Affairs inquiry on**

### **How the corporate sector establishes models of best practice to foster better engagement with Aboriginal and Torres Strait Islander consumers**

November 2021

#### **Introduction**

Thank you for the opportunity to make a submission to this inquiry.

We are strong supporters of reconciliation between the Australian community and our First Nations peoples, whose community and culture has been part of this country for tens of thousands of years.

We believe Reconciliation Action Plans (RAPs) are an important way for organisations to make public commitments towards reconciliation. RAPs play a positive role and deliver meaningful outcomes.

Our support for and partnership with First Nations communities and consumers also goes beyond our RAPs. For example, our Telstra Foundation has supported and continues to support a range of programs to boost the digital inclusion and skills of First Nations communities. During 2021 we made calls to anywhere in Australia free from our extensive network of payphones across metropolitan, regional and remote communities. We also supported the National Aboriginal Community Controlled Health Organisation's (NACCHO's) efforts to improve COVID vaccination rates in First Nations communities. We are also proud of our ongoing partnership with governments on co-investment programs (including the Federal Government's Mobile Black Spot Program and Regional Connectivity Program) to extend and improve connectivity to many remote locations across the country.

#### **Telstra's connection with Reconciliation Action Plans**

Telstra established its First Nations Directorate and First Nations Hotline in 2005 as part of its business function Telstra Country Wide. At that time, the Directorate largely focussed on appropriate products and services for remote First Nations communities across Australia.

In 2008, we developed our first Indigenous Action Plan and in 2010 we launched our inaugural Reconciliation Action Plan (RAP). In 2010, Telstra also became a founding member of Supply Nation.

In 2011 we launched our second RAP [2011-2014](#) and during this time, we achieved several significant achievements, including:

- Installed Acknowledgement-of-Country signs in over 400 stores and business centres
- Joined the Recognise campaign to push for constitutional recognition of Aboriginal and Torres Strait Islander peoples
- Established the Telstra Indigenous Employee Network
- Launched the Indigenous Workforce Program to engage local people to undertake the grounds maintenance of more than 600 Telstra sites in remote WA, NT and Qld
- Established the Indigenous Digital Excellence (IDX) program at the National Centre of Indigenous Excellence in Redfern



- Held our first Indigenous Digital Excellence Agenda Summit
- Became a secondment partner of not-for-profit organisation Jawun to place skilled people from Australia's leading companies and government agencies into Indigenous organisations
- Became a supporter of the Australian Human Rights Commission's campaign "Racism: it Stops with Me"
- Published "Making the Connection: Essays on Indigenous Digital Inclusion"
- Delivered a \$5.8 million co-investment project with the NT Government to deliver communications infrastructure to 13 Indigenous Communities.

We launched our first Elevate RAP in 2015. At the time of launching the [2015-2018](#) RAP we also announced a \$30 million infrastructure co-investment fund with the NT Government to increase connectivity to 16 remote communities. During the three-year period we completed the following:

- IDX Flint was established to spark the interest, ideas and talent of young First Nations Australians in technology and digital making
- Established inDigiMOB to deliver culturally responsive digital skills training in 13 remote Northern Territory communities in partnership with First Nations Media
- Launched our first national employee engagement campaign 'Common Ground'
- Launched a new First Nations employee recruitment campaign 'A Place to Belong'
- Published the Indigenous Digital Excellence (IDX) Roadmap: Building Indigenous Digital Excellence: Looking to 2030
- Celebrated 25 years of supporting First Nations artists through our sponsorship of the Telstra National Aboriginal and Torres Strait Islander Art Awards (NATSIAA)
- Launched Deadly Digital Communities to improve digital literacy in 26 remote communities in partnership with the State Library of Queensland
- Established the Telstra Indigenous Advisory Committee
- Hosted the inaugural Indigenous Digital Excellence Awards
- Released our research report in partnership with RMIT University 'Cyber Safety in remote Aboriginal communities'
- Connected 11 Aboriginal Medical Services sites to the National Telehealth Connection Service with four additional sites in progress
- Delivered 12 infrastructure projects across 10 islands in partnership with the Torres Strait Regional Authority.

