



17 March 2017

Water Team – Customer Service Codes
Essential Services Commission
Level 37, 2 Lonsdale Street
MELBOURNE VIC 3000

C/- water@esc.vic.gov.au

Dear Sir/Madam,

RE: Submission – Proposed Amendments to the Water Customer Service Codes

I am writing to you in relation to the proposed amendments to the Water Customer Service Codes – new requirements for family violence policies and to provide a formal submission.

Thank you for the opportunity to provide a submission and the work that has been undertaken to prepare the proposed amendments. Family violence is a significant issue within our communities that needs greater support for victims.

North East Water supports the amendments that have been proposed with many of the changes already underway within the organisation. However, there are elements of the proposed amendments that have raised some areas of concern for our organisation.

- The specialised skills required to identify and respond to family violence.
- The increased emotional stress that staff will encounter when faced with family violence.
- The heightened risk of incorrectly assuming family violence.

The above concerns present an opportunity to strengthen the current wording in the following two sections of the amendments:

3.2.1 Staff Training to improve responses to family violence victims

- Greater emphasis on the specialised training required for employees. This will require specific skills to identify and respond to customers impacted by family violence. Most organisations may be better placed to provide a higher level of training to nominated family violence officers and only awareness training for other staff that have contact with customers.
- The amendments need to place greater emphasis on recognising the additional emotional stress that this can put on staff and the impact this can have on them.

3.2.5 Providing customers with referrals to expertise

- Referral services is an area that carries the greatest risk for employees to incorrectly assume family violence and refer a customer incorrectly. Guidance needs to be included around how organisations can protect themselves and employees if this occurs.
- The proposed amendment document makes the following statement:
"It is not expected that water businesses will become experts in the field of family violence or provide a counselling service". This needs greater emphasis at the beginning of the document so that the reader puts the proposed amendments into perspective.

Thank you for the opportunity to provide feedback on the proposed amendments. If you wish to discuss the above further please don't hesitate to contact me

Yours sincerely



Rebecca Jhonston
Executive Customer & Culture
North East Water