



# Domestic, Family & Sexual Violence Policy

Updated: 8 May 2026

Pennytel may update this policy from time to time.

The current version is maintained by Pennytel as part of its domestic, family and sexual violence consumer protection framework.

This policy supports Pennytel's **Domestic, Family & Sexual Violence Information Statement** and must be applied together with Pennytel's related procedures, training materials, Privacy Policy, Payment Assistance Policy and Complaints Handling Process.

The **DFSV Information Statement** is the customer-facing disclosure required to explain what support is available and how to access it.

This **DFSV Policy** is the governance and operational document that sits behind that statement: it sets Pennytel's commitments, minimum internal controls, staff obligations, escalation principles, privacy protections, training expectations, record-keeping and review requirements.

## 1. Purpose

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Pennytel recognises that domestic, family and sexual violence can affect a person's:

- safety;
- privacy;
- access to telecommunications services;
- ability to manage their account;
- ability to make payments or manage debt; and
- confidence in engaging with their telecommunications provider.

This policy sets out Pennytel's approach to supporting people who are, or may be, affected by domestic, family or sexual violence.

The policy is intended to ensure that Pennytel:

- prioritises the safety of affected persons;
- provides support in a trauma-informed, respectful and practical way;
- protects privacy, account security and safe communication preferences;
- helps affected persons remain connected where safety is a concern;
- complies with applicable telecommunications, privacy and complaints-handling obligations; and
- embeds domestic, family and sexual violence protections into relevant systems, processes, training and governance.

## 2. Scope

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This policy applies to:

- current Pennytel consumers;
- former Pennytel consumers;
- prospective Pennytel consumers;
- small business or not-for-profit consumers where the relevant consumer protections apply; and

- all Pennytel personnel, contractors and agents involved in designing, selling, supplying, billing, supporting or managing telecommunications products or customer interactions.

For this policy, a person is treated as an **affected person** where they identify as, or may be, affected by:

- domestic or family violence; or
- sexual violence outside a domestic or family violence situation.

Pennytel will provide applicable protections and support regardless of whether the person uses the terminology “domestic violence”, “family violence”, “sexual violence”, “abuse”, “coercive control”, “unsafe”, or another description of their circumstances.

### 3. Policy principles

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Pennytel’s approach is guided by the following principles.

#### 3.1 Safety first

The safety of affected persons is the primary consideration in how Pennytel responds, communicates, manages accounts and exercises operational discretion.

#### 3.2 Privacy and security

Pennytel will protect the privacy, confidentiality and account security of affected persons and will avoid actions that could unintentionally increase risk or disclose sensitive information.

#### 3.3 Respect, dignity and trauma-informed support

Pennytel will communicate in a respectful, non-judgmental and supportive way. We will avoid requiring affected persons to unnecessarily repeat their circumstances or disclose more than is required to provide support.

#### 3.4 Accessibility and inclusion

Pennytel recognises that domestic, family and sexual violence can affect people of all backgrounds, identities and circumstances. We will design and provide support in an accessible, inclusive and non-discriminatory manner.

#### 3.5 Keeping people connected

Pennytel will prioritise continued access to telecommunications services where a person’s safety may be affected.

#### 3.6 Practical, proportionate assistance

Pennytel will seek to provide support that is responsive to the affected person’s circumstances and proportionate to the safety, privacy, account and service risks involved.

### 4. Safe engagement with affected persons

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When a person indicates that they are, or may be, affected by domestic, family or sexual violence, Pennytel will:

- check whether it is safe to continue the interaction;
- ask for, agree and record a safe and preferred method of communication where appropriate;

- ask for, agree and record a safe time of day to contact the person where appropriate;
- use the agreed safe communication method and time for domestic, family and sexual violence-related contact, unless:
  - Pennytel is legally required to use another method; or
  - the affected person initiates contact through another channel and confirms that it is safe to continue through that channel;
- avoid language or processes that require the affected person to reveal unnecessary details of their situation; and
- escalate the matter in accordance with Pennytel's domestic, family and sexual violence procedures where the interaction requires specialised handling.

Pennytel's final Information Statement reflects these same commitments on safe callbacks and preferred contact. The safe-contact requirements are also central obligations under the DFSV Standard.

