

POLICY		Responsible Department	Roxby Power
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ROXBY POWER FAMILY VIOLENCE	
Latest Review Changes	New Policy
Previous Council Reviews	N/A
Previous Audit & Risk Committee Reviews	16.05.25

Applicable Legislation

Roxby Downs (Indenture Ratification) Act 1982 (Indenture)

Related Policies

Electricity Bond Policy
Power Direct Debit Terms and Conditions
Roxby Power Supply Terms and Conditions
Roxby Power Hardship Policy

Related Procedures

Reference Documents

[Australian Energy Regulator \(AER\) Customer Hardship Policy Guideline](#) – November 2019
[Family Violence Rules - Guidance for Energy Retailers](#) – February 2025

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1. PURPOSE

Roxby Power, a business unit of the Municipal Council of Roxby Downs (Roxby Council), is committed to supporting those facing family violence. The primary goal of Roxby Power is to help these customers maintain their electricity accounts, ensuring they can stay connected and continue receiving reliable electricity services.

The purpose of this policy is to outline a process for identifying customers who may be facing family violence and offer an approach to support these customers by managing their electricity account. Roxby Power will provide a safe and confidential space for customers to discuss their situation and access the necessary support required.

Roxby Powers policy is applicable to all residential customers living in Roxby Downs, South Australia who face difficulties paying their electricity bills due to the impact of family violence. It ensures that family violence protections continue for both current and former customers with a strong emphasis on maintaining confidentiality of information to protect customers' safety.

This policy sets out:

- a) The procedures for recognising customers who may be experiencing payment difficulties due to family violence, which may include self-identification by the customer, identification by an independent assessor, recognition by an accredited financial counsellor, referral by a welfare agency, or any other appropriate mechanism, and
- b) provides a range of support measures and programs designed to assist customers experiencing payment difficulties due to family violence. This can include tailored payment arrangements, financial assistance, extended time to pay without penalty, access to hardship programs, referral to specialised support services, and options to suspend disconnection or limit service impacts, in line with the AER guidelines to ensure customers receive the necessary support and protection.

2. DEFINITIONS

Definitions for the purpose of this policy are defined in the table below.

AER	Australian Energy Regulator
Family Violence	Family violence is a recurring pattern of behaviour aimed at exerting control, manipulation, or domination over an individual within a domestic, intimate, familial, or family-like relationship.
Affected Customer	A customer who is experiencing family violence and is impacted by it.
Perpetrator	An individual who intentionally uses abusive behaviour, including physical, emotional, psychological, or financial tactics, to control, manipulate, or harm a family member or intimate partner.
Hardship	Means difficulty paying bills and repayments when they are due.
Direct Debit	Means an arrangement made that allows a third party to transfer money from a person's account on agreed dates, typically to pay bills.
Payment Arrangements	A mutually agreed delay in the payment due date, designed to give affected customers additional time to settle bills without incurring penalties
BPay	Means an online solution that allows businesses to coordinate payments.
Confidentiality	Means the protection of personal information, ensuring it is not disclosed without consent, except where required by law
Residential Customer	Means a customer or consumer who is supplied with retail services for use at residential premises (as defined in the National Energy Retail Law (South Australia) Act 2011)

Retailer	Means the holder of a license issued by the Essential Services Commission of South Australia under the National Energy Retail Law (South Australia) Act 2011.
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3. INTRODUCTION

Roxby Power operates electricity distribution and retail services for the supply of electricity within the Roxby Downs township in its capacity as the Power Distribution Authority pursuant to Clause 18 of the Schedule to the *Roxby Downs (Indenture Ratification) Act 1982* (Indenture).

Recognising and addressing family violence is an essential aspect of this policy, as family violence can significantly impact a customer's ability to manage their electricity account. This policy ensures that Roxby Power actively supports affected customers, while safeguarding their privacy and confidentiality as well as ensuring access to reliable electricity services during difficult times.

