

Family and Domestic Violence Policy

April 2025



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 affected by family violence with confidential support and flexible payment arrangements to help manage their needs. The safety of affected customers is our primary concern in all our interactions and service delivery.
- 1.3. We are committed to making sure that this policy remains effective, up to date, and aligned with best practice. We will review this policy at least once every 12 months, or sooner if there are significant changes to legislation, regulatory guidelines, or customer needs.
- 1.4. To support continuous improvement, we will:
 - a. Collect internal data on the application of this policy (e.g. number of customers supported, referrals made, staff training completed)
 - b. Monitor feedback from affected customers and staff involved in delivering this policy
 - c. Conduct internal audits of our systems and procedures to ensure they are fit for purpose
 - d. Use this information to evaluate the effectiveness of the policy and identify any areas for improvement
- 1.5. The outcomes of these evaluations will inform future training, process updates, and refinements to this policy.
- 1.6. 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:
 - a. Designing our systems and processes in a way that reduces the risk of harm;
 - b. Reducing the barriers to customers who are seeking help, assistance or information under this Policy;
 - c. Adopting the measures set out in this Policy; and
 - d. 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:
 - a. Reduce the risk of harm to our customers experiencing family violence;
 - b. Provide safe, flexible and confidential support for customers affected by family violence; and

- c. Demonstrate our commitment to addressing family violence at all levels of our business.
- 2.3. This policy applies to both current and former small customers of ASENO who may be affected by family violence.

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 with a quick exit feature to ensure safe browsing. This policy is also available in large font, Easy English, screen-reader compatible formats, and can be translated into other languages if needed. Just let us know if you would like the policy in a different format or language.
- 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 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 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.
 - e. Appoint an authorised representative or a support person to act on your behalf. We will implement a secure verification process for authorised 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.
- 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 will implement a robust and meaningful intersectional approach to our customer relationships which will include induction training, workplace resources, refresher training, and collecting client and staff feedback with the aim of continually improving.
- 6.2. 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.
- 6.3. We will manage all engagement with affected customers in a respectful, understanding, and sensitive manner.
- 6.4. We will handle information pertaining to customers affected by family violence securely and confidentially and restrict staff access to sensitive information.
- 6.5. We will ensure that customer consent is obtained before disclosing their personal information to a third party (unless required under law).
- 6.6. We will contact emergency services (police and/or ambulance) on request by the customer or if they believe further assistance is needed.
- 6.7. We will take your specific circumstances into account and discuss a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children
- 6.8. We will provide information regarding government support programs, including concessions and the availability of external family violence support services (see below)

7. Training

- 7.1. Ongoing 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 also anyone responsible for systems and processes that guide interactions with small customers.
- 7.2. 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.
- 7.3. Training will cover:

- a. the nature and consequences of family violence;
- b. the application of this policy;
- c. how to identify affected customers using the 'Recognise, Respond, Refer' model;
- d. how to engage appropriately and effectively with affected customers, including when there is no direct disclosure of family violence;
- e. the impact of intersectionality, and how factors such as culture, gender, disability, language, and financial dependence may shape a customer's experience of family violence:
- f. how staff who are not family violence specialists can engage safely and respectfully;
- g. available referral pathways to specialist support services; and
- h. the importance of a flexible, customer-centred approach, including the use of non-judgemental and non-victim blaming language in all communications
- 7.4. Training materials will be reviewed and updated at least once a year to ensure they remain current and effective. Feedback from customers will be considered and incorporated where relevant to improve the training content and delivery.

8. How we secure your account

- 8.1. 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.
- 8.2. We take various steps to secure your data including:
 - a. Restricting access to your accounts,
 - b. customer defined account security,
 - c. data masking and redaction, and
 - d. de-identifying correspondence.
- 8.3. These measures are applied based on your preferences or our assessment of your needs.
- 8.4. Once identified as being affected by family violence, your customer record will be flagged in our system to ensure you receive the protections under this policy. Your personal information will be stored securely and will only be accessible by staff who need it to support you. The flag will remain in place until you ask us to remove it. We will not disclose your confidential information to any other person without your prior consent or where we are required to do so by law.
- 8.5. Our organisation will maintain records relating to our compliance with our obligations under the law relating to retailers and family violence. These records will be maintained for at least two years, for as long as you continue to receive assistance from us, or as long as there are any unresolved disputes.

9. What we will do about debts

- 9.1. Our organisation recognises family violence as a potential cause of financial hardship or payment difficulty. Before taking action to recover arrears from an affected customer or transferring affected customer debt to a third party debt collector, we will consider each customer's individual circumstances and take into account the potential impact of debt recovery action at that time on the affected customer. We will aim to find a suitable solution specific to the customer's needs and offer support in accordance with our hardship policy Customer Hardship Policy. This will include whether other persons are jointly or severally responsible for the energy usage that may have resulted in the accumulation of any arrears. Prior to arranging for disconnection of electricity to your premises we will ensure that we take into account the potential impact on you considering your circumstances and any other parties that may be involved in the non-payment of any debt.
- 9.2. We will not ask for a security deposit from any customer who has or is experiencing family violence and we will waive late fees associated with late payment of a bill
- 9.3. 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.

