PERSL Personal Emergency Response Services Limited

Advocacy, standards, and direction for Personal Emergency Response Services

Triple Zero Legislative and Regulatory Review

Submission of Personal Emergency Response Services Limited (PERSL)

[redacted]

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1. Executive Summary

Personal Emergency Response Services Limited (PERSL) welcomes the opportunity to contribute to the Triple Zero Legislative and Regulatory Review.

PERSL represents organisations dedicated to providing high-quality Personal Emergency Response Services (PERS) to Australians. Our members deliver critical emergency monitoring services that protect older Australians, people living with disability, those with chronic health conditions, and other vulnerable members of the community.

PERSL members operate in accordance with AS4607 – Personal Response Systems and adhere to the PERSL Industry Guidelines, ensuring nationally recognised standards of quality, reliability and professional practice. **(Refer Appendix A – List of Companies Registered as Members of PERSL).**

This submission focuses on the role of Personal Emergency Response Services in supporting the Triple Zero services.

This submission does not represent any references to non-monitored and/or non-compliant devices.

2. PERS Technology

Personal Emergency Response Systems (PERS) work through a wearable trigger, a signal transmitter, and a 24/7 monitoring centre. When a user needs help, the process moves through three main steps:

Activation: The user presses a physical button on a wearable pendant or wristband, or an internal sensor automatically detects a hard fall. Other sensors include smoke detectors, fall detectors and non-movement sensors or passive devices that will trigger unusual behaviours.

Transmission: The wearable device sends a radio or cellular signal to a home base unit or directly via mobile networks (IoT) using cellular and GPS chips.

Communication: A built-in two-way speakerphone connects the user directly to a trained response operator, who assesses the event and dispatches family, emergency services, or an ambulance. In the event a trigger alert is received by the 24/7 monitoring centre, and 'no-voice' is detected the operator can determine an appropriate response in the event the client is unconscious and/or unable to speak clearly, ensuring there is no delay to a quick response.

Core Technical Features

- GPS Tracking: Pinpoints the exact outdoor coordinates of mobile users via satellite.

- Fall Detection: Uses internal accelerometers and gyroscopes to sense sudden drops and impact.
- Cellular/Landline Hybrids: Routes calls over digital mobile networks with landline or backup SIM redundancy.

AS 4607 Compliance Infrastructure

The framework treats personal alarms as critical lifecycle safety systems rather than basic appliances:

- The 95% of calls in 2 mins Response Benchmark: Call centres must answer at least 95% of incoming emergency calls within 2 minutes.
- Network Capability: Systems must bypass standard consumer voice constraints. Modern interpretations dictate 4G LTE cellular compatibility to prevent signal dropouts.
- Supplier Registration: Suppliers must legally log hardware into the Australian Communications and Media Authority (ACMA) National Equipment Registration System (NERS) database. Non-registered devices are classified as legally non-compliant.

Battery Management Protocols

Battery mechanics are split into two strict operational categories under AS 4607 to guard against unexpected power loss:

- Base Station Backup: Main units require an internal backup battery capable of running for 36 hours during a localized mains power failure.
- Wearable Hardware: Sealed pendants use high-density lithium batteries lasting 1 to 5 years. Mobile GPS trackers feature recharge cycles with explicit low-voltage thresholds.
- Proactive Pushing: When hardware drops below 20% capacity, the local unit silently transmits a standardized, automated data packet to the central monitoring facility (CMF) to schedule a physical replacement

Equipment Maintenance and Self-Testing

Maintenance utilizes background automated telemetry rather than relying on vulnerable users.

- Heartbeat Polling: Base stations and mobile units run an automated "silent heartbeat" check every 24 to 72 hours. This polls cellular health and hardware integrity.
- Fail-to-Report Alarms: If a device fails to check in during its scheduled heartbeat slot, the Call Centre flags a mechanical disruption error code, prompting a staff follow-up.
- Manual Testing Routines: Monitored workflows mandate that users physically trigger a monthly test call. This tests the physical microphone, speaker, and casing

Monitoring Centre Disaster Recovery (DR) and Redundancy

A compliant central monitoring facility utilizes industrial disaster recovery blueprints to maintain zero downtime.

