

17 March 2017

To: water@esc.vic.gov.au

Dear Sir/Madam

Re: Submission on Codes draft decision – Kildonan UnitingCare

Kildonan UnitingCare (Kildonan) congratulates the Essential Services Commission (ESC) on its proposed changes to the urban and rural customer service codes that will require water businesses to establish and implement family violence policies.

Kildonan endorses the proposed changes as they currently stand.

We particularly commend the ESC on the inclusive and consultative manner in which the changes have been drafted, in particular ensuring they address the need for:

- training and support for staff dealing with customers impacted by family violence
- the protection of private and confidential customer information
- access to payment difficulty programs provided by businesses
- minimising the need for repeat disclosures of family violence by a customer, and
- referring customers to external expertise.

Kildonan has a long history of pre-empting social trends and developing practical, innovative and holistic solutions that help individuals and communities get ahead of their problems (refer Attachment 1). We recognise that problems particularly co-occur, for example family violence and financial hardship. Kildonan promotes and delivers holistic wrap-around services for the communities we serve, and advocates for social justice, systemic change and best practice social policy.

The proposed code changes represent an opportunity for corporate entities to work with the community sector to embed these types of holistic solutions that will drive systemic and cultural change. By being able to identify and safely and appropriately respond to victims and perpetrators of family violence, water retailers have the opportunity to assist their customers to address financial hardship, and refer them to experienced support services for further assistance.

We believe this change to social policy will strengthen the connections between corporate and community as we work together to address this serious issue.

We support the statement that “water businesses should not and cannot be expected to solve all problems associated with family violence”(p 6). Neither should water businesses be expected to “provide counselling services”(p 8). Kildonan highlights the importance of clear guidelines for water business front line/call centre staff so staff are aware of the parameters and boundaries of their roles when speaking to victim survivors of family violence, and when to refer to specialist family violence services.

We recommend the importance of a consistent policy and practice framework, rather than possibly ad hoc or disparate (and possibly conflicting) policy and practice by different providers.

Kildonan supports the suggested minimum components and advises that all policy is also underpinned by the safety of women and children, and that this is explicitly stated.

In relation to 3.1 – Proposed Family Violence Clause we would add:

g) provide a means for referring customers who may be affected by family violence to **appropriate** external assistance.

In relation to 3.2.1. we note that whilst “empathy and understanding” are important qualities for call centre staff to have, training needs to clearly distinguish the parameters of these qualities to prevent staff ‘over-empathising’ with customers and becoming enmeshed in the customer’s life. Staff also need to know available avenues for support to deal with the impact customers’ stories may have on them in order to prevent vicarious trauma.

In relation to 3.2.5 we agree with the importance to identify and provide referrals. The introduction of Support & Safety Hubs as a first port of call for those experiencing and perpetrating family violence in 2018 will be a key referral point. Safety & Support Hubs will exist in each of Department of Health & Human Services 17 catchments across Victoria.

Kildonan is pleased to see a requirement for training and support for staff who deal with customers affected by family violence and is also heartened that retailers will be required to refer these customers to external expertise.

In our experience, it is important to ensure family violence policies relating to customer response and associated training for staff are accompanied by internal policies for staff, who often represent a microcosm of the retailer’s broader customer base. Our training often raises issues for staff around their own lives and team leaders and managers need to be appropriately trained to deal with this.

It was heartening through the ESC’s consultation process, to see the collaborative nature of the water retail industry, with geographically based retailers happy to share knowledge and information for the benefit of Victorians.

As the code changes are implemented, we encourage the ESC to provide more detailed guidelines in its better practice guiding material around how businesses might approach debt management and recovery where a customer is affected by family violence. We feel this will enable a consistent approach across the sector.

We also encourage the ESC to continue its consultative approach to the research and communication it has conducted on this matter to date as it continues its work.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stella Avramopoulos', written in a cursive style.

Stella Avramopoulos
Chief Executive Officer

ATTACHMENT 1

About Kildonan

Kildonan is an innovative and trusted community service organisation within one of Australia's largest welfare networks, UnitingCare Australia – an agency of the Uniting Church. We are one of Australia's oldest organisations dating back to 1881 – yet we have a reputation for delivering some of the most proactive, innovative and relevant community services in Victoria.

Our services support individuals, families and communities from metropolitan Melbourne through to northern regional Victoria. We also have a corporate arm which consults nationally to companies wanting to deal more fairly with their customers from across the utility, telecommunications, property, banking and government sectors.

Kildonan is one of approximately 250 UnitingCare agencies across Australia, making the UnitingCare network one of the largest providers of community services in the country. The network employs 39,000 staff, supported by 28,500 volunteers, providing services across more than 1600 sites in every state and territory in remote, regional and metropolitan Australia. It has an annual turnover in excess of \$2.5 billion.

In October 2016 Kildonan and 21 other Uniting Church agencies in Victoria and Tasmania merged into one. Uniting (Victoria and Tasmania) Ltd is the new community services organisation of the Uniting Church in Australia Synod of Victoria and Tasmania.


Building from the legacy of its 22 founding agencies across the UnitingCare network, Uniting (Victoria and Tasmania) Ltd has over 3,500 staff and 3,500 volunteers. It operates across metropolitan, regional and remote parts of Victoria and Tasmania, offering a broad range of services and advocacy to support thousands of vulnerable people.

The services of the new organisation include: emergency relief; financial counselling; housing and homelessness; employment; early childhood; child, youth and family; disability; mental health; community aged care and respite services; alcohol and other drugs; and Lifeline.

2016-17 is a year of transition with a single Board of Governance overseeing the 22 entities (founding agencies), while organisational capability and identity is developed. It is expected that agencies will come together as part of the new single organisation in the middle of 2017.



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