



TELSTRA CORPORATION LIMITED

Submission to the Australian Energy Market Commission's (AEMC) consultation paper *protecting customers affected by family violence*

1 March 2022



We welcome the opportunity to comment on the Australian Energy Market Commission's (AEMC) consultation paper *protecting customers affected by family violence*. We recognise that essential services can be used as a way to further harm victim survivors, and the importance of ensuring victim survivors can receive support to try and minimise this harm.

The proposed rule change submitted by Red Energy and Lumo Energy represents a positive step for customers and retailers on this basis that:

- the structure of the proposed rule change can help ensure support for customers who are affected by family and domestic violence, including access to vital information in a consistent way across organisations; and
- would allow retailers who operate in multiple jurisdictions (including Victoria) the ability to extend existing services and supports, reducing operational complexity.

We have introduced organisation-wide principles for providing a high care approach to customers in vulnerable circumstances and those dealing with and escaping domestic and family violence. We have also implemented organisational-wide training for our employees on supporting vulnerable customers, and this includes raising awareness on domestic and family violence.¹ While we offer this across our organisation, we agree with the proponents that training on this does not necessarily need to be prescribed within the energy rules.

Our family violence policy has been developed to support our energy retailing and has been developed in line with the Victorian requirements but will be available to support all our energy customers irrespective of their location. We do not think it is necessary for a 'model policy' to be developed, particularly as this may then lead to divergences between the Victorian and NECF requirements in future. Flexibility in the policy will allow retailers to create national consistency for customers and simplifies operational requirements. It also allows us to update our policies as we look to expand our support for energy customers and align to broader organisational objectives.

We agree that safety is paramount and should be a primary consideration in how the AEMC develop the necessary rules. A key operation of the Victorian requirements is to ensure that retailers can apply the necessary measures / stops to help ensure a victim survivor is able to remain safe and make necessary arrangements for their circumstances.

As we do not currently have small business customers for energy, we have no specific position on whether small business customers should be excluded, however we recognise that there are a range of potential circumstances where victim survivors may be adversely impacted because of a business arrangement with a perpetrator and would support further consideration of this should the AEMC deem it appropriate.

Finally, in relation to an implementation timeframe we would support end of the calendar year to give sufficient time to develop any additional requirements and test our systems for broader application in NECF jurisdictions.

¹ Telstra *Bigger Picture 2021* [Sustainability Report](#)