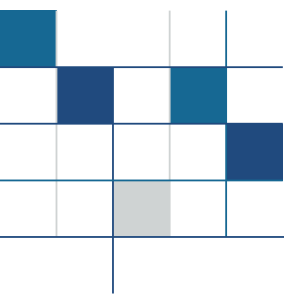




Guideline

Guidance for water service providers in addressing family violence

December 2020



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December 2020

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Acknowledgements

The Department of Water and Environmental Regulation acknowledges that this guideline has been informed by the Victorian Essential Services Commission's *Better practice in responding to family violence* (August 2019) and *Family and Domestic Violence Common Risk Assessment and Risk Management Framework*.

In addition, the department would like to thank the Western Australian Department of Communities' Family and Domestic Violence Unit for their contribution to developing this guideline.

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1. Purpose

This guideline has been prepared to assist water service providers develop and implement their family violence policies in accordance with the *Water Services Code of Practice (Family Violence) 2020* (code).

Appendix A provides a sample family violence policy that water service providers may customise to their circumstances to ensure they comply with the minimum requirements of the code. Appendix B provides a checklist to assist water service providers to ensure they have met the minimum requirements of the code.

In addition, this guideline suggests actions above the minimum requirements in the code that a water service provider may consider in developing their approach to addressing family violence.

Addressing family violence requires a whole-of-community approach to prevention, early intervention, victim safety and perpetrator accountability.

2. Scope

The considerations provided in this document are not mandatory; rather, their purpose is to assist water service providers in doing everything they can within their role as water service providers to address family violence in safe and effective ways.

The Department of Water and Environmental Regulation recommends water service providers consult with relevant experts in developing the best approach for their circumstances to address family violence.

3. Context

What is family violence?

Family violence is the intentional and systematic use of violence and abuse to control, coerce and create fear in another person within a familial relationship.

The term family violence most commonly refers to violence and abuse against an intimate partner, including same-sex relationships and ex-partners, and can also include the abuse of children, older people and other family members.

Examples of behaviour that may constitute family violence include:

- an assault against the family member
- a sexual assault or other sexually abusive behaviour against the family member
- stalking or cyber-stalking the family member
- repeated derogatory remarks against the family member
- damaging or destroying property of the family member



- causing death or injury to an animal that is the property of the family member
- unreasonably denying the family member the financial autonomy that the member would otherwise have had
- unreasonably withholding financial support needed to meet the reasonable living expenses of the family member, or a child of the member, at a time when the member is entirely or predominantly dependent on the person for financial support
- coercing, threatening, or causing physical abuse, emotional or psychological abuse or financial abuse, in connection with demanding or receiving dowry, whether before or after any marriage
- preventing the family member from making or keeping connections with the member's family, friends or culture
- kidnapping, or depriving the liberty of, the family member, or any other person with whom the member has a family relationship
- distributing an intimate image of the family member without the family member's consent, or threatening to distribute the image
- causing any family member who is a child to be exposed to these behaviours.

Family violence has serious and often ongoing impacts on victims' health including injuries, homicide and poor mental health, and exposes children and young people to trauma that can impact them for the rest of their lives.

Family violence is a fundamental violation of human rights and should not be tolerated in any community or culture.

Family violence in Western Australia

Family violence is a significant issue in Western Australia. In 2018–19, there were 11,975 family violence restraining order applications lodged; and in 2019–20, the Western Australian Police Force recorded 24,498 family-related offences (assault and threatening behaviour) which was a 13.8 per cent increase on the average over the past five years (14,761 of these offences were in the metropolitan area and 9,737 in regional areas).

Because of the way family violence is categorised and reported on the WA Police website, these statistics do not reflect all family violence incidents. A more indicative statistic is likely to be the 47,623 family violence incidents triaged by Family Violence Response Teams in 2018–19. However, even this is considered an underrepresentation of the actual incidences in Western Australia.

The Government of Western Australia is committed to addressing family violence and has invested significantly in reforms to address the issue. While government leadership is critical, long-term success requires community support and participation. Ending family violence is everybody's business.



On 22 July 2020, the State Government released [*Path to Safety: Western Australia's Strategy to Reduce Family and Domestic Violence 2020–2030*](#) (the strategy). The strategy sets out a clear whole-of-government and community plan for reducing and responding to this issue over the next decade.

