



# VCOSS submission on family violence changes to water customer service code

March 2017

## Introduction

VCOSS welcomes the opportunity to comment on proposed new requirements for family violence policies to be included in Water Customer Service Codes. VCOSS believes family violence can be tackled with a whole-of-government and whole-of-community approach. We support the Essential Services Commission implementing Royal Commission into Family Violence recommendations by amending the Water Customer Service Code to require water businesses to have a family violence policy. We further believe it would be beneficial to extend this approach to other utilities and services so all providers take a uniform approach.

Family violence policies should protect survivors and promote safety. VCOSS notes the promotion of safety is not explicit in the proposed Family Violence Clause. VCOSS suggests that this could be included under section (a). For example, the concept of promoting safety could be included in (a) (1) by adding “and take steps to promote safety”.

In addition to providing support for this initiative, this submission discusses:

- Taking consistent business approaches
- More support for water services staff
- Designing mechanisms to protect family violence survivors and promote safety
- Forging formal linkages

## Taking consistent business approaches

VCOSS notes the Royal Commission made recommendations to encourage essential services providers to implement policies recognising the hardship caused by family violence. These recommendations require service providers to respond appropriately to family violence survivors.

VCOSS welcomes the Essential Services Commission’s action. However, we propose the Commission extend a uniform policy approach to family violence across all essential services. The Royal Commission called for consistent hardship policies and procedures to assist family violence survivors. Family violence survivors are navigating multiple service systems at a stressful time, and need to know all essential services will take a consistent approach.

VCOSS proposes that regional and rural water businesses adopt a consistent approach, and we urge the Essential Services Commission to extend the Royal Commission’s recommendations to other utility providers.

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## More support for water services staff

Increased public awareness of family violence leads to increased reporting to police and other support services.<sup>1</sup> Staff members may also disclose their own experience of violence or abuse when organisations implement family violence policies to support their customers. To support these staff members, VCOSS suggests adopting workplace family violence policies.

In January 2017, the Inner North West Primary Care Partnership released a “Workplace Family Violence Policy Template”.<sup>2</sup> The template guides organisations in developing a workplace family violence policy, and assists them to manage disclosures, respond to risks and helps staff understand their roles and responsibilities.

## Designing mechanisms to protect family violence survivors and promote safety

The Royal Commission documented poor information management practices have resulted in specific incidents of harm to family violence survivors. Failure to protect the private and confidential information of family violence survivors can be catastrophic. Mechanisms to prevent inadvertent or deliberate disclosure of personal information should be developed as a matter of urgency. VCOSS believes the proposed Family Violence Clause can stipulate secure information handling protects survivors’ safety.

## Forging formal linkages

Effective support for survivors of family violence and prevention of violence against women relies on meaningful partnerships between organisations. The proposed Family Violence Clause acknowledges the need for training and effective referrals. Developing formal relationships between family violence support services and water businesses will promote and support effective working relationships, including training and referral pathways.

Partnerships between water businesses and family violence service providers:

- Help water businesses identify and connect with local service providers. Local water businesses, including rural and regional water businesses, need to know where to refer people for support. Local service providers are best placed to understand regional boundaries and areas of specialisation. VCOSS encourages communications between high level representatives from water businesses and family violence support agencies. The new family violence support and safety hubs could provide a mechanism to facilitate this.
- Help family violence service providers understand family violence and other hardship policies within local water businesses. This assists family violence survivors when navigating entitlements and responsibilities.

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<sup>1</sup> For example, see <http://www.abc.net.au/news/2016-04-22/domestic-violence-data/7342520>

<sup>2</sup> <http://inwpcp.org.au/resources/identifying-and-responding-to-family-violence/family-violence-policy-templates/workplace-family-violence-policy-template/>

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- Help to identify local services. In regional areas, this may include guiding regional customers to make contact with physically distant services, including using information and communications technologies.
  - Help water businesses identify specialist services for Aboriginal and Torres Strait Islander customers and customers from culturally and linguistically diverse communities.

Formal linkages between water businesses and family violence service providers can be multi-dimensional and mutually beneficial.