



ALDI Mobile Policy

Assisting customers experiencing domestic and family violence

Edition 1.0

This Policy is informed by
Communications Alliance Ltd Industry Guideline G660:2018
Assisting Customers Experiencing Domestic And Family Violence

Part A – Domestic and family violence: ALDI Mobile’s response

1 **Domestic and family violence**

Domestic and family violence can mean violent, threatening or other behaviour by a person that coerces or controls a member of the person’s family or causes them to be fearful or isolated. It can include:

- physical, emotional, technology-facilitated, and other forms of abuse, threats, and control within families and domestic partnerships;
- economic or financial abuse that undermines a person’s ability to leave the situation, or efforts to become economically independent – financial abuse is about power, control and manipulation of a person; and
- monitoring or controlling the person’s access to or use of telecommunications services, or causing their telecommunications service to be transferred or cancelled – including where a person relies on a mobile phone service that is registered in the name of the perpetrator.

2 **ALDI Mobile’s response to domestic and family violence**

In our role as a prepaid mobile voice and data service provider, ALDI Mobile rejects domestic and family violence in all its forms, and we will take relevant steps to support victims.

The ways in which we may assist victims may change over time in response to community circumstances and experience.

Right now, this Policy prioritises ensuring that a victim who relies on a mobile phone service, that is registered in the name of the perpetrator, can gain full control of that service – subject to reasonable antifraud measures. We’ll explain how that works in Part C. But first, we’ll speak directly to victims, in Part B.

Part B – If you are a victim

3 **Tell us if you need our help**

We won’t know that you are experiencing domestic and family violence, unless you tell us. Be as clear as you can about that, and why you are contacting us. When we understand what’s going on, we’ll allocate a senior staff member to look after your case.

4 **We’re not a specialist domestic and family violence support service**

We can’t really help you with matters other than our prepaid mobile phone services – but there are places to get other help. We can provide some options if you wish.

5 **You know how best to keep yourself safe**

We understand that every instance of domestic and family violence differs, and you know best how to keep yourself safe.

When we deal with you, we’ll always be listening for your concerns, and how you wish to proceed in your best interests.

Sometimes, the options for us to help are limited, but we’ll try to inform you of the options available and empower you to choose the most appropriate assistance for you.

6 Tell us how to communicate safely with you

- Maybe you can only call us, and it's not safe to receive calls from us.
- Maybe a perpetrator has access to your email account.
- Maybe they are the registered holder of your phone service and can see its call history and other details online.

Please let us know how we can communicate with you in a way that doesn't put you at more risk. Tell us what the circumstances of concern are, and we'll do everything we can to work around them.

Part C – Special process for keeping a mobile service number

7 About this process

In some cases:

- a victim of domestic and family violence is the usual user a mobile phone;
- the phone account and its number are legally registered in the name of a perpetrator;
- so the perpetrator can control, or monitor, or cancel the victim's use of or access to the mobile phone; and
- if the victim loses access to that mobile number, friends, family, employers and others may not be able to contact them.

We have a special process that may allow a victim to take control of the mobile number and use it with a new service account.

8 The victim will know best if this is the right solution

Our special process may be an option, but there may be better options. For instance, it might be safer to stop using an existing phone number and open a new account with a new number.

We'll let a victim decide whether the special process is right for them.

9 Our special process is really 'special'

The law normally protects the legally registered holder of a phone number from losing that number without their agreement. There are rules and procedures in place that would normally prevent a person from taking control of a mobile phone number without the permission of its legally registered holder – especially because taking unauthorised control of a number is often part of a fraud.

Our special process recognises that in situations of domestic and family violence, it may be paramount to protect the victim. At the same time, the process takes reasonable steps against fraud.

10 Special process

10.1 Termination of service and recalling a mobile number If we determine, in accordance with this Part C, that:

- a person (**Account Holder**) has an ALDI Mobile mobile service account (**Existing Account**) that is associated with a particular mobile phone number (**Relevant Number**);
- another person (**End User**) is likely to be the usual end user of that mobile service, including the Relevant Number; and
- the End User has been the subject of domestic and/or family violence by the Account Holder –
- we may terminate (**Special Termination**) service to the Relevant Number and recall the Relevant Number without issuing the Account Holder a replacement number.

10.2 Notice of Special Termination

- a) Because of the nature and circumstances of Special Termination, we may or may not give the Account Holder notice, before or after it occurs.
- b) We will consult with the End User and seek to identify a process (**Notification Process**) for notifying the Account Holder that their account in respect of the Relevant Number, and their right to use the Relevant Number, have been terminated, keeping in mind that notification itself may create safety issues for the End User.
- c) If and when a safe Notification Process is identified, we shall notify the Account Holder accordingly.

10.3 End User evidence – why we need it

- a) As well as our concern for victims of domestic and family violence, we are obliged to protect our customers, including the Account Holder, from fraudulent use of our special process.
- b) We need evidence that:
 - the End User is associated with the Relevant Number; and
 - the End User has been the subject of domestic and/or family violence by the Account Holder.
- c) We will consult with the End User before deciding exactly what form/s of evidence will be required.

10.4 End User evidence – association with Relevant Number

To establish that the End User is associated with the Relevant Number, we may:

- a) send a one-time code to the Relevant Number, which the End User can confirm back to us;
- b) obtain from the End User, and verify, part of the call history of the Relevant Number; or
- c) use another method that we accept after consulting with the End User.

10.5 End User evidence – domestic and/or family violence

To establish that the End User has been the subject of domestic and/or family violence by the Account Holder, we may accept:

- a) a certified copy of:
 - i) an Apprehended Violence Order;
 - ii) a Family Violence Order;
 - iii) a Court Order;
- b) a Statutory Declaration;
- c) a letter from a women's shelter, financial counsellor, or other community advocate – that we can verify (eg by contacting the issuer or document witness) if necessary, or other evidence that we accept after consulting with the End User.

10.6 Further steps

Further steps in our special process are in our internal documentation and will be explained to the End User via an agreed safe communications channel.

11 Release

Account Holders and End Users release us from any claim, action or demand arising out of anything we do in connection with this Policy or our special process, unless we have acted with gross negligence or in bad faith.