Impact of COVID-19

Movement restrictions, quarantine and self-isolation measures related to COVID-19 have increased the risk for women and children in their homes living with a violent perpetrator.

The number of family violence incident reports to the WA Police Force between March and June 2020 was between 4.7 per cent and 6.4 per cent higher than the same months last year. Additionally, the Department of Communities' Women's Domestic Violence Helpline received a 47 per cent increase in calls in March 2020 compared with March 2019.

As part of the State Government's WA Recovery Plan a comprehensive \$28.1 million support package for victims of family and domestic violence was announced including:

- \$8.6 million to employ additional outreach workers to support women and children fleeing family and domestic violence
- \$6.7 million for family violence response teams that support victims following police call-outs
- \$4 million to expand the new Peel and Kwinana women's refuges.

Under the National Partnership Agreement on COVID-19 Domestic and Family Violence Responses, Western Australia received Commonwealth funding to focus on the immediate safety needs of victims of family and domestic violence.

Relevance to water services

Preventing family violence and abuse is the responsibility of the whole community and requires a shared understanding that it must not be tolerated under any circumstance.

Residential water services in Western Australia are provided by a variety of water service providers including local governments, companies and water corporations.

Water service providers should consider the many ways in which family violence can intersect with their services in order to tailor their approach to do everything they can within their role as a water service provider to address family violence.

Staff and customers of water service providers can be affected by family violence – as victims, perpetrators and through their interactions with victims and perpetrators.

Perpetrators of family violence could capitalise on the essential nature of water services to assert control over their victims. For example, perpetrators might incur



debt in the victim's name, refuse to contribute to costs, refuse to pay bills or have the service disconnected when they leave the family home.

Victims of family violence may be deterred from leaving an abusive situation if they feel they will be faced with large debt should they leave. In addition, victims may suffer significant psychological and emotional impacts while attempting to resolve debts at the same time as ensuring their personal safety.

Furthermore, perpetrators may gain access to the victim's confidential information, such as their whereabouts; for example, through their knowledge of the personal details of the victim.

In Western Australia, while some water service providers may enter into agreements with tenants, water service customers are the landowners and not the tenant/s on the land. It is open to water service providers to go beyond their minimum statutory obligations to provide additional support to tenants.

Staff may be victims or perpetrators of family violence themselves or may be affected by their experiences in dealing with co-workers or customers affected by family violence (vicarious trauma).

Family violence may, in some cases, pose a risk to the physical and psychological health and safety, not only of employees who are victims of the violence, but also of co-workers and other third parties.

Water service providers can play their part in addressing family violence by:

- prioritising the safety and wellbeing of those affected by family violence
- ensuring their staff, systems and processes do not discourage victims from seeking support and assistance
- promoting awareness and a culture of no tolerance for family violence
- ensuring their systems and processes do not enable family violence.

Water Services Code of Practice (Family Violence) 2020

Western Australia's approach to addressing family violence through water service providers has been informed by the approach taken by the Victorian Essential Services Commission following the 2016 Victorian Royal Commission into Family Violence.

On 9 December 2019, the Minister for Water, Hon Dave Kelly MLA, the Minister for Energy, Hon Bill Johnston MLA, and the Minister for Prevention of Family and Domestic Violence, Hon Simone McGurk MLA, issued [a joint statement](#) committing to changes to the customer codes for Western Australian utility service providers to increase protection for customers experiencing family violence.



On 8 December 2020, the Minister for Water established the *Water Services Code of Practice (Family Violence) 2020*. This code was developed in consultation with key stakeholders including water service providers, regulators, financial counsellors and social services.

The approach in Victoria:

The 2016 Victorian Royal Commission into Family Violence found that essential services could be used by perpetrators of family violence to cause harm; for example, by registering a service in the name of a victim without their knowledge or consent, or intercepting mail that identifies the victim's safe location. The financial impact of family violence (including financial abuse) also means that people affected by family violence may have trouble paying bills, particularly if they have had to move multiple times.

In light of this, the Victorian Essential Services Commission amended the Victorian energy and water codes to set minimum requirements that energy and water retailers must meet when providing assistance to customers affected by family violence. In particular, energy and water retailers must:

- have a family violence policy in place
- meet minimum standards on staff training, account security, debt management and customer service.

