Guidance on Section 2.2.2 (c) First Nations Cultural Understanding

Section 2.2.2 of the TCP Code (2025) requires that CSPs provide company-wide staff training on the Code, including an awareness of 'First Nations culture and world views'.

This guidance is designed to assist CSPs to meet their obligations under this clause.

Note: This page will be updated from time-to-time. CSPs are advised to check the link for currency.

What are the objectives of the requirement?

The objectives are to:

- help provide staff with an awareness that First Nations peoples' culture, practices and living arrangements can affect their experience purchasing and using a telecommunications product or service, and interacting with a CSP.
- support staff in recognising that specific actions and responses by a CSP may be needed to overcome systemic barriers and facilitate fair and equitable outcomes for First Nations consumers.

Why is it necessary to provide company-wide training?

Many roles in a company influence the outcomes and customer experience, from IT system design, to how an offer is structured, or how it is marketed.

Being aware of an issue is the essential first step in allowing it to be considered and addressed – and ensuring that processes or practices do not inadvertently cause harm.

For clarity, it is not expected that roles with no association or influence over the outcomes for customers in Australia would be included in this training[1].

What should be covered in all-staff training?

Guidance on training topics and the minimum content to be covered is provided below.

This should be supplemented with more detailed training for frontline or other specialist staff as and where appropriate. Links to further resources are provided at the end of this guidance[2].

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Diversity of First Nations languages

- There are over 150 Aboriginal and Torres Strait Islander languages spoken in Australia.
- For some people, English is their second or third language.
- To create an equitable experience for First Nations consumers, CSPs may need to offer additional support to First Nations consumers when appropriate. This could include:
  o providing plain-language resources,
  o providing – or referring a customer to – interpreter services,

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[1] For example, office cleaners, building maintenance staff, administrative or other roles with no influence on customer outcomes, including staff based outside of Australia with no association with Australian customers.
2 Note: It is expected that CSPs demonstrate that they have evaluated training requirements against their structure, size, target customer base and physical and geographical reach (cl. 3.2.4).

- o helping the customer use an Advocate,
- o additional training in communication skills.

Remoteness

Some First Nations people live in very remote parts of Australia. This may mean that they may:

- have limited or no home internet connectivity and may use their mobile as their primary device for internet connection, meaning their mobile data needs may be higher than consumers with fixed and mobile services,
- need to travel to access a telecommunications service, meaning their usage may be sporadic,
- need to travel long distances to purchase telecommunications products or services, meaning they may not have been able to access information prior to talking to frontline staff.

Cultural aspects

First Nations' culture may impact:

- individuals' use of telecommunications products and services. For example, they may share one phone or internet service within a community. This may affect consideration of which plans may be most suitable. First Nations perspectives on shared usage may also influence understandings of ownership, rights, and financial obligations related to the service.

- interactions with staff. For example, CSPs may observe a preference for silence during conversations for deep thinking or consideration or a tendency to agree readily. Being aware of this cultural preference can help CSPs to communicate more effectively and avoid misunderstandings, to build trust and deliver services that are truly accessible and respectful.

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UNDER CONSTRUCTION

FURTHER RESOURCES

CSPs may find the following further resources useful. This list will be further developed and updated over time.

General resources

Home | Closing the Gap

Paving the way: Cultural Capability Resource: cultural-capability-resource.pdf

Enhance your business – First Nations cultural capability webinars | Business Queensland