## 5. Support options Pennytel will discuss

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Pennytel will explain and discuss support options that may be relevant to the affected person's circumstances.

Depending on the situation, this may include:

- confirming safe contact details;
- updating account contact information;
- discussing who has access to the account;
- changing or removing an authorised representative where appropriate;
- adding additional account security protections, such as a PIN or verification step;
- reviewing whether account notes, contact preferences or other safeguards are required;
- assisting the person to establish a separate account where relevant and lawful;
- discussing service continuity where a safety concern has been raised;
- considering payment assistance where domestic, family or sexual violence has contributed to non-payment; and
- referring the person to external domestic, family and sexual violence support information where appropriate.

Pennytel will not present these options as mandatory, and will take care not to make assumptions about what is safest for the affected person.

## 6. Keeping affected persons connected

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If an affected person tells Pennytel that they are concerned about their safety, Pennytel will prioritise taking action to assist with their telecommunications needs.

Where the affected person is the customer of the relevant service, then for **30 days** after they first raise the safety concern — or for a longer period agreed with them — Pennytel will not restrict, suspend or disconnect that telecommunications service unless the affected person asks Pennytel to do so.

If a relevant telecommunications service has already been restricted, suspended or disconnected, and the affected person urgently asks Pennytel to reverse that action because of a **domestic or family violence-related safety risk**, Pennytel will reverse the restriction, suspension or disconnection as a matter of urgency where it can.

If reversal is not practical, Pennytel will offer an equivalent telecommunications service.

This aligns with the final Information Statement and the DFSV Standard's service-continuity protections.

## 7. Payment assistance, debt and credit management

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Pennytel recognises that:

- domestic and family violence; and
- sexual violence outside a domestic or family violence situation,

can contribute to non-payment of telecommunications bills.

An affected person may be eligible for support under Pennytel's **Payment Assistance Policy** and the **Telecommunications (Financial Hardship) Industry Standard 2024**.

Before taking credit management action in relation to an affected person, Pennytel will consider, where relevant:

- the potential impact of the proposed action on the affected person's safety;
- whether another person may have contributed to the debt;
- whether any previously agreed payment assistance, payment plan, extension or other action has been implemented; and
- whether the matter should be escalated or further reviewed before action is taken.

Pennytel will not use credit management action in a way that conflicts with applicable payment assistance protections, domestic, family and sexual violence protections, complaints-handling obligations or other applicable law.

## 8. What Pennytel will not require

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Pennytel will not require an affected person to:

- provide evidence that they are affected by domestic, family or sexual violence, unless:
  - Pennytel is required by law to obtain it; or
  - it is reasonably necessary to protect the affected person's interests;
- disclose the details or circumstances of the abuse as a condition of receiving support;
- contact or engage with the perpetrator or alleged perpetrator;
- contact or engage with the perpetrator's authorised representative; or
- take steps that Pennytel reasonably considers may create an avoidable safety risk.

Where Pennytel needs to transfer the interaction to another staff member or team for appropriate support, Pennytel will offer a **warm transfer** so that the affected person does not have to unnecessarily repeat their circumstances.

## 9. Interactions involving perpetrators or alleged perpetrators

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Pennytel will not disclose information about an affected person, their account, their contact with Pennytel or their support arrangements to a perpetrator or alleged perpetrator unless:

- the affected person has clearly authorised that disclosure;
- Pennytel is required or authorised by law to make the disclosure; or
- another lawful basis applies and the disclosure is handled consistently with Pennytel's privacy and safety obligations.

Where an account, authorised representative arrangement or service relationship involves both an affected person and a perpetrator or alleged perpetrator, Pennytel will:

- avoid requiring the affected person to engage with that person;
- avoid disclosing the affected person's support request or safety concerns;
- apply Pennytel's domestic, family and sexual violence procedures to assess safe next steps;
- consider account-security, contact-preference and representative-access controls; and
- escalate complex cases for specialist or senior review where appropriate.

Pennytel will **not** apply a blanket rule that a shared account is automatically suspended merely because domestic, family or sexual violence is alleged. That approach could create safety, service-access or fairness risks.

## 10. Privacy, information security and record handling

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Pennytel will handle personal information relating to domestic, family and sexual violence carefully and in accordance with:

- the Privacy Act 1988 (Cth);
- Pennytel's Privacy Policy; and
- applicable telecommunications obligations.