In August 2019, the Commission released research on customer experiences of changes to the water customer service codes and also published the [*Better practice in responding to family violence*](#) guide, which explores ways energy and water retailers can provide family violence assistance that is safe and effective. The Commission has an ongoing commitment to work with the water and energy sectors to support collaboration and better practice in responding to family violence.

4. Legislation

In Western Australia, water service providers are licensed under the *Water Services Act 2012* to provide water supply, sewerage, irrigation and drainage services to customers. The customers of water service providers are the owners of the land to which the service is delivered.

The *Water Services Code of Practice (Family Violence) 2020* was made under section 26 of the *Water Services Act 2012* and requires water services licensees that provide a water service to residential customers to have and implement a family violence policy.

Water service providers are required to comply with the code as part of their licence conditions.

The code provides flexibility for water service providers to tailor their approach to addressing family violence to their circumstances.



5. Outcome

This guidance has been developed to help water service providers develop their approach to addressing family violence to contribute to the following outcomes:

- Safety and support for victims – Adult and child victims are safe and kept free from harm through timely and accessible services. Women and children at risk of or experiencing family violence are identified early, offered supports and protection, and are assisted to recover and thrive.
- Accountability – Perpetrators are held accountable for their actions and are actively supported to cease their violent behaviour.
- Prevention and early intervention – Individual attitudes and behaviours within the community reflect that family violence in any form is not acceptable.

6. A comprehensive and effective approach

Ensuring the approach is well-informed and continually improved

To fully understand water service providers' potential to address family violence, water service providers are encouraged to engage with:

- specialist family violence organisations that can shed light on a variety of perspectives such as:
 - initiatives already in place to address family violence and how these could intersect/support the water service provider's approach (e.g. [WA Department of Communities – Family and Domestic Violence Unit](#))
 - financial impacts and difficulties experienced by victims of family violence, and potential solutions (e.g. [Financial Counsellors' Association of WA](#))
 - appropriate ways of supporting and empowering victims of family violence (e.g. [Women's Council for Family and Domestic Violence Services](#))
 - issues prevalent in particular communities, and how water service providers can tailor their approach to better support victims in these communities
- all business functions within their organisation which can identify past and potential areas of concern, and create opportunities to address them
- other water service providers and businesses who have developed and implemented strategies to address family violence, who can share their knowledge, experiences and approaches.

To promote continual improvement, the *Water Services Code of Practice (Family Violence) 2020* requires that water service providers review their family violence policy at least once in every five-year period, and if directed to do so by the Minister.



The operation and effectiveness of the code will be reviewed at least once every five years.

Effective implementation

Organisation-wide commitment

Embedding lasting practices to address family violence requires organisation-wide commitment. Low awareness and poor responses by staff can deter customers experiencing family violence from disclosing their situation or accessing support.

Organisation-wide commitment can be achieved by:

- communicating the **organisation's position and commitment** to addressing family violence to staff and the community. By publishing their family violence policy, water service providers will communicate their position and commitment to addressing this issue. Water service providers could go above and beyond by partnering with other organisations or participating in events that draw attention to the issue of family violence. The code requires that water service providers ensure their family violence policies are available on their websites and in hard copy at no charge
- involvement of **senior leadership** within the organisation in developing and implementing the water service provider's approach
- commitment from senior leadership to communicate to staff and external stakeholders that family violence is an issue that the organisation takes seriously
- **including all business areas** in the development of the water service provider's approach to addressing family violence to help understand the organisation's direction, ensure changes are appropriate and can be fully implemented, and to build support internally
- providing family violence **training to all staff** and reinforcing the importance of understanding and addressing the issue in everyday life and work.

Water service providers are encouraged to draw attention to the issue of family violence and commit to addressing this issue, for example, by publishing their policy and other relevant information and resources in a prominent position on their website.

Support for staff

Staff may be directly affected by family violence, or indirectly through their interactions with victims, and are likely to all have different responses.

Water service providers are encouraged to ensure staff are aware of the support available to staff affected by family violence, including any training, leave, confidentiality and security measures, availability of flexible working arrangements, debriefing support, external referrals and counselling available.



7. Prevention and early intervention

Greater awareness of what is family violence, its prevalence, impacts and ramifications can help to prevent people from perpetrating family violence in the first place, support victims to take action safely and encourage the community to intervene early and in an appropriate and effective manner.

