



## Protecting customers from family and domestic violence

This policy forms part of the commitment by Clarence Property Corporation Limited ACN 094 710 942 and its related bodies corporate, including WPT Solar Pty Ltd ACN 646 261 261 (**Clarence Property**) to individuals who may be affected by family and domestic violence. It explains how we will help you if you tell us that you are experiencing family violence, including our obligations to protect your energy-related information, and support you if you are having trouble paying your energy bills.

This policy applies to all residential and small business energy customers at select Clarence Property buildings and centres who are covered by the applicable Class R1 retail exemption. Those sites may also hold Class R5 exemptions; however, this policy is intended to meet the family violence obligations that apply to Class R1 exempt selling activities under Condition 27 of the Australian Energy Regulator Retail Exempt Selling Guidelines.

Class R5 customers are identified separately because they sit outside the scope of this policy. Clarence Property may still choose to apply the practical protections in this policy more broadly where appropriate, but this policy is not intended to create additional obligations for Class R5 customers where those obligations do not apply under the guideline.

This policy is in addition to any rights you may have under relevant state or territory legislation.

This policy applies only to the New South Wales and Queensland buildings and centres listed below.

**If you consider you are in immediate danger, call emergency services on 000.**

## 1. Sites covered by this policy

The following selected Clarence Property buildings and centres hold Class R1 and Class R5 exemptions. This policy applies to the R1 component of those sites:

Site	Address	State	Exemption classes held	Policy scope
<b>201 Leichhardt Street</b>	201 Leichhardt Street, Brisbane QLD 4000	Queensland	R1 and R5	<b>R1 only</b>
<b>183 Varsity Parade</b>	183 Varsity Parade, Varsity Lakes QLD 4227	Queensland	R1 and R5	<b>R1 only</b>
<b>The Rocket</b>	The Rocket, 203 Robina Town Centre Drive, Robina QLD 4230	Queensland	R1 and R5	<b>R1 only</b>
<b>Epiq Marketplace</b>	Epiq Marketplace, Cnr Huntley & Snapper Drive, Lennox Head NSW 2478	New South Wales	R1 and R5	<b>R1 only</b>
<b>Metro Middle Park</b>	Metro Middle Park, Cnr Horizon Drive & Riverhills Road, Middle Park QLD 4074	Queensland	R1 and R5	<b>R1 only</b>

## 2. What is family violence?

Family violence is when someone in a family, domestic, intimate or family-like relationship is violent or threatening, coerces or controls you, or tries to make you feel unsafe.

Family violence can include, but is not limited to:

- **Financial abuse**, such as controlling your money, taking away your financial independence, refusing to provide necessary financial support, opening or using an energy account in your name without your consent, or refusing to contribute to energy costs
- **Emotional or psychological abuse**, such as manipulation, intimidation or behaviour that undermines you or makes you feel controlled
- **Physical abuse** or threats of harm against you, another person or an animal
- **Sexual abuse**, including any forced, unwanted or exploitative sexual activity
- **Social abuse**, such as isolating you from your family, friends, community or culture
- **Elder abuse**, including a single or repeated act, failure to act, or threat that results in harm or distress to an older person where there is an expectation of trust or a power imbalance

We recognise family violence as a likely cause of payment difficulty. We also recognise that energy accounts can be used as a tool of financial abuse

### **3. How we will help you**

If you tell us that you are affected by family violence, we will:

- Prioritise your safety and the safety of others in everything we do
- Take extra precautions with your energy-related information
- Only discuss your energy contract, energy account or energy bills with you, or with a person you choose to communicate with us
- Not ask you to provide evidence or proof of family violence before we help you
- Not ask you to repeatedly disclose your personal circumstances
- Work with you respectfully, privately and without judgement.

### **4. How we will communicate with you**

**You can choose how you want to communicate with us**

We will ask for your preferred method of communication and record it on your account. This may include email, phone, SMS, post or communication through a support person you nominate.

We will only use your preferred method of communication to talk to you about your energy account, unless that method is not safe or available. If we cannot use your preferred method, we will work with you to agree another safe way to communicate.

### **5. You can nominate a support person**

You may choose a support person to communicate with us about your energy account. This could include a family member, friend, financial counsellor, social worker or another person who helps you manage your energy bills.

We will only communicate with your chosen support person if you give us permission and provide their contact details. We will record your instructions and only communicate with you and/or the support person according to those instructions. If you prefer, we can communicate solely with your chosen support person.

### **6. Keeping your energy-related information safe**

If you tell us that you are affected by family violence, we will secure information related to your energy account, including your contact details. We will limit access to employees, agents and contractors who need the information to assist you or manage your energy account.

Our information security measures include:

- Paper files related to your energy account are kept in locked storage and only accessed by relevant employees or agents who need access to perform services relating to your account



- Digital records are stored in password-protected systems and only accessed by relevant employees or agents who need access to perform services relating to your account
- With your agreement, we will flag your energy account so relevant employees, agents and billing providers take extra precautions and use your preferred communication method or nominated support person
- Any billing agent, embedded network manager, contractor or other person acting on our behalf must handle your information consistently with this policy.

We will not share your energy-related information with anyone unless you give us permission, or we are required by law to do so.

## **7. Payment difficulty and financial abuse**

Family violence can include financial abuse, which may make it difficult to pay energy bills. Financial abuse can occur when someone stops you from accessing money, manipulates your financial decisions, uses your money or assets without consent, or uses an energy account to control or harm you.

Examples of financial abuse involving energy accounts may include:

- Opening an energy account in your name without your knowledge or consent
- Opening a joint energy account with you but refusing to contribute to the costs
- Opening your energy account details, bills or contact information to manipulate or control you.

If family violence has affected your