

Family and Domestic Violence Policy

Purpose

This policy outlines how Greater Western Water (GWW) employees and contractors support residential and small business customers, experiencing or affected by family and domestic violence.

GWW condemns the perpetration of family and domestic violence in all its forms and recognises the short and long-term significant impacts family and domestic violence has on all victim survivors, their families and society.

GWW understands the unique role essential services can have in supporting victim survivors of family and domestic violence and is committed to supporting our customers affected by family and domestic violence. This is aligned with our values.

This policy informs our decisions and actions when supporting customers experiencing or affected by family and domestic violence, and ensure we meet the obligations outlined in the Essential Services Commission Water Industry Standard - Urban Customer Service and Rural Customer Service Version 3, incorporating amendments as at 1 April 2024 (Water Industry Standards).

This policy applies to customers who are identified as experiencing or affected by family and domestic violence. They may be identified by themselves, by GWW or an independent financial counsellor or case worker or by another professional acting on behalf of and with the consent of the customer. We are also aware that any of our customers could be affected by family and domestic violence and they may not want to be identified and may be supported differently.

Objectives

The objective of this policy is to support our people to provide sensitive and appropriate services to customers who are experiencing or are affected by family and domestic violence. Through this policy, we commit to supporting our people to provide specialised, tailored services to customers who need support, we build trust amongst our community, and we bring our vision of 'thriving people' to life.

In meeting our objectives for Customer Experience, GWW supports our vision and strategic objectives:

- Our vision is for thriving people and Country.¹

¹ *GWW 2030 Corporate Strategy*

- Improving customer experience by understanding what matters most to our customers and communities. We will continue to:
 - implement our Community Engagement Framework to ensure customer and community voice is heard and used in decision making
 - support customers experiencing payment difficulties in the face of cost of living pressures
 - improve our customer service to ensure customers feel supported raising issues and are confident in our ability to resolve them.

Commitment

To achieve our vision when supporting customers experiencing or affected by family and domestic violence, we commit to the following:

- We will provide personalised assistance to victim survivors of family and domestic violence who are experiencing or are affected by financial difficulties, either short or long-term.

We understand that sometimes things do not go to plan and unexpected expenses and household pressures require some adjustments to household budgets. Customers might be experiencing difficulties for various reasons and under different circumstances. This means their needs, and the way GWW can help, will be considered when discussing support options.

- We are here to help and have specialised supports available, so when it is safe to do so, we recommend that customers contact us early so we can work together to determine the best supports for their situation.
- In cases where family violence is identified or disclosed, we will refer the customer directly to our Community and Care team for specialised support. All of their details and information will be kept strictly confidential.

To achieve our strategic objectives, we commit to the following:

- We recognise that victim survivors of family and domestic violence experience a broad range of behaviour that is not limited to physical violence. This can often include economic and emotional abuse and will require varying supports depending on individual circumstances.
- We will offer a customer who advises GWW that they are affected by family and domestic violence the opportunity to have their account managed by our Customer Support Program. This will provide a case management approach and continuity of service so customers won't need to repeatedly disclose their

circumstances.

- We will proactively identify customers who may be affected by family and domestic violence to introduce them to our Community and Care team for support.
- We note that family and domestic violence affects people of different genders and we acknowledge that the probability of violence against women is higher and becomes compounded when intersected with other forms of inequality and discrimination, including race, age, First Nations and disability.
- We will provide a careful and sensitive response, in consultation with the victim survivor, to achieve the best outcomes for their individual circumstances.
- We will empower customers, with our support, to manage financial impacts, security of their data and we will provide future account management that aims to meet their needs and supports them to move forward.
- We will provide a safe environment for customers to access relevant information and support.
- We will take the following actions and approaches, assessed on a case-by-case basis with sensitivity and respect, when supporting those who are experiencing difficulties:
 - promote the agency of the customer and family members at risk by considering their wishes and plan for the safety of all family members
 - apply a flag to the customer account to further protect their privacy by:
 - masking all personal information so only the team managing the Customer Support Program can see the detail
 - alerting other GWW employees to transfer any calls or enquiries to the case managers who are trained to effectively manage perpetrator interactions, ensuring the privacy, safety and confidentiality of customers experiencing family and domestic violence are protected
 - enabling additional security measures for joint accounts when perpetrators still require some access to the account
 - provide access to the full range of financial supports offered through the Customer Support Policy², considering the customer's situation and capacity to pay, which may include:
 - flexible payment arrangements, grants, debt waivers or deferment, referral to Utility Relief Grant Scheme or concessions

² Refer to the Customer Support Policy for the full range of financial supports.