Water service providers are encouraged to take and communicate the position that family violence and abuse is a fundamental violation of human rights and should not be tolerated in any community or culture.

Attitudes and behaviours within the community that reflect that family violence in any form is not acceptable will also help to discourage this behaviour.

It is important that perpetrators (and potential perpetrators) understand what family violence is, and that it is not acceptable. It is also important that victims (and potential victims) and the community as a whole have this understanding. This will help to prevent family violence occurring and to promote intervention to prevent it from continuing or escalating.

Water service providers can raise awareness and support attitude changes towards family violence by:

- speaking out against the issue of family violence
- articulating support for victims of family violence
- providing information and training to staff.

Having measures in place that provide support and assistance to victims of family violence helps to empower them to make their own choices, including whether to stay in or leave an abusive situation. If a victim is attempting or preparing to leave an abusive relationship, then water services must have measures that support this option.

Raising a voice against family violence

A water service provider can contribute to reducing family violence simply by publishing their family violence policy on their website. Water service providers can also team up with and support organisations that provide family violence services or participate in events that support addressing the issue.

Clearly articulating support for victims

Having information easily accessible to victims on the support that is available to them may help inform their responses and support safe decision-making. As some victims may look for information before making any decisions about addressing their circumstances, water service providers are encouraged to publish detailed information about support available on their website in a way that can be easily found; for example, through online searches.



Many family violence webpages have an option for the user to close the page quickly without it appearing in their browsing history.

Providing information and training to staff

It is important that staff dealing with victims of family violence understand that victims are best positioned to understand their circumstances and that it is the victim's responsibility to choose how they wish to address their circumstances.

Customers who choose to remain in or return to a violent home environment should be supported and their decision respected.

Identifying signs of family violence and knowing when and how to take appropriate action would be a daunting task for water service provider staff. Well-intended, but inappropriate, responses can have a negative impact on family violence situations. The skills and knowledge required to enable staff to respond appropriately will depend on the nature of the organisation and the employee's role.

It is recommended that all staff are provided with basic training to help build a common understanding of family violence and the role the community can play in addressing the issue.

All staff should understand the importance of appropriate responses to family violence, including ensuring information is kept confidential and secure. Training around this may be more pertinent in smaller communities where anonymity is almost impossible.

Front-line staff such as those receiving phone calls from customers should be equipped with knowledge and skills to identify customers affected by family violence and to deal with them in an appropriate manner. For example, call centre staff could be provided with a script to use when dealing with a customer who has indicated that they have been, or are being, affected by family violence.

These staff would also need to understand the water service provider's family violence policy, including the support available to customers and how to refer to a case manager within the organisation.

Case managers would need a detailed understanding of, and skills necessary to implement, the water service provider's family violence policy and processes. This should include some training in risk assessment, risk management and safety planning to ensure any actions taken are safe and appropriate to the victim's circumstances.

Senior leaders and management should be provided with an understanding of family violence and the water service provider's approach to family violence so as to be able to appropriately support and lead their staff.



The water service provider could consider training select staff who could then deliver in-house training to their colleagues and develop ongoing awareness and engagement.

The code requires water service providers to set out in their family violence policy the training to be provided to employees and other persons interacting with customers on behalf of the licensee to enable them to appropriately respond to customers affected by family violence. Resources to assist water service providers in developing a training package for their staff are provided in Appendix C.

8. Safety and support

The safety and wellbeing of those affected by family violence and abuse should be the first priority of any response.

Customers

Water service providers can contribute to the safety of customers experiencing family violence by ensuring staff are trained to respond appropriately to incidences of family violence and that systems and processes do not enable family violence to be perpetrated. For example, they can:

- ensure staff are equipped to handle situations where a customer's safety is at stake. For example, a water service provider's call centre may witness family violence while on a call with a customer. Staff that have been trained appropriately would understand their duty of care to report incidences and how to handle the customer, because knowing whether, and who, to call for support could help ensure the safety of the victim
- have systems and processes in place to ensure information about customers experiencing family violence (who have consented to their circumstances being noted) is kept secure and confidential. For example, a water service provider could set up a system whereby, once a customer has requested family violence assistance:
 - access to their information is locked to select staff who are involved with the case

The code requires water service providers to set out in their family violence policy how information obtained from, or relating to, customers affected by family violence is to be protected.

