



# Better practice in responding to family violence handbook

Exploring ways essential services providers can provide family violence assistance that is safe and effective

4 September 2025



## Acknowledgement

We acknowledge the Traditional Owners of the lands and waterways on which we work and live.

We acknowledge all Aboriginal and Torres Strait Islander communities and pay our respects to Elders past and present.

As the First Peoples of this land, belonging to the world's oldest living cultures, we recognise and value their knowledge, and ongoing role in shaping and enriching the story of Victoria.

## Victim-survivor acknowledgement

We would like to acknowledge the contribution and expertise of the survivor advocates who were involved with the update of this handbook. Their participation in the cross-sector stakeholder working group and draft handbook review helped ensure the updates appropriately represented victim-survivor perspectives and the key issues raised in stakeholder working group discussions.

We would also like to acknowledge the contribution from people with lived experience of family violence who shared their experiences with essential services, including water and energy. Their stories and ideas helped us understand what better practice looks like from the perspective of a customer. Direct quotes from these conversations are shared throughout this report. A full report on the feedback from people with lived experience was produced by Uniting and is available on our website.

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## A message from the commission

Since the 2016 Royal Commission into Family Violence tasked us with creating regulatory protections for water and energy customers affected by family violence, we've worked with experts and our regulated sectors to create some of the strongest safeguards in the country.

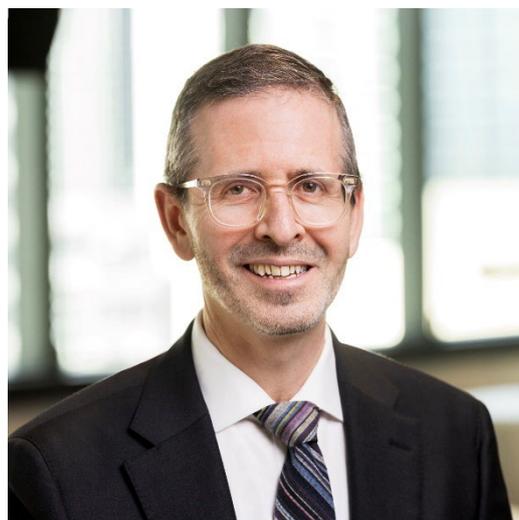
This is the third iteration of the better practice in responding to family violence publication. This update captures maturing practice in the water and energy sectors and demonstrates how a principles-based approach can support continuous improvement.

The handbook recognises that businesses need a whole-of-organisation approach to respond effectively to customers and staff affected by family violence. It presents principles and actions that illustrate better practice and provides a framework for businesses to use at both operational and leadership levels. Each iteration of this publication has explored contemporary business practices with the aim of fostering innovation and continuous improvement. The handbook is not a compliance guideline, and it is a business's responsibility to ensure it complies with relevant laws.

So why update it now? Over the last six years, our understanding of family violence risk, and the role businesses can play in addressing it, has deepened. We've seen the positive impact when businesses take a systems perspective and build in safety by design. We've also seen the benefits when safe and flexible assistance for customers is backed up by senior leadership support.

We also know that people who use violence will keep looking for loopholes to exploit as systems and technologies change. Industries and regulators need to be agile and responsive to this risk. Our Safety by Design partnership project (*Designed to Disrupt: Safety by design for essential services* discussion paper, May 2025) looked at the next steps for building a culture of safety in systems and processes. This handbook shows how businesses are applying elements of that approach in practice, tailoring it to their own operations, systems, and service design.

We consulted widely to update this handbook, with water and energy businesses, other essential services providers, the community sector and people with lived experience of family violence. Thank you to everyone who had input, particularly the people who shared their lived experiences to ensure our work was well informed.



Strong, visible and accountable leadership is critical to drive and support this work. Businesses need to listen and learn from each other and from experts in this field. We need to keep the focus on family violence and share what works to support customers and prevent harm.

Businesses are invited to use this handbook as a practical guide to assess and strengthen their response to family violence. By reflecting on the principles and actions outlined here, businesses can embed safer, more effective practices into their operations. Family violence remains an urgent issue for Victorians, and we all have a role to play in preventing the harm it creates.



**Gerard Brody, Chairperson**

# Family violence and essential services

Family violence in the community

1 in 4 women

1 in 14 men



experienced violence by an intimate partner from age 15<sup>1</sup>



Essential services can be used as a tool of abuse<sup>2</sup>

Manipulating systems to

## change account details and communication preferences

Insisting the account is in a victim's name and **refusing to contribute** to the cost

Putting a service in the sole name of the victim **without their knowledge** or consent

Holding an account jointly and **refusing to contribute** to the cost

Holding the account in their own name and **not paying bills**, resulting in disconnection

**Sabotaging services** to interrupt supply or force high usage

**Unauthorised tampering** with meters or accounts

Holding the account in their own name and **threatening to have the service cut off** or having it cut off when they leave the family home



<sup>1</sup> Australian Bureau of Statistics, Partner violence, 2021-22 financial year, [website], 22 November 2023, accessed 12 May 2025.

<sup>2</sup> Fitzpatrick, C., 2025, Designed to Disrupt discussion paper. Safety by design for essential services, Flequity Ventures, p. 19; State of Victoria, 2016, Royal Commission into Family Violence: Summary and recommendations, Parl Paper No 132 (2014-16), p.104.

Economic abuse is a form of family violence

economic abuse can continue after a relationship ends



16% of women and 7.8% of men have experienced economic abuse from a current or previous partner from age 15<sup>5</sup>

Behaviours that prevent or control access to economic resources, causing harm or fear. These actions manipulate, control, isolate or intimidate, and are generally repeated<sup>3</sup>

Privacy breaches can reveal contact details and locations. Usage may be monitored and information used to stalk or harass

Processes may require contact with the perpetrator

Essential services can create risks to personal safety<sup>6</sup>



Family violence significantly impacts a victim-survivor's finances

25.5% of women who experienced physical or sexual violence by a partner in the last five years could not pay electricity, gas or telephone bills on time<sup>7</sup>

3 Australian Bureau of Statistics, op. cit. 4 Australian Institute of Health and Welfare, Intimate Partner Violence [website], 15 Feb 2024, accessed 10 June 2025. 5 ABS cited in FN 1 6 Fitzpatrick, op. cit., p.8. 7 Summers, A., Shortridge, T., & Sobock, K., February 2025, The cost of domestic violence to women's employment and education, Sydney: University of Technology, p.61.

# Introduction

The *Better Practice in Responding to Family Violence Handbook* will support our regulated sectors to build safe and effective responses to family violence through better practice approaches and continuous improvement. Our role to promote better practice is part of the Essential Services Commission's [family violence framework](#).

See Appendix A for more information about our family violence framework.

## Updating the handbook

For the 2025 handbook, we reviewed, tested and updated the principles and actions in the previous edition, and sourced new case studies.

Our approach included:

- **Research** to understand the lived experiences of customers who have experienced family violence and what a good customer experience should look and feel like. This research by Uniting, *Better practice in responding to family violence – Lived experience insights for utilities providers* has been published as a companion piece to the handbook.
- **Interviews** with over 40 stakeholders, including water and energy businesses, community and advocacy organisations and businesses from other essential services sectors. The interviews sought to understand the needs, issues and gaps that impact a business's family violence response and customer outcomes and identify better practice examples.
- **A cross-sector stakeholder working group** with members from the energy, water, community sectors and family violence survivor advocates. The working group explored new and emerging approaches, issues and gaps in businesses family violence practices, as well as what contributes to good customer outcomes.
- **Feedback from survivor advocates** who were part of the stakeholder working group. The advocates provided feedback on the draft handbook to ensure victim-survivor perspectives were appropriately represented and that the key issues raised in stakeholder working group discussions were captured.
- **A desktop review** of grey literature relating to family violence, essential services and economic/financial abuse released since 2019.<sup>1</sup>

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<sup>1</sup> Grey literature is material or research produced outside commercial or academic publishing. For example, research reports, government reports and working papers.

## Case study selection

We collected many examples of good business practice during our consultation – many more than could fit in this handbook. These examples were mapped against the five principles of better practice and the case studies selected demonstrated new or innovative practice, or a mature understanding of the needs of customers and staff affected by family violence. We then further narrowed down the selection to ensure the case studies included businesses of different sizes, locations and sectors.

The case studies are for information purposes only. They should not be taken as an endorsement of any business's conduct or practices, and they should not be seen as assurance that the business complies more broadly with the Water Industry Standards or the Energy Retail Code of Practice.

## Language used in this handbook

**Family violence:** For the purposes of this handbook, a reference to 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. It includes behaviour by a person that causes a child to hear or witness or otherwise be exposed to the effects of family violence. This definition of family violence is from section 5 of the *Family Violence Protection Act 2008*. Where research is cited or direct quotes are used, the terminology of the source is retained. For example, a reference may use the term 'domestic and family violence' or 'DFV'.

**Person using family violence:** In most instances, this replaces the term 'perpetrator'. Person using family violence recognises the use of violence and promotes accountability but is not shaming of the person by focusing on the behaviour and not the person. Where research is cited or direct quotes are used, the terminology of the source is retained. For example, a reference may use the term perpetrator.

**Victim-survivor:** Used throughout this handbook to refer to people who have experienced or are experiencing family violence.

**Survivor advocate:** Used throughout this handbook to refer to people who apply their lived experience to influence policy development, service planning and practice.<sup>2</sup>

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<sup>2</sup> Wark, A., Simms, L., & Morgan, E., July 2022, *Sources of lived experience in the family violence sector. Issues Paper, Safe and Equal*, p. 5.

# Better practice principles

Five better practice principles provide a framework for essential services providers to improve their responses to family violence. Each business can adapt their approach to meet the unique needs and circumstances of their customers and business, encouraging innovation and a focus on outcomes.

This handbook refers to ‘better practice’ (as opposed to best practice) to illustrate that this work must be ongoing and requires a continuous improvement mindset. Continuing to seek advice from experts and sharing learnings will support businesses to respond, adapt and refine their supports for customers and staff affected by family violence.

The commission considers the five principles to be the pillars of a good business response. They highlight the cultural and behaviour changes that support businesses to develop and build on safe, flexible and appropriate family violence responses. The principles should be considered together, there is no hierarchy to how they should be read or actioned. They are designed to support businesses at any stage of their family violence work.



Figure 1: Principles to support better practice responses to family violence.

## Actions to support better practice

Each principle is supported by practical actions businesses can take to build capability within their organisation.

See Appendix B for a list of additional resources to support businesses with their approach.

## Case studies

The case studies highlight innovative industry examples that demonstrate how the principles and actions are being put into practice. All businesses are encouraged to continue learning and sharing their practices to build capability across essential services sectors.

## Quotes from victim-survivors

Quotes from victim-survivors in this handbook are from the focus groups run by Uniting. They demonstrate the positive impact of good business practice from the perspective of victim-survivors. Every effort has been made to share these comments in the context they were originally made, and with respect to the original intent of the speaker.

[See our website for further lived experience insights.](#) *Better practice in responding to family violence – Lived experience insights for utilities providers*, by Uniting, is a companion piece to the handbook.



## Principle 1: Informed and tailored

*“That constant commitment to continuous improvement ... I think we can only acknowledge and address the barriers when we’re hearing what the barriers are from those who are affected.”*

– Survivor advocate

Businesses should ensure their family violence work is informed by experts and tailored to the needs of the organisation. Seeking advice from specialist family violence organisations and trained family violence survivor advocates can help businesses understand the impact of their policies.

Advice from experts will:

- help identify areas of potential risk and improvement
- anticipate future behaviour of people using violence
- support businesses to find and tailor solutions that work.

Each business will need to tailor their approach to meet their unique needs, including size, customer base and geographic reach. We encourage businesses to share and collaborate on this work. Ongoing learning and sharing can support businesses to improve their individual responses as well as improving capability across the water and energy sectors.

### Actions to support better practice



1.1 Safely seek expert advice to inform the approach

1.2 Tailor the approach to the organisation’s needs

1.3 Learn from others and share experiences

### 1.1 Safely seek expert advice to inform the approach

Water and energy businesses are not expected to be experts in providing family violence support and services. Seeking advice from experts such as specialist family violence organisations and trained family violence survivor advocates can help businesses understand the risks to customers and staff and what they can do to improve their approach.

Listening to the voices of people with lived experience can: <sup>3</sup>

- help businesses understand the impact of their policies
- support businesses to find and tailor solutions that work
- identify products and services at risk of weaponisation
- help anticipate future behaviour of people using violence.

### **Working with experts in specialist family violence organisations**

Many water and energy businesses have worked with specialist family violence organisations to develop, review and audit their policies, procedures and practice, as well as to deliver staff training. For businesses operating in a defined geographic area, working with local specialist agencies has the added advantage of building relationships, local knowledge and referral pathways that will also benefit customers.

### **Working with survivor advocates**

A survivor advocate is a person with lived experience of family violence who applies their lived experience to influence policy development, service planning and practice.<sup>4</sup> Advocates have generally received training and professional development to build their capability and ability to advocate.

Organisations like Safe and Equal, as well as many specialist family violence organisations, can connect businesses with trained survivor advocates.<sup>5</sup> Engaging advocates through specialist agencies ensures both advocates and businesses are supported to prioritise safe, respectful and authentic engagement and develop an appropriate, trauma-informed approach.<sup>6</sup>

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<sup>3</sup> Domestic, Family and Sexual Violence Commission, 2024, *Business Roundtable Summary Report*, Domestic, Family and Sexual Violence Commission, p. 5.

<sup>4</sup> Wark et al., op. cit., p. 5.

<sup>5</sup> Safe and Equal is the peak body for Victorian organisations that specialise in family and gender-based violence across the continuum, including primary prevention, early intervention, response and recovery. Safe and Equal also consult with businesses and industry leaders, survivor advocates and subject matter experts to ensure responses to family violence are informed by better practice and lived experience. Safe and Equal, [Supporting Businesses and Workplaces](#) [website], n.d., accessed 12 May 2025.

<sup>6</sup> Morgan, E., & Wark, A., May 2022, *The Family Violence Experts by Experience Framework Implementation Plan and Guidelines for the Essential Services Commission and essential service providers. Project Report*, Melbourne: Safe and Equal, p. 9.

Principle 1: Informed and tailored

## The voices of individuals with lived experience

*“Those people that have the power to create change have been through it themselves because no one will ever understand.”*

– Victim-survivor

The lived experiences of individuals who have experienced family violence can help businesses understand and improve the interactions customers have with their business, as well as identify areas of potential risk. Staff on the frontline will be able to draw on their experiences supporting customers to identify pain points and opportunities to improve. Working with specialist organisations can be another way to safely gather feedback from people with lived experience.<sup>7</sup>

Some businesses have received input from staff with lived experience, for example when reviewing policies or training. This is an emerging area of practice. Careful assessment of business maturity, organisational safety, and supports in place for staff is required before proceeding with this approach.

See Appendix C for information about what to consider before taking this approach.

### Expert advice helped Alinta Energy identify risks and improvements

Alinta Energy sought expert advice from an organisation that specialises in preventing and responding to family violence. They wanted to understand the risks to customers experiencing family violence, with a focus on processes that sit outside the Alinta Assist team. Alinta Assist is a dedicated team that provides support for customers experiencing payment difficulty and customers experiencing family violence. The scope of the advice included policies, processes, work instructions and written correspondence that may impact a customer who is experiencing family violence, including privacy, verification, credit collection, and move-in move-out processes.

Alinta Energy has said the advice has helped them better understand the needs and experiences of their customers, across all their touchpoints with the business, not just the Alinta Assist team. The advice captured existing good practices as well as some areas for improvement. The

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<sup>7</sup> Cook, K., Mattila, P., Symington, N., Bowman Madaan, R., Dilger, K., Maury, S., Taffe, S., Pye, A., Sinclair, S., Burgin, R., Kocsis., Eversole, R., Hiruy, K., 2022. *Supporting Women's Financial Safety: A Guide to Prevention and Action on Financial Abuse within the Financial Services Sector*, Department of the Prime Minister and Cabinet's Office for Women: Canberra, p. 9.

functional leads in each team will be responsible for implementing the recommendations relevant to their work area.

## 1.2 Tailor the approach to the organisation's needs

Developing a family violence approach and implementing policies can be a complex task, requiring commitment from across the organisation.<sup>8</sup> Each organisation will have factors it needs to consider, including size, customer base and geographic reach.

A commitment to continuous improvement enables a business to continue growing its understanding of family violence and adapting its approach to best meet the needs of customers and staff. This is particularly important when it comes to understanding the tactics used to cause harm, which are constantly evolving, as well as understanding common barriers to accessing support.

*“The tactics that are used and the limitations on victim-survivors reaching out or getting help, whatever those barriers are, they change as the tactics change.”*

– Survivor advocate

Tailoring the business' approach to meet current and emerging needs ensures implementation is likely to have a positive impact for staff and customers.