Our [2018-2021](#) RAP focusses on three key areas - Building Digital Futures, Lifting Economic Participation, and Cultural Responsiveness and Engagement. Key achievements include:

- Fibre upgrade and infrastructure enhancements at Gulkula to support the GARMA festival
- A \$28 million Remote Telecommunications Co-Investment Program with the NT Government, targeting remote locations, including communities, transport corridors and tourist destinations
- Extending inDigiMOB, adding seven new sites so that the program is now being delivered in 20 locations
- Producing and publishing an audio documentary series addressing online safety and emerging technology in collaboration with First Nations Language and media organisations
- Delivering Storylines in Pt Augusta, Whyalla, and Ceduna – an intergenerational program in partnership with the Burruga Foundation to develop digital skills and reinforce identity via storytelling
- Developing culturally appropriate materials, known as Mobile My Way, to increase consumer understanding of Telstra products and services
- Delivered the MoneyMob Talkabout Loans and Phones project in six APY communities
- Sponsored 20 First Nations interns through Career Trackers each year in 2019, 2020, 2021.



We are proud of the impact these programs have had over the past ten years, as we believe they have had a positive and lasting impact. For example, the inDigiMOB digital mentoring and literacy program has better equipped thousands of people to get the most from their connectivity. And through ongoing improvements to our procurement policies, the amount of money we spend with First Nations suppliers continues to grow with a target of \$10 million this financial year.

## Improper sales practices and the actions we've taken in response

Despite the many initiatives summarised above, we know when we don't listen properly or truly understand the impact of our actions, we can cause harm to the very people we are seeking to empower.

We recognise that from 2016 to 2018 we failed some of our First Nations customers by signing them up to products and plans that were not appropriate for their needs and that they couldn't afford. Following an internal and an ACCC investigation, in 2020 we admitted that five of our licensee stores had engaged in improper sales practices towards 108 First Nations customers between 2016 and 2018. We are disappointed and sorry this conduct by our licensees took place and that we did not understand the issue quickly enough, nor act quickly enough, to address it. We know this damaged our relationship with First Nations consumers and communities and we are determined to rebuild trust.

In response to the ACCC's findings regarding these improper sales practices, in March 2021 Reconciliation Australia (RA) revoked Telstra's 2018-2021 RAP. RA concluded that we did not meet our aspirations to be a leader in the reconciliation movement nor the expectations of an Elevate RAP partner. Telstra remains a part of the RAP network and has been invited to begin the development of a new Stretch RAP.

Both through the actions agreed to in our court-enforceable undertaking with the ACCC, and through other steps we took previous to that, we have provided impacted customers with remediation and support. This has included waiving a range of customer debts that we believed in any way may have a connection to improper sales practices.

Our Regional General Managers have visited 43 communities to raise awareness of the remediation options available to impacted people, and to raise awareness of our First Nations Connect hotline, which provides dedicated and culturally appropriate assistance to First Nations customers.

As part of a broader strategy to help ensure we offer a consistent and appropriate experience to all our customers, we have been going through a process to bring ownership and operation of all our retail outlets back within Telstra. Once this change is finalised, we will have one of the largest store networks in Australia. We believe this approach will help ensure that we are able to offer a more consistent and appropriate service to our First Nations customers.

We have also made good progress on many elements of the ACCC undertaking, including:

- Appointing an Indigenous Cultural Compliance Officer
- Developing and publishing an internal First Nations customer policy statement
- Ensuring all agents who engage with First Nations consumers complete consumer law and Indigenous cultural awareness training, and restricting access to Telstra systems for anyone who does not complete the training on time
- Re-launching the First Nations Connect hotline, including a team of First Nations agents based in Darwin
- Commencing external promotion of the First Nations Connect hotline and remediation process (including upcoming ICTV advertisements)



- Establishing regular reviews by our Customer Advocate on the remediation cases as part of the required oversight process over the remediation program
- Gaining consent to provide digital literacy training in remote communities over the next five years.

We are confident the changes we have made to simplify our business, improve our processes and adhere to our undertaking with the ACCC mean the issues that arose in 2016-2018 would not occur today or, if they did occur in a store, they would be identified significantly earlier. This is because:

- We no longer have fixed term contracts or excess data charges for mobile services
- We now have much better means of detecting anomalies in our credit assessment process
- We have much tighter rules around being able to purchase devices on a repayment plan
- Complaints from First Nations customers are now dealt with by special assistance teams who receive a heightened level of training.