This will encourage customers to seek assistance by providing assurance that interactions with the water service provider will not jeopardise their safety.



- the customer is provided a specific reference code to use when liaising with the organisation (to prevent perpetrators who may know personal details about the victim's accounts from accessing information through standard controls)
- staff dealing with customers experiencing family violence are trained in using the water service provider's systems, maintaining confidentiality and security controls.

Water service providers can support customers affected by family violence by ensuring they do not discourage customers from seeking the assistance and support they need to address their circumstances.

Publishing information on how the water service provider can assist customers affected by family violence will help victims to understand their options and make informed decisions, and appropriate systems and staff training helps to reduce the emotional toll on victims. Water service providers can do this by:

- having systems in place so that customers (who have consented to their circumstances being noted) do not need to relive their trauma by having to repeat their circumstances each time they deal with the water service provider's staff. For example, water service providers could provide them with a reference number to quote each time they call which would direct them to relevant case managers who have access to their account
- identifying an account where there may be a history of family violence equips employees to engage effectively with all customers on the account, recognising that both victims and perpetrators of abuse are entitled to fair service from their water services provider
- having measures in place to provide assistance to customers affected by family violence, such as access to the water service provider's financial hardship program and referrals to relevant organisations
- equipping staff who may come into contact with customers experiencing family violence with the knowledge and skills to understand the customer's situations, the organisation's approach and the context of their role in order to deal with customers in an empathetic and appropriate manner

The code requires water service providers to set out in their family violence policy a process by which the account of a customer affected by family violence can be identified by employees without the need for a customer to repeat details of the issues.

The code requires water service providers to set out its position in relation to payment difficulties, financial hardship and debt management for customers affected by family violence.

This will help alleviate the uncertainty customers affected by family violence can experience in relation to their options in accessing assistance.



- ensuring staff understand when it is appropriate to refer, how to refer and to whom to refer. The timing and manner of referral or the provision of information about referral may influence the customer's experience and decision to address family violence. Staff should be equipped to determine the best timing and manner of referral through their training. A list of helpful organisations is available on the [Department of Communities' website](#).

The code requires water service providers to set out what information is to be provided to customers affected by family violence about external services through which they can receive support, and when that information is to be provided. Water services providers are not required to provide or engage external family violence support services themselves.

Given the covert nature of family violence and the difficulty victims have in speaking out about it, water service providers are encouraged to believe victims' experiences.

The code of practice provides that water service providers may request written evidence of family violence from a customer if the evidence is reasonably necessary to enable the licensee to assess appropriate measures that it may take in relation to debt management and recovery. Such evidence could include a Statutory Declaration similar to that under the *Residential Tenancies Act 1987*.

Staff

Family violence can pose a work health and safety issue. In some cases, it may pose a risk to the physical and psychological health and safety not only of employees who are victims of the violence, but also of co-workers and other third parties.

The code does not impose requirements on water service providers in relation to staff entitlements.

Water service providers should consider their responsibilities under the *Occupational Safety and Health Act 1984* when developing their approach to addressing family violence with their staff.

Water service providers can contribute to their staff's safety by:

- ensuring staff are equipped to handle situations where a colleague's safety is at stake. For example, the perpetrator could come to the victim's place of work and threaten to harm the victim or their colleagues. Staff who have been appropriately trained may be able to diffuse the situation and/or seek assistance from authorities
- having systems and processes in place to ensure information about staff experiencing family violence is kept secure and confidential. For example,



ensuring access to human resource systems is secure and that staff are trained in using the organisation's systems, maintaining confidentiality and security controls.

Water service providers could support their staff by having, and making easily accessible, measures to enable them to take action to address their circumstances, such as by providing:

- debriefing assistance for staff who deal with customers affected by family violence
- an employee assistance program
- information about where to seek specialist assistance
- family violence leave entitlements
- flexible working arrangements to enable staff experiencing family violence to attend to their circumstances
- information on confidentiality and how it will be managed in the workplace.

9. Accountability for perpetrators

Engaging directly with perpetrators of family violence is challenging and requires particular skills in order to ensure the safety of all parties involved. Water service providers are not expected to intervene in a manner other than as required by duty of care.