Important principles of this Family Violence Policy include:

- As per the AER, Roxby Power will adopt a "Recognise, Respond, Refer" model when interacting with affected customers. This ensures that customers are supported through every stage of their journey, from initial recognition of their situation to referral to external services for additional support.
- Hardship assessments related to family violence should be handled by independent, qualified professionals. To support this, Roxby Power will refer customers who identify or are affected by family violence to an independent assessor to determine if they are facing genuine hardship. Roxby Power will ensure that the independent assessor has the appropriate skills and knowledge to perform objective assessments grounded in the available evidence
- Roxby Power will ensure secure handling of affected customers' information by restricting staff access, recording communication preferences, and disabling automated messages to prevent contact with perpetrators. Processes will be designed with the needs of these customers in mind, ensuring secure communication methods are used, and regularly reviewed to adapt to any changes in requirements for safe and confidential contact.

4. HOW FAMILY VIOLENCE WILL BE RECOGNISED

Roxby Power will remain attentive to signs that may indicate a customer is experiencing family violence, which could include, but are not limited to:

- If a customer mentions they are experiencing family violence or related behaviors such as threats, controlling actions, or assault.
- If the customer displays signs of fear, nervousness, or hesitation during interactions.
- Third-party involvement is observed, such as a partner attempting to dominate or control the interaction.
- If the customer requests additional security measures or wants information to be kept confidential from a joint account holder.
- If the customer mentions having an intervention order (or similar legal protections) in place.

Additionally, Roxby Power will remain conscious that affected customers may not be aware of their financial situation or have access to information relating to their accounts such as bills and debt, due to financial control imposed by the perpetrator. Therefore, engaging with the affected customers must be flexible and treated with respect.

Once a customer is identified as being affected, Roxby Power will, in consultation with the customer, flag the account to restrict access, limiting internal access to authorised staff only. Once the account is flagged, it will not be removed unless requested by the affected customer. This protection extends to former customers who may have been affected by family violence in the past.

5. ROXBY POWER WILL PRIORITISE SAFETY AND PRIVACY

Roxby Power will have regard firstly to the affected customers safety, recognising that neglecting this responsibility could result in further trauma, serious injury and even death. While the retailer can take steps to ensure the customer's safety, it is not within their responsibility to provide crisis family violence support, this should be handled by a qualified family violence case manager and/or organisation. The affected customer will be provided with clear information and support to access organisations and services that offer the necessary expertise and assistance in dealing with family violence situations.

Additionally, systems and procedures will be established to safeguard the affected customers information and account to prevent accidental disclosure.

This approach may include:

- Simplify the process for affected customers to separate from joint accounts with perpetrators.
- Limit staff access to sensitive customer information.
- Record the affected customer's preferred communication methods and ensure they are followed.
- Disable automated communications to avoid sending messages to perpetrators.
- Review all communications before sending to confirm they align with the customer's preferred method.
- Ensure customer communication is sent to the correct, updated address and not to a previous address.
- Minimize the inclusion of personal details in communications
- Ensure no information is disclosed or accessed by Roxby Power contractors, subcontractors or agents.

Essential services, including energy, can be exploited by perpetrators of family violence to cause harm. Therefore, Roxby Power plays a critical role in supporting customers affected by family violence to mitigate and prevent the harm that perpetrators may inflict through electricity services.

Examples of exploitation of essential services by perpetrators may include:

- **Obtaining information:** Perpetrators may attempt to gather personal or account details from a retailer, such as contact details to locate or contact them
- **Accumulating debt in the victims' name:** Perpetrators may use the victims account to accumulate debt, leaving them with financial burdens
- **Threatening disconnection:** Perpetrators may threaten to disconnect essential services to instill fear and maintain control over the victim.
- **Financial abuse:** Perpetrators may refuse to contribute to utility payments or obstruct efforts to establish or maintain payment plans, resulting in increased debt and leaving the victim financially responsible.

Roxby Power will remain vigilant and aware of these tactics and work with the affected customer to provide support, ensure their safety, and offer tailored solutions to minimize the impact of such exploitation.

6. SUPPORTIVE MEASURES FOR AFFECTED CUSTOMERS

If a customer has been identified as an affected customer, we will not:

- charge late payment fees.
- require a security deposit; or
- make changes to the customers plan without their agreement, including avoiding the implementation of shortened collection cycles unless the customer has given explicit consent.

