

## Protecting customers affected by family violence

### STAKEHOLDER FEEDBACK TEMPLATE

Please use this template if you wish to provide your feedback on the questions posed in the consultation paper. Please don't feel obliged to answer each question, but address those of particular interest or concern. Further context for each question can be found in the consultation paper.

#### SUBMITTER DETAILS

**ORGANISATION:** White Ribbon Australia

**CONTACT NAME:** [REDACTED]

**EMAIL:** [REDACTED]

**PHONE:** [REDACTED]

**DATE** 23 February 2022

#### PROJECT DETAILS

**NAME OF RULE CHANGE:** Protecting customers affected by family violence

**PROJECT CODE:** RRC0042

**PROPONENT:** Red Energy and Lumo Energy

**SUBMISSION DUE DATE:** 3 March 2022

## CHAPTER 1 – VIEWS ON THE RULE CHANGE PROPOSAL

### Question 1– Red and Lumo’s rule change request

What are your views on the effectiveness of the changes proposed by Red and Lumo in protecting customers affected by family violence?	White Ribbon Australia warmly welcomes the additional safeguards and measures as a way of contributing to stopping violence and abuse in the family home. Family violence disproportionately impacts women and further to this women are impacted by the implications of wider gender inequality often impacting financial autonomy and security. We strongly welcome all measures that contribute to the mainstream community response to support women who are experiencing trauma associated with men’s violence and abuse. We applaud the steps taken by Red and Lumo around this rule change request.
What improvements and challenges should the Commission consider?	All workplaces need to adopt a primary prevention approach to their practices, policies and procedures. In addition to the rule change we urge that all companies associated with the National Energy Retail Law consider wider practices for their internal and external stakeholders relating to gender equality.

## CHAPTER 2 – ADDITIONAL COMPONENTS THAT COULD BE INCLUDED IN THE RULE

### Question 2 – Additional matters

Are there matters you would like to see addressed in the National Energy Retail Rules beyond those considered in the proposed rule? These could be issues, protections or requirements. For instance, regarding the Victorian approach, compliance and enforcement, or ways to minimise implementation costs?	Learning and Development for energy retail providers in workplace safety, the signs of abuse and their level of civic/social partnerships with organisations like White Ribbon Australia to better address gendered drivers of violence and adapt workplace processes to provide ongoing safety and security.
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## CHAPTER 3 – ALTERNATIVE APPROACHES AND COMPLEMENTARY POLICY APPROACHES

### Question 3: Alternative approaches

What regulatory approaches from other sectors should the Commission consider, to complement, amend or replace Red and Lumo's proposal? Please explain why that regulatory approach is being used and provide evidence of its effectiveness in protecting consumers from financial abuse.	Nothing further to add here.
Could a broader cross-sector approach effectively address financial abuse in the energy sector? What would be its key aspects?	Yes, looking at a primary prevention campaigns and the role that energy providers can play in leading the mainstream discourse around preventing violence before it occurs. A Literature Review on Preventing the Financial Abuse of Women was finalised and published on the Office for Women website. The Literature Review maps out existing approaches to preventing financial abuse, identifies effective initiatives, gaps and areas for improvement. The review suggests that organisations must take a preventative approach for instance; increasing mainstream awareness of the impacts of financial abuse and the epidemiology and augmenting partnerships to shift community attitudes towards financial abuse by demystifying the issue.
What existing jurisdictional provisions should the Commission take into account for this rule change?	Nothing further to add.

## CHAPTER 4 – WHAT IS AN APPROPRIATE ASSESSMENT FRAMEWORK FOR THIS RULE CHANGE

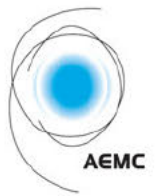
### Question 4: Assessment framework

Is the proposed assessment framework appropriate? What	Assessment Framework should look at unintended consequences for the consumer to ensure that no further impact is attributed to them or that they are not being put at further risk of harm or abuse. For instance, managing confidentiality, ensuring that staff in the energy sector
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## Stakeholder feedback

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amendments or additions would you suggest, and why?

are adequately trained to handle sensitive information and adopting a trauma-informed lens. In other information you would need to add Men's Referral Services in the Support Services.