- Geo-Redundant Sites: Infrastructure relies on active mirrored facilities located in different sites. If a fire or network crash knocks out one facility, the secondary facility absorbs the entire call volume instantly.
- On-Site Survival Utility: Data hubs run dual industrial uninterrupted power supplies (UPS) coupled with automated on-site diesel generators holding up to a week of independent fuel reserves.

3. Impact to Triple Zero and Emergency Services

Research published in 2020 indicates that the MePACS personal alarm system reduces avoidable ambulance attendances by approximately 35%, helping to relieve pressure on Triple Zero. This triage-based service, supporting over 18,000 clients living alone, achieved an annual cost reduction of A$1,414,732.80.

Out of the thousands of calls processed daily, only a small fraction are pushed to emergency services, illustrating the industry's role as a massive gatekeeper. For instance, of the ~2,000 daily alarms handled by MePACS, just over 60 calls require escalation to emergency services (roughly 3%). **(Refer Appendix B – Quantifying the economic benefits of personal alarm and emergency response system in Australia: a cost analysis of the reduction in ambulance attendances)**

Collectively PERSL members are supporting more than 300,000 vulnerable Australians to help them live safe and more independent lives in a place of their choice. Australian medical alarm companies collectively manage an estimated 15,000 to 20,000 calls and alarm activations per day.[1] Out of the thousands of calls processed daily, only a small fraction is pushed to emergency services, illustrating the industry's role as a massive gatekeeper.

Without the services provided by PERSL members, Australia would face an increase in direct emergency calls, higher rates of unverified dispatches, and greater strain on ambulance resources. Vulnerable older Australians would rely instead on delayed bystander discoveries or direct Triple Zero calls during severe crises.

Impacts on Emergency Call Volume and Response:

- **Higher Triple Zero Call Volume:** Many non-lethal falls or urgent medical checks currently filtered and managed by alarm monitoring centres would route straight to Triple Zero.

- **Delayed Interventions:** Emergency services would be called only after a family member or neighbour physically finds an incapacitated person, leading to worse health outcomes.

- **Resource Strain:** Ambulance and police services would conduct more welfare checks and face higher demand for low-acuity responses.

[1] The users numbers and monitoring call volumes listed are based on estimates only

Impact on Health and Aged Care Systems:

- **Unmonitored Risks:** High-risk seniors living alone would lack an immediate trigger for help during sudden strokes or cardiac events.

- **Hospital Burdens:** Increased untreated or delayed complications from falls at home would lead to more emergency department presentations and longer hospital stays.

- **More Welfare Visits:** Home care packages would spend vital hours on daily physical check-ins rather than actual care services.

4. Broader Benefits to Clients and the Health and Care Ecosystem

Monitored Personal Emergency Response Services provide benefits extending beyond their important role in filtering and appropriately escalating calls to Triple Zero and emergency response services.

- **Reducing the Consequences of Falls and Medical Events:** Whilst Personal emergency alarms do not of themselves prevent falls or medical events, their principal benefit is reducing the likelihood that a person will remain without assistance for an extended period.

- **Supporting Independence and Choice:** Access to a monitored alarm can help people continue living safely and independently in the place of their choice. Personal alarms should therefore be recognised not only as emergency devices, but also as assistive technology supporting independence, dignity, personal choice and ageing in place.

- **Supporting Families and Carers:** Monitored alarms also provide reassurance to families, friends and informal carers. Family members and responders view personal emergency response services as valuable tools that provide **24/7 peace of mind**, reduce carer stress, and ensure fast medical assistance.

- **Supporting Care in the Community:** Personal emergency response services complement home care, disability support, rehabilitation and post-hospital discharge arrangements. Community care workers view personal emergency response services (PERS) as vital tools that promote independence, reduce family stress, and improve safety.

- **Enabling the Right Response:** A central benefit of professional monitored services is their ability to arrange a response proportionate to the circumstances. Many stakeholders emphasize the value of services staffed by

trained professionals, which helps properly triage non-urgent situations versus dispatching unnecessary ambulances.