Pennytel will:

- collect only the information reasonably needed to provide support, manage safety, administer services or comply with legal obligations;
- avoid recording unnecessary details about the abuse;
- record safe contact preferences and agreed support actions where needed;
- limit access to domestic, family and sexual violence-related information to personnel who need it to perform their role;
- use appropriate account flags, restricted notes, case-management controls or other internal safeguards where operationally available and appropriate;
- take reasonable steps to avoid inadvertent disclosure through ordinary customer contact, billing, service communications or account access; and
- maintain records needed to demonstrate compliance with applicable domestic, family and sexual violence obligations.

Pennytel's Information Statement already tells customers that we will discuss options to protect privacy, safety and account security. This Policy is the internal control framework behind that promise.

## 11. Staff responsibilities

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All Pennytel personnel involved in customer interactions, account management, billing, collections, complaints, privacy, fraud, service operations, product design or relevant supporting functions must act consistently with this policy and Pennytel's related procedures.

Relevant personnel must:

- recognise and respond appropriately where a customer may be affected by domestic, family or sexual violence;
- prioritise safety, privacy and secure communication;
- avoid requiring unnecessary disclosure or evidence;
- avoid directing or encouraging the affected person to engage with a perpetrator or alleged perpetrator;
- apply safe-contact preferences and account-security measures where relevant;
- explain available support options within the scope of their role;
- use warm-transfer processes where a matter requires specialist or escalated handling;
- follow Pennytel's Payment Assistance Policy where payment difficulty is identified;
- escalate immediate safety, privacy or service-continuity risks promptly; and
- record actions accurately and carefully in accordance with Pennytel's procedures.

## 12. Training and capability

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Pennytel will provide domestic, family and sexual violence training appropriate to the roles of its personnel.

Training will be designed to ensure relevant staff understand:

- Pennytel's domestic, family and sexual violence policy and procedures;
- the nature and telecommunications-related impacts of domestic, family and sexual violence;
- how to recognise indicators that a person may be affected;
- trauma-informed communication principles;
- safe contact methods and safe callback arrangements;
- privacy, confidentiality and account-security risks;
- service-continuity protections;
- payment assistance implications;
- warm-transfer and escalation requirements; and
- appropriate referral information.

Pennytel will ensure customer-facing and other relevant staff receive training that is appropriate to their role, and that any specialist personnel receive additional role-specific training where required.

Pennytel will maintain training records sufficient to demonstrate compliance with applicable obligations. The DFSV Standard expressly requires telcos to train staff to recognise and respond appropriately, including specialised training for customer-facing staff.

## 13. External support information and referrals

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Pennytel's customer-facing **Domestic, Family & Sexual Violence Information Statement** explains where customers can find external support, including **1800RESPECT**.

Pennytel staff may provide information about external support services where appropriate.

Where a warm referral or assisted hand-off is operationally available and the affected person consents, Pennytel may assist in connecting the person with an appropriate external support service. Pennytel will not disclose personal information to an external support organisation without consent or another lawful basis.

## 14. Complaints and urgent concerns

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If an affected person is dissatisfied with Pennytel's support, account handling, communications or application of this policy, Pennytel will handle the matter in accordance with its **Complaints Handling Process**.

Where a complaint involves a domestic, family or sexual violence-related safety risk, Pennytel will assess whether it should be treated as urgent in accordance with applicable complaints-handling obligations.

Making a complaint to Pennytel or seeking external dispute resolution does not prevent a person from receiving support under this policy.

## 15. Governance, approval and review

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This policy must be approved by Pennytel's most senior responsible executive.

Pennytel will:

- implement procedures that support this policy;
- review this policy, the Information Statement, procedures and training in accordance with applicable domestic, family and sexual violence obligations;
- consult with relevant domestic, family and sexual violence experts and lived-experience or representative organisations where required;
- consider whether changes to products, systems, account processes, payment processes or digital experiences create new risks for affected persons;
- maintain records sufficient to demonstrate compliance; and
- address identified policy, procedural, training or control gaps through Pennytel's compliance and assurance processes.

Pennytel will maintain and review its DFSV policies, procedures, training and compliance records in accordance with applicable domestic, family and sexual violence consumer protection obligations.