### A tailored training approach improved Southern Rural Water's capacity

Following a review of their family violence policy, Southern Rural Water identified a need to expand their capacity to support customers and staff affected by family violence.

They engaged a new training provider to meet this need and trained four dedicated family violence support officers. Two of these staff members sit outside the customer service team and can now support this team as needed. The four trained staff can also provide peer support for staff experiencing family violence.

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<sup>8</sup> Economic Abuse Reference Group, Version 2, April 2018, *Addressing the Financial Impacts of Family Violence - Good Practice Industry Guideline*, p. 1.

## Internal expertise informs Coliban Water's whole-of-organisation response

In 2024 Coliban Water responded to a family violence incident. Recognising the expertise within the Customer Care team, the team were empowered to manage the customer and Coliban Water's family violence response. The Executive team provided Customer Care with the autonomy and discretion to make real-time decisions to keep the customer safe. This discretion enabled Customer Care to respond to the customer's safety needs in the moment.

The Customer Care team has daily interactions with customers. This allows them to use their insights to ensure that the organisation's policies, procedures and practices align with customer needs. The Customer Care team has completed specialised training to support them to recognise and respond to family violence disclosures confidently. Additionally, the Customer Care team supports other departments in assessing and mitigating potential risks related to the accounts of customers affected by family violence.

### 1.3 Learn from others and share experiences

As water and energy businesses continue to develop and improve their family violence response, there is opportunity to continue learning from each other, as well as other sectors, to build a shared understanding of better practice.

We encourage organisations to draw on the experiences of those who have gone through similar work, as well as resources developed by experts. We also encourage businesses to share their own experiences to support continued learning. This work should be seen as an opportunity for cooperation and collaboration, rather than an area of competition. Taking a collective approach to capability development will improve outcomes for vulnerable customers and help build the community's confidence in essential services providers.

Local networks can be a valuable source of information about local challenges, trends and available supports. They can also build awareness of available supports and referral pathways for customers.

## Collaboration supports business improvement

The [Thriving Communities Australia Family and Domestic Violence network for business](#) is open to Australian essential services businesses who have committed to supporting customers experiencing family and domestic violence.

The network provides a space for businesses to come together to share, learn and explore evolving better practice for supporting people experiencing family violence. The network meets bi-monthly and brings in guest speakers and knowledge experts to keep businesses moving forward in their efforts to better support people experiencing family violence.

*“We are members of the TCA Family and Domestic Violence network for Business. It’s a good forum for staying connected across sectors. The network meeting is a regular connection to share information and ask questions.”*

– Yarra Valley Water

The [One Generation business initiative](#) provides free practical resources to support businesses to:

- provide better and safer support for victim-survivors
- foster a culture of respect
- identify and share evidence of what works.

One Generation is about collaboration: sharing information about what works, removing inconsistencies across sectors and pooling resources for greater effect. The founding organisations will fund research on the lived experiences of diverse customers to inform cross-sector actions to make it easier and safer to get support. The Customer Insights Snapshot, for example, explores what customers need from their essential services.

One Generation is a Thriving Communities Australia program, co-founded with social enterprise Flequity Ventures.



## Principle 2: Leadership and accountability

*“I think what is absolutely necessary is that there is a whole-of-company, trauma-informed response and that is not just a one-off training session.”*

– Victim-survivor

Business leaders have an important role to play in fostering a whole-of-organisation commitment to responding to family violence and holding the organisation to account. Strong, visible and ongoing leadership is the foundation of a good business response.

Clear and consistent messaging and an ongoing focus on culture, knowledge and systems across the business builds organisational understanding of the issues and how the business can improve responses to customers and staff.

A whole-of-organisation view of family violence risks can:

- help prevent harm by identifying and closing gaps in systems
- support the design of an appropriate response to customers.

Policies for staff and customers are an important way for businesses to communicate the support that is available, how to access it, and how the business will respond to people using violence.

They send a clear message about the importance of the issue to the business. Seeking expert advice when developing or reviewing policies can ensure they meet better practice standards and incorporate current knowledge about family violence harm.

Leadership and accountability work is ongoing. Establishing regular monitoring, reporting and evaluation can ensure businesses are prepared to improve and adapt as systems and technologies change.

### Actions to support better practice



2.1 Senior leaders set the tone

2.2 Consider all relevant functions of the business

2.3 Develop a safety by design approach to understand and mitigate risks

2.4 Embed cultural and systems change

2.5 Develop policies for staff as well as customers

2.6 Consider appropriate responses to people using violence

2.7 Develop ongoing monitoring, reporting and evaluation

## 2.1 Senior leaders set the tone

Leadership support is foundational to the effective development and implementation of a business's family violence response.<sup>9</sup> When executive and senior managers demonstrate a commitment to a business's family violence initiatives, staff will feel confident that their workplace takes this issue seriously.

Regular training for leaders will ensure they understand current thinking about family violence and are able to refine the organisation's approach, allocating resources to respond to current and emerging risks. Sharing customer case studies, call recordings and examples of approaches taken by other businesses at senior executive meetings can ensure a shared understanding at all levels of the business.

*“Understanding what constitutes family violence or what causes family violence as well is important to be regularly updated. That knowledge and awareness ... it can't just be one and done. ... If we are talking about analysing services or activities that may increase risk, you can't know what that is without knowing what that is. How can you identify behaviours that are potentially going to increase harm when your knowledge of harm is not comprehensive?”*

– Survivor advocate

A family violence strategy can be used to:

- prioritise activities
- identify the key business functions which need to be examined
- allocate accountabilities for delivering on the strategy
- determine which staff should be involved in different parts of the work.

Establishing governance structures and accountability for the business's family violence response will ensure an ongoing focus on family violence across the organisation, as well as clear lines of

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<sup>9</sup> Economic Abuse Reference Group, Version 2, April 2018, op. cit., p. 1.

responsibility for decisions and actions. Clear accountabilities can ensure positive outcomes for customers and staff affected by family violence.

## South East Water's Family Violence Action Plan

*"It is my responsibility and the responsibility of the Executive team to make sure that we provide the right training and processes and systems for our employees so that they've got the tools they need to do the right thing."*

– Lara Olsen, Managing Director, South East Water. From the Essential Services Commission and Energy and Water Ombudsman Victoria Family Violence Leaders Forum, 29 August 2023.

South East Water's 2025–2028 Family Violence Action Plan sets out a broad range of initiatives that will evolve the support and protections available to South East Water's customers and people affected by family violence. It will also contribute to better practice approaches across the water sector and beyond.

Initiatives in the plan are grouped into four workstreams that align with the four domains of the *National Plan to End Violence against Women and Children 2022–2032*. To develop the plan, South East Water undertook a self-assessment to benchmark their maturity against the four domains and mapped initiatives against the gaps they identified.

## AGL leadership: creating foundations for positive change

AGL recognises that family violence may impact their customers, workforce, people supporting customers and the communities AGL operates in, and that leadership is crucial to bring about positive change.

AGL's Chief Customer Officer is the executive sponsor for family violence and has been instrumental in AGL's involvement with key initiatives. This includes the [One Stop One Story Hub](#), [Respect & Protect](#), and as a founding partner of the [One Generation](#) initiative. AGL's CEO is a member of the Champions of Change Coalition Energy Group. Members work across their organisation to improve gender equality and increase the representation of women in leadership.

The leadership and accountability demonstrated by these senior leaders sends the strong message that this work is critical to help create inclusive, respectful and equitable workplaces that benefit all employees, customers and the broader community.

## 2.2 Consider all relevant functions of the business

Businesses should ensure they have considered family violence across all of the organisation's policies, products and services.<sup>10</sup> In addition to family violence customer related policies and procedures, businesses should consider all functions of the business that may touch or impact on customers or staff affected by family violence. For example, product development and IT.<sup>11</sup>

Businesses should also consider their relationships with contractors and suppliers and how they can ensure they are aligned with the business's understanding and relevant policies relating to family violence.

### Gippsland Water: raising awareness of risks and supporting improvements

Gippsland Water's Customer Care team leads its family violence response. The team works closely with other areas of the business to ensure they understand:

- how family violence risks might present in their area of work
- what actions they can take to mitigate these risks
- how the Customer Care team can support their work.

All staff complete family violence training every two years, and new starters do this training as part of induction. In addition, all frontline staff, including Field Services, Property Services, Customer Service and Customer Care, complete specialised family violence training which is tailored to their roles. These teams understand their role and know when to reach out to the Customer Care team for extra support.

If Field Services need to visit a property that is flagged for family violence, they will work with the Customer Care team who will contact the customer to explain the process and what will happen when the Field Services team visit their property.

The Property Information team recognised the risk of using old customer profiles during the change of ownership process for a customer identified as affected by family violence. In collaboration with the Customer Care team, they implemented system modifications to ensure all identified customers information could not be linked to previous accounts.

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<sup>10</sup> Morgan, E., & Wark, A., op. cit., p. 17.

<sup>11</sup> Economic Abuse Reference Group, Updated 29 October 2018, *Family Violence Guide - Making a Start*, p. 2.

The Customer Care team have worked closely with the Information and Communication Technology team to ensure they understand the importance of protecting data and the risks for customers affected by family violence. This understanding has put customer safety at front of mind as Gippsland Water prepares to migrate to a new online services platform and develop an app for customers.

### North East Water sets the standard for contractor understanding of family violence

The Victorian Community Rebate Program uses qualified plumbers to offer water audits and water efficiency upgrades to households in vulnerable and hardship situations.<sup>12</sup>

North East Water requires that all plumbers contracted through this program must complete annual Domestic and Family Violence Training before they are able to attend properties. The training covers indicators of family violence, what to look for at a property, and what to do if they have concerns. This training gives North East Water confidence that their family violence policy will be adhered to by plumbers participating in this program.

## 2.3 Develop a safety by design approach to understand and mitigate risks

*“It is not enough to acknowledge domestic and financial abuse as a factor in hardship; it must be recognised as a material, foreseeable risk that demands dedicated governance action. Directors and senior executives have a legal and ethical obligation to ensure their organisations manage known, repeated and preventable risks.”*

– Designed to Disrupt. Safety by design for essential services

Victim-survivors of family violence can face serious risks to their personal and financial safety from their water and energy provider. Businesses have a responsibility to ensure that their products, services and systems cannot be weaponised to cause harm, and that they do not put customer safety at risk through the inadvertent disclosure of private customer information.

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<sup>12</sup> The Community Rebate Program is funded by the Victorian Government and delivered by Victorian water corporations. The program helps to reduce household water use and bills by sending a qualified plumber to check for leaks and faulty fixtures and fittings, fix leaks in and around the home and improve the water efficiency of fittings and appliances. For more information visit: <https://www.water.vic.gov.au/our-programs/community-rebate-program>.

The *National Plan to End Violence against Women and Children 2022–2032* highlights the critical role the corporate sector must play in preventing gender-based violence ‘by fostering gender equality in the workplace and designing products and services that are safe and prevent misuse, while also focusing on perpetrator accountability’.<sup>13</sup>

Safety by design is a principles-based approach that supports businesses to reduce the likelihood and impact of harm. Originally developed by the eSafety Commissioner, the concept has been adapted for the banking, general insurance and essential services sectors in Australia.<sup>14</sup> A safety by design approach ‘embeds safety into the values, culture, leadership and operations of a business’.<sup>15</sup>

A safety by design approach:

- supports businesses to identify and mitigate risks before they cause harm
- ensures that future system changes, products and technologies do not introduce new opportunities for weaponisation and harm.

*“In the product and service design, or when there’s maintenance of the product or redesign of an existing product or service. That’s also an opportunity for organisations to look at whether the redesign will actually open up any more risk, or whether it can be used to actually mitigate an existing risk.”*

– Uniting perpetrator behaviour change expert

The Essential Safety by Design framework outlines a tailored approach for water and energy businesses to proactively identify and mitigate risks to physical safety, financial abuse and technology-facilitated abuse.

The objective of the framework is to:<sup>16</sup>

- Prevent the misuse of essential services for domestic abuse and control.
- Design for victim-survivor safety and informed choice.
- Be clear about the rules and consequences of misuse.

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<sup>13</sup> Commonwealth of Australia (Department of Social Services), 2022, *National Plan to End Violence against Women and Children 2022-2032*, Commonwealth of Australia (Department of Social Services), p. 105.

<sup>14</sup> eSafety Commissioner, [Safety by Design](#), 25 September 2024, [website], accessed 8 May 2025.; Flequity, [Smarter products. Safer futures](#), n.d., [website], accessed 8 May 2025.

<sup>15</sup> Cook et al, op. cit., p. 5.

<sup>16</sup> Fitzpatrick, C., 2025, *Designed to Disrupt discussion paper. Safety by design for essential services*, Flequity Ventures, p. 9.

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## Domestic and financial abuse is a foreseeable enterprise risk

Essential Safety by Design recommends that water and energy providers recognise domestic and financial abuse as a foreseeable enterprise risk. A number of businesses have started this work by including family violence in their organisational risk framework, for example:<sup>17</sup>

- Risk of psychosocial injury to staff through customer contact (for example, vicarious trauma).
- Privacy and customer safety risks arising from disclosure of customer information.
- The risks of business systems, assets and technologies being weaponised.
- Lack of awareness and training of staff.
- Poor documentation of processes and controls specific to domestic abuse.
- Risk of manual disconnection without adequate checks.
- System vulnerabilities in digital services and online security.
- Challenges when both customers on an account accuse each other as a perpetrator.
- Inadequate processes, systems and controls to capture and manage customer data, including identification processes.

As businesses and consumers embrace new technologies, businesses should apply a safety by design mindset to mitigate the risks of weaponisation. For example, considering risks relating to smart meters and technology that enables devices at home to be turned on and off remotely and track usage patterns.<sup>18</sup>

*“If you have those safe design and safe defaults in place, it should mean you’re less reliant on consumers telling you about a vulnerability. It puts the onus onto a provider to proactively consider what risks or barriers might be being incorporated into products and services. How might these products and services be exploited by a perpetrator? Or how might you be making it more difficult to support vulnerable customers?”*

– Catherine Wolthuizen, Energy and Water Ombudsman Victoria. From the Essential Services Commission and Energy and Water Ombudsman Victoria Family Violence Leaders Forum, 29 August 2023.

Some water and energy businesses are embracing the concept of safety by design and are building this into their work in a number of ways.

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<sup>17</sup> Fitzpatrick, op. cit., p. 33, 40.

<sup>18</sup> Fitzpatrick, op. cit., p. 45.

## Yarra Valley Water's corporation-wide risk review identifies gaps and actions

Yarra Valley Water's risk management team facilitated a corporation-wide risk review to identify possible risks associated with family and domestic violence in their systems and processes. The review identified 16 core family violence related risks, with multiple sub-risks for each of these.

Each risk has been allocated to a General Manger for further investigation, including:

- documenting existing controls
- additional actions required to eliminate or minimise the risk
- timeframes and cost to deliver this.

A dedicated Family and Domestic Violence Program Manager has been appointed to manage the implementation of the risk improvements, and shortly a delivery team of project professionals will be introduced to coordinate implementation.

A Program Control Group, with members representing every group across the business, meets once a month for the Program Manager to report on how risks are tracking and will support the ongoing work to address high priority risks. A key benefit of this approach has been the allocation of responsibility to teams across the organisation, which creates a culture where everyone has a role to identify improvements and controls to reduce family violence related risk.

## Wannon Water has moved beyond compliance to understand family violence as a strategic risk

Wannon Water's Zero Harm aspiration has driven a shift from a compliance focus to a safety culture. Family violence risk is considered a strategic risk for the organisation and is approached as a whole-of-business issue. The aim of this approach is to embed this thinking into business as usual across the business.

The foundational activities for the shift to a safety culture were led by the Customer Experience and Risk team. Education materials were shared with teams to explain why this work was being done and to increase awareness of some of the key family violence issues in a water context, focusing on privacy and weaponisation. The team then led an organisation-wide risk assessment process to identify:

- family violence-related risks
- the likelihood and consequence of these occurring
- the number of customers that may be impacted.

These risks were then prioritised and will feed into the organisation's risk management plan.

## North East Water embeds safety by design in their 2040 corporate strategy

North East Water's corporate strategy, Strategy 2040, sets out a roadmap for the organisation's future. Under their commitment to build community trust and value, North East Water has committed to implementing a safety by design service approach across the business by 2030.

The work is guided by a Steering Group and a Working Group that includes representatives from every team across the business. A kick-off workshop identified six themes that will be the focus of the two-year project to embed safety by design as a way of thinking across the organisation. At the completion of the project, North East Water will have enhanced capabilities to better identify, and support customers affected by family violence via improvements to staff training, third party vendor training, systems and processes.

## 2.4 Embed cultural and systems changes

For a business's family violence response to be effective in the long term it must embed changes to its culture and systems, requiring buy-in from across the organisation. Senior leadership commitment and demonstrable support for this work, resourcing of specialist teams, as well as whole-of-business staff training, is critical to drive cultural and systems change.<sup>19</sup>

Cultural change should include a shared organisational understanding of the gendered nature of family violence. Family violence training for all staff can address this topic and any common myths and misconceptions. Leadership can raise the visibility of the societal issue of gendered and family violence through participation and promotion of events such as the [16 Days of Activism against Gender-Based Violence Campaign](#). Such activities demonstrate that this is an important issue for the business that is prioritised by leaders.