- **Strengthening Emergency Information and Coordination:** Professional Monitoring Centres hold vital unique client information which provides responders with valuable information such as the client's identity, life dependent medications, allergies and general health conditions, location, access arrangements, emergency contacts, the time and nature of the activation and whether communication with the client was possible. Responders and paramedics value systems that pre-load vital user details—such as medical history, allergies, and lock-box or key-safe access codes—allowing them to make informed decisions and act swiftly upon arrival.

5. 8 July Outage – Impact to Clients

On behalf of our members, PERSL wishes to express our grave concerns regarding the nationwide Telstra mobile network outage on 8 July 2026, which significantly disrupted telecommunications services, including access to Triple Zero and the communications pathways relied upon by medical alarm monitoring services throughout Australia.

The incident exposed a critical gap in Australia's emergency communications framework. While considerable attention has focused on the inability of individuals to call Triple Zero directly, far less attention has been given to those who are physically unable to make an emergency call and instead depend entirely upon monitored personal emergency response systems.

For these Australians, the outage represented not merely an inconvenience, but the temporary loss of their primary means of obtaining emergency assistance.

The outage demonstrated the extent to which vulnerable Australians depend upon resilient telecommunications infrastructure.

For many elderly Australians, people living with disability and individuals managing chronic illness, a wearable emergency pendant, fall detector or emergency button is their only practical means of requesting assistance.

During the outage:

- Medical alarm activations were unable to reach monitoring centres where devices relied on the affected mobile network.
- Monitoring centres experienced significant increases in traffic from customers on unaffected networks, resulting in operational delays.
- The critical communication pathway between the client, the monitoring centre and emergency services was interrupted.
- Clients and their families experienced considerable anxiety, uncertainty and loss of confidence in services that are expected to remain available during emergencies.

The outage highlighted that the existing regulatory framework does not adequately protect people who cannot independently access Triple Zero.

6. Current Emergency Roaming Arrangements

Following previous national telecommunications outages, Australia introduced emergency "camp-on" arrangements requiring mobile phones attempting to contact Triple Zero to automatically connect to any available mobile network when their primary carrier is unavailable. These reforms represented an important improvement in public safety. However, they do not extend to monitored Personal Emergency Response Systems. Unlike an able-bodied mobile phone user, most PERS clients cannot simply pick up a telephone and dial Triple Zero. Their emergency response depends entirely upon their alarm successfully communicating with a 24-hour monitoring centre. Consequently, the current emergency roaming arrangements unintentionally exclude one of Australia's most vulnerable populations.

Restricted Domestic Roaming

Australia continues to maintain restrictions on domestic roaming between mobile network operators, largely to preserve infrastructure investment and market competition. PERSL acknowledges the importance of maintaining incentives for ongoing telecommunications investment. However, Personal Emergency Response Systems generate only minimal network traffic. These devices transmit extremely small data packets or short voice sessions solely for emergency signalling. Allowing emergency medical alarm devices to automatically connect to an alternative carrier during catastrophic network failures would have negligible impact on overall network capacity while delivering substantial public safety benefits.

PERSL believes the regulatory framework should distinguish emergency medical alarm communications from general consumer telecommunications.

Fail-safe Emergency Communications

PERSL supports the development of a national fail-safe communications framework for monitored medical alarms. Rather than introducing unrestricted domestic roaming, PERSL proposes a controlled emergency failover architecture.

Under such a model:

- telecommunications networks would continue operating independently under normal circumstances;
- when a carrier experiences a catastrophic network failure, certified approved medical alarm providers and/or devices would automatically connect to or be connected to available Australian mobile network;
- emergency communications would continue until the primary network is restored; and
- this capability would apply solely to approved Personal Emergency Response

This "break glass in case of emergency" approach preserves commercial competition while ensuring vulnerable Australians are never isolated because of a single network failure.

7. Independent Reporting and Industry Consultation

The July outage also demonstrated the need for independent reporting of impacts affecting vulnerable Australians.