However, perpetrator accountability is not just about an action or consequences taken against a person who is using violence and abuse. Holding a perpetrator to account includes how water service providers engage with customers and record information. For example, it is important that records do not imply the victim is in any way to blame for the abuse.

Similarly, it is important that staff avoid colluding with perpetrators by excusing their behaviour or showing overt acceptance of any abusive behaviour. There are non-confrontational ways to support victims and hold perpetrators to account for their violence and abuse.

Water service providers are encouraged to take steps within their control that will promote perpetrator accountability, such as training relevant staff to:

- understand their duty of care to ensure their and their colleagues' safety
- understand their duty of care to ensure the safety of the victim, including reporting incidences of family violence to authorities
- understand their limitations
- understand good recording practices
- understand what collusion is and how to avoid it.



10. Communicating the water service provider's approach

The importance of raising a voice against family violence and making information about support available is reiterated throughout this document.

Water service providers are encouraged to make the process of seeking family violence assistance as simple as possible for victims. It is recommended water service providers consider how to overcome potential barriers to access, such as language, cultural and accessibility difficulties.

For example, people considering leaving a family violence situation may choose to research their options before taking any steps. This could mean that they would search online for information about assistance available rather than contacting the water service provider directly.



Appendices

Appendix A - Sample family violence policy

The Department of Water and Environmental Regulation has prepared this Sample Policy to assist water service providers in preparing their family violence policy in accordance with the minimum requirements of the *Water Services Code of Practice (Family Violence) 2020*.

Water service providers are encouraged to do everything they can (within their control) to address family violence, and so should consider whether they are able to go above and beyond these minimum requirements.

Title:	Family violence policy		
Sub title:	Our approach to addressing family violence		
Published:	[Date of publication]		
Last reviewed:	[Date]	Next review:	[Date – max five years since last review]

If you wish to access a hard copy (at no charge) of this policy, please contact us via: [insert contact details]

1. Purpose

This policy outlines [water service provider]'s approach to addressing family violence, as required by the *Water Services Code of Practice (Family Violence) 2020*.

2. Scope

This policy applies to customers and staff of [water service provider] who have been, or are being, affected by family violence.

3. Legislation

The *Water Services Code of Practice (Family Violence) 2020* requires water service providers to have and implement a family violence policy, and stipulates the minimum requirements that the policy must address.

This policy meets [/exceeds] these requirements and has been informed by the Department of Water and Environmental Regulation's *Guidance for water service providers in addressing family violence*.

4. Context

Family violence is the intentional and systematic use of violence and abuse to control, coerce and create fear. It can be physical, emotional/psychological, sexual, financial, spiritual or social in nature. Further information on what is considered family violence is available [here](#).



Perpetrators of family violence can use control over their victims as a form of economic abuse, such as incurring debt in the victim's name, refusing to contribute to costs, refusing to pay bills or having the service disconnected when they leave the family home.

Victims of family violence may suffer significant psychological and emotional impacts while attempting to resolve debts at the same time as ensuring their personal safety.

In addition, perpetrators may gain access to the victims' confidential information such as their whereabouts; for example, through their knowledge of the personal details of the victim.

5. Our role in addressing family violence

At [water service provider], we have zero tolerance for family violence and will do everything we can (within our control) to support customers affected by family violence.

We have implemented systems and staff training so that customers who disclose to us that they have been, or are being, affected by family violence:

- are heard and need only make this disclosure once
- have confidential and respectful interactions with our staff
- can be certain their personal information is kept confidential and safe
- are provided with information about financial support and assistance available, including specialised support networks
- are provided with time and information to help them consider their options and make informed decisions
- can enter into [water service provider]'s Financial Hardship program and be supported by our family violence process.

6. Support available

Customers can be referred into external support networks and resources including:

[Water service providers can access up-to-date information about support networks and resources from the [Department of Communities' website](#).]

7. Complaints procedure

Please refer to our Complaints procedure (available at: [insert link to Complaints procedure]) if you are not satisfied with how we have handled your situation.



Appendix B - Checklist against minimum requirements

This checklist contains the minimum requirements a water service provider must meet to comply with the *Water services code for addressing family violence*.

