



In reply please quote: FC2017/02404
Enquiries to: Kellie King, General Manager Community and Corporate Services

16th March 2017

Marcus Crudden & Lucy Weston
Water Team – Customer Service Codes
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

Dear Marcus and Lucy

**RESPONSE TO PROPOSED AMEDEMMENTS TO WATER CUSTOMER SERVICE CODES:
FAMILY VIOLENCE**

Thank you for the opportunity to respond to the document “*Proposed amendments to water customer service codes: New requirements for family violence policies, Draft Decision*”.

Wannon Water applauds the ESC’s uptake of the recommendations from the Royal Commission into family violence as they pertain to the water sector. We also thank the ESC for the way in which it has engaged with the sector on the development of these proposed amendments.

The directions outlined in the proposed amendments are consistent with Wannon Water’s vision which is “beyond water for strong communities.” This vision encapsulates the idea that water businesses can and do have a significant impact upon the communities in which they operate and the outcomes for these communities.

Wannon Water is committed to working on the prevention of family violence in our region, consistent with our vision. Communities within Wannon Water’s service region experience the same level of family violence as the rest of the state (9.1 incidents per 1000¹), however, some parts of our region experience significantly higher rates than this (up to 12.2 incidents per 1000²).

It is recognised within the family violence sector, that a key approach supporting primary prevention for family violence is to work on improving gender equity within our society over the longer term. Workplace prevention initiatives that focus on improving gender equity and removing barriers to inequality are therefore important contributing factors to family violence prevention. Workplace interventions that provide support to employees experiencing family violence are also critically important.

¹ www.socialstatistics.com 2011/12 data

² *ibid*



It is very appropriate that a customer code focuses on systems, initiatives and partnerships that improve support for customers experiencing family violence – as the proposed amendments currently do. However, the proposed amendments could be strengthened through clearer articulation and greater clarification of how workplace intervention and workplace prevention initiatives intersect with the customer focussed aspects of the amendments. Whilst section 3.1(b) references a workplace intervention approach, missing from the document is commentary about workplace prevention approaches. This is particularly relevant given the Water Industry's current approach to gender equity (diversity and inclusion) being driven by the Minister and coordinated through VicWater.

A few other observations of the proposed amendments include:

- Single points of entry for family violence customers are difficult to achieve in a literal sense due to planned and unplanned leave of individual employees. A single point of entry to a team of employees may be an alternate approach that is more achievable and that delivers similar outcomes.
- Whilst not impossible, identification of customers in family violence environments is challenging. Training of water business employees can assist, as can partnerships with family violence service providers. However, data sharing and disclosure across multiple organisations on sensitive personal matters - even with victims' consent - have been historically challenging even within the community services sector. This is something we should strive for, but also be realistic about what can be achieved.
- Victims of family violence currently in hardship are not necessarily always in this situation, so systems of identification will need to allow for the dynamic nature of individuals' circumstances over time.
- Many of the proposed amendments prompt the need for software system changes. Including relevant software providers in the conversation about the need and timing for these changes will be critical moving ahead.

It is our hope that these observations of the proposed amendments are helpful in finalising the code amendments.

Certainly, we look forward to continuing to work in our own organisation but also with the ESC, other water businesses and our regional partners on a path to a society where gender equity is achieved and family violence is no longer an issue for our customers, employees and communities.

Yours sincerely

Kellie King
General Manager, Community & Corporate Services