Public reporting during the outage largely reflected statistics available to individual telecommunications providers. For example, Telstra reported completing welfare checks on people who were unable to contact Triple Zero. While valuable, these figures do not capture the significantly larger number of vulnerable Australians whose monitored medical alarms were unable to communicate with monitoring centres.

As Australia's largest telecommunications provider and operator of critical emergency infrastructure, Telstra possesses unique operational data. However, assessments of the broader impact on vulnerable communities should be independently coordinated by Government regulators with direct input from affected industries.

PERSL believes future investigations should include formal consultation with Personal Emergency Response Service providers to ensure that the experiences of vulnerable Australians are accurately represented.

8. Recommendations

PERSL recommends that the Review consider the following reforms:

- Recognise PERSL Medical Alarm Communications as Critical Infrastructure
- Legislate telecommunications pathways supporting monitored Personal Emergency Response Systems as protected critical health infrastructure.
- Introduce Mandatory Emergency Cross-Carrier Roaming for certified Personal Emergency Response Systems to automatically connect to any available Australian mobile network whenever their primary telecommunications provider experiences a catastrophic outage.
- Require independent regulatory reporting on the impacts of major telecommunications outages affecting vulnerable Australians, including those who rely upon monitored emergency response services.
- Include PERSL and the Personal Emergency Response Services industry as recognised stakeholders in future telecommunications resilience reviews, emergency communications reforms and ACMA investigations.

9. Conclusion

The events of 8 July 2026 exposed a significant vulnerability within Australia's emergency communications framework. For many Australians, particularly older people and those living with disability, monitored Personal Emergency Response Systems are their only practical means of accessing emergency assistance. The reliability of these services should not depend upon the uninterrupted operation of a single telecommunications provider.

PERSL believes this Review presents an important opportunity to strengthen Australia's emergency communications framework by ensuring monitored medical alarm services receive the same level of protection afforded to other critical emergency communications.

PERSL would be delighted to expand in detail upon the benefits of professional monitoring services during further engagement meetings and explain why PERSL's Monitored Personal Emergency Response Services should be recognised as an integral component of Australia's community health, aged care, disability support and emergency response ecosystem.

PERSL and its members, stand ready to work collaboratively with the Triple Zero Custodian, Government, ACMA, ACCC, telecommunications providers and emergency services to develop practical regulatory reforms that improve resilience, protect vulnerable Australians and strengthen public confidence in Australia's emergency response systems.

10. Appendix A - List of Companies registered as Members of Personal Emergency Response Services Limited (PERSL)

Company	Website Link Address
Central Monitoring Services Pty Ltd	https://centralmonitoring.com.au
Constant Companion	https://www.willoughby.nsw.gov.au/Home
INS LifeGuard	https://www.inslifeguard.com.au
OnWatch Pty Ltd	https://www.onwatch.com
Eevi Life Pty Ltd	https://www.eevi.life
Chiptech Limited	https://www.chiptech.co.nz
VitalCall (Chubb Fire & Security Pty Ltd)	https://www.vitalcall.com.au
Safety Link Pty Ltd	https://www.safetylink.org.au
Silver Chain Group Limited	https://www.silverchain.org.au
Tunstall Australasia Pty Ltd (t/a Tunstall Healthcare)	https://www.tunstallhealthcare.com.au
Vitalcare Pty Ltd	https://www.vitalcare.com.au
Smart Link (Ness Corporation Pty Ltd)	https://www.smartlink.com.au
MePACS (Bayside Health)	https://www.mepacs.com.au
Security Alarm Monitoring Service (Intelligent Monitoring Solutions Pty Ltd)	https://www.intelligentmonitoringsolutions.com.au

11. Appendix B – Quantifying the economic benefit of the personal alarm and emergency response system in Australia: a cost analysis of the reduction in ambulance attendances[2]

MePACS and ambulance attendar

https://www.researchgate.net/publication/344354146_Quantifying_the_economic_benefit_of_the_personal_alarm_and_emergency_response_system_in_Australia_a_cost_analysis_of_the_reduction_in_ambulance_attendances

[2] Published online September 2020