Section of code	Minimum requirements	Check
5(2)	Have a family violence policy in place before the end of the six-month period starting on 9 December 2020 or the day of the grant of the licence if this is after 9 December 2020.	
6	Publish the family violence policy on the water service provider's website and provide a hard copy of the policy on request at no charge.	
5(1)	The family violence must, at a minimum, address:	
5(1)(a)	<ul style="list-style-type: none"> the training to be provided to employees and other persons interacting with customers on behalf of the licensee to enable them to: <ul style="list-style-type: none"> (i) identify customers affected by family violence (ii) appropriately address issues relating to the family violence 	
5(1)(b)	<ul style="list-style-type: none"> the information to be provided to customers affected by family violence about external services through which they can receive support, and when that information is to be provided 	
5(1)(c)	<ul style="list-style-type: none"> a process by which the account of a customer affected by family violence can be identified by employees without the need for a customer to repeat details of the issues 	
5(1)(d)	<ul style="list-style-type: none"> how information obtained from, or relating to, customers affected by family violence is protected 	
5(1)(e)	<ul style="list-style-type: none"> in what circumstances a customer affected by family violence will, as a result of the family violence, be taken to be experiencing — <ul style="list-style-type: none"> (i) payment difficulties for the purposes of the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i>, or (ii) financial hardship for the purposes of the licensee's financial hardship policy 	
5(1)(f)	<ul style="list-style-type: none"> how the licensee deals with debt management and recovery in relation to the accounts of customers affected by family violence 	
5(1)(g)	<ul style="list-style-type: none"> that the licensee may only request written evidence of family violence from a customer if the evidence is reasonably necessary to enable the licensee to assess appropriate measures that it may take in relation to debt management and recovery. 	
7	Family violence policy is reviewed at least once in every five-year period, and as directed to do so by the Minister.	
8(1)	Maintain adequate records in relation to compliance with this code or any policy made under the code — <ul style="list-style-type: none"> (a) if the licensee is a government organisation* as defined in the <i>State Records Act 2000</i> section 3(1) — in accordance with its obligations under that Act; or 	



Section of code	Minimum requirements	Check
	<p>(b) otherwise — for at least seven years after the last communication between the licensee and the customer or water services ombudsman in relation to the matter the subject of the record, or for at least seven years after the record is made.</p> <p>*Note that ‘Schedule 3 organizations’ under the <i>State Records Act 2000</i> are ‘government organizations’ under that Act, and so clause 8(1)(a) would apply to those organizations.</p>	
9	Inform the customer of the existence and operation of the licensee’s complaints procedure under the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i> clause 46.	
10	Ensure the water service provider’s website contains a link to the current version of the code . (Note that a link to the code is sufficient – the provider does not need to publish the code on their website.)	



Appendix C - Training resources for water service providers

Recommended knowledge and skills for different roles

Knowledge/Skill		All staff	Frontline staff and managers	Case managers
1	Foundational knowledge – Understanding the nature, scope and impacts of family violence	✓	✓	✓
2	Understanding role in addressing family violence within the organisation (including what is out of scope)	✓	✓	✓
3	Knowing where to turn to for support and assistance in addressing family violence	✓	✓	✓
4	Recognising and referring customers affected by family violence		✓	✓
5	Knowing how to handle situations, including setting appropriate boundaries, what action to take and how to safely refer clients for support		✓	✓
6	Specialist skills in handling family violence accounts			✓
7	Family violence risk assessment, safety planning and risk management			✓

Potential experts or supports who can assist in developing or accessing relevant knowledge/skills

Potential experts or supports	Knowledge/Skill (Refer to table above)						
	1	2	3	4	5	6	7
Department of Communities, Family and Domestic Violence Unit; Contact: Stacey Collins Stacey.collins@communities.wa.gov.au	✓	✓		✓	✓	✓	✓
Womens Council for Domestic and Family Violence Services WA womenscouncil.com.au/	✓		✓	✓	✓	✓	✓
Stopping Family Violence Inc. (WA); sfv.org.au/	✓		✓	✓	✓	✓	✓
No To Violence (Vic); ntv.org.au/	✓		✓	✓	✓	✓	✓
Officer within the water service provider who understands the organisation's approach, processes and procedures		✓			✓		



Potential resources to develop knowledge and skills:

