

## Family Violence Policy

### Introduction

This policy applies to all residential customers who experience family violence.

Family violence includes a broad range of behaviour that is not limited to physical violence. It can also involve other forms of abuse, including social, financial and emotional abuse.

In today's world, electricity and gas are essential household services. It has been found that perpetrators of family violence can use control over essential services as a form of family violence called economic abuse, including by:

- insisting an account is in a victim's name and refusing to contribute to the cost;
- putting a service in the sole name of the victim without their knowledge or consent;
- holding an account jointly and refusing to contribute to the cost;
- holding the account in their own name and threatening to have the service cut off or having it cut off when they leave the family home; and
- intercepting mail from a service provider that identifies a victim's location.

We appreciate that many victims of family violence are women and children, but that other forms of inequality and discrimination experienced (for example by people with a disability, migrant refugee backgrounds, Aboriginal and Torres Strait Islander people) can increase the risk of family violence.

From 1 January 2020, all small energy customers in Victoria affected by family violence are entitled to safe, supportive and flexible assistance from their energy retailer in managing their personal and financial security.

This policy describes the standards of conduct customers can expect from Sumo in handling family violence situations, including relating to training, account security, customer service, debt management, external support and record keeping. In developing this policy, Sumo seeks to prioritise the safety of its customers and its people, and to keep customer connected.

### Building a culture of awareness

Sumo provides training on family violence to any Sumo employee or contractor who engages with customers, is a manager of a person who engages with customers, or is responsible for systems and processes that guide interactions with customers.

The training covers: the nature and consequences of family violence; how to identify customers affected by family violence; how to apply this policy; and how to engage appropriately and effectively with a customer affected by family violence.

Sumo has a dedicated Customer Care team with primary responsibility for engaging with customers affected by family violence. This team also supports other employees to help them understand their roles.

### What we will do to help customers

We prioritise safety for family violence victims and survivors by providing for safe and secure engagement with them. We do this by:

#### ***How we identify victims/survivors***

We will attempt to identify victims through direct customer communication. Our frontline staff will attentively listen to signs that may identify victims of family violence.

### ***We do not require a customer to repeatedly disclose their experience of family violence***

Once we have identified a customer as being a victim or survivor of family violence, we will flag their account. This will ensure their enquiry is transferred to the Customer Care team, and handled by appropriately trained individuals.

### ***We show empathy***

Customer service representatives are trained in how to engage appropriately and effectively with victims or survivors of family violence. Calls will be transferred to a specialist Customer Care team.

### ***We will guide customers affected by family violence through the options that are available to them, so they're not taking it on alone.***

Our specialised agents will manage customer needs, provide support and options available to customers in a safe and confidential environment. These options will include, but are not limited to, offering external support, possible debt relief, and personalised customer support as required.

### ***Evidence of family violence***

We understand that asking for evidence of family violence can cause additional stress, and documents may be difficult for a victim-survivor to access. Having to provide evidence may be a major barrier to seeking support. Where victim-survivors are receiving support from a family violence professional (e.g. a family violence service or financial counsellor) we will usually accept this as an indication that their circumstances have been deemed appropriate for specialist support and should ordinarily form sufficient evidence. We will only ask for evidence where absolutely necessary. For instance, we may seek documentary evidence when considering debt management and recovery action, or de-energisation of supply for non-payment.

### ***We will protect private and confidential information***

We understand the importance of protecting confidential information, particularly when the perpetrator of family violence is, or has been, a joint account holder. Call centre staff are trained to transfer calls from victims or survivors of family violence to a specialist Customer Care team. We are working on systems that will ensure account information of family violence victims is only available to this team. We agree with victims and survivors of family violence on a safe method of communication and will keep a record of these arrangements.

### ***Response to financial impacts of family violence***

We recognise family violence as a potential cause of payment difficulty. Family violence victims and survivors won't need to prove payment difficulty in order to access payment difficulty assistance. As part of our existing measures for customers experiencing payment difficulty or financial hardship, we will offer flexible arrangements tailored to a customer's circumstances.

Before collecting debt, we will consider the impact of debt recovery on victims and survivors of family violence, and whether other people are responsible for the debt, before taking action to recover arrears. For instance, where more than one person is liable for the account, we may choose only to pursue that portion of the debt that the person affected by family violence was not responsible for.

### ***What we will do to help employees***

Sumo promotes a safe and respectful work environment that embraces diversity and gender equity.

Employees who are victims of family violence are encouraged to seek external assistance, including family violence experts. Sumo offers an Employee Assistance Program and promotes this assistance to all staff.

We will maintain the privacy and confidentiality of any information we learn about situations of family violence experienced by our people.

### ***Addressing barriers to access***

When engaging with victims and survivors of family violence, we will explain the assistance that is available to them.

We are not experts in family violence; however, we are well placed to provide customers with information about support services that may help. We will refer customers to support services when we consider it

safe, respectful and appropriate to do so; we will not necessarily offer referrals every time a customer makes contact. We will ask whether the customer is already receiving support (and from which kind of service) before referring them elsewhere.

This policy is published on Sumo's website, along with information about external family violence support services. We will provide a copy of this policy to any customer on request.

### **Developing an informed approach**

We will look to develop mechanisms to monitor the quality and effectiveness of our response to family violence.

We see this policy as a first step. We will look to build on this policy, including by engaging with our customers and our employees, and through collaboration with external partners and third-party support agencies.

We will review this family violence policy at least every two years. The next review date is 31 December 2023.