

15 March 2017

Water Team – Customer Service Codes
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000

Dear Sir/Madam,

Re: The Essential Services Commission (ESC)'s Proposed Amendments to Water Customer Service Codes New Requirements for Family Violence Policies – Draft Decision

Thank you for the opportunity to comment on the *Essential Services Commission (ESC)'s Proposed Amendments to Water Customer Service Codes New Requirements for Family Violence Policies – Draft Decision (Draft Decision)*.

As an industry-based external dispute resolution scheme, the Energy and Water Ombudsman (Victoria) (EWOV) provides alternative dispute resolution services to Victorian energy and water consumers by receiving, investigating and facilitating the resolution of complaints. EWOV's comments are based on our experience handling complaints that may involve family violence.

Support for change to Water Customer Service Codes

EWOV supports the ESC's proposal to update the Water Customer Service Codes. We agree that water corporations have a critical role in assisting known victims of family violence. We believe that creating family violence policies, via changes to the Water Customer Service Codes, will ensure that water corporations can achieve better outcomes for those experiencing family violence.

Billing history

Under part 3.3 of the *Draft Decision*, the ESC has proposed to make changes to the existing requirements so that billing history information is not provided where it may inadvertently risk the confidentiality of a family violence victim. We support the inclusion of the amendment, and suggest that water corporations notify EWOV, if a case is lodged, explaining that this is why this information has not been made available to an account holder, so that EWOV can best manage the case and prevent this information being provided incorrectly.

Review of Policies and Reporting Framework

EWOV notes that the *Draft Decision* does not suggest that the water corporations periodically review their policies (once in practice) to ensure that any necessary improvements can be identified. We also note that the ESC has not settled on a reporting approach, other than to check that all water corporations have implemented their policies by June 2018. We suggest that any reporting framework also assesses whether different approaches deliver improved outcomes for victims of family violence.

We trust the above comments are helpful. Should you require further information or have any queries, please contact Belinda Sandilands, Senior Research and Communications Advisor, on (03) 8672 4460 or at Belinda.Sandilands@ewov.com.au.

Yours sincerely



Cynthia Gebert
Energy and Water Ombudsman (Victoria)