

# UNWELCOME & LIFE-THREATENING COMMUNICATIONS & DOMESTIC VIOLENCE POLICY



## UNWELCOME COMMUNICATIONS

### What Are Unwelcome Communications?

Nuisance or Unwelcome Communications are the use of a telecommunications service in a manner that is unwelcome, but not currently a Life Threatening Communication, and which may be intentional or unintentional. These may be in the form of verbal calls, unanswered repeated calls, automated message services, SMS, MMS, emails or voicemails left for our customers.

### Who Can Report Unwelcome Communications?

Anyone can raise a concern in regards to receiving Unwelcome Communications. These should be directed to our Customer Happiness Team through one of our contact channels.

How do I raise a complaint?

Here are the channels that you can use to raise a complaint:

1. Live Chat through our website at <https://www.circles.life/au/complainthandling> or on our Circles.Life app
2. Contact us forms via our website or Circles.Life app
3. Email to [happinessau@circles.asia](mailto:happinessau@circles.asia)
4. Our official Social Media accounts on Facebook and Twitter
5. Voicemail at **1300 863 004**
6. Post to Circles.Life Australia, PO BOX 1006, North Sydney NSW 2059

### How We Will Assist You Once You Report Unwelcome Communications?

There are a few actions we may recommend when you raise your concerns about these types of communications, such as:

1. Hanging up on the caller straight away
2. Screening your calls using an answering machine or voicemail
3. Using Caller ID to identify the caller and screen calls
4. If an unwelcome call is from a fax machine, divert the call to a fax machine to assist in identifying the calling fax
5. Not sending SMS or MMS to people to whom you do not want to reveal your number
6. Registering your number on the DO NOT CALL register (please note that there is a 31 day action period)
7. Removing your white pages listing and other listing services
8. As a last resort, we may attempt to change your service number with your consent

If the communications continue and you wish to continue with a further investigation, we will be more than happy to assist if a pattern of Unwelcome Communications has occurred. To investigate if a pattern of Unwelcome Communications has occurred we will check our records to determine if there have been:

1. Ten or more Unwelcome Communications spread over a 24-hour period or
2. Three or more Unwelcome Communications over a 24-hour to 120-hour period, or
3. Unwelcome Communications made at consistent or regular intervals

At least one Unwelcome Communication must have been received in the last 30 days for us to be able to take further action.

We make take action in relation to Unwelcome Communications made to emergency call services or registered helplines, even if a pattern of Unwelcome Communications has not occurred.

We will confirm your consent to providing your number to the person making the Unwelcome Communications or their service provider before proceeding with further investigations or sending any warning letters. We may also request that do not delete any Unwelcome Communications and that you make detailed records of the communications including origin, date, time and approximate duration.

If the Unwelcome Communications are coming from a Circles.Life service, we will send an initial formal warning letter within 2 working days.

If the Unwelcome Communications continue after a 10 working day period, we will follow up with a second warning letter. If the Unwelcome Communications continue after the second warning letter, we will advise you of your options, including contacting the police.

At any stage you have the option of reporting these matters to the relevant authorities such as the police.

### **If You Are Not a Customer of Circles.Life**

If the Unwelcome Communications are coming from a Circles.Life service, we will take this matter seriously on your behalf.

If you are not a Circles.Life customer, we will ask you to contact your service provider, as you will need to report these issues to them for privacy and record-keeping purposes. Once we receive the request from your service provider for an investigation, we will perform our own internal investigation.

The investigation period for all matters is a maximum of 10 business days. If we determine that there has been a pattern of Unwelcome Communications as described above, we will issue a warning letter to our customer within 2 business days of the completed investigation. If the calls continue after 10 working days, we will follow up and issue a second warning letter. If the Unwelcome Communications continue after the second warning letter we may suspend the service which is being used to send the Unwelcome Communications. The offending customer must confirm in writing to us that they will not continue to offend. Failure to provide this may lead to the termination of their Circles.Life service.

We take everyone's concerns and safety seriously and will act accordingly.

### **Consent**

If you are contacting us about Unwelcome Communications but do not consent to providing any details to the person making the Unwelcome Communications and their service provider, we will not be able to investigate your concern.

### **If the Caller is Not a Circles.Life Customer**

If you are receiving Unwelcome Communications from a person who is not a Circles.Life customer, we will report this to their service provider within 2 Business Days of receiving your complaint.

### **If Circles.Life is Making the Unwelcome Communications**

If you believe that Circles.Life is providing Unwelcome Communications you should let us know. We are subject to the same guidelines as any other sender of Unwelcome Communications and every complaint raised is considered an official warning in accordance with the 2 warning process outlined above.

## LIFE THREATENING COMMUNICATIONS

### What Are Life Threatening Communications?

Life Threatening Communications are communications where a person reasonably believes that action is required to prevent or lessen a serious and imminent threat to the life or health of a person. This includes, but is not limited to, a person being seriously injured, a bomb threat, an extortion demand, a kidnapping or a threat to public safety.

### How Do I Report a Life Threatening Communication?

If you are in a life-threatening situation or receive or become aware of a situation involving a Life Threatening Communication, you should contact emergency services on 000 or 112 immediately. The policy will contact us directly if they require further information regarding life threatening communications.

### How We Deal With Reports of Life Threatening Communications

If you call us to report a Life Threatening Communication to us we will tell you to call emergency services directly by contacting 000 or 112. We will also report the facts to the appropriate authorities.

### What If Authorities Require Details That Are Not Held by Circles.Life?

We will cooperate with police in accordance with our obligations relating to Life Threatening Communications and escalate the investigation to our network provider if required.

## DOMESTIC AND FAMILY VIOLENCE

### What If I Am a Victim of Domestic Violence and Cannot Speak to Circles.Life About My Concern?

If we you that you are in danger or there is a life threatening situation on hand you should call emergency services directly by contacting 000 or 112. If we suspect that you are in danger or there is a life threatening situation, we may request a health check with local authorities and report our concerns to emergency services.

You may contact us using the following channels:

1. Live Chat through our website at <https://www.circles.life/au/complainthandling> or on our Circles.Life app
2. Contact us forms via our website or Circles.Life app
3. Our official Social Media accounts on Facebook and Twitter
4. Voicemail at **1300 863 004**
5. Post to **Circles.Life Australia, PO Box 1006, North Sydney NSW 2059**

We will authenticate your identity to ensure your security is protected, in accordance with our Privacy Policy. If it is not the right time for you to speak or chat with us, please notify us of how and when you would prefer to be contacted. One of our Customer Happiness Experts will accommodate and assist you.

If you would like to nominate another person to speak to us on your behalf (such as a person providing counseling or support services), we may contact them and ask for their permission either via phone or in writing first to ensure privacy and security. We may require appropriate evidence of authority from you such as letter of authorisation or a power of attorney.

### How Can Circles.Life Help in a Domestic Violence Situation?

If you are in a domestic violence situation our Customer Happiness Experts may be able to assist in various ways, including by referring you to appropriate external support services. We can also talk to you (or an authorised representative) about the options that are available in relation to telecommunications services, such as removing authorised persons from your account, updating contact information, blocking numbers, changing passwords, obtaining financial hardship assistance or investigating the possibility of transferring a mobile number you are using to your own account if you are not the primary account holder.