A crucial aspect of organisational culture is to create a safe environment for staff to speak up when mistakes have been made as well as to help identify and address risks.

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<sup>19</sup> Economic Abuse Reference Group, Version 2, April 2018, op. cit., p. 1; Whereto Research, 9 September 2022, *Research with financial counsellors exploring the effectiveness of family violence provisions in the Victorian water customer codes*, Essential Services Commission, p. 18.

*“Whilst we’re really focused on what the potential implications are from an error in this space, we also want to make sure it’s safe enough that our people can mention when they’ve made a mistake because that gives us the best chance to try and contact that customer and rectify it as soon as possible or at least minimise the potential impact.”*

– Lara Olsen, Managing Director South East Water, speaking at the Essential Services Commission and Energy and Water Ombudsman Victoria Family Violence Leaders Forum, 29 August 2023.

Energy and water businesses have made significant progress in embedding cultural and systems changes since the introduction of family violence obligations.

### **Centralised expertise can support cultural change by providing consistent, organisational-wide support**

The Customer Safety and Support team at AGL are the central point of the organisation’s family violence response. They support teams across the business to ensure processes and procedures that potentially impact customers affected by family violence are compliant and reflect better practice. This broad remit recognises that customers interact with many business processes outside those owned by the Domestic and Family Violence team and that expert internal advice can identify and reduce potential risks and unintended consequences for customers experiencing family violence.

## **2.5 Develop policies for staff as well as customers**

With one in four women (23 per cent) and one in fourteen men (7.3 per cent) in Australia experiencing violence by an intimate partner since the age of 15, it is highly likely that an organisation will have victim-survivors and people using violence working for them, as well as in their customer base.<sup>20</sup> Employees may also be customers of the business they work for and may benefit from family violence support as a customer and a staff member.

Family violence policies must reflect the nature and causes of family violence, and the experiences of victim-survivors.<sup>21</sup>

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<sup>20</sup> Australian Bureau of Statistics, [Partner violence, 2021-22 financial year](#), [website], 22 November 2023, accessed 12 May 2025.

<sup>21</sup> Economic Abuse Reference Group, Version 2, April 2018, op. cit., p. 2.

Increasingly, businesses are engaging family violence experts to review and update their policy. This ensures the policy and associated procedures meet better practice standards and incorporate current knowledge about family violence risk and harm.

### **Policies for staff**

Policies, processes and training for staff can provide support for employees experiencing family violence, as well as guide how the business responds to staff who are or may be using family violence. Workplace family violence policies are an important way for businesses to create an environment that keeps victim-survivors engaged with the workforce, secures safety and supports recovery and their financial independence.<sup>22</sup>

Family violence training for all staff, such as 'Responding to Disclosures' or 'Recognise, Respond and Refer', can provide the foundations for a safe and supportive environment for staff who choose to disclose. Workplace education and awareness about family violence can also help staff and colleagues identify and name what they are experiencing or observing in colleagues.<sup>23</sup>

Businesses should be prepared to support staff who may disclose their experience of violence or find talking about this topic challenging.

A family violence policy for staff should outline the support available and how to access it. The supports available through the policy must be able to be tailored to the needs of the individual employee.<sup>24</sup> The policy and its promotion should de-stigmatise victim-survivors reporting their abuse and taking time off.<sup>25</sup>

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<sup>22</sup> McNicol, E., Fitz-Gibbon, K., & Brewer, S., October 2022, *From workplace sabotage to embedded supports: Examining the impact of domestic and family violence across Australian workplaces*. Victoria: Monash University, p. 41.

<sup>23</sup> McNicol et al., October 2022, op. cit., p. 46.

<sup>24</sup> McNicol et al, October 2022, op. cit., p. 52.

<sup>25</sup> Summers, A., Shortridge, T., & Sobeck, K., February 2025, *The cost of domestic violence to women's employment and education*, Sydney: University of Technology, p. 72.

A policy for staff might include:<sup>26</sup>

- A definition of family violence and the various forms this can take.
- Paid leave provisions. Under the [National Employment Standards](#), all employees are entitled to ten days of paid family and domestic violence leave each year. This includes full-time, part-time and casual employees.
- Clear information on supports other than leave that are on offer, such as flexible work options and additional assistance such as financial assistance and temporary accommodation.
- Workplace safety planning.
- How to respond if a perpetrator comes to the workplace.
- The organisation’s approach to employees who use violence, including if the victim-survivor and perpetrator are both employees (page 30 for more information on responses to staff who use violence).
- How privacy and confidentiality will be maintained.
- Referral pathways, including ensuring that the business’s Employee Assistance Program provider can effectively respond and provide appropriate referrals for people seeking support relating to family violence.

## Policies for customers

All Victorian water and energy businesses must have a family violence policy.<sup>27</sup> The positive impact of these policies is clear when hearing from people with lived experience:

*“It was really difficult to rebuild back then. It was really difficult to get any kind of assistance ... so on a really positive note this time round... I, you know, got back into another relationship which was very emotionally coercively abusive. This time around, a lot of the services have at least tried... Other than [business name] but everybody else that I have been working with has had some kind of policy change.”*

– Victim-survivor

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<sup>26</sup> UN Women Australia, December 2017, *Taking the first step: workplace responses to domestic and family violence*, UN Women National Committee Australia, p. 6.; Champions of Change Coalition, 2021, *Playing our part. A framework for workplace action on domestic and family violence*. Champions of Change Coalition, pp. 30-31.; Sightlines Professional Services - Domestic Violence Service Management, 2020, *Insights Paper. Experiences and perceptions of workplace responses to domestic and family violence*, Domestic Violence Service Management - Sightlines Professional Services, p. 41.; Summers et al., op. cit., p.72.

<sup>27</sup> Essential Services Commission, *Water Industry Standard – Urban Customer Service*, Version 4 incorporating amendments as at 1 July 2024, 11.2 Family violence policy; Essential Services Commission, *Water Industry Standard – Rural Customer Service*, Version 4 incorporating amendments as at 1 July 2024, 10.2 Family violence policy; Essential Services Commission, *Energy Retail Code of Practice*, Version 3 1 October 2024, Division 2, Family violence policies.

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*“I think that general understanding of that, this is not a normal situation, not that we're asking for special treatment. We're just asking for appropriate treatment for our situation. So, I think they have to be very clear about their approach to individuals. You cannot take templates that work for the bulk of your customers and place it over the top of domestic abuse.”*

– Victim-survivor

Businesses should consider how they can make their policy accessible to customers. For example:

- using simple, trauma-informed language
- translating into different languages
- making it accessible through screen readers
- making it easy to find on the website.

Staff should be trained to understand the policy and associated processes.

*“You can have great policies, but if no one knows how to implement those great policies, what do they even mean? Great that they're there, but then, there's that work that has to go from that policy to that implementation.”*

– Survivor advocate

### **Expert input can ensure policies and supports for staff are targeted and appropriate**

North East Water collaborated with a local domestic and family violence specialist service, who also provide workplace family violence training, to design a training program and resources to support staff. The training included lived experience perspectives and the experiences of staff at the service. The resources included a simple workplace safety planning tool to support staff who are affected by family violence. The two-page document outlines the types of support that staff can access. The document layout is simple, and uses lots of white space, icons and checkboxes to make it easy to read and understand the available options. It also clearly states that these are ideas not advice, and that it is important that a plan is relevant to an individual's needs and is adapted when circumstances change.

## Regular policy review keeps the focus on better practice and continuous improvement at South East Water

South East Water runs a quarterly health check on its family violence policy, which includes consultation with an organisation that specialises in preventing and responding to family violence. This systematic approach ensures their policy and practice remain effective and meet better practice standards. Working with experts and incorporating the voices of lived experience helps identify changes in customer expectations as well as ways people using violence may be causing harm. The regular review is also an opportunity to ensure referral information is up to date and meaningful for customers.

Future health checks will include the family violence policy for employees.

## 2.6 Consider appropriate responses to people using violence

Businesses need to consider responses to customers and staff using violence as part of their family violence response. This is a complex area that can carry significant risk, and experts advise that businesses should have a whole-of-organisation response to victim-survivors of family violence before they consider directly engaging with people who cause family violence harm.<sup>28</sup>

### Responses to customers who use violence

*“I think it’s becoming more and more evident that organisations need to invest in training up their staff specifically to handle or to offset some of the tactics that perpetrators are using.”*

– Uniting perpetrator behaviour change expert

Experts in preventing and ending family violence recommend that policies and procedures for responding to perpetrators are carefully considered so that they:<sup>29</sup>

- are appropriate and safe
- send clear messages to highlight perpetrator accountability and the prevention of violence against women
- respect the rights of perpetrators to confidentiality and a fair process.

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<sup>28</sup> Vlasis, R., 2017, *Guidelines for engaging people who cause family violence harm. Policy guidelines*, North West Metropolitan Region Primary Care Partnership, p. 5.

<sup>29</sup> Our Watch and No To Violence Men's Referral Service, September 2017, *Workplace responses to perpetrators of violence against women*, Our Watch and No To Violence, p. 4.

When developing a response to customers who use violence, there are a range of specialist services that can provide support, including [No To Violence](#) or a local men’s behaviour change program. In addition to seeking advice from family violence experts, organisations should ensure that individuals’ rights to fair processes and confidentiality are respected.

Businesses should ensure:

- Staff are very clear about their role and limitations regarding responses to customers who use violence. Staff should never be expected to directly challenge a person using violence as this is highly complex and requires specialist skills and training.
- Staff receive training so they can recognise tactics and invitations to collude and be prepared to respond in a safe way when they suspect they may be interacting with a person using violence.<sup>30</sup> Case studies, scripts or suggested responses can support staff to do this safely without colluding or provoking the situation.
- This work should have an ongoing focus, recognising that people using violence will continue to adapt and devise new tactics to cause harm as businesses make their systems safer. A safety by design approach can support businesses to identify and prevent products or systems.

### A public pledge to ‘Respect & Protect’ outlines consequences for perpetrators who use water accounts for financial abuse

*“We know there are occasions where perpetrators of family violence can use services like ours to threaten victim-survivors, maintain a system of coercive control, or even accrue debts in their name leaving them financially worse off.”*

– Coliban Water Executive General Manager Customer and Stakeholder Experience, Lauren McLean<sup>31</sup>

Coliban Water was the first Victorian water business to sign up to the [Respect & Protect initiative](#) which encourages businesses to commit to update their terms and conditions to make it clear that using their products or systems to abuse will not be tolerated. Coliban Water updated its terms

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<sup>30</sup> ‘Collusion’ refers to ways that an individual, agency or system might reinforce, excuse, minimise or deny a perpetrator’s violence towards family members and/or the extent or impact of that violence. An invitation to collude may be deliberate, considered and calculated. The person using violence may attempt to manipulate or get someone onside or instil doubt. Invitations to collude occur when the perpetrator seeks out the professional to agree with, reinforce or affirm their narrative about their use of violence, the victim survivor or their situation. Victorian Government, [Key concepts for practice](#), [website], updated 21 July 2021, accessed 10 June 2025; Victorian Government, [MARAM practice guides: Guidance for professionals working with adults using family violence](#), [website], updated 16 August 2021, accessed 14 July 2025.

<sup>31</sup> Coliban Water, [Water industry first as Coliban Water puts would-be abusers on notice](#), [website], 10 July 2024, accessed 7 May 2025.

Principle 2: Leadership and accountability

and conditions to make it clear the provision of water and sewerage is no place for financial abuse.

This public pledge has helped raise awareness within the business about financial abuse and what this might look like in a water account. Coliban Water has found customer-facing staff are more aware of the signs of financial abuse and are supported to act on their concerns.

### Testing to prevent weaponisation of South East Water's online portal

South East Water has developed a 'Care-First' approach to guide the design and review of services and processes. The approach embeds safety by design principles to protect personal information, integrate external expertise and draws on better practice and lived experiences to protect and offer flexibility for customers.

Using this approach, South East Water ran a hackathon style workshop with employees to explore ways their online portal could be weaponised by persons using violence. It's not uncommon for people using violence to know the personal information of the victim-survivor, which means they may access the portal using the victim-survivors' details. The workshop helped identify potential vulnerabilities in the portal, explore ways it could be weaponised to cause harm and better understand the impact on customers. This was followed by a design thinking workshop to come up with solutions.

One of the risks identified during the hackathon concerned unmasked data. This was data visible in the portal that could be weaponised to cause harm by someone using that information, such as by creating accounts with different service providers and amassing debt, perpetrating financial abuse. The resulting solution limits and masks personal data, including date of birth, in the portal. Additionally, South East Water is planning to deploy multi-factor authentication to the portal login process to strengthen the protections and ensure the person logging in is who they say they are.

### Responses to staff who use violence

To support businesses develop a response to staff who use violence, the [Champions of Change Coalition](#) developed a toolkit with experts to provide evidence-informed and practical guidance for organisations. To do this effectively requires 'a balance of procedural fairness for the employee using domestic and family violence and a focus on safety for the person who is experiencing the

violence'.<sup>32</sup> The toolkit clearly states that the role of the organisation is to 'recognise, respond, refer and record', and warns against the workplace managing the situation of domestic and family violence and/or provide a therapeutic response.<sup>33</sup>

Experts recommend that policies and procedures for responding to staff who use violence are carefully considered so that they are appropriate and safe, send clear messages to highlight perpetrator accountability and the prevention of violence against women, and respect the rights of perpetrators to confidentiality and a fair process.<sup>34</sup>

### **'Responding to disclosures' training to support staff and customers**

Goulburn-Murray Water ran 'Responding to Disclosures' training for staff, delivered by an organisation that specialises in preventing and responding to family violence. As a large, geographically dispersed organisation, they wanted to ensure there were trained staff at all locations who were able to appropriately and safely support staff and customers who chose to disclose family violence.

Twelve staff completed the training which increased their understanding of the signs of family violence and how to offer support in an appropriate manner. Trained staff are based at different locations across the business, which makes it easier for staff and customers to access support. Goulburn-Murray Water is Australia's largest rural water corporation, with over 500 staff across four locations.

## **2.7 Develop ongoing monitoring, reporting and evaluation**

*"Those processes with feedback are going to be really important, especially because the mechanisms of abuse, the tactics of abuse, are so nuanced and keep changing as well, and that might help with the identification of behaviours and how we can best respond."*

– Survivor advocate

The Economic Abuse Reference Group recommends that businesses should have an ongoing policy review process to monitor the quality and effectiveness of their response.<sup>35</sup> This approach

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<sup>32</sup> Male Champions of Change, July 2020, *Employees who use domestic & family violence: A workplace response*, Male Champions of Change, p. 26.

<sup>33</sup> Male Champions of Change, op. cit., p. 25.

<sup>34</sup> Our Watch and No To Violence Men's Referral Service, op. cit., p. 5.

<sup>35</sup> Economic Abuse Reference Group, Version 2, April 2018, op. cit., p. 3.

will ensure businesses are also able to evaluate where any processes inadvertently facilitate family violence or place its customers at risk.

Regular customer reporting can help businesses identify customers who may benefit from targeted support, as well as opportunities for additional staff support or training. Businesses should consider how they can safely develop feedback processes to review the support received by specialist teams.<sup>36</sup>

Thriving Communities Australia suggest businesses carefully consider what success looks like for specialised teams who support people experiencing vulnerability or financial hardship:<sup>37</sup>

- Consider success indicators that encourage the best experience for customers, not just the business.
- Align metrics and key performance indicators to support a human-centred culture.
- Provide staff with the time to ‘actively, empathetically, and respectfully listen and engage’ with customers.
- Provide tailored support (such as call coaching) to encourage better practice approaches and continuous improvement.

Quality assurance on customer calls is also an opportunity to ensure staff are receiving appropriate support to manage their wellbeing. Call screening technology to detect trigger words can ensure staff have not missed important information from customers.

Businesses could also consider public reporting mechanisms as a way of showing their commitment to the issue to the broader community. For example via a [Financial Inclusion Action Plan](#) and reporting via the [Workplace Gender Equality Agency](#). For Victorian water businesses, the action plans and gender impact assessments that are required under the *Gender Equality Act 2020* are also an opportunity to reflect and take action to improve on their family violence responses.

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<sup>36</sup> Morgan & Wark, May 2022, p. 26, 29.

<sup>37</sup> Oakley, J., Oglethorpe, P., Millwood, J., Sterling, C., Collier, T., Sundstrom, G., (Eds.), 2022, *Better Practice Guide: Staff Awareness and Training*. Thriving Communities Partnership, p. 48.

## Organisational reporting helps track and monitor family violence response

Yarra Valley Water reports at a number of levels of the organisation to track and monitor its family violence response.