Roxby Power will make available to customers a range of payment method options, including:

- Direct Debit (Quarterly or Monthly options)
- BPAY
- BPOINT
- Payment arrangements

Customers affected by family violence will be provided with extended and flexible payment arrangements, tailored to their specific needs. These arrangements will consider factors such as their ability to pay, the outstanding balance, and their anticipated energy consumption over the next 12 months, ensuring that the terms are manageable and supportive during difficult times.

6.1 What the Roxby Power Customer must do

For customers experiencing family violence, situations can change quickly, therefore it is essential for affected customers to maintain communication with Roxby Power.

Customers are strongly encouraged to contact Roxby Power especially if:

- Their circumstances have changed.
- They are struggling to meet their payment obligations.
- There have been updates to their contact information

This ensures that:

- Roxby Power can provide appropriate support.
- Flexible payment arrangements can be explored.
- Necessary details are updated to assist customers in managing their situation.

If a customer defaults on multiple payments, Roxby Power will make several attempts to contact them through their preferred method of communication, offering support and assistance.

Roxby Power will prioritise the customer's safety and well-being and will not initiate disconnection without thoroughly considering the customer's circumstances. All available options to support the affected customer will be explored before any action is taken. These measures ensure that the customer's situation is handled with care, and no further harm is caused. Throughout this process, Roxby Power will work with the customer, offering them time to respond, and will collaborate with relevant support services if necessary.

7. OTHER SUPPORT TO HELP THE CUSTOMER PAY THEIR ENERGY BILL

There may be other forms of support available to customers to help them pay their energy bills.

7.1 What Roxby Power will do

Roxby Power will do its best to tell hardship customers about any other forms of support that may be available to them at the time. This support may include:

- government relief schemes
- financial counselling services

These schemes are generally sourced through either Government or not-for-profit agencies and are not provided by Roxby Power.

7.2 What Roxby Power needs the customer to do

If the customer finds out they are eligible for any of these programs, they should advise Roxby Power as soon as possible so both parties can work together.

7.3 External Support

Below are a variety of external support services that may be able to provide help and support.

Organisation	Contact Details
Police and Emergency Services	Phone: 000
Lifeline	24/7 Phone: 13 11 14
Domestic Violence Crisis Line	24/7 Phone: 1800 800 098

	Website: www.womenssafetysservices.com.au
Family & Domestic Violence Gateway Services	24/7 Phone: 1300 782 200
Family Relationship Advice Line	Phone: 1800 050 321
1800 RESPECT	24/7 Phone: 1800 737 732 Website: www.1800respect.org.au
MensLine Australia	Phone: 1300 78 99 78 www.mensline.or.au

8. ROXBY POWER CAN HELP YOU SAVE ENERGY

Using less energy can save you money.

8.1 What Roxby Power will do

Affected customers may ask Roxby Power to help them reduce their individual energy consumption. This would normally take the form of helpful tips and printed information guides.

9. GENERAL PROVISIONS

We will ensure customers have equitable access to this Family Violence policy, and that this policy is applied consistently.

We will ensure appropriate training of staff dealing with customers facing financial violence to enable them to treat customers with respect and without making value judgements. Training will also assist staff in the early identification of affected customers, with establishing payment plans based on a customer's capacity to pay and include processes for referral to an accredited financial counsellor or welfare agency for assistance.

This customer family violence policy does not limit or prevent us from waiving any fee, charge or amount of arrears for the provision of retail services to customers who are experiencing financial hardship.

10. CONFIDENTIALITY

Any information disclosed by a customer is confidential and will not be used for any purpose other than the assessment of an application for assistance

11. COMPLAINTS HANDLING

Details of our customer complaints and dispute resolution process are available at our website: www.roxbydowns.sa.gov.au. We will also make a copy of this process available to a customer, upon request, and at no charge to the customer.

A customer experiencing hardship has a right to have any complaint heard and addressed by us, and if their complaint cannot be resolved, the right to escalate their complaint to the external dispute resolution body approved by the Essential Services Commission of South Australia.

12. REVIEW

This Policy will be reviewed and evaluated no less than once every 3 (three) years.

13. AVAILABILITY

This Policy is available for inspection at the Council Office, 6 Richardson Place during ordinary business hours and is also available from Council's website <https://www.roxbydowns.sa.gov.au/council/about-roxby-council/policies>