

HON TONY PICCOLO MP



**Government
of South Australia**

REF: MES14D0095

Hon Malcolm Turnbull MP
Minister for Communications
Parliament House
CANBERRA ACT 2600

Minister for Disabilities
Minister for Police
Minister for Correctional Services
Minister for Emergency Services
Minister for Road Safety

Level 2, 45 Pirie Street
ADELAIDE SA 5000

GPO Box 668
ADELAIDE SA 5001

Tel 08 8463 6641
Fax 08 8463 6642

ministerpiccolo@sa.gov.au

Dear Minister

Thank you for your letter received on 4 July 2014 inviting submissions and seeking support for the review of the national Triple Zero operator.

My response on behalf of the Government of South Australia is enclosed. It embraces the collective position of South Australia's Police, Ambulance and Emergency Service agencies.

I support the Review as a positive and important step to ensure this most vital of services continues to meet the needs of Australia's residents and visitors when seeking help in life threatening situations and emergencies. I also support the need to ensure the arrangements established for the service in coming years are governed and supported in a way that delivers the most effective responses to inevitable changes in technology and community expectations.

I note that your Department will be seeking to hold meetings with key stakeholders to consult on issues that have arisen during the Review's public consultation phase. I request that representatives of the South Australian Government be included in those meetings.

My contact person for any matters that arise during the course of the Review is Mr Cliff Grantham, who can be contacted on (08) 8463 6691.

I wish you well with the remainder of the Review.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'TP' with a flourish.

Hon Tony Piccolo MP
Minister for Emergency Services

10/9/2014

Cc Mr David Place, Chief Executive, SA Fire and Emergency Service Commission
Mr Rick Persse, Chief Executive, Attorney-General's Department (SA)

Submission on behalf of the South Australian Government

Review of the National Triple Zero Operator

The Review's Discussion Paper and terms of reference reflect input from earlier consultation with emergency service organisations (ESOs) across Australia, in particular:

- the National Emergency Communications Working Group (NECWG), which includes representatives of South Australia's Police, Ambulance and Emergency Services; and
- work being led by the New South Wales Police Force on NECWG's behalf to develop a Triple Zero policy, framework and standards to address current and future community expectations; including its recently completed 'Next Generation Triple Zero Strategy Proposal (the 'NG000 Strategy').

The Review is reasonably balanced and inclusive of most of what should be addressed when considering the Triple Zero service and its future; and we support the majority of the actions proposed in the NG000 Strategy.

However, given its callers critical reliance on Triple Zero, when it matters most, it is essential that consideration of any material changes to the service and/or its arrangements be undertaken within and driven by an overarching framework, comprising amongst other things:

A. First order principles

Acknowledging the importance of the Triple Zero service and that its success fundamentally relies on adhering to first order principles such as:

- a. Citizens and visitors (i.e. potential callers) need to be aware of the purpose of the Triple Zero service and the best way to connect to it, i.e. by calling 000.
- b. Callers need to get through to the Triple Zero service, and then be transferred to the right ESO, as quickly as is realistically possible.
- c. ESOs need to be provided or have ready access to the information necessary to help determine the nature, risk and priority of the emergency (and the best possible response to it).
- d. ESOs need to be able to quickly and accurately determine the actual location of the emergency (and how responding crews access it).
- e. Everyone has a personal responsibility to call Triple Zero only when they believe there is a genuine need for urgent assistance from police, fire or ambulance services in life-threatening or time-critical emergencies. They need to be aware that inappropriate or

mischievous calls to Triple Zero can pose a direct risk to the lives and safety of others.

The Triple Zero service, including the way it is implemented, managed, operated and accessed needs to be:

- cohesive, uniform and resilient across Australia;
- driven and prioritised by evidenced-based assessments that are inclusive of all potential benefits and risks to the performance of the service and expected community needs; and
- realistically achievable and affordable.

B. Cohesive and representative governance

Establishing a multi-jurisdictional body to provide overarching governance of ESO and community needs and expectations with respect to the Triple Zero service (including its operation and any changes made to it). It is important that:

- a. membership of that body includes senior representatives of the Commonwealth, States and Territories; and
- b. the body is provided sufficient authority, resources and responsibility to make and inform and/or influence decisions that are likely to materially affect the Triple Zero service and its arrangements.

It is proposed the scope and terms of reference of the body include, but not be limited to:

- c. Ensuring decisions on the priority of Triple Zero investments, initiatives and changes adhere to the principles described above and that they are evidenced-based.
- d. Ensuring those decisions take into account potential consequential benefits, risks and costs that may arise with the provision of other emergency and essential services provided by ESOs, in particular, where interdependencies between those services and the Triple Zero service are evident, for example:
 - Police and State Emergency Service assistance lines and bushfire hotlines;
 - the emergency response (dispatch) management systems and centres established in each State and Territory; and
 - the use of Emergency Alert and social media (Twitter and Facebook) to disseminate information to the community

during a crisis, i.e. where these can act to reduce inappropriate calls to Triple Zero.