- Family violence risk is reported quarterly to the Board as part of the operational risk report.
- The Program Control Group leading the family violence risk program (see case study on page 22) receives a monthly report that includes activities delivered, activities planned, timelines and other project updates.
- The Water Care Team report on an ad hoc/as requested basis on the number of safety flags on customer accounts.

Yarra Valley Water acknowledges the limitation of using 'safety flags' as an accurate measure of the number of customers affected by family violence as some customers choose not to have a flag on their account and are therefore not captured.

The benefits of regular reporting at all of these levels are clear lines of accountability and an ongoing focus on the organisation's family violence response.



## Principle 3: Safety and choice

*“They [utilities providers] need to understand that it is a forever thing we have to deal with. We can be OK this year, but next year things might happen, and we’re triggered back to that same mind frame. That’s something that every single service provider needs to understand - it’s not a linear effect. It goes up and down, and it goes sideways.”*

– Victim-survivor

Businesses need to provide safe and flexible support options that prioritise customer choice. Businesses should understand the ongoing and long-term impacts of family violence and consider how they best support customers at different stages of their experience of family violence. An empathetic response that promotes customer agency can make a positive difference to a customer’s experience.

Customers will feel more confident to reach out for help if they know they will be believed. A better practice response does not require evidence of family violence, and businesses should ensure they have processes that reduce the need for a customer to retell their story.

Support options should always be agreed with the customer. They should include options that address the financial impacts of family violence and options to protect customers’ private and confidential information. Careful consideration should be given for how to address these matters for customers with joint accounts. Customers will benefit when a business prioritises customer safety and provides flexible support options to meet their individual needs.

### Actions to support better practice



- 3.1 Understand the immediate and long-term impacts of family violence
- 3.2 Show empathy to victim-survivors
- 3.3 Support the agency of victim-survivors
- 3.4 Avoid requiring evidence of family violence
- 3.5 Avoid repeat disclosure
- 3.6 Protect private and confidential information

### 3.1 Understand the immediate and long-term impacts of family violence

*“And the job of all of community, and especially these companies, is to unburden that at a very crucial time, and especially with the terrified, I think I would like them to know how terrifying it is.”*

– Victim-survivor

*“There’s a crisis period. But there is an ongoing need for support, so just really supporting people through that long journey.”*

– Family violence financial counsellor

*“Victim-survivors of domestic and family violence need to feel physically, digitally, financially, and emotionally safe. In every interaction with essential services, safety must be the foundation.”*

– One Generation Customer insights snapshot<sup>38</sup>

The impacts and consequences of family violence are long lasting. The emotional, psychological, physical and financial impacts of family violence can affect victim-survivors for many years after a relationship has ended.<sup>39</sup> The recovery journey for a victim-survivor of economic abuse is dependent on many factors, including ‘the level of financial entanglement, the depth of abuse, and the victim-survivor’s access to resources and support’.<sup>40</sup>

Uniting research identified two distinct phases in the experience of family violence that victim-survivors wanted utility providers to understand: the crisis phase and the rebuild phase. Business responses should consider these phases and reflect the understanding that family violence is not a linear experience, and victim-survivors may cycle through the crisis and rebuild phases many

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<sup>38</sup> Thriving Communities Australia and One Generation, May 2025, *Customer Insights Snapshot: What victim-survivors need from organisations*, Thriving Communities Australia, p. 8.

<sup>39</sup> McAlpine, M., & Samuel, J., September 2025, *Better practice in responding to family violence - Lived experience insights for utilities providers*, Uniting Vic Tas, p. 12.; Summers et al, op. cit., p. 17.

<sup>40</sup> Kun, J., 2025, *Financial security pathways after economic abuse. 'It's is a full-time job'*, Centre for Women's Economic Safety and Illawarra Women's Trauma Recovery Centre a major project of Illawarra Women's Health Centre, p. 28.

times.<sup>41</sup> Businesses should ensure their policy and support options are flexible and can be adapted to meet the individual needs of customers affected by family violence.

### Understand and respond to the needs of customers in the crisis phase

The crisis phase is when ‘victim/survivors are often overwhelmed by immediate safety concerns, trauma and the complexity of disentangling their lives’.<sup>42</sup> When considering appropriate supports for victim-survivors in the crisis phase, businesses should ensure they include options that can provide immediate relief, flexibility and ensuring victim-survivors have time to address other urgent needs.<sup>43</sup>

*“When leaving a violent relationship, a lot of things might change, budgets are fluid. Sometimes my clients are homeless, sometimes they are paying rent and utility bills on two properties. This leads to tricky conversations and obstacles.”*

– Financial counsellor<sup>44</sup>

The Uniting research highlighted what victim-survivors would like water and energy businesses to understand about their needs in the crisis phase.

They need:

- time to sort out the crisis
- safety and privacy protections
- access to trauma-informed specialist support
- separation from the person using violence
- financial counsellor support.

This is not an exhaustive list of customer needs and businesses should always prioritise the agency and individual needs of each customer.

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<sup>41</sup> McAlpine & Samuel, op. cit., p 10. The Uniting research describes two phases of family violence, crisis and rebuilding. Other Australian research explores different stages of family violence, including: Fernando, N., 2018, *When's the right time to talk about money? Financial 'Teachable Moments' for women affected by family violence*, Melbourne: WIRE.; Commonwealth of Australia (Department of Social Services), op. cit.; Corrie, T., 2016, *Economic Security for Survivors of Domestic and Family Violence: Understanding and Measuring the Impact*, Abbotsford: Good Shepherd Australia New Zealand.; Financial Counselling Victoria, June 2024, *FCVic submission to the Australian Energy Regulator*; Kun, op. cit.

<sup>42</sup> Ibid.

<sup>43</sup> Ibid.

<sup>44</sup> Whereto Research, op. cit., p.13.

## Understand and respond to the needs of customers in the rebuild phase

As a victim-survivor begins to regain control of their financial and personal lives, financial stability, predictability, and manageable payment arrangements that do not exacerbate the trauma they have already experienced are a priority for victim-survivors.<sup>45</sup> Businesses should recognise that the impacts of family violence are long lasting and ensure their response offers flexible options that can support victim-survivors as they rebuild their lives.

*“... oftentimes this is not just a moving from one place to another. This is actually ... rebuilding a life and for some people that’s rebuilding from the ground up and I know that was in my situation...But you know, that’s not just my story. That can be an experience of many, many victims that they’re actually really having to restart from nothing.”*

– Victim-survivor

*“When people flee, they typically have a raft of debts and very little resources to set themselves up. I think there is a case for utilities and creditors to play a role in recovery. If that is one-to-two years [of reduced bills] then so be it.”*

Financial counsellor<sup>46</sup>

Uniting research highlighted what victim-survivors would like water and energy businesses to understand about their needs in the rebuilding phase which include:

- supportive and understanding communications
- payment smoothing and flexibility
- understand missed payments
- power audits.

A victim-survivor shared their recent experience when calling their water business. They weren’t experiencing family violence at this time but had in the past. The person answering the call asked if they would still like to be put through to the specialist team:

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<sup>45</sup> McAlpine & Samuel, op. cit., p.12.

<sup>46</sup> Whereto Research, op. cit, p.13.

*“Even though I’m not experiencing family violence, I’m still very much a product of family violence ... the fact that they still offered that to me, and I had that extra care, that trauma-informed response ... being able to still utilise that specialist service made the whole world of difference because ... they are trauma-informed, they know what words to use. They’re extremely sympathetic and show extreme empathy and that made my call so much better.”*

– Victim-survivor

### **Coliban Water provides flexible financial and practical support options to meet individual customer needs**

Coliban Water offers a range of payment and practical support options. Staff in the Customer Care team can offer debt waivers for customers who have experienced family violence. In recognition of the long-term impacts of family violence, Coliban Water will also consider providing a debt waiver more than once. Coliban Water recognises that victim-survivors without debt may also benefit from support. Staff are empowered to discuss other options including discounts and other flexible options.

Coliban Water is also a supplier of ‘Escape Bags’. These are free tote bags containing the necessities that a victim of abuse and his/her children may need when initially escaping a dangerous or abusive situation. The bags are available at Coliban Water’s offices and staff have them in the car during site visits. The bags are also available for staff and can be taken from common areas by those who need them.

The Escape Bags are provided by [Escabags](#), an Australian registered charity who distribute the bags for victims fleeing domestic and family abuse.

## **3.2 Show empathy to victim-survivors**

*“Experiencing domestic violence, [was] humiliating and I had a sense of shame around it so asking for help was so hard that I think that there needs to be some kind of humanity training and compassion and empathy and kindness because ... I just felt so much shame and humiliation that I was experiencing it.”*

– Victim-survivor

Empathy and understanding of the long-term complexities of family violence are key factors that can support an appropriate response to customers.<sup>47</sup> A sensitive and empathetic response ‘fosters trust, empowers the individual, and increases the likelihood that they will follow through on seeking help’.<sup>48</sup> Interactions with their utility provider can often be the first time a customer discloses family violence, which underscores the importance of a safe and appropriate response to customers.

*“I think what happens is when you receive that kind response, that appropriate response, you kind of feel like there’s hope in other places as well. When you get a very negative response, you can be in such a beaten down kind of emotional frame of mind from the abuse and you get a clearly negative response from somewhere and you can walk out that door, [hang] up that phone and feel like there’s no hope for you anywhere.”*

– Victim-survivor

*“... interactions with customers are actually an opportunity. They’re a fork-in-the-road moment where the person acting on behalf of the energy or water company has the chance to either empower that person, who has, through their experience of family violence, been disempowered to date, or they have the opportunity to further that disempowerment, to add to the feeling of abuse that that person has been experiencing.”*

– Uniting perpetrator behaviour change expert

The tone of written communication with customers can also demonstrate empathy and support and should use trauma-informed language. The language used in written communication should be carefully constructed to ensure this cannot be perceived as adding to a customer’s experience of abuse.<sup>49</sup>

However, empathy alone is not enough to achieve good customer outcomes, this must be underpinned by flexible, appropriate and practical support options for customers.

Recruitment and training are crucial to ensuring staff have the knowledge and soft skills, including ‘using appropriate language and dealing with customers with compassion, empathy and humanity’, to respond with empathy to customers.<sup>50</sup>

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<sup>47</sup> Uniting, September 2022, *People with lived experience of family violence focus groups - final report*, Essential Services Commission, p. 6.; McAlpine & Samuel, op. cit., p.18.

<sup>48</sup> McAlpine & Samuel, op. cit., p.10.

<sup>49</sup> Uniting, September 2022, op. cit., p. 10.

<sup>50</sup> Ibid.

A number of businesses consider the natural empathy of candidates when recruiting for specialist teams.

### Recruiting for empathy supports positive outcomes for customers

When recruiting staff to the Customer Care team, Gippsland Water look for candidates with natural empathy, the ability to analyse problems and take safety into consideration to ensure positive outcomes for customers. The Customer Care team is a dedicated team that has been trained to support customers experiencing or at risk of family violence, vulnerability and assist customers who require financial assistance.

Gippsland Water changed from having a common position description across their Customer Care, Customer Service and Revenue teams to developing a specialised position description for Customer Care team members. The Customer Care position description highlights the specific skills and capabilities needed in the team, emphasising soft skills and empathy, which are also tested through behavioural interview questions. This approach to recruitment focuses on the unique skills needed by staff in this team so they can provide tailored support for customers that best suit their individual circumstances.

### 3.3 Support the agency of victim-survivors

*“... the situation of family violence is complex and individual, personal, and organisations need to have flexibility to respond appropriately.”*

– Victim-survivor

Business policies and processes should enable flexibility to support customers in a way that is personalised and appropriate to their individual needs at the time. Businesses should also ensure customers can find clear and detailed information about available assistance and entitlements on their website.

A solution that works for one customer may not be appropriate for another. The Women’s Legal Service highlights this with an example of a safety flag, which for one customer may be helpful as it will prevent online access. But for another customer this same option may increase risk if the perpetrator suspects the victim-survivor has reported the family violence.<sup>51</sup> Safety flags should only be applied or removed with customer consent.

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<sup>51</sup> Bond, C., & Ulbrick, M., 2020, *Responding to Financial Abuse. Full Report*, Women’s Legal Service Victoria, p. 38.

## Flexible application of customer flags prioritises customer choice

Energy Australia identified a need for customers to have greater control over their accounts and created three types of customer flags that enable customers to choose their preferred level of protection:

- Flag one: completely locks down the account and removes any self-service options.
- Flag two: provides partial restriction with the customer being able to choose contact methods for communication.
- Flag three: ensures the account is managed by a specialised trained agent but has no other restrictions on access.

This flexibility ensures customers can make a choice about their account access and information.

## Working with experts to tailor training and resources to staff needs

North East Water's collaboration with a local domestic and family violence specialist service, who also provide workplace family violence training, included the development of a practical 'DFV customer conversation guide' for staff.

The guide prompts staff on key questions and matters to address when speaking with a customer who may be experiencing family violence. This includes indicators of family violence and how to speak to customers without being intrusive. Staff keep this guide at their workstation for easy reference when they need it. It provides them with the support and confidence to respond and support customers in a way that best meets their customers' needs.

### 3.4 Avoid requiring evidence of family violence

A major barrier to customers seeking support can be the concern that they will be asked to provide evidence of family violence. There are many reasons why a victim-survivor may find it difficult to provide evidence, including:

- being asked for evidence can be retraumatising and distressing
- providing evidence may increase risks to the customer's safety due to retaliation or worsening abuse, or evidence may not be available at the time support is needed (for example, if the business is contacted when the victim-survivor is fleeing)

- the impacts of family violence can last for many years, and it can be challenging to provide evidence of ongoing impacts
- exposing staff to evidence from customers can also increase the risk of vicarious trauma.

The Energy and Water Ombudsman of Victoria has identified providers seeking inappropriate information and evidence from victim-survivors as one of the four most serious and common issues for victim-survivor customers.<sup>52</sup>

Several energy and water businesses' family violence policies explicitly state that they do not require evidence or proof of family violence. This is better practice because requiring documented evidence can delay resolving the problem, place stress on the victim-survivor and may result in disclosure of very personal information.<sup>53</sup>

*“None of the companies that I'd actually called have asked for evidence for domestic violence. They just go off what I said to them.”*

– Victim-survivor

#### Examples from family violence policies that do not require evidence from customers

**Lower Murray Water:** ‘To ensure our customers are safe and not to add any stress to their complex circumstances, we will not require proof of family violence. We will take people at their word and work towards supporting customers in a timely manner.’

**Wannon Water:** ‘Wannon Water recognises that family violence is a complex and sensitive issue for customers to discuss with their service provider. In order to prioritise customer safety and privacy, Wannon Water does not require customers to provide evidence of family violence.’

**Momentum Energy:** ‘We will never ask you to provide documentary evidence of family violence.’

**Powershop Australia:** ‘Powershop will not seek evidence from you to access the support detailed in this policy. If you are a Victorian customer accessing the Utility Relief Grant Scheme (URGs) we may ask you to provide the Department of Families, Fairness and Housing evidence of your circumstances to assess your eligibility for the grant.’

<sup>52</sup> Energy and Water Ombudsman Victoria, 2024, *Empowering change: Supporting victim-survivors of family violence*, Energy and Water Ombudsman Victoria, p. 5.

<sup>53</sup> Bond & Ulbrick, op. cit., p. 36.

## Evidence and Utility Relief Grants

*“It is hard when speaking to customers and telling them 'We take you at face value and won't ask for evidence' but then applying for an URG requires evidence, it feels like you are not being true to your word.”*

– Water business interview

Water and energy businesses support customers to complete Utility Relief Grant (URG) applications. One of the [eligibility criteria](#) is that the customer or a person in their household has experienced family violence and evidence of this is required to be provided with the application. Several water and energy businesses have noted the conflict between the requirements of the URG and their family violence policy not to require evidence from customers. In this situation businesses use a range of approaches to reduce the burden on customers, including: <sup>54</sup>

- Waiving evidentiary requirements for URG applications where customers are unable or unwilling to provide evidence.
- Sending the application to the customer for completion, so they do not need to share the evidence with the utility provider.
- Ensuring any records of the evidence are deleted from email accounts and business systems.
- Applying under financial hardship criteria as it can be easier to provide this evidence.

### 3.5 Avoid repeat disclosure

*“... you re-traumatise yourself every single time you tell that story, you re-live it and it's hard enough to actually live it without having to retell it over and over again.”*

– Victim-survivor

When victim-survivors have to repeat their story of family violence to different staff it can be traumatising. It can lead them to stop seeking support or may place them at greater risk if their calls or movements are being monitored by the person using violence.

Repeated disclosure may occur if staff members aren't adequately trained to identify signs of family violence, or if internal systems don't allow staff to readily identify the account of a customer who has been identified as affected by family violence.

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<sup>54</sup> Whereto Research, op. cit., p. 12.