1. Foundational knowledge - Understanding the nature, scope and impacts of family violence

- Free eLearning: AVERT Family Violence Basics Course: www.avertfamilyviolence.com.au/training/basic-course/
- eLearning (\$95): Tangentyere Family Violence Prevention – Introductory program; www.tangfamilyviolenceprevention.com.au/training
- Free eLearning: FDV An Introduction cpfs.moodle.com.au/mod/page/view.php?id=13778 (External agencies click on the link 'request an account'. Once you have an account, sign up via elearning, then 'sector and foster care' link)
- Free eLearning: FDV Introduction: www.wnhs.health.wa.gov.au/Our-services/Statewide-Services/Womens-Health-Strategy-and-Programs/Family-and-Domestic-Violence-Training (scroll down to 'e-learning's' link)
- Free eLearning: DV-alert-Recognise, Respond, Refer www.dvalert.org.au/workshop/workshop-landing-page
- A service-specific package could be developed in consultation with relevant expert or private FDV specialist consultant.

2. Understanding role in addressing family violence within the organisation (including what is out of scope)

- A service-specific package could be developed in consultation with relevant expert or private FDV specialist consultant.

3. Knowing where to turn to for support and assistance in addressing family violence

- A service-specific package could be developed in consultation with relevant expert or private FDV specialist consultant.

4. Recognising and referring customers affected by family violence

- Free eLearning: Communities 'FDV Recognise and Respond' (in development)
- Free workshop: Technology facilitated abuse: Office of e-Safety commissioner; www.esafety.gov.au/key-issues/domestic-family-violence/training-for-frontline-workers
- A service-specific package could be developed in consultation with relevant expert or private FDV specialist consultant.

5. Knowing how to handle situations, including setting appropriate boundaries, what action to take and how to safely refer clients for support

- Free eLearning: Communities 'FDV Recognise and Respond' (in development)
- Service specific package could be developed in consultation with relevant expert or private FDV specialist consultant.



6. Specialist skills in handling family violence accounts

- Specific to the organisation

7. Family violence risk assessment, safety planning and risk management

- Free eLearning: AVERT Screening and Safety Planning;
www.avertfamilyviolence.com.au/training/screening-and-safety-planning/



References

- Crime Statistics*, Western Australian Police Force, Available from: www.police.wa.gov.au/Crime/CrimeStatistics#/, Last accessed: 21 October 2020.
- What is family and domestic violence?*, Government of Western Australia Department of Child Protection and Family Support, 2015, Available from: www.dcp.wa.gov.au/CrisisAndEmergency/FDV/Pages/Whatisfamilyanddomesticviolence.aspx
- Western Australian Family and Domestic Violence Common Risk Assessment and Risk Management Framework (2nd ed.)*, Government of Western Australia Department of Child Protection and Family Support, 2015, Available from: <https://www.dcp.wa.gov.au/CrisisAndEmergency/FDV/Documents/2015/CRARMFFinalPDFAug2015.pdf>
- Moving towards better practice—implementing family violence policies in the Victorian water sector*, May 2017, Victorian Essential Services Commission, Available from: www.esc.vic.gov.au/sites/default/files/documents/proposed-customer-service-code-changes-moving-towards-better-practice-20170706-v4.pdf
- Practice Guidelines: Women and Children's Family and Domestic Violence Counselling and Support Programs [Adapted version of original 2008 Department of Human Services (Victorian Government) edition]*, Department for Child Protection and Family Support, Government of Western Australia, Perth.
- Consultation Paper: 10 Year Strategy for Reducing Family and Domestic Violence*, Government of Western Australia Department of Child Protection and Family Support, Available from: www.communities.wa.gov.au/media/1722/fdv-10-year-strategy-consultation-paper.pdf
- Family violence—a work health and safety issue?*, Australian Government, Australian Law Reform Commission, 2011, Available from: www.alrc.gov.au/publication/family-violence-and-commonwealth-laws-improving-legal-frameworks-alrc-report-117/18-occupational-health-and-safety-law-2/family-violence-a-work-health-and-safety-issue/
- Employer Guide to Family and Domestic Violence*, Australian Government, Fair Work Ombudsman, Available from: www.fairwork.gov.au/ArticleDocuments/1414/employer-guide-to-family-and-domestic-violence.docx.aspx
- Path to Safety: Western Australia's strategy to reduce family and domestic violence 2020-2030*, Government of Western Australia Department of Communities, 2020, Available from: www.communities.wa.gov.au/media/2766/fdv-strategy.pdf