

reasonable for a provider to contribute towards or pay for emergency accommodation or other measures such as security cameras for the consumer impacted by family violence.

EWOV will consider the actions of the provider in identifying and remedying any privacy breach to consider whether compensation for non-financial loss (including for additional distress, harm and inconvenience) is appropriate. EWOV will also consider if the matter should be reported to the relevant regulator, including the Office of the Australian Information Commissioner. This may involve EWOV reporting the matter to the relevant regulator directly and/or recommending for the relevant provider to do so.

Customer service

EWOV recognises that poor customer service can have a disproportionate effect on consumers impacted by family violence, particularly when it causes them to repeat intimate and difficult circumstances to numerous staff members and/or on numerous occasions. We also recognise that consumers impacted by family violence may face different barriers to safely engage with their provider and may require additional assistance compared to other consumers. EWOV expects providers to appropriately recognise when additional assistance is required and to implement this assistance accordingly.

When there is poor customer service, EWOV will consider the impact this had on the consumer considering their individual circumstances. EWOV recognises that the impact of poor customer service may be different for a consumer impacted by family violence, compared to another consumer who received the same level of service but was not impacted by family violence.

When considering the appropriateness of the customer service of a provider, EWOV will consider a range of factors including:

- obligations to provide family violence assistance under the relevant codes and standards;
- adherence to the provider's family violence policy;
- if the provider recognised indicators of family violence and made appropriate enquiries and offered appropriate support;
- if the provider created any barrier or unnecessary distress for the consumer, such as requiring the consumer to have to repeat personal details or requesting unnecessary information;
- if the provider failed to contact the consumer by their preferred contact method which may have increased the risk of harm; and
- if staff adopted a supportive and empathetic approach during their dealings with the consumer.

A final thought

It is an enduring priority for EWOV to help resolve cases relating to family violence. We acknowledge that we are on our own journey to support consumers impacted by family violence. We welcome continued engagement and feedback from all stakeholders including on this position statement ~~XXXXXXXXXX~~