*“I spoke to like 20 different support services and had to go through that traumatic retelling of my story only to be referred on to other people. And I had three services that I finally got to that actually helped me. Everybody else just made me tell the whole story and then offered nothing other than phone calls and on referrals and it was really awful to go through, and I almost gave up.”*

– Victim-survivor

Businesses should consider how they can avoid the need for customers to retell their story, for example:

- providing customers with a direct number to reach specially trained customer support staff
- allocating case managers for individual customers
- not asking for evidence of family violence
- joining the One Stop One Story Hub to support referrals to and from other participating businesses (see case study below)
- providing the option for an account flag or similar system tool that will indicate that the customer is affected by family violence. Any option like this should only be applied or removed with the consent of the customer.

### **The One Stop One Story hub connects customers with support to reduce the need to retell their story**

Thriving Communities Australia’s One Stop One Story Hub enables frontline workers from participating organisations to seamlessly refer customers to a range of corporate, community, and government supports. Through this integrated digital platform, customers can access support without having to contact each organisation separately.

Importantly, this approach means people do not need to retell their story multiple times – a process that can be embarrassing and re-traumatising and creates a significant barrier to seeking help. By reducing the need for repeat disclosure, the OSOS Hub not only lessens the risk of vicarious trauma for staff but also fosters a sense of pride and confidence that customers are receiving coordinated care across multiple services.

Organisations receiving referrals have reported that up to 90% of these customers had never previously reached out for support or had been unable to be contacted by the business before the referral was made.

*“Just having to discuss your circumstances one time and a streamlined process to be able to refer to multiple agencies – that’s really beneficial. It’s beneficial to us because the customers love it, we’re trying to help them, but it’s beneficial to them because it just takes such a weight off their shoulders.”*

– Corporate Partner

With over 20 partnering organisations, water and energy businesses can find out more about the OSOS hub by contacting [Thriving Communities Australia](#).

### 3.6 Protect private and confidential information

*“I was worried that he would get his new partner to ring up and cancel my electricity and turn it off ... So then I'd have to go through the, you know, hassle of having it reconnected all that sort of stuff. So, they actually put a password on all my utilities so that so they couldn't get a female. How would you be able to know the identity check if they're only asking simple questions like what's your date of birth? ... he or she knows all that.”*

– Victim-survivor

*“On all of them I have a password and it's on screen so that when I ring up and I inquire they cannot progress further, unless they ask me the password.”*

– Victim-survivor

An effective family violence policy needs to make the victim-survivor's safety and protection a priority from beginning to end. Two major family-violence-related risks businesses need to consider when it comes to private and confidential information are:

- A person who uses violence accessing new address details or changing account information. This may include using knowledge of their former partner's personal information to pass standard account privacy protection methods or taking advantage of poorly designed systems (such as online portals).
- The inadvertent disclosure of victim-survivor information to the person using violence due to inadequate business systems. This may include sending correspondence (written or email) to an old address, thereby revealing the customer's new address.

Some customers may have additional privacy concerns. Protecting customer information is particularly important when the perpetrator is, or has been, a joint account holder. It may also be relevant where family violence is occurring between account holders of a non-residential (business) account. Financial counsellors have noted that water customers living in regional or rural areas may have additional privacy concerns, for example if the person using violence or their

connections are working at the water business and may be able to access information about them or their account.<sup>55</sup>

To effectively reduce the risks relating to customer information, businesses should be considering systems, training, policies and procedures and the role of each of these in both causing and mitigating risk. A safety by design approach can support this risk assessment. (See section 2.3 for more information about safety by design).

Information protection options should be considered at all stages of a customer's experience, including opening and closing an account and removing an account holder from an existing account.

Businesses should use a range of approaches to protect customer information. This may include restricting access to sensitive information to trained staff and clearly recording and only using the customer's preferred method of communication. Consideration should also be given to how communications can be made safer, for example some businesses ensure any written communication to family violence flagged customers is sent manually to reduce the likelihood of sending to the wrong address.

Customer safety and privacy should be an ongoing concern for businesses and additional security options should be offered to customers. Code words, pins and multi factor authentication are all examples of additional security measures businesses can implement to keep customer information secure.

Approaches to protect customers should adapt and evolve to respond to new technology and new tactics of people using violence.

### **Alinta Energy puts a safety lens on move out requests**

One of the ways gas and electricity can be weaponised is by the person using violence attempting to close the account or change providers, potentially leaving the victim-survivor without energy.

Alinta Energy runs a daily report on customers moving out or transferring out, who are flagged for family violence. This report addresses the risk the request was not made by the customer and that the person using violence has made this request to cause harm to the victim-survivor. Staff reach out to customers on this report to confirm they want the transfer or move out request to

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<sup>55</sup> Whereto Research, op. cit., p. 3.

proceed. If they are unable to reach the customer by phone, they send a request using the customer's preferred method of communication asking them to contact Alinta Energy if they did not request the transfer. If Alinta Energy is unable to contact the customer, an additional safeguard built into the process is to do a final read of the meter, rather than disconnection of supply.

### Protecting customer information through all stages of the customer journey

Gippsland Water uses a range of approaches to protect customer information. When a customer is identified as affected by family violence (protected customer) they are allocated a case manager from the Customer Care team.

Protected customers can apply a password to their account and are given the direct number for the Customer Care team. Any closed accounts in the system associated with a protected customer are thoroughly reviewed, and all phone numbers and email addresses are deleted. The customer's mailing address is updated to 'c/o Customer Care'. They also ensure that the new profile is not linked to previous accounts.

When a protected customer vacates a property the address for this property account is updated to 'c/o Gippsland Water' to ensure their new address is not disclosed. A member of the Customer Care team engages with the vacating customer and manually addresses the final customer account, ensuring it is sent via the customer's preferred communication method. They also confirm the customer's preferred method of receiving their final bill, ensuring their new address or other personal details are not inadvertently disclosed.

### GloBird helps customers make an informed choice about account protections

GloBird discusses options for account safety and privacy with customers who are affected by family violence to raise their awareness of potential risks. This includes verifying the customer before sharing any sensitive information, reinforcing the importance of secure communication channels and informing the customer of potential areas where their information might be at risk. For example, whether the person using violence knows their access password, date of birth and email, whether the account has a shared password, how GloBird might contact the customer safely and their preferred method and times to contact. GloBird applies the same security

controls to any other accounts linked to the customer (for example, different fuels or different sites).

Staff capability is supported by family violence training that includes modules on trauma-informed communication, active listening, responding safely to disclosures and scenarios to practice sensitive conversations without re-traumatising the customer.

By limiting access to sensitive information and using customer-approved contact methods, GloBird reduces the risk of harm or re-traumatisation. This helps customers feel safe, heard, and supported, and builds trust and engagement, which is critical in supporting customers to maintain services.

### **Protections for customers who have not disclosed to the business**

While staff should be trained to help identify potential family violence, many businesses recognise that the high rates of family violence in the community are not reflected in the number of customers flagged in their system as affected by family violence. There are many reasons why a customer may not disclose their experience of family violence to their water or energy provider. (See section 5.5 for an exploration of barriers to disclosure).

The Essential Safety by Design framework highlights the opportunity for businesses to proactively identify and mitigate safety risks. Ensuring that all customers can access account privacy protections is an important way businesses can support the safety of customers who have not disclosed. Business systems need to be designed to ensure that customer address details are not inadvertently shared, regardless of whether the customer is known to be affected by family violence or not. This can ensure protection of customer information for customers who have not disclosed family violence but nevertheless may still be experiencing it.

### **Applying a safety lens to customer communications**

Following a review of its communications, Wannon Water implemented a change to remove identifying information from any customer communication that relates to a service address, to reduce the risk of inadvertent disclosure of customer address details. For example, if a meter reader is unable to access a meter, a letter will be sent to the customer informing them of this.

The first trial of this new approach removed the account number and the property address from the communication. However, this meant that customers who owned multiple properties were unable to identify which property the letter related to. Wannon Water updated the process and now exclude the service address only. This change means customers know what property the

information relates to and when they call Wannon Water it allows staff to identify the property, after the customer has passed verification.

### Sharing knowledge to mitigate risks with online portal registration

Gippsland Water staff identified an issue with the registration process for their online customer portal. The process only required validation of the name and account number of a customer, and if the customer added a new email address as part of the registration this replaced the original customer email address, without providing notification to the original email to advise the record had been changed. This was identified as a high risk to customer privacy and safety.

Gippsland Water reached out to Central Highlands Water to inform them of this issue, as they use the same customer billing system. Both businesses suspended the registration functionality due to the risks posed by this issue and the Customer Service Team now assist with registrations until upgrades can be made to address this risk. As a security precaution, customers flagged as affected by family violence were already unable to use the portal, but this new understanding of how the system works will help protect customers who may not have disclosed to the business.

## 3.7 Respond to the financial impacts of family violence

*“... all they did was get into a relationship with somebody who’s an abuser ... All they’re doing is literally calling up and saying help I can’t pay my bill, and I think it really needs to be looked at in that context and that it’s not their fault that they’re in this situation. Yet that’s the burden that’s been placed upon them.”*

– Victim-survivor

*“...after you leave a DV relationship, your finances, you know, are still going to be in financial hardship. In my experience. I was for a long time after I was in debt and even organising a payment plan with them, you know, took a long time.”*

– Victim-survivor

Family violence can have significant negative impacts on a victim-survivor’s financial situation. Research has shown that women who leave a violent relationship can suffer a drop in income of as

much as 45 per cent.<sup>56</sup> The Energy and Water Ombudsman of Victoria has found that ‘energy and water debts can be a key contributor to financial insecurity for consumers impacted by family violence.’<sup>57</sup>

Water and energy businesses have an opportunity to support customers to rebuild their lives by providing a range of flexible options that can respond to the needs of individual customers. This may include payment support options (which should be considered for customers with debt and without debt), debt management options, as well as other options that will support customers with their unique circumstances, such as food vouchers. Financial support options that help include flexibility with payment arrangements and debt relief measures, including account credits, payment matching, gift vouchers, and payment scheme reviews.<sup>58</sup>

### Assistance for payment difficulty

It is important to recognise that even if a customer is paying their utility bills, this doesn’t mean they are not going without in another area of life. The financial impacts of family violence can be ongoing. By offering financial assistance even where it appears a customer experiencing family violence is not yet in dire need, organisations send a powerful message to that customer that they aren’t alone, and there is help available should they need it.

*“We know that many victim-survivors are highly skilled at budgeting and pay their utilities on time to protect themselves and their families from abuse at the hands of the perpetrator, this can make accessing a debt waiver difficult or unsafe. We also know that just because a customer pays their water bill doesn’t mean they aren’t going without. Paying a water bill may be at the expense of putting food on the table or paying for other essential items and services like healthcare and medication.”*

– Coliban Water

Businesses should ensure customers are aware of the potential longer-term impacts of some debt relief options. Financial counsellors report that extensions or holds can be beneficial for clients affected by family violence. For example, when waiting for a court case to conclude, but such an option could be unhelpful for a customer if debt continues to accumulate during this time.<sup>59</sup>

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<sup>56</sup> Summers, A., July 2022, *The Choice: Violence or Poverty*, Sydney: University of Technology, p. 18.

<sup>57</sup> Energy and Water Ombudsman Victoria, op. cit., p. 2

<sup>58</sup> Uniting, op. cit., p. 2.

<sup>59</sup> Whereto Research, op. cit., p. 13.

*“Repayments in that part of your life, we’re going to rebuild. They really need to be doable. Like I remember in the early days I entered into agreements pretty much under duress.*

*‘Cause, they’re saying if I didn’t pay this amount per fortnight of my electric would get cut off. And I even said to them, OK, I’ll agree, but I don’t have that. I won’t be able to pay that, but they sort of didn’t really care as long as I agreed and it was like I entered agreements knowing it wasn’t doable for me.”*

– Victim-survivor

Affordable payment plans that are set in consultation with the customer are an important form of support businesses can offer.

### Ensuring affordable payment plans are meeting customer needs

Gippsland Water’s approach to payment plans focuses on what the customer can afford and prioritises keeping them engaged.

The Customer Care team member has a conversation with the customer to explain what the costs are and listens carefully to help understand what might be affordable for the customer. The focus is agreeing on a payment plan that is manageable and affordable for the customer.

When tailoring a plan to meet a customer’s needs, Gippsland Water looks at the customer’s payment and account history and agree on an amount that is manageable. If a customer has previously defaulted on a payment plan and their circumstances have not changed, it is a possible indicator that the previously agreed payment plan instalments were not affordable.

This approach to payment plans prioritises safety and choice for victim-survivors and supports their financial recovery from family violence.

### Debt management and joint accounts

*“I think bills that are in joint names, or if you’re still living in the home where the husband’s name is on that bill, that bill just needs to be waived and the account needs to be closed and wiped from existence. So, then you can start fresh because you’re dealing with all these people. You’re talking to numerous different people within the same organisation. You’re telling the story over and over again, and then they’re ringing them and of course making it worse. Wipe it. End it. Done.”*

– Victim-survivor

*“Probably the most useful thing a business can do to help a victim-survivor is a clean slate ... [There is] not a lot of recognition that debt follows someone and traps them, or fear of not being able to afford essential services can draw them back to relationship.”*

– Westjustice

Consumer Action Law Centre research has found a high correlation between the experience of family violence and closed energy account debt, with 22 per cent of National Debt Helpline callers who disclosed experiencing family violence having closed account debt, compared with only 10 per cent of those who didn’t disclose family violence.<sup>60</sup>

Financial abuse can continue for many years after an abusive relationship has ended. Debt waivers have many benefits to support the long-term recovery of victim-survivors including:<sup>61</sup>

- reducing financial outgoings freeing up income to be spent on daily living expenses
- increasing the capacity for victim-survivors to save and create a financial buffer
- addressing the unfairness and sometimes illegality of economic abuse that victim-survivors are subjected to
- improving credit ratings, increasing victim-survivors ability to access loans in future.

Many businesses will waive debt that is the result of family violence to help give the customer a fresh start, whether they are remaining in the formerly shared home or moving to a new address.

Businesses can also take a proactive approach to the risks of joint accounts, by clearly explaining the risks and benefits to customers at signup.<sup>62</sup>

### **Debt waivers can directly reduce the impacts of financial abuse and support customers in recovering and rebuilding from family violence**

South East Water works with customers to design a tailored approach to debt management that considers personal circumstances and capacity to pay. Their family violence policy outlines their approach to debt relief and the additional support options that are available to customers affected by family violence. A financial counsellor shared an example of South East Water waiving debt accrued by their client due to family violence. South East Water also waived the next two

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<sup>60</sup> Consumer Action Law Centre, June 2024, *Energy Assistance Report 4th Edition. Keeping The Lights On - How Victoria's energy policies are impacting Victorian households*, Melbourne: Consumer Action Law Centre, p. 34.

<sup>61</sup> Kun, op. cit., p. 103.

<sup>62</sup> Ibid.

upcoming bills for the customer. Importantly, these debts were waived without the customer having to access a Utility Relief Grant, meaning this option was still available to the customer in future if required.

### Providing options that can address the financial impacts of family violence

North East Water recognises the financial impacts of family violence, and that when customers flee family violence debt can hamper recovery and rebuilding. North East Water run a regular report on inactive accounts that are flagged for family violence. If any of these accounts are in debt North East Water staff will contact the customer offering to pay their final water bill. Extra care is taken if this relates to a joint account as they don't want to put the person who has fled at further risk. Affordable payment plans are also given as an option if the customer does not want North East Water to pay the bill for them.

### Empowering customers to make choices

Alinta Energy recognises the impacts of financial abuse and how disempowering this can be for a victim-survivor.

The Alinta Assist team supports the agency of customers in debt and empowers them to make the best decision for their situation. Debt waivers, partial waivers and discounts on debt are all options for customers. While many customers will accept a waiver, others have preferred to pay it back over time, demonstrating how important it is for businesses to work with customers to meet their individual needs.



## Principle 4: Awareness and capability

*“You know, we’ve all got different various levels of domestic violence and these essential service customer services people at the end of the phone are not expected to be our counsellors, nor do we want them to be our counsellors. However, if essential service providers have some sort of training of some sort for them to identify ... As soon as we just say we are a domestic violence lived experienced person on the phone ... as soon as the customer service individual hears that, then they already have a specific set, you know, guidelines from their employer that ... this is the way we deal with this.”*

– Victim-survivor

Business leaders need to build a culture of awareness to effectively support staff and customers affected by family violence. A whole-of-organisation approach to family violence awareness, training and capability building can support early detection of family violence and support employees to respond safely and appropriately. Selecting a training provider with expertise in family violence can ensure training is informed by current better practice knowledge.

A tailored training approach can support implementation of the business’s family violence policy. Training for leaders can help with effective policy development and implementation and improves support for staff. Specific training for customer-focused roles can support staff to respond appropriately to customers and can contribute to more consistent customer experiences.

Training should help staff understand their role and responsibilities, and when to refer customers for further support.

