

19/12/2023

Marcus Crudden
Executive Director, Price Monitoring and Regulation
Essential Services Commission
Level 8, 570 Bourke Street
Melbourne VIC 3000

Dear Marcus,

RE: Amendments to the Family Violence clause of the Water Industry Standards – Draft Decision 20 November 2023

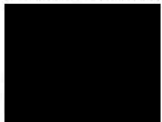
We thank you for your advice on 20 November regarding the draft decisions to make specific changes to the family violence clause of the water industry standards, and the opportunity to consult and provide feedback on those updates.

While Melbourne Water does not fall under the current provisions of the Water Industry Standards for customers, we appreciate the work the commission is doing to address this critical community need, and we believe that the Water Industry can play a crucial role in supporting our customers who are impacted by this issue.

We have reviewed the proposed amendments to the standards outlined in the draft decisions, and are please to support the work the commission is doing in this area by providing our feedback in the attached documents.

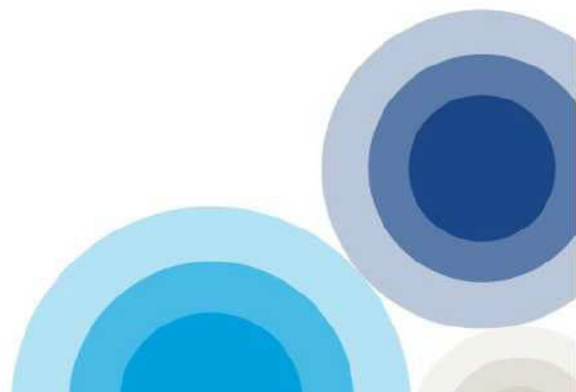
Thank you once again for the opportunity to consult and provide feedback on these important changes to the existing framework for managing customers across the water industry. If you would like any further input or clarification on our feedback outlined above, please do not hesitate to let us know.

Yours sincerely



Heidi Ryan
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Melbourne Water Corporation

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Melbourne Water Feedback on ESC's Proposed Changes to Family Violence Provisions in the Water Industry Standards

New obligation to report to the Commission

New Clause 25

Paragraph 25(b): An effective framework for reporting actual and potential breaches of the standards will require organisations to develop sophisticated data and systems capability that enable the detection and prediction breaches as quickly as possible.

Updating data prediction and detection capabilities will present significant challenges for some organisations, and the deadline of having this capability established by March 2024 will be a challenge for most organisations.

Adverse material impacts for Melbourne Water customers will not be the same as direct residential and trade service suppliers. The proposed amendments should allow for Melbourne Water to define specific instances where our customers can suffer a material adverse impact and design controls for reporting instances of non-compliance in those circumstances, or the Commission should define what it considers to be adverse material impacts.

Amending existing Family Violence clause 11.1

Paragraph 11.1 (a) (ii): refers to supporting employees impacted by Family Violence. Melbourne Water has a separate Family Violence policy for employees impacted by Family Violence, and this specific provision will be reflected in that policy.

Paragraph 11 (a) (iv): refers to debt management and recovery for customer impacted by family violence. Melbourne Water does not have a direct billing and transactions relationship with our customer base for water, sewerage and waterways and drainage charges. In so far as this clause can be applied to any Melbourne Water customers who have a financial relationship with us, we will adopt the provisions of this proposed amendment.

Amending existing family violence clause 11.2

Paragraph 11.2 (b) (iii): Melbourne Water believes that formal document translation services are essential for translating official policies and documentation into different languages, due to the inability of software based translation programs to effectively and accurately translate nuanced text into all languages. In addition, Melbourne Water has an established CALD approach to support customers in different languages. We propose that to minimise delays for customers accessing our policy that it can be accessed in different languages through the use of our existing on-demand verbal translation services (provided and referred by MW).

Effective date for adoption and implementation of the amendments

While Melbourne Water recognises the importance and urgency of addressing this issue, to ensure the efficient use of resources we would prefer to work with the ESC to develop a schedule to become compliant with the standards over time, that aligns with our internal family violence work programs.