

Family Violence Policy - Victoria

Effective Date	31 March 2025
Version	1.3
Company	Real Utilities Pty Ltd

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1. Policy Statement

- 1.1. Our organisation recognises that family violence is a serious and widespread issue that affects the whole community.
- 1.2. We are committed to providing customers (including current and past customers and those within embedded networks) affected by family violence with confidential support and flexible payment arrangements to help manage their needs.
- 1.3. This Policy, including any variations to this policy, come into effect as soon as practicable following the issue of our licence. This Policy will be reviewed at least every 12 months to ensure it remains effective.
- 1.4. We have a number of resources set out in this Policy.

For immediate support, you can contact 1800 RESPECT on 1800 737 732. This is the National Sexual Assault, Domestic Violence Counselling Service 24-hour helpline.

If you require urgent help from the police, fire, or ambulance, call 000.

2. Purpose

- 2.1. Our objective as an energy retailer is to reduce the risk of harm to our customers who are experiencing or who have experienced family violence. We do this by:
 - 2.1.1. Designing our systems and processes in a way that reduces the risk of harm;
 - 2.1.2. Reducing the barriers to customers who are seeking help, assistance or information under this Policy;
 - 2.1.3. Adopting the measures set out in this Policy; and
 - 2.1.4. Demonstrating our commitment to support customers at all levels within our business, including from senior leadership.
- 2.2. The purpose of this policy is to:
 - 2.2.1. Reduce the risk of harm to our customers experiencing family violence;
 - 2.2.2. Provide safe, flexible and confidential support for customers affected by family violence; and
 - 2.2.3. Demonstrate our commitment to addressing family violence at all levels of our business.

3. Publication and access

- 3.1. We can send you a copy of this policy if you would like us to. We will make sure this policy is easy to find on our website so that you can print it or read it online.
- 3.2. We recognise that there are many forms of family violence. Family violence is 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, that causes a person to live in fear for their safety or wellbeing or that of another person. Family violence

is also 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.

4. Scope

- 4.1. This policy applies to all current and former residential and small business customers, as well as customers in embedded networks who are impacted by family violence.

5. Your Rights

- 5.1. Our customers who are impacted by family violence have the following rights:
 - a. Receive support from our employees in a respectful and supportive manner.
 - b. Have your personal information handled securely, privately, and sensitively.
 - c. Choose a safe method of communication of your preference. We offer a variety of communication channels, such as email, phone, and secure messaging, to suit different needs and comfort levels.
 - d. Access information about external family violence support services. We will maintain an updated list of external family violence support services and make it easily accessible through various platforms.
 - e. Appoint an authorised representative or a support person to act on your behalf. We will implement a secure verification process for authorized representatives to ensure they are legitimate.
 - f. Remove the joint account holders and, if needed, set up a new account in your name (if required). We will implement a simplified, expedited process for removing joint account holders and setting up new accounts.
 - g. Receive payment assistance support, including access to the assistance under our hardship policy. We won't charge you anything to change details on your account.
 - h. Avoid the need to repeatedly disclose your circumstances and receive continuity of service. If you are comfortable with us doing so, we will assign you a dedicated contact and backup contact within our organisation. You can request a change to who your contacts are at any time.
 - i. Account security options: we will implement additional account security measures as set out below. These are designed to keep your account safe.

6. What we will do

- 6.1. We provide all staff with thorough training in awareness of family violence.
- 6.2. training is provided to every person (including employees, agents and contractors) acting on our behalf who may engage with affected customers, managers of any person who may engage with affected customers and anyone responsible for systems and processes that guide interactions with small customers.
- 6.3. The purpose of the training we provide is to ensure that we comply with this policy and our obligations under relevant law and to ensure that our customers are adequately supported and protected.

- 6.4. Training will cover the nature and consequences of family violence, the application of this policy, how to identify affected customers and how to engage appropriately and effectively with affected customers.
- 6.5. We have systems and controls in place to effectively identify customers experiencing family violence and also internal processes to avoid an affected customer from having to repeat their situation during subsequent interactions providing for effective ongoing engagement.
- 6.6. We will manage all engagement with affected customers in a respectful, understanding, and sensitive manner.
- 6.7. We will handle information pertaining to customers affected by family violence securely and confidentially.
- 6.8. We will ensure that customer consent is obtained before disclosing their personal information to a third party (unless required under law).
- 6.9. We will contact emergency services (police and/or ambulance) on request by the customer or if they believe further assistance is needed.
- 6.10. We will discuss a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children.
- 6.11. We will provide information regarding government support programs, including concessions and the availability of external family violence support services (see below)

7. How we secure your account

- 7.1. Our organisation takes our obligations regarding all of our customer's personal information seriously and we manage this in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. A copy of our privacy policy is available [here](#).
- 7.2. We take various steps to secure your data including:
 - j. restricting access to your accounts,
 - k. customer defined account security,
 - l. data masking and redaction, and
 - m. de-identifying correspondence.
- 7.3. These measures are applied based on your preferences or our assessment of your needs.
- 7.4. In accordance with section 150(1) of the Energy Retail Code of Practice (ERCoP), Real Utilities must not disclose or provide access to confidential information about an affected customer to any other person without the consent of the affected customer. Your personal information will be securely handled and will remain confidential. We will not disclose your confidential information to any other person without your prior consent.
- 7.5. In accordance with section 160(2)(c) of the ERCoP, where an affected customer has made a complaint or referred a dispute to the energy ombudsman in relation to the provision of family violence assistance by Real Utilities, we will maintain records relating to our compliance with these obligations. These records will be maintained:

- n. for at least two years,
 - o. for at least as long as you continue to receive assistance from us, or
 - p. as long as there are any unresolved complaints or disputes,
- whichever is the longer period.