Both customers and staff benefit when staff are well-trained and supported to do this work. Customers can feel confident that the business understands family violence and will provide appropriate and flexible support. Staff will feel confident and clear about how they can help and know that their wellbeing is a priority for the business.

### Actions to support better practice



4.1 Educate, train and support employees

4.2 Tailor training for customer-focused and senior roles

4.3 Support staff to understand their role and limitations

## 4.1 Educate, train and support employees

Providing education, training and support for staff signals to the whole organisation that addressing family violence and ensuring the safety of customers and staff is a business priority. A shared understanding across the organisation on the drivers and impacts of family violence will support the cultural change that is required to embed this work. Ensuring staff have completed training and have an understanding of family violence and the supports their organisation offers, means they will be able to make a valuable contribution to the development and review of family violence policy for customers.<sup>63</sup>

All staff should understand:

- the nature of family violence
- the organisation's family violence policies
- their responsibilities relevant to their individual role.

Many customers may not be aware they are experiencing family violence and providing training for staff will help them identify potential family violence and how to safely refer the customer to the appropriate person or team within the business, or external support services.<sup>64</sup>

Businesses should be prepared to support staff who may disclose their experience of violence or find talking about this topic challenging.

### Selecting a training provider

Selecting a training provider with expertise in family violence can ensure training is trauma-informed, addresses the key issues relevant to family violence, and is informed by current practices and research in the identification, awareness and prevention of family violence.<sup>65</sup>

Businesses should also consider whether training providers have included perspectives of people with lived experiences into their training.

### Consider training for contractors

Businesses should also consider how to ensure third parties who have customer contact or access to systems containing customer information have the appropriate level of knowledge about family violence and the businesses policies. For example, this may include ensuring debt collection

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<sup>63</sup> Economic Abuse Reference Group, Updated 29 October 2018, op. cit., p. 1.

<sup>64</sup> Bond & Ulbrick, op. cit., p. 17.

<sup>65</sup> Uniting Vic. Tas., 3 March 2022, *Submission to the AEMC Consultation on Protecting Customers Affected by Family Violence*. [Protecting customers affected by family violence | AEMC](#), p. 6.

agencies adhere to the businesses policies to ensure protections for customers who have not identified to the business.<sup>66</sup>

The ISO Standard on Consumer Vulnerability recommends training programs should be reviewed at a minimum annually to ensure content is useful, relevant and up to date.<sup>67</sup>

### **Adapting training for staff who have personal experience of family violence**

Businesses may find that some staff are reluctant or unwilling to participate in family violence training, for personal reasons. Businesses should ensure staff are aware of the supports available for staff experiencing family violence and provide alternative training options so staff can acquire the knowledge required in a safe environment for them. Some examples of alternative training options are described in the case study on page 57.

Businesses should also ensure training providers are prepared to support staff who may realise their personal experience is that of family violence during training.

### **Address risk of vicarious trauma for staff**

*“And just having the staff trained, I think that’s important not just for us, but it’s important for them because they hear a lot of stories and that’s second-hand trauma to them as well. I think that’s something a lot of places forget that, you know, when you’re talking to someone, they’re not necessarily trained in trauma, and they might go home and be disturbed.”*

– Victim-survivor

Businesses should also consider how to address the risk of customer-facing staff experiencing vicarious trauma in hearing about customers’ experiences of family violence.<sup>68</sup> The importance of self-care and strategies to reduce risk should be covered in staff training and ongoing supports should be available. Providing appropriate support for employees will also support them to provide a better response for customers. There are many ways to ensure staff feel supported, including ensuring family violence staff training addresses wellbeing and self-care strategies for staff, team

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<sup>66</sup> Ibid.

<sup>67</sup> International Organisation for Standardisation, 2022, *Consumer vulnerability - Requirements and guidelines for the design and delivery of inclusive service (ISO Standard No. 22458:2022(E))*. Retrieved from <https://www.iso.org/standard/73261.html>, p. 14.

<sup>68</sup> Vicarious trauma is the trauma someone experiences due to exposure to other people’s trauma. It can affect people in different ways and at different times. It may result from ‘repeated exposure to distressing events, a single situation, or indirect exposure such as reading about a traumatic event’.  
WorkSafe Victoria, [Exposure to traumatic events](#), [website], n.d., accessed 15 June 2025.

or one-to-one debriefings, buddying and mentoring of staff, taking time off the phones after a difficult call, and Employee Assistance Programs.

### A flexible approach to staff training supports staff to achieve their learning outcomes

South East Water has developed a 'Care-First' alternate learning pathway for staff who are unable to participate in the standard family violence training program. The purpose of Care-First is to ensure that staff meet their learning outcomes in a manner that also protects their safety and wellbeing. Alternate pathways available to staff include:

- One-on-one discussions between people leaders and affected employees to ensure team members understand the learning outcomes.
- Completing the learning with support from a people leader or trusted colleague present.
- Completing the eLearning in small chunks with the support of their people leader or trusted colleague, providing an extension on the compliance due date for training completion.
- People leader debriefing after, or throughout the training.
- Providing a handout (print-out or digital) which takes employees through our processes related to the learning outcomes.
- Providing a handout (print-out or digital) of the eLearn module as a pamphlet that can be referenced in their own time.

### Managing risks to staff

AGL recognises that staff in its contact centres may be exposed to potentially traumatic events, including interactions involving family and domestic violence, placing them at risk of vicarious trauma – a recognised psychosocial hazard.

In line with obligations under the *Occupational Health and Safety Act 2004*, AGL has implemented a range of measures to support its teams and establish safer systems of work to prevent and mitigate harm.

One key initiative is a pilot trauma-informed training program tailored to key roles that are most exposed to potentially traumatic events. Delivered by registered psychologists, the program focuses on managing complex callers, de-escalation techniques, and wellbeing planning.

AGL is also strengthening internal support systems through leader-specific training on recognising and responding to vicarious trauma. Additionally, the organisation is reviewing its

existing support services to ensure they are fit for purpose and responsive to individual needs. These initiatives reflect AGL's proactive approach to psychological safety and workplace wellbeing.

### **Collaboration to build organisational capacity**

Westernport Water and South Gippsland Water collaborated to deliver family violence training for their frontline staff.

This approach reduced costs and enabled them to run two sessions which meant they only had half their team off site for each session. The training was run by a specialist training organisation and contained many real-life scenarios to help staff understand family violence in the context of their work.

### **Organisation-wide training for staff is the foundation for a strong business response**

Alinta Energy has developed a comprehensive family violence training program that includes organisation-wide awareness training, tailored training for frontline staff and in-depth training for members of the Alinta Assist team.

Every two years all staff are required to complete an e-learning module on family violence that covers responding to disclosures and an overview of how Alinta Energy provides support for staff and customers affected by family violence. For frontline staff their biennial training includes modules about responding to customers and internal referral pathways to the Alinta Assist team.

The Alinta Assist team supports customers in hardship and those who are experiencing family violence. This team completes additional face to face training annually to equip them to respond appropriately to customers. In addition to annual training, Alinta Assist team leaders regularly develop 'huddle packs' to share and discuss with their team. These short slide decks focus on a key issue to remind staff of why the issue is important and how they might respond in line with Alinta's policies and procedures, such as the importance of customer's preferred communication methods.

## 4.2 Tailor training for customer-focused and senior roles

*“When you flag that you’re experiencing family violence, I automatically just, like would like it to go to a specific team or a specific staff member ... Somebody who’s more trained and knows the sensitivity and knows the language knows how to approach me because my needs may change from one day to the next to next week to the week after.”*

– Victim-survivor

*“Just for the staff to understand that as soon as we say those two words. Family violence. We’re talking about a whole different ball game and if they could, if we can work with someone who’s trained in that and understands the complexities of it and that we’re not necessarily going to be thinking straight because you know, I mean, in my case, my brain was so scrambled just trying to cope.”*

– Victim-survivor

Thriving Communities Australia considers leadership support is imperative to responding to family violence. Tailored training for senior roles helps management effectively implement policy, improve processes and support their staff. It also increases leadership support and ensures there is funding available for training and resources.<sup>69</sup>

Training all staff provides clarity on what their role is, and the role of the organisation in responding to family violence. It helps them consider risks relating to their work areas. When they are aware of the risks, they can take action to prevent and reduce risk and potential harm. For example, members of the IT team might consider risks in system processes and upgrades, creating solutions to prevent unintentional disclosure of confidential information and safeguards to ensure sensitive information can only be accessed by authorised staff. The communications team may consider the risks in outbound communications that may contain customer information such as addresses. Training for staff in overseas call centres should address differing understandings of family violence.<sup>70</sup>

The Economic Abuse Reference Group recommends in addition to providing all staff with general awareness training, targeted training should be provided for staff who:<sup>71</sup>

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<sup>69</sup> Thriving Communities Partnership, 2019, *Family Violence Roundtable Report*, Thriving Communities Partnership, p. 21.

<sup>70</sup> Morgan & Wark, op. cit., p. 15; Australian Energy Regulator, February 2025, *Family Violence Rules: Guidance for Energy Retailers*, Australian Energy Regulator, p. 10.

<sup>71</sup> Economic Abuse Reference Group, Version 2, April 2018, op. cit., p. 2.

- have any customer contact
- respond to vulnerable customers (for example, customer support or hardship teams)
- hold management roles which may involve supporting staff who are responding to family violence
- are responsible for designing products and processes.

From a customer perspective, a consistent response from a business can make a difference. Consistency means customers know what to expect and the level of support available is the same regardless of who they speak to at the business. Whether this consistency is achieved through individual case management or through a specialist team, training is the foundation of a consistent experience for customers.

Tailored training for staff members interacting directly with customers will help develop their capacity to identify signs of family violence at an early stage and to respond according to the organisation's policy.

Knowledge about family violence is constantly evolving and businesses should ensure their training includes current knowledge and information about family violence. This is best achieved by working with organisations with expertise in family violence to design and deliver staff training.

Businesses should consider including the following topics in staff training:<sup>72</sup>

- The gendered nature and prevalence of family violence.
- Unconscious bias and intersectional experiences of family violence, shaped by culture, race, disability, gender identity, sexuality and age.<sup>73</sup> This should include specific reference to the unique impact of domestic and family violence of Aboriginal and Torres Strait Islander women.
- Detecting the warning signs of family violence, even when a customer has not disclosed.
- How to ask about family violence.
- Handling disclosures with empathy.
- How water and energy can be used to cause harm.
- Ensuring customer safety, protecting data, privacy and confidentiality.
- Providing flexible and personalised solutions.

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<sup>72</sup> Morgan & Wark, op. cit., p. 25.; Economic Abuse Reference Group, Updated 29 October 2018, op. cit., pp.1-2.; Tonkin, 2018, *Restoring Financial Safety: collaborating on responses to economic abuse. Project report describing Westjustice's work and reflections on economic abuse*, Westjustice, p. 11.

<sup>73</sup> The Victorian Government's Family Violence Diversity and Intersectionality Framework defines intersectionality as 'different aspects of a person's identity that can expose [that person] to overlapping forms of discrimination and marginalisation. These aspects can include gender, class, ethnicity and cultural background, religion, disability and sexual orientation.'

Victorian Government, [Intersectionality and family violence](#), [website], n.d., accessed 6 June 2025.

- Making referrals to support services (this can be transferring them directly to the appropriate team within the organisation or, if the customer is talking to the specialised team member, external referrals to support service organisations).
- Responding safely to people using violence and avoiding collusion.
- Applying the businesses family violence policy and procedures.
- The risks of vicarious trauma to staff and self-care to manage these risks.

Staff should have access to resources and supports in addition to training. This might include materials that support them to have conversations with customers, tip sheets with soft questions they could ask, framing suggestions as well as regular team meetings or other support options.

### **Expert trainers can provide tailored training to meet the organisation's needs**

OVO Energy engaged a specialist family violence service, who also provide tailored family violence training, to run family violence training for their customer facing teams and operational staff. The training was tailored to meet OVO Energy's needs and included the perspectives of people with lived experience of family violence. Participants workshopped potential customer scenarios and received feedback from the customer perspective, which helped staff understand how they could better communicate with customers.

### **Tailored training can improve confidence when engaging with individuals using violence**

Having completed family violence training and regular refresher sessions, staff in Yarra Valley Water's WaterCare team felt confident in their ability to support victim-survivors. However, they were less certain about how to engage with individuals using violence. To address this, Yarra Valley Water sought guidance from a community services organisation with expertise in supporting businesses improve their responses to customers experiencing vulnerability, including family violence. They worked closely with Yarra Valley Water to design a training session tailored to the team's needs.

The training focused on understanding the perspective of the person using violence – exploring their behaviours, how they might weaponise systems or processes, and strategies for responding without colluding or getting involved with their perpetration. As a result, the team now feels confident in handling calls from individuals who use violence.

### 4.3 Support staff to understand their role and limitations

Customers will receive more consistent responses when staff are clear about what is expected of them. Staff need to understand the scope of their role and what options are available to support a customer to decide on the most appropriate solutions for them.<sup>74</sup>

Information about the organisation's response to family violence must be clear to employees. In this way staff will feel confident and better able to efficiently and effectively assist customers affected by family violence. Customers will benefit from a more efficient and less stressful process. The risk of staff experiencing vicarious trauma can also be reduced.

Increasingly, businesses are looking to systems and technology to provide additional support to staff. For example, employing speech analytics on customer calls that can help identify hardship or family violence triggers. Such approaches can help ensure staff aren't missing key information from customers and can also be used to alert a team leader to reach out to an agent to offer support if a difficult call is identified.

A transparent recruitment process can help ensure businesses recruit staff who are aware of the scope and limitations of their role.

#### Developing a tailored, whole-of-organisation approach to family violence training

Barwon Water has committed to completing organisation-wide face-to-face family violence training every two years, with an e-learning module being provided in the year between. Most recently, Barwon Water worked with a community services organisation with expertise in supporting businesses improve their responses to customers experiencing vulnerability, including family violence, to develop three tailored training offerings. Each training session was opened by a senior leader who reiterated the organisation's commitment and importance of the training. Organisational leaders were the first to complete the training, which set them up to provide support for employees. Employee training focused on family violence awareness and responding to disclosures. Customer service staff received tailored training to directly support customers. Even though the training was not mandatory there was high participation across the three streams. Staff provided positive feedback on the practical nature of the training and the ability of the trainers to create a safe and comfortable space for the training. The community service organisation also reviewed Barwon Water's family violence policies for customers and staff as part of the training package.

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<sup>74</sup> Morgan & Wark, op. cit., p. 25.



## Principle 5: Accessible and flexible

*“I wasn’t aware of the options that existed with my utility company. It was my social worker who let me know and facilitated that process. I don’t think I could have disclosed to somebody on the phone at the time.”*

– Victim-survivor

Energy and water businesses should recognise and address the factors which increase the likelihood of experiencing family violence and which can make accessing services more difficult. To provide inclusive support, businesses should consider the diversity of customer needs and how they can best communicate with and support all customers. Accessible and flexible support means customers have options, both in how they reach out and communicate with the business, and in the support that is available to them.

It is important that businesses can provide safe and appropriate referrals to customers to link them in with other support available in the community.

Businesses should understand the barriers to disclosure and engagement that customers face and take action to reduce these barriers. When customers understand that practical family violence informed support is available, they can feel more confident to reach out for help.

### Actions to support better practice



5.1 Understand the gendered nature of family violence

5.2 Provide support that is inclusive for all Victorians

5.3 Provider referrals to expert support services

5.4 Promote the options available to customers

5.5 Address barriers to disclosure and engagement

## 5.1 Understand the gendered nature of family violence

The Victorian Royal Commission into Family Violence found that:

*“The strategy to address family violence must continue to recognise that most family violence incidents occur in the context of intimate partner relationships. The significant majority of perpetrators are men, and the significant majority of victims are women and their children.”<sup>75</sup>*

Research continues to show that women are more likely than men to have experienced violence. One in four women in Australia (23 per cent) have experienced violence by an intimate partner since the age of 15, compared with 7.3 per cent of men.<sup>76</sup> Pointing out this disparity is not intended to dismiss the experience of male victim-survivors, but rather demonstrates that the most prevalent pattern of family violence in Australia is male violence against women.

Violence against women is preventable.<sup>77</sup> Gender inequality is known to be a driver of violence against women and so must be targeted to address the gendered nature of family violence.<sup>78</sup>

Delivering clear messages to staff about the gendered nature of family violence will support female employees to feel believed and respected if they disclose experiences of family violence. It is also an opportunity to highlight that men can have an active role in preventing all forms of violence against women by challenging sexist attitudes and behaviours.

### Training supports understanding of the gendered nature of family violence

Wannon Water is a partner in ‘Respect 2040’, a regional partnership in Barwon South West that is committed to the elimination of violence against women. The partnership coordinates a regional approach to disrupt the gendered drivers of violence in a sustained way over time through collaboration and action.

Respect 2040 lead agency, Women’s Health and Wellbeing Barwon South West, delivered Wannon Water’s organisation-wide gender and equity training. This training focuses on

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<sup>75</sup> State of Victoria, ‘Royal Commission into Family Violence: Summary and recommendations’, Parl Paper No 132 (2014-16), p. 2.

