

17<sup>th</sup> June 2021



Essential Services Commission

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Dear Sir/Madam,

## **Getting to Fair – breaking down barriers to essential service**

Thankyou for the opportunity to respond to the ESC’s draft strategy. Our feedback is based on input from one of our members, Domestic Violence Victoria, and our project manager, Carolyn Bond. We understand that some of our Victorian member organisations will be responding in their own right.

### **Family violence**

We commend the leading work that the ESC has undertaken in relation to vulnerable customers. We particularly commend the ESC’s work on industry responses to family violence, including the way the ESC has brought together the industry and the community sector to provide industry guidance. We believe the ESC’s experience could be shared with other regulators to broaden the impact of this valuable work.

### **Local Councils**

We support the focus in the strategy on local councils. Our members have raised some concerns about how some councils respond to ratepayers experiencing family violence. While some respond well, others appear to show little understanding of these circumstances and are inflexible in their responses.

### **Terminology**

We support the ‘hybrid’ approach to communication about vulnerability, with the aim of clear communications to industry and other stakeholders, but the use of more inclusive language in public communications.

We think that the working definition of “a person experiencing vulnerability”, could be expanded, firstly to reflect that we are also concerned with those at risk of experiencing vulnerability, and also to reflect that this may be long-term or short-term. These changes might provide a clearer message to industry and stakeholders and reflect that we are considering circumstances that could affect any us at some time.

## Input from Domestic Violence Victoria

The reference on p,20 to 'systemic factors' could be framed more in terms of discrimination, such as ageism, ableism, racism, classism, sexism, rather than suggesting the issue is the consumers.

Initiative 3.2. While important to listen, it's important to act on specific recommendations made by consumers. Consumers are also not a homogenous group, so it is important to provide communications on clear rationale on why recommendations are implemented or not. Suggestion for 3.2: 'We will hear and act on the voices of consumers experiencing vulnerability to better inform our reforms and monitoring of the energy market. We will communicate our rationale for reforms to support the empowerment of consumers experiencing vulnerability'.

Initiative 4.3 given the prevalence of misidentification of victim survivors as perpetrators, and visa versa, we suggest Industry education program includes an understanding of misidentification and potential vexatious use of hardship policies against victim-survivors.

Proposed goal five: Given the evidence on pg 41 of the importance of businesses having a trauma-informed approach to support, goal 5 should reflect this. Suggestion for goal five: 'We aim to ensure support offered to consumers is flexible, trauma-informed and suited to their needs'.

Proposed goal eight: ensure that family violence is reflected in initiatives for goal eight, given that the theme speaks to how events can exacerbate barriers

Other goals or initiatives to consider, within ESC's scope of responsibility, that would better support consumers:

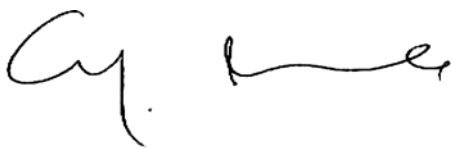
We support that the draft strategy that initiatives 3.5, 4.6 and 5.3 apply to whole of organisation. Potential to add an initiative, given ESC's engagement with DV Vic and DVRCV and University of Melbourne's Safer Families Centre and the University's WEAVERS (Women and children who have Experienced Abuse and Violence: Advisors and Researchers) lived experience group on the family violence 'Experts by Experience' Framework Implementation Plan and Guidelines. Suggestion to include

'We will ensure alignment with Guidelines for best practice responses to family violence. This also relates to goals four and five'.

and

'We will ensure alignment with family violence 'Experts by Experience' Framework Implementation Plan'

Carolyn Bond AO



for Economic Abuse Reference Group