8. What we will do about debts

- 8.1. Our organisation recognises family violence as a potential cause of financial hardship or payment difficulty. We will consider each customer's individual circumstances to find a suitable solution specific to the customer's needs and offer support in accordance with our hardship policy here. This will include:
 - a. the potential impact of debt recovery action at that time on the affected customer; and
 - b. whether other persons are jointly or severally responsible for the energy usage that may have resulted in the accumulation of any arrears.
- 8.2. We will not ask for a security deposit from any customer who has or is experiencing family violence.
- 8.3. Regardless of whether or not you are in hardship, the support that we offer may include:
 - a. Flexible payment arrangements.
 - b. Reviewing your energy plan and placing you on a more suitable plan.
 - c. Waiving or suspending the debt.
 - d. stopping the collections cycle to ensure that your premise is not de-energized for an overdue bill.

9. What support is available

- 9.1. You can access support by contacting:
 - a. our customer service department through various channels such as phone, email.
 - b. an independent financial counsellor, case worker or an external family violence support services to access resources and support.
- 9.2. In accordance with section 150(4)(a) of the ERCoP, we will take reasonable steps to elicit the affected customer's preferred method of communication and offer alternative methods of communication if the affected customer's preferred method of communication is not practicable. Alternative methods may include SMS, Email, or by Phone. We will keep a record of the ways in which we will communicate with you.

10. Supporting Documentation

- 10.1. We will never request you or a third party acting on your behalf to provide specific documentation or evidence before providing you with support under this policy or the Rules.
- 10.2. We will only ask for documented evidence of family violence when permitted to do so in considering actions pertaining to debt management, recovery under Clause 152 of the ERCoP, or in assessing restrictions on disconnection as outlined in Part 10 of the ERCoP and in accordance with the provisions

of the Electricity Industry Act or Gas Industry Act. Our request for documented evidence must be guided by the understanding of the potential impact of debt recovery on the affected customer, especially in the context of family violence, and will always be strictly limited to what is reasonably necessary for the purposes of evaluating the customer's debt management situation and any decisions related to disconnection. We will ensure that our actions are sensitive to the circumstances of the affected customer, respecting their privacy and dignity, while complying with the regulatory framework.

11. External Support

- 11.1. In accordance to section 154(1) of the ERCoP, Real Utilities must provide an affected customer with information about the availability of one or more external family violence support services at a time and in a manner that is safe, respectful and appropriate. We will advise you of external support services, including access to a free interpreter service (telephone 13 14 50), and will do so at a time and manner that considers the affected customer's circumstances.
- 11.2. We will also maintain a list of external support services that are published on our website.
- 11.3. We will keep this information up-to-date, ensuring that customers affected by family violence can easily access this assistance.

12. If you have a complaint, question, or feedback

- 12.1. At any time, if you have concerns about your well-being or need support with your energy account, please do not hesitate to contact us. You can reach us via email at support@realutilities.com.au or by phone at 1300 16 16 68.
- 12.2. We take all your concerns and complaints seriously and will handle them in accordance with our Complaints Policy [here](#).
- 12.3. We welcome feedback on this policy. If you have feedback on this policy please do not hesitate to contact us.
- 12.4. If you are not satisfied with the outcome of our investigation, you can also contact the state-specific Ombudsman for further assistance.
- 12.5. See below a list of state specific energy ombudsman contact details.

Ombudsman	Contact no.	Website
Energy and Water Ombudsman (VIC)	1800 500 509	www.ewov.com.au
Energy and Water Ombudsman (SA)	1800 665 565	www.ewosa.com.au
Energy and Water Ombudsman (NSW)	1800 246 545	www.ewon.com.au

Energy and Water Ombudsman (QLD)	1800 662 837	www.ewoq.com.au
Civil and Administrative Tribunal (ACT)	02 6205 4855	www.acat.act.gov.au

13. What external support is available

- 13.1. We will advise you of external support services, including access to a free interpreter service. (see above)
- 13.2. We will also maintain a list of external support services that are published on our website (see below).
- 13.3. We will keep this information up to date, ensuring that customers affected by family violence can easily access this assistance.
- 13.4. If you or someone you know is experiencing sexual abuse or family violence contact:

External support services	Contact number
National Sexual Assault, Domestic Violence Counselling Service 24-hour helpline	1800 RESPECT on 1800 737 732
24-hour Emergency Accommodation helpline	1800 800 588
Safe Steps (Victoria)	1800 015 188
Sexual Assault Crisis Line (Victoria)	1800 806 292
Safe At Home helpline	1800 633 937
National Violence and Abuse Trauma Counselling and Recovery Service	1800 FULLSTOP (1800 385 578)
SHE (free and confidential counselling and support)	6278 9090
Sexual Assault Support Services on 6231 1811, or after hours	6231 1817
Family Violence Crisis and Support Service	1800 608 122
Bravehearts – Sexual Assault Support for Children	1800 BRAVE 1
Kids Helpline is for young people aged 5 to 25	1800 551 800

Men's Referral Service	1300 766 491
Don't Become That Man helpline	1300 243 413