<sup>76</sup> Australian Bureau of Statistics, [Personal Safety, Australia](#), [website], 15 March 2023, accessed 28 March 2025.

<sup>77</sup> Our Watch, [What is ‘primary prevention’ of violence against women?](#), [website], n.d., accessed 14 July 2025.

<sup>78</sup> Our Watch, [The link between gender inequality and violence against women](#), [website], n.d., accessed 28 March 2025.

prevention and the drivers of family violence and broader gender equity issues and complements the family violence training undertaken by customer support staff.

## 5.2 Provide support that is inclusive for all Victorians

The Royal Commission into Family Violence recognised that some groups in the community may be at greater risk of family violence, may experience it at higher rates or face multiple and intersecting barriers to reporting, seeking and obtaining help.<sup>79</sup> For example, three in five Aboriginal and Torres Strait Islander women have experienced physical or sexual violence perpetrated by a male intimate partner.<sup>80</sup> Research has shown that intersectional discrimination is a major contributor of the issues and harms Aboriginal and Torres Strait Islander women and girls experience.<sup>81</sup>

Businesses need to consider how they are making their supports inclusive and accessible to groups that may experience other forms of inequality and discrimination. Discrimination such as racism, ableism, homophobia and transphobia will impact how people will experience services such as the police and the courts and even their utility company. This coupled with family violence will further shape the access people have to services and the power and authority they may (or not) be able to leverage when accessing services.<sup>82</sup>

The personal experiences shared by victim-survivors demonstrate how important it is for businesses to consider the diverse characteristics and experiences of customers affected by family violence.

*“I’m neurodivergent as well, so I have trouble with ambiguous information. So, for me having like a list of, if you make these criteria, you can get this stuff was really, really helpful where that was available.”*

– Victim-survivor

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<sup>79</sup> State of Victoria, December 2018, *Everybody matters inclusion and equity statement*, State of Victoria, p. 9.

<sup>80</sup> Department of Social Services, 2023, *Aboriginal and Torres Strait Islander Action Plan 2023-2025*, Commonwealth of Australia (Department of Social Services), p. 30.

<sup>81</sup> Department of Social Services, op. cit., p. 18.

<sup>82</sup> Economic Abuse Reference Group, 5 December 2018, Submission to Family Violence Resource Review 2018, p. 3. [Family violence resources review 2018 | Essential Services Commission](#).

*“Standard assistance and tailored assistance. But all of this is already too much for me to be able to read with my disability. It’s so much writing ... I’m actually unable to read and process what’s on here, so I’ll have to get someone to read that for me and summarise it for me.”*

– Victim-survivor describing their reaction when looking at a recent energy bill.

*“I just wanted to mention that sometimes it’s a cultural barrier too in terms of, you know, you know being brought up in a household where you don’t talk about these things and things like that. So, it makes it hard for that person to actually tell a particular company look, they need assistance. So, it’s just a question of, you know, be mindful that sometimes again picking up on the cues because of that cultural barrier.”*

– Victim-survivor

Research has identified that importance of promoting the options for customers experiencing family violence. This is particularly important where customers ‘have barriers to access due to concerns about cultural safety, lack of access to appropriate communication technology, having an intellectual disability and not speaking English’.<sup>83</sup>

It is important for businesses to understand these often compounding forms of discrimination and barriers to accessing services so they can develop policies and services that everyone can access equally.

#### **Actions businesses can take to be more inclusive and accessible<sup>84</sup>**

- Provide easily accessible information about financial abuse and warning signs.
- Routinely provide information about financial abuse when promoting or discussing products, such as joint bank accounts.
- Use plain English and translate information about financial abuse into community languages, including those of emerging or vulnerable communities.
- Communicate with visuals and graphics to support written messages and promote comprehension.
- Design your IT systems for a low level of English and technological literacy.
- Consider how to enhance accessibility for customers with a disability.

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<sup>83</sup> Whereto Research, op. cit., p. 18.

<sup>84</sup> These actions were developed to respond to financial abuse but can be applied by essential services to their overall family violence supports for customers. Cook et al., op cit., p. 13.

- Ensure that information is easy to find without customers needing to click through multiple website pages.
- Appreciate that your customers will have different levels of understanding. Your teams have ongoing conversations with them about product safety and performance, system and service operations, and where to find support.
- Collect and use data on the harm prevention or safety performance of your products, systems, and services when financial abuse or risk factors come to light.

### Addressing barriers to accessing information about family violence support

Westernport Water conducted a Gender Impact Assessment on their family violence policy, as part of their obligations under the Gender Equality Act. The outcomes of the review were to improve accessibility of the family violence information on their website and to ensure relevant local support agencies were aware and informed about services available from Westernport Water. Website improvements included ensuring there were links to local support agencies, developing additional resources including visual aids, promoting the culturally safe practices of Westernport Water and ensuring the website is fully accessible and barriers to access are removed. An accessibility review of the website is underway to improve functionality for customers experiencing barriers to access.

### 5.3 Provide referrals to expert support services

*“With providers that they probably should know where to refer you, a person that’s experiencing domestic violence, where to refer them to. Not necessarily just go to the police or Lifeline ... But the supports out there, support networks and what is available for anyone experiencing domestic violence.”*

– Victim-survivor

Businesses are not expected to be experts on family violence or to provide counselling as part of their family violence response. However, they are well placed to provide customers with information about support services that may be able to help. For example, they can refer customers to family violence services, financial counsellors or services for Aboriginal and Torres Strait Islander communities, and culturally and linguistically diverse (CALD) communities.

Referrals to a financial counsellor are important as many victim-survivors will have multiple debts.<sup>85</sup>

Customer facing staff should only refer customers when they consider it safe, respectful and appropriate to do so. They are not required to offer referrals every time a customer makes contact. There may be instances where it isn't safe or convenient for a customer to write down the number of another service. Businesses should also confirm with the customer the safest way to share referral information. If someone is experiencing tech-facilitated abuse they may prefer information is sent to a trusted friend or family member.

In making a referral staff should ask whether the customer is already receiving support (and from which kind of service) before referring them elsewhere. Employees will need to draw on their family violence training and take the customer's circumstances into account to determine what's best at the time.

Water and energy businesses should have an up-to-date list of relevant referral options for staff to use that makes it as easy as possible to know which service/s would be most appropriate for the customer. The Economic Abuse Reference Group recommends businesses consider the level of training staff have received and their ability to choose between services when developing their referral lists for staff.

Water and energy businesses are required to publish an up-to-date list of referral services on their website. Victim-survivors may use the website to access referral information when they don't feel safe to speak to the business directly about their experience but still need help.

Relationships and local networks can be an important tool for helping staff understand local support options and referral pathways.

### Relationship with local services can improve staff knowledge and referrals

North East Water regularly engages with local services to help staff understand what other support is available locally and assist with referrals. Staff from the local Orange Door service visited North East Water to talk to staff about what they do and how North East Water staff can best refer customers to them. This helped staff understand the limits of their role and gave them confidence to refer customers to appropriate local services for additional support. Orange Door staff are now more aware of the support North East Water can provide, as well as their processes for keeping customer details safe and secure, which gives them confidence to refer their clients to North East Water for support.

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<sup>85</sup> Uniting, op. cit., p. 10.

East Gippsland Water’s relationship with their local Anglicare Victoria service allows it to provide flexible support options for customers experiencing family violence. With permission from the customer, East Gippsland Water can make a warm referral to Anglicare Victoria that includes the customer’s preferred days and times to be contacted. Additionally, every six weeks an Anglicare Victoria support worker attends the East Gippsland Water offices for a water bill drop-in session, where the support worker is available to speak with customers and staff. This provides a safe option for customers to meet with a support worker, without needing to attend the Anglicare offices.

## 5.4 Promote the options available to customers

*“I think there are other things they can do, but maybe even improving on the things that they’ve already got in place, like for instance ... [I had] no clue, didn’t, didn’t even know that they had that like the DV policy. So, get getting it more out there, maybe sending out flyers to you know community places where people go for help, things like that. Just so it’s more accessible.”*

– Victim-survivor

*“But there was never any ready information like at Centrelink or anything like that. When I was going through it. So, it’s trying to find the information what’s out there is hard and what makes it worse is there actually is a lot of helpful services. Unless you know about them, they’re useless.”*

– Victim-survivor

*“It can be a maze in my opinion, and just in my experience you can get there, but sometimes it’s a long and winding road to find the resources you need.”*

– Victim-survivor

Research with financial counsellors identified a need for greater transparency on the options available to people experiencing family violence and financial hardship, as well as promoting these options to the community sector and specialist family violence services.<sup>86</sup>

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<sup>86</sup> Whereto Research, op. cit., p10.

Businesses need to provide clear and easy to find information about the support they provide for customers affected by family violence. When developing this information, businesses must consider that many customers may not realise what they are experiencing is family violence. Research with people with lived experience highlights the importance of customers having an awareness of different types of family violence, including coercive control, psychological abuse and financial abuse.<sup>87</sup> By providing basic information that raises awareness of the diverse types of family violence, businesses can help customers understand that they may be eligible for this support.

*“Many people don’t even realise that they are experiencing family violence and that makes it difficult for them to get support.”*

– Victim-survivor

South East Water’s website includes examples of what abuse might look like in the context of a water bill, as well as other examples of types of family violence:<sup>88</sup>

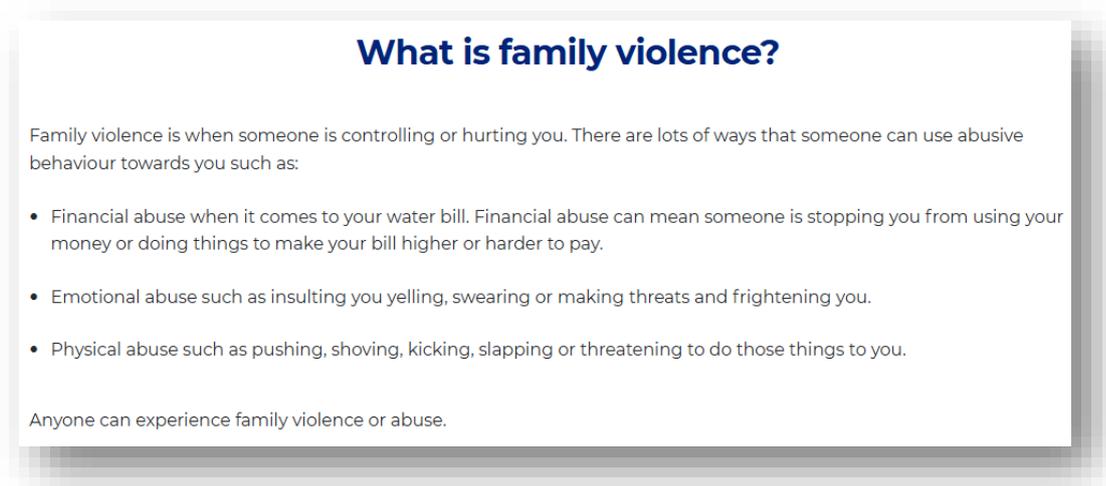


Figure 2: South East Water’s website includes examples of abuse.

One of the main barriers to people experiencing family violence accessing support from their utility provider is lack of awareness and promotion of what is available.<sup>89</sup> In 2021, two in five respondents (41 per cent) to the National Community Attitudes Towards Violence Against Women survey did

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<sup>87</sup> McAlpine & Samuel, op. cit., p. 16.

<sup>88</sup> South East Water, [Family violence support](#) [website], n.d., accessed 6 June 2025.

<sup>89</sup> Uniting, op. cit., p. 19.

not know where to access help for someone experiencing domestic and family violence.<sup>90</sup> This lack of awareness impacts the likelihood of someone seeking help.

Businesses should be using a range of methods to communicate with customers about the support available if they are affected by family violence. In addition to publishing their policy on the website, this could include information on bills, attending pop-up engagements at local community venues and events, brochures left with community partners, and other appropriate methods.

### **Communicating with customers from culturally and linguistically diverse backgrounds**

There are additional barriers experienced by CALD and minority community members when seeking support from utility providers, including cultural stigma about family violence, fear of repercussion within their community and a low awareness of protections.<sup>91</sup>

Businesses should consider how they can address these barriers. For example, by building relationships with local service providers to increase awareness of available support and safely and clearly communicating what support is available, ensuring that communications are accessible. Communications can be made more accessible for all customers by:<sup>92</sup>

- having adequate white space to promote readability
- having accessible and inclusive formats such as printed, large font and Easy English
- translating into various languages to support linguistically diverse customers
- ensuring accessibility through screen readers for those with a visual impairment.

### **Promoting safety online**

Information on family violence supports needs to be easy to find on a business website. More businesses are including a 'quick exit' button on their website. A quick exit button allows a person to leave a website quickly, sending them to a generic website such as a search page. The presence of the button also informs the user that the website contains sensitive information.<sup>93</sup> While there are limitations to the functionality of this option (for example, the website will still be visible in browser history), it does provide a safer option for customers.

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<sup>90</sup> Australian Institute of Health and Welfare, [Community understanding of FDSV](#), [website], 12 April 2024, accessed 1 April 2025.

<sup>91</sup> McAlpine & Samuel, op. cit., p. 19.

<sup>92</sup> Australian Energy Regulator, February 2025, *Family Violence Rules: Guidance for Energy Retailers*, Commonwealth of Australia, p. 7.

<sup>93</sup> Infoxchange, [How to increase internet safety with a quick exit button](#), [website], n.d., accessed 31 March 2025.

The quick exit button on South East Water’s website is bright orange and highly visible on the family violence support page. The button remains at the top right of the screen as the user scrolls down the page, making it easily accessible.

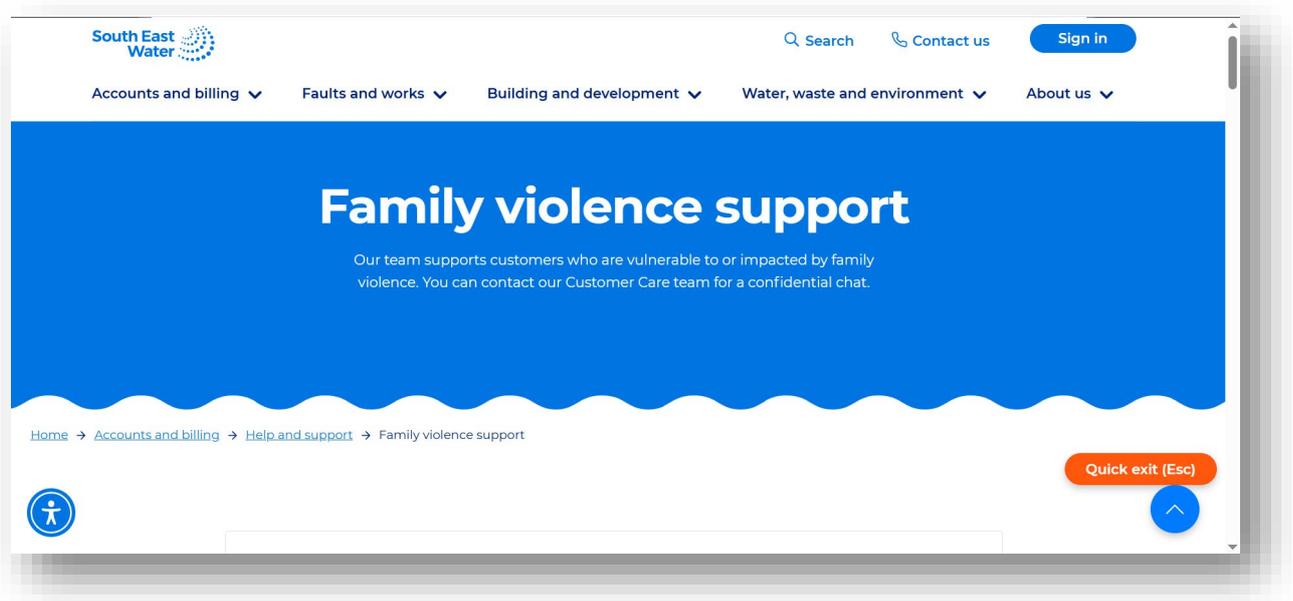


Figure 3: South East Water's website includes a quick exit button.

## Expert advice improves communications for customers

AGL has an ongoing relationship with family violence experts to consult where advice is needed on family violence policy and process issues and engage with victim-survivors with lived-experience where appropriate. They have worked closely with the business and to date have provided feedback including incorporating trauma-informed language in policies, procedures, processes and customer communications, and guidance on appropriate referral options at a national and state level. Using the content from the updated policy, the AGL Team have updated the family violence landing page of their website to feature key information from their family violence policy, making sure it also uses trauma-informed language, and includes all national referral services on the landing page. Their family violence policy has also been translated into five community languages and Easy English, which are all available on their website.