10. Centrepay

- 10.1. You may request that we accept payment using Centrepay as a payment option.
- 10.2. If you are on a standard retail contract, we must accept Centrepay as a payment option.
- 10.3. If you are on a market retail contract, and if Centrepay is available as a payment option, we must allow you to use Centrepay as a payment option.
- 10.4. If you are on a market retail contract and Centrepay is not available as a payment option, we must review the market retail contract.
- 10.5. If as a result of the review an alternative contract that allows Centerpay as a payment option is considered to be more appropriate, we must transfer you to that contract where you give us your explicit informed consent to do so.
- 10.6. If as a result of the review, there is no appropriate alternative contract that allows Centrepay as a payment option, we must make Centrepay available as a payment option under your existing contract.
- 10.7. We won't charge you for the review, for switching contracts, or for ending your old contract early.

11. What support is available

- 11.1. You can access support by contacting:
 - a. our customer service department through various channels such as phone, email, or in-person visit.
 - b. an independent financial counsellor, case worker or an external family violence support services to access resources and support.
- 11.2. We will ensure that we ask your preferred method of communication and will clearly record this on your account. We will communicate with you via this method of communication or,if your preferred method of communication is not practicable, you may communicate with us via SMS, WhatsApp, Messenger, Email, or by Phone. We will keep a record of the ways in which we will communicate with you.
- 11.3. To further safeguard affected customers:
 - We will disable automated communications such as texts, emails or letters, to prevent messages being inadvertently sent to a perpetrator.
 - All communications be manually reviewed before they are sent to ensure they are delivered using your preferred communication method.
 - c. We will ensure that no communication is sent to a previous address if you have provided us with a new one.

12. Supporting Documentation

- 12.1. 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.
- 12.2. We will only ask for documented evidence of family violence in limited circumstances and where we are expressly permitted to do so under the law. Any evidence sought will be limited to that which is reasonably required under the relevant law.

13. External Support

- 13.1. We will advise you of external support services, including access to a free interpreter service through us on 1300 027 366.
- 13.2. We will also maintain a list of external support services that are published on our website.
- 13.3. We will keep this information up-to-date, ensuring that customers affected by family violence can easily access this assistance.

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

14.1. 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 info@aseno.com.au or by phone at 1300 027 366.

- 14.2. We take all your concerns and complaints seriously and will handle them in accordance with our Complaints and Dispute Resolution Policy <u>available here</u>.
- 14.3. We welcome feedback on this policy. If you have feedback on this policy please do not hesitate to contact us.
- 14.4. If you are not satisfied with the outcome of our investigation, you can also contact the statespecific Ombudsman for further assistance.
- 14.5. 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
Energy and Water Ombudsman (TAS)	1800 001 170	www.energyombudsman.tas.gov.au
Civil and Administrative Tribunal (ACT)	02 6205 4855	www.acat.act.gov.au

15. What external support is available

- 15.1. We will advise you of external support services, including access to a free interpreter service. (see above). We will ensure that this information is provided in a safe, respectful and appropriate manner taking your specific circumstances into consideration.
- 15.2. We will also maintain a list of external support services that are published on our website (see below).
- 15.3. We will keep this information up to date, ensuring that customers affected by family violence can easily access this assistance.
- 15.4. If you or someone you know is experiencing sexual abuse or family violence contact:

Service	Phone	Website	Support provided
1800 RESPECT (National)	1800 737 732 (24/7)	https://www.1800respect.org.au/	24/7 counselling, information, and referral for people impacted by family, domestic or sexual violence
Lifeline (National)	13 11 14 (24/7)	www.lifeline.org.au	24/7 crisis support and suicide prevention for people in emotional distress
Men's Referral Service (National with localised support)	1300 766 491	www.ntv.org.au	Support and referrals for men using violence, and those impacted by male family violence

13YARN (First Nations – National)	13 92 76	www.13yarn.org.au	Crisis support line for Aboriginal and Torres Strait Islander people, run by Indigenous people.
QLife (LGBTIQA+ - National)	1800 184 527 (3pm – midnight)	www.qlife.org.au	Telephone and webchat peer support for LGBTIQA+ people across Australia.
DVConnect - Queensland	1800 811 811 (Women 24/7), 1800 600 636 (Men 9am – midnight)	www.dvconnect.org	Crisis counselling, transport, safety planning and shelter referrals (QLD)
Domestic Violence Crisis Service – ACT	(02) 6280 0900 (24/7)	www.dvcs.org.au	Crisis accommodation, outreach, safety planning and support services (ACT)
Women's Safety Services – South Australia	1800 800 098 (24/7)	www.womenssafetyservices.com.au	Safety planning, accommodation and support for women and children (SA)
Family Violence Counselling and Support Service - Tasmania	1800 608 122 (24/7)	www.legalaid.tas.gov.au/family- violence	Counselling, legal advice and support for people experiencing family violence (TAS)

Version Control

Version	Amendment	Author and date
Version 1.0	Initial draft	CQ - 20/03/2025
Version 1.1	Reviewed	A.M – 01/05/2025