## The lessons we have learnt and our commitment to the future

Our reconciliation journey has taught us many lessons. We share the following with the Committee in the hope they can assist the inquiry process and any recommendations that come from it:

**First, understand** - To deliver effective actions that can support reconciliation or address an area of need requires a full understanding of the nature of the challenges facing Aboriginal and Torres Strait Islander peoples. We have learnt the value of direct engagement with First Nations Australia and complementing this with rigorous and specific research and analysis.

**Tackle the challenge comprehensively** - When it comes to reconciliation and inclusion, the challenges faced by Aboriginal and Torres Strait Islander peoples are layered and interconnected. For example, when it comes to digital inclusion, we have learnt to apply our efforts across the three interconnected components — accessibility, affordability and digital ability.

**Find partners** - Telstra does not have all the skills necessary to help make the most of the opportunities we see in digital inclusion, employment and cultural engagement with Indigenous Australia. We have learnt to do this in partnership with various organisations where new perspectives and expertise are brought to the table to deliver a common vision and better outcomes.

**Be true to your purpose** - We can leverage the considerable resources and know-how within Telstra when we see a clear link to what we stand for as an organisation. Our purpose is to build a connected future so everyone can thrive. This is a clear responsibility and call to action for Telstra when it comes to First Nations Australians.

**Review** - Don't assume it has worked, check that it has. Telstra has learnt to carefully measure what needs to get done, analyse the meaning and importance of those measurements, and then review this with First Nations communities and partners to generate insights and actions. This enables us to improve over time.

**Engage in the proper way** – Our learning and experience has been that despite our good intentions, we don't always get things right. We have also learnt that when we don't get things right and/or cause harm our strong tendency is to act quickly, to fix things ourselves and to do so from the perspective of what we see as being the proper way to do things. The treatment of, and harm caused, to our First Nations peoples over the last 250 years have created complicated policy,



economic and social challenges and polarising points of view on potential action to address these challenges. What we now understand is that if we want to be part of the solution we need to slow down, work with the people who are affected by our decisions and give them a proper voice in decisions that impact them. It is only by doing so we will make enduring policy, economic and social change.

We have considered deeply our experience over the last five years and all of the positive initiatives we have taken have enhanced our First Nations Strategy to move from a position of shortfall to one of leadership. We are consulting with our external and internal stakeholders and will finalise the enhanced strategy, and our new RAP framework by the end of the year.

Our First Nations Strategy will help guide our efforts to back the aspirations of First Nations peoples, communities and leaders for a better Australia. The key pillars of this strategy are:

- Leadership on key areas impacting self-determination
- Re-engagement with key stakeholders to build trust
- Delivery of programs that achieve social change
- Achieving better outcomes for our First Nations Customers.

We have also updated the role of our First Nations Advisory Committee so that its members can provide guidance, counsel and leadership advice to Telstra.

Telstra remains committed to the development of a new RAP and we continue to work closely with Reconciliation Australia on that process.

### The need to engage meaningfully and directly with First Nations communities to define and deliver 'best practice'

Telstra is firmly committed to reconciliation and we continue to reflect on our past and future engagement with First Nations communities. We want to take up the generous invitation outlined in the Uluru Statement from the Heart to walk with First Nations peoples in a movement of the Australian people for a better future.

As such, we strongly support the Committee's efforts to define and deliver 'best practice' for engaging with First Nations communities, strengthening cultural awareness, and developing RAPs which lead to improved outcomes.

However, we recognise that neither the corporate sector nor the Parliament can arrive at genuine and lasting 'best practice' without the experience and wisdom of those most impacted – First Nations peoples and communities.

Our recent experience has reminded us that we do not necessarily have all the answers or understand the proper ways. That is why we believe the corporate sector and this Committee should not propose a way forward on these topics without meaningful engagement with First Nations peoples.

Despite the short timeframes established for this inquiry, we strongly urge the Committee to seek a range of views and experiences from across First Nations communities and empower communities to shape any report and recommendations put forward by the Committee. We will continue to listen and learn and look forward to hearing from First Nations people on this Inquiry.