## Mutual benefits of building local relationships

North East Water has actively built strong relationships with local services to help increase community awareness of their family violence support options. The Customer Care team invited the Albury Wodonga Ethnic Communities Council to visit and spoke with them about their family violence policies. The team also presented at a humanitarian settlement program to talk about all their support programs, including family violence. The board has met with stakeholders who represent people with disabilities, which helped the business understand some of the challenges experienced by people with disabilities, including the need for plain language communications and disability accessibility.

North East Water has also partnered with Albury Wodonga Regional FoodShare. Through this partnership North East Water purchase food vouchers which they can give to vulnerable customers, including customers fleeing family violence. Each \$25 voucher is the equivalent to \$150 worth of groceries.

### Expert input can improve messaging to customers

South East Water recently updated the messaging on its IVR (Interactive Voice Response) telephony system including information about its family violence support. South East Water sought advice on messaging options from an organisation that specialises in preventing and responding to family violence. The IVR was updated based on this feedback to include messaging that aligned with better practice and reflects learnings from those with lived experience.

## 5.5 Address barriers to disclosure and engagement

*“The way that you make it accessible, the way that you, that people apply for it, if it has to be a verbal conversation, you're shutting the door for a huge number of people.”*

– Victim-survivor

*“I don't think I could have on the phone to someone said and named myself as a victim of family violence at in that moment, I needed somebody else to do that for me. If it was an online form, though. Where I could upload a copy of the intervention order. I probably could have done that.”*

– Victim-survivor

*“...just how hard it is for a lot of victims to be even, to be able to make that initial call to services. PTSD. More often, everything just becomes so overwhelming that calling a service or even trying to have these really hard conversations about finances. It’s really, really difficult to even make the call.”*

– Victim-survivor

Businesses should be aware of the barriers that may stop customers from disclosing their experience of family violence or impact their engagement with the business and take action to minimise the impact of these barriers.

#### Barriers that may affect customer disclosure and engagement<sup>94</sup>

- A lack of information about the supports available for people experiencing family violence and financial hardship can lead to uncertainty about the benefits or impact of disclosure. For example, someone may fear disconnection if they disclose to their utility provider.
- Concerns about personal safety, such as the reaction of the person using violence if they find out they have disclosed to a business or not having a safe way to communicate with a business if they are experiencing technology-based abuse.<sup>95</sup>
- Privacy concerns, which can stem from a lack of trust in service providers. This has been noted as a particular concern for water customers living in regional areas who may be concerned about the person using violence or their connections working at the water businesses accessing information or controlling accounts.
- Embarrassment and shame.
- Fear they will need to retell their story.
- Language and cultural barriers, which can include concerns about cultural safety, especially in regional areas.
- Financial coercion and control.
- They may not be aware that what they are experiencing is family violence.

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<sup>94</sup> McAlpine & Samuel, op. cit., pp 13-14.; PIAC, ACTOSS, Good Shepherd, QCOSS, Financial Rights Legal Centre, 9 March 2022, Submission to AEMC Protecting Customers Affected by Family Violence. <https://www.aemc.gov.au/rule-changes/protecting-customers-affected-family-violence>. p. 7.; Whereto Research, op. cit., pp 17-19.

<sup>95</sup> Technology facilitated abuse is where digital technology is used to harass, stalk, impersonate or threaten someone. This can include tracking someone’s location (with or without their knowledge), and gaining access to online accounts (like email, social media and bank accounts) to monitor what the person is doing, impersonate them or lock them out. Respect Victoria, [Red flags: What is tech abuse and what should you look out for?](#), [website], 21 September 2023, accessed 15 June 2025.

Businesses should provide easy to access information that clearly explains their understanding of the barriers that might prevent someone from disclosing family violence and what family violence and hardship support is available. This should include that a trained specialist team or staff are available, and how to reach this team directly.<sup>96</sup> Written communications should use trauma-informed language to ensure this is not perceived as adding to the abuse. Businesses should avoid using blocked or unknown numbers when making outbound calls to customers.<sup>97</sup>

Offering a range of trauma-informed ways to contact the business can make it easier for customers to reach out for support, for example, through SMS and webchat. Businesses could consider providing a direct contact number and email address to reach specialist teams, as well as options for self-identification, for example in telephone menus or self-select options in webforms.<sup>98</sup>

Businesses should consider where they promote support options to customers, for example on the business's website (ensuring it is easy to find), on bills, at local services or council websites.<sup>99</sup>

### **Clear information and multiple contact methods make it easier for customers to reach out to Gippsland Water**

Gippsland Water has developed a range of pathways for customers to access information and request support. Their website provides clear information about the availability of trained staff and how customer's personal information is protected. Customers can contact the specialist team directly by telephone, can reach out through online services, or fill out a webform requesting a call back at a time nominated by the customer. Gippsland Water's family violence policy has been translated into five community languages. Providing clear information about what support is available and multiple pathways to contact the specialist team makes it easier for customers to reach out to Gippsland Water for support.

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<sup>96</sup> Uniting, op. cit., p. 6.; Whereto Research, op. cit., p. 18.

<sup>97</sup> Fitzpatrick, op. cit., p. 35.

<sup>98</sup> Uniting, op. cit., p. 6, 10.

<sup>99</sup> Whereto Research, op. cit., p. 20.

# Appendix A: Our family violence framework

The commission's family violence framework outlines how we see our role in supporting family violence responses in businesses we regulate.

The framework incorporates our **regulatory tools**. This includes the family violence rules in the [Water Industry Standards](#) and the [Energy Retail Code of Practice](#), as well as our monitoring, compliance and enforcement roles.

We promote better practice through **industry education and awareness**. We support businesses to meet their obligations by working in partnership and collaboration with our regulated sectors, community organisations and advocates, and people with lived experience of family violence. The better practice handbook is part of our industry education and awareness activities.

The third element of our family violence framework is our commitment to seek **expert guidance and advice** to inform our family violence work. We partner and work with experts to ensure we are taking a better practice approach, including bringing lived experience to the heart of our work on family violence.

Our family violence framework demonstrates our ongoing commitment to working with our regulated sectors to support collaboration and better practice in responding to family violence.

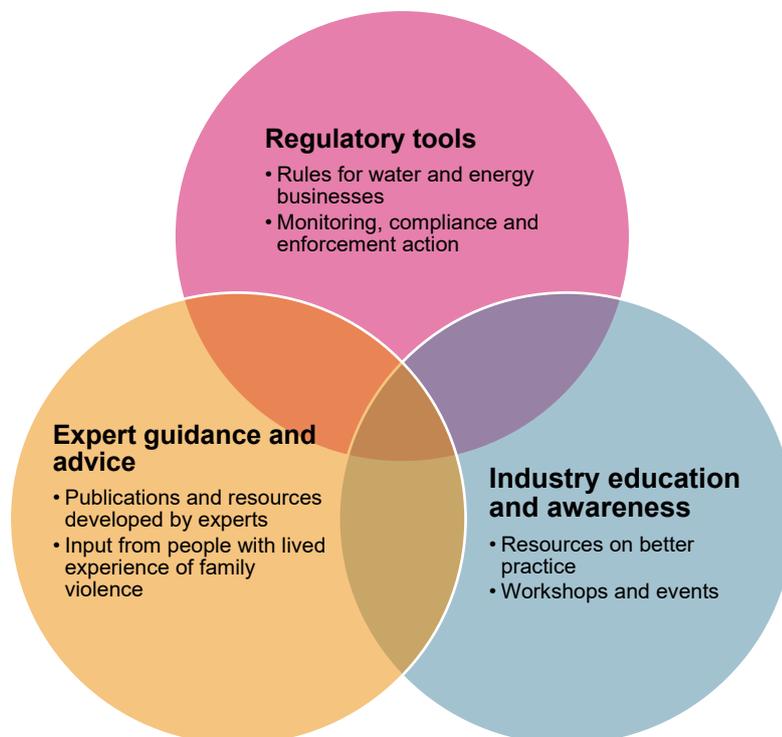


Figure 4: Family violence framework.

# Appendix B: Resources to support businesses develop and improve their family violence response



## Principle 1: Informed and tailored

### Resources to support engagement with people with lived experience of family violence

The [Family Violence Experts By Experience Framework Implementation Plan and Guidelines](#) provides evidence based, practical advice for regulators and essential service providers on engaging with victim-survivors of family violence. This includes guidance on better practice responses to victim-survivors of family violence, and guidance on engaging victim-survivors in design, delivery and evaluation. This resource was developed in partnership with [Safe and Equal](#) and in collaboration with the [University of Melbourne's Safer Families Centre](#).

[Safe and Equal have developed a number of resources](#) to help businesses and survivor advocates understand their readiness to engage.

### Thriving Communities Australia cross-sector initiatives to support collaboration

#### **TCA network for Business – Domestic and Family Violence**

A space for businesses from across sectors to come together to share, learn and explore evolving better practice for supporting people experiencing family violence. The network meets bi-monthly and brings in guest speakers and knowledge experts to keep businesses moving forward in their efforts to better support people experiencing family violence. [More information about the network can be found on the TCA website](#).

#### **One Generation – A cross-sector essential service alliance**

The [One Generation](#) business initiative will provide free, practical tools and resources to enable businesses to give safe customer support, foster a culture of respect to prevent gendered violence and identify and share evidence of customer support that works.

One Generation is about collaborating, sharing information about what works, removing inconsistencies across sectors and pooling resources for greater effect.

The founding organisations will fund research on the lived experiences of diverse customers to inform cross-sector actions to make it easier and safer to get support.

One Generation is a program of Thriving Communities Australia, co-founded with social enterprise Flequity Ventures.

### Knowledge Centre

Thriving Communities Australia online [knowledge centre](#) is an extensive resource library featuring the latest research, reports and information guides generated and sourced by the TCA secretariat, partners and community leaders.



## Principle 2: Leadership and accountability

### Resources to support Workplace Action on Domestic and Family Violence

[Workplace Equality and Respect resources](#) (Our Watch)

[Creating safe to speak cultures](#) (Our Watch)

The [Champions of Change Coalition](#) has produced guides, resources and toolkits for businesses to improve their workplace response to domestic and family violence, including:

- 16 Days of Activism Against Gender-Based Violence Participation Guide
- Playing Our Part: A Framework for Workplace Action on Domestic and Family Violence
- Playing Our Part: Tools and Resources

A number of energy businesses are members of the coalition.

[Insight Exchange](#) provides free (donated) information, insights and reflection materials that are informed by lived expertise of domestic, family and sexualised violence. They have developed several resources to support workplaces, including:

- Guide to uplifting workplace responses

- My support options
- Workplace intranet content guide
- Lived experience insights related to workplaces.

[Myth Busting. Domestic & Family Violence at Work: Using evidence to debunk common myths and assumptions](#). This resource uses evidence to tackling common myths about domestic and family violence and provides tools and resources for Australian organisations to become leaders in prevention. (Diversity Council Australia and Our Watch)

### Resources to support workplace responses to staff who use violence against women

[Employees who use Domestic and Family Violence](#) (Champions of change coalition)

[Workplace responses to staff who perpetrate violence against women](#) (Our Watch)

[Workplace resources and insights](#) (Insight Exchange)

### Resources to support a safety by design approach

[Safety by Design](#) (eSafety Commissioner)

[Designed to Disrupt® series of papers](#)

- Designed to Disrupt®: From safety culture to essential safety by design
- Designed to Disrupt®: Reimagining general insurance to improve financial safety
- Designed to Disrupt®: Reimagining banking to improve financial safety.



## Principle 3: Safety and choice

### Resources that explore lived experiences and essential services

[Better practice in responding to family violence – lived experience insights for utilities providers](#) (Uniting, 2025)

This report explores the experiences of people with lived experience of family violence and what utilities providers can do to support customers at each stage of the customer journey.

[Customer Insights Snapshot: What victim-survivors need from organisations](#) (Thriving Communities Australia, 2025)

The Customer Insights Snapshot is based on a national desktop review of lived and learned experience research and outlines a Victim-Survivor Needs Framework, that identifies six core needs that are critical when navigating essential services in the context of abuse.

[Research report – People with lived experience of family violence focus groups](#) (Uniting, 2022)

This report explores the experiences of customers affected by family violence and their interactions with water businesses. This research was done for the commission by Uniting as part of the Water Industry Standards Family Violence Review.

[Research report – Research with financial counsellors exploring the effectiveness of family violence provisions](#) (Where to Research, 2022)

This report explores the experiences of financial counsellors supporting clients affected by family violence and their interactions with water businesses. This research was done for the commission by Where to Research as part of the Water Industry Standards Family Violence Review.

[Water Code Outcomes Review 2019: Family Violence Changes Research Report](#) (Wallis Research, 2019)

This report explored outcomes for customers following the family violence changes to the water customer service codes.

[When's the right time to talk about money? Financial Teachable Moments for women affected by Family Violence](#) (WIRE, 2018)

This report builds on existing knowledge about women, family violence and financial wellbeing. It explores when, where and how women victim-survivors of family violence want to receive financial information and support.



## Principle 4: Awareness and capability

### Resources to help select a training provider

[Family violence guide – Staff training](#) (Economic Abuse Reference Group)

[Find a not-for-profit training provider](#) (Economic Abuse Reference Group)

<https://www.thriving.org.au/what-we-do/family-violence> (Family violence training)

Thriving Communities Australia

[Choosing family violence and gender equity training and consultancy that delivers results. A tool for employers, human resources and learning professionals](#)

Women's Information and Referral Exchange (WIRE) and Women's Health in the South East (WHISE)



## Principle 5: Accessible and flexible

### Resources to address workplace gender inequality

[Gender equality and the workplace education resources](#) (Workplace Gender Equality Agency)

[Reports and Resources on Gender Equality](#) (Champions of Change Coalition)

[Task guides, templates, research and reports](#) (Commission for Gender Equality in the Public Sector)

[Change the Story](#) is an evidence-based framework to guide a coordinated and effective national approach to preventing violence against women. (Our Watch)

### Resources that focus on inclusive support

[Promoting Inclusive Essential Service Provision for All: A Practice Guide](#) (WIRE)

[Intersectionality Matters: A guide to engaging immigrant and refugee communities in Australia](#) (Multicultural Centre for Women's Health)

[Women with Disabilities Victoria](#) provide numerous resources to support the prevention of violence against women with disabilities.

OurWatch has developed resources focused on preventing violence against diverse groups which can help businesses understand the different experiences and needs of these groups, including:

[Preventing violence against Aboriginal and Torres Strait Islander women](#)

[Preventing violence against women with disabilities](#)

[Preventing violence against LGBTIQ+ people](#)

[Preventing violence against older women](#)

[Preventing violence against migrant and refugee women](#)

Family Safety Victoria created this statement to build an inclusive, safe, responsive and accountable system for all Victorians: [Everybody Matters Inclusion and Equity Statement](#)

**1800 Respect** has developed a [series of inclusive practice guides](#) that provide information about supporting people from diverse groups.

## Resources to help address barriers to access

[How to increase internet safety with a quick exit button](#). This online article from Infoxchange shares tips and common mistakes when implementing a quick exit button for a website.

## Appendix C: Considerations regarding input from staff with lived experience of family violence

Some businesses have received input from staff with lived experience when reviewing and updating their policies and staff training. This is an emerging area of practice and careful assessment of business maturity, psychological safety, capability and readiness is required before proceeding with this approach.

The stakeholder working group who informed the update to this handbook have suggested there are a number of important matters for businesses to consider before involving staff with lived experience of family violence:

- **Be flexible and allow staff to self-determine how they want to contribute.** It is vital that staff are empowered to make decisions about their involvement that are safe for them, and this may be different for everyone. Consider options for anonymous or voluntary input, rather than directly approaching staff you know have lived experience, as well as enabling confidential contributions.
- **Take a trauma-informed approach.** A trauma-informed approach will ensure staff are supported to participate and are not re-traumatised. The five principles of a trauma-informed approach are safety, trustworthiness, choice, collaboration, and empowerment.<sup>100</sup>
- **Ensure appropriate supports are available.** Be aware of the possibility that this work can create a load for contributing staff. Ensure you are providing a psychologically safe environment. Ensure debriefing is available, and any other supports that will support the safe participation of the staff member. Be prepared with referral options.<sup>101</sup>
- **Develop clear and agreed expectations.** Ensure a shared understanding of the role and consider remuneration for the staff member.
- **Understand the benefits of working with trained survivor advocates**  
A survivor advocate applies their lived experience to inform changes and improvements to systems, policies and processes. They can provide objective advice and feedback as they are external to the organisation.
- **Do your homework.** Ensure staff members are not asked questions that can be, or have already been, answered somewhere else. Understand the experiences of staff who interact

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<sup>100</sup> Blue Knot Foundation, [Applying Trauma-Informed Principles to Conversations About Trauma](#) [website], n.d., accessed 2 July 2025.

<sup>101</sup> Champions of Change Coalition, op. cit., p. 24.

with customers affected by family violence. They may be able to identify pain points and barriers to support.

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