- e. Determining the estimated total cost of potential or proposed changes to the Triple Zero service, including the consequential costs those changes may impose on the Commonwealth, States and Territories.
- f. Reviewing and recommending equitable and transparent funding arrangements to sustain the Triple Zero service and to meet the total cost of any changes to it.

Early agreement and the introduction of an overarching framework will be a vital and positive contributor to the Review's success and the future of the Triple Zero service.

The following options and risks are provided in the context of the principles and governance framework. It is proposed they be pursued as a high priority during the remainder of the Review.

Options

1. Callers getting through

Reduce Call Demand – by reducing the significant percentage of calls to Triple Zero that are not related to life-threatening or time-critical emergencies.

The Triple Zero operator (Telstra) indicates that up to 35 per cent of all calls to Triple Zero fall into this category and are not passed on to ESOs. Indications are that an even higher percentage of the remaining calls, that transferred to ESOs by Telstra, fall into the same category.

This presents a very real opportunity to reduce call congestion/delays during periods of peak demand. Options to consider include:

- Use of Interactive Voice Recording (IVR) systems to remind or divert calls that are not life-threatening or time-critical;
- More extensive or innovative public Triple Zero awareness/education programs; and
- Introduce disincentives, even penalties, e.g. for inappropriate calls from serial/repeat callers

SMS-to-Triple Zero – a potentially more viable, achievable and effective 'new' channel to the Triple Zero service. A recent consumer research project indicates substantial consumer acceptance and potential demand. However, some risks/uncertainty if ESOs are unable to question the caller about the nature or location of the incident.

VoIP Standards – introduce legislation to require all providers of Voice over Internet Protocol (VoIP) technology or services in Australia to provide access to Triple Zero

2. Information to ESOs

Images (including video) – if this capability could be provided to ESOs by Triple Zero callers it may provide more accurate and reliable information about the emergency and the response required. There is some potential this may be achievable and affordable, in relative terms, using currently available technologies such as smart phones and tablets. However, it is highly likely it would result in significant costs to change systems and infrastructure currently relied on by the Triple Zero operator and ESOs.

3. Location Confirmation

Requires mobile providers to configure minimal data capability in SIMS and mobile phone firmware, i.e. to transmit Geo-Coordinates with all Triple Zero calls allowing much quicker and certain confirmation of the location of an emergency.

To a degree, this capability probably already exists within the telecoms industry (and where issues regarding privacy should be able to be dealt with relatively easily/affordably). However, it would be limited to mobile phones (smart phones) that have GPS capability and will result in some additional, potentially significant, costs for ESO and operator systems and infrastructure changes.

Risks

Social Media & Smart Technology – there is a high risk that the attractiveness and/or popularity of new and innovative technology results in too much emphasis and funding being directed to these aspects of the Triple Zero Review, rather than to the more fundamental aspects of what the Triple Zero should to achieve and what it needs to do so.

This is a particular risk with respect to social media (Facebook and Twitter) where the lack of enforceable standards is highly likely to remain the case for the foreseeable future. Nevertheless, these options/opportunities need to be explored, but not at the expense of the Triple Zero fundamentals.

Cost pressures – there is a high risk of significant consequential cost pressures on ESOs (States and Territories) as a result of:

- the need to integrate new technologies and Triple Zero ‘channels’ into the system environments supporting their emergency communications centres; and
- increases in the cost of the national Triple Zero service and/or changes to current Triple Zero funding arrangements.

Early, high priority needs to be given to:

- estimating the total cost of potential or proposed changes to the national Triple Zero service, including the consequential costs those changes may impose on the Commonwealth, States/Territories; and
- reviewing and recommending equitable and transparent funding arrangements to sustain the Triple Zero service and to meet the total cost of any changes made to it.

Competitive tender; Charges – there is a high risk that the competitive tender, seeking proposals to provide Triple Zero operator services, will result in significantly higher operator charges/costs because the service may not be seen as an attractive commercial proposition by potential bidders.

Note that this refers to a potential increase in what it may cost to, in effect, maintain the existing scope and level of Triple Zero services only.

Competitive tender; Performance – there is moderate to high risk that the competitive tender will result in diminished service standards, reliability and continuity because the tender results in multiple providers of separate components of the Triple Zero service. Commercial and practical assurances that the performance and 24x7 availability of the Triple Zero service need to be key determining requirements of the tender outcome.