- exemption from further recovery action or restriction of supply, including waiving any prior interest accrued on outstanding amounts, exemption from further accrual of interest, waiving or suspending late fees and suspending the sale of debt
- applying the full range of financial supports on joint accounts with additional protection to protect confidentiality of the customer from other persons on the account
- provide a support directory on the GWW website listing government assistance programs, no-cost independent financial counsellors, and specialist family and domestic violence services as well as more targeted referral via case management in the Customer Support Program to appropriate support services, for example for:
 - Aboriginal and Torres Strait Islander people
 - LGBTIQA+ communities
 - women with disability
 - older women
 - culturally and linguistically diverse communities
- maintain customer privacy and confidentiality in line with our Privacy Policy to ensure secure handling of customer information. The Customer Support Program's secure flag provides additional safety measures to protect against perpetrator access to personal information
- provide information on how to reduce water use, improve water efficiency and referral to relevant government water efficiency programs
- support all employees and contractors working with customers who may be affected by family and domestic violence to deal compassionately and sensitively with customers, through:
 - induction and regular in-service training, with supporting processes to build and maintain the required knowledge
 - ensuring employees can identify and respond appropriately to customers affected by family and domestic violence by applying our full suite of policies and procedures, and can adapt them for different genders, abilities, ages, sexual orientations, cultural backgrounds or for First nations people
 - access to supervision or counselling to support employees in their roles when working with customers who are impacted by family and domestic violence.
- While GWW strives to provide exceptional customer service, we understand that some customers may not be satisfied. Our Complaints Resolution Policy outlines our commitment to addressing complaints fairly, promptly and professionally. Customers have the right to lodge a complaint with the Energy

and Water Ombudsman Victoria or other dispute resolution forum if they are not satisfied.

Definitions

<p>Family violence as defined under the Family Violence Protection Act 2008 (Vic)</p>	<p>Family violence is defined under the <i>Family Violence Protection Act 2008 (Vic)</i> as:</p> <p>(a) behaviour by a person towards a family member of that person if that behaviour:</p> <ul style="list-style-type: none"> (i) is physically or sexually abusive; or (ii) is emotionally or psychologically abusive; or (iii) is economically abusive; or (iv) is threatening; or (v) is coercive; or (vi) in any other way controls or dominates the family member and causes that family member to feel fear for the safety or wellbeing of that family member or another person; or <p>(b) behaviour by a person that causes a child to hear or witness, or otherwise be exposed to the effects of, behaviour referred to in the paragraph a.</p>
<p>Family violence</p>	<p>Family and domestic violence is recognised as any behaviour that occurs in family, domestic or intimate relationships that is physically or sexually abusive; emotionally or psychologically abusive; economically abusive; threatening or coercive; or is in any other way controlling and causes a person to live in fear for their safety or wellbeing, or that of another person.</p> <p>This definition includes violence within a broader family context, such as extended families, kinship networks and ‘family-like’ relationships which can include a paid or unpaid carer for people with disabilities; families of choice for LGBTIQ+ people; and cultural kinship networks.</p> <p>In relation to children, family violence is defined as behaviour by any person that causes a child to hear or witness or otherwise be exposed to the effects of the above behaviour.</p> <p>Family violence involves patterns of coercive, controlling, and abusive behaviours by the perpetrator and makes the victim survivor fear for their own or someone else’s safety and wellbeing. Family violence can take many forms, none of which are mutually exclusive. It can include physical, sexual, psychological, emotional, and spiritual violence, and financial/economic abuse and control. It can also</p>

	include exposing a child to the effects of family violence, such as through hearing, witnessing or otherwise living with violence at home.
Aboriginal definition of family violence	The Victorian Indigenous Family Violence TaskForce defined family violence against Aboriginal people as “an issue focused on a wide range of physical, emotional, sexual, social, spiritual, cultural, psychological and economic abuses that occur within families, intimate relationships, extended families, kinship networks and communities ... it extends to one on- one fighting, abuse of Indigenous community workers as well as self-harm, injury and suicide”. This definition acknowledges the spiritual and cultural perpetration of family violence by non-Aboriginal people against Aboriginal partners, children, young people and extended family members, abuse of Elders, and lateral violence within Aboriginal communities.
Economic abuse	A form of domestic and family violence that involves a pattern of behaviour that controls a person’s ability to acquire, use and maintain economic resources, in a way that threatens their economic security and potential for self-sufficiency. ⁱ
Family member	May include current and former spouses or domestic partners, people who have or had an intimate personal relationship with the relevant person (sexual or otherwise), relatives (including children) and significant others who are not part of the physical household but are part of the family and/or fulfilling the function of family. This may include a person related according to Aboriginal and/or Torres Strait Islander kinship roles.
Family of choice	A family that someone is emotionally, socially or culturally connected to, who shares commonalities, mutual love and support. Chosen family is particularly relevant to members of the Stolen Generations who may have lost contact with families of origin, and/or people from LGBTIQ+ communities who may be estranged from members of their family of origin (someone biologically or legally connected). It is important to be mindful_of this definition of family for some people and that violence can occur within these relationships.

Disclosure	May include someone sharing personal or sensitive information in any manner pertaining to themselves or others with or without permission of the people affected.
Victim survivor	The person against whom a perpetrator directs their coercive and violent acts.
Perpetrator/person using violence	The person who carries out a pattern of coercive tactics against an intimate partner, spouse or family member (the victim).
Domestic violence	Acts of violence that occur in domestic settings between two people who are, or were, in an intimate relationship.

Framework and implementation

This policy is implemented through our annual business planning cycle, which monitors our policies and identifies areas for action, resourcing requirements and timeframes for delivery. It guides our Residential Customer Charter 2021-2024, Customer Support Program, Customer Experience employee behaviours and related management processes.

All Customer Experience employees will be trained in the Family and Domestic Violence Policy and related processes during induction, supplemented by refresher training and coaching to ensure customers are treated with sensitivity and respect.

The policy is published on the GWW website and every effort will be made to provide resources in different languages. A copy can be emailed or posted to our customers on request.

Roles and responsibilities

The GWW Board is responsible for overseeing implementation of this policy.

The Executive Leadership Team is responsible for incorporating our responsibilities under this policy into our business planning activities.

The General Manager of Customer Experience is responsible for directing, reviewing, and reporting on the implementation and ongoing management of the Family and Domestic Violence Policy for our customers.

Managers and Team Leaders are responsible for ensuring customer facing employees are trained in the Family and Domestic Violence Policy (including related programs) and can sensitively engage with customers.

All employees are responsible for complying with relevant GWW policies, guidelines and processes related to this policy for developing an understanding of how their work functions are affected by this policy.

References and related documents

Other relevant GWW Policies, Procedures and Guidelines include:

Ending family violence – Victoria’s 10-year plan for change

Essential Services Commission Water Industry Standard - Urban Customer Service and Rural Customer Service Version 3 incorporating amendments as at 1 April 2024

Essential Services Commission Amendment to the Water Industry Standards: Final decision 20 February 2024

The Residential Customer Charter 2021 -2024

POL-1007604	Customer Support Policy
POL-1005465	Information Security Policy
POL-18	Privacy Policy
POL-1005431	Complaints Resolution Policy
POL-44	Social Policy
POL-20	Risk Management Policy

Review process

The policy will be reviewed annually or more frequently as required.

Approved by the Executive Leadership Team (ELT) on 05 April 2024
Next due for review by the ELT in April 2025

Version control

Version Number <i>Vx-0</i>	Document Owner's Position Title <i>Insert Document Owner's Position Title</i>	Purpose/Change <i>Outline purpose of the change or summary of changes in 1-2 lines. You can also mention section names or numbers that have changed</i>	Date <i>DD/MM/YYYY</i>
1	Customer Assist Manager	Create separate Family Violence policy for employees	August 2023
2	Customer Assist Manager	External review by Safe & Equal	April 2024

ⁱ <https://cwes.org.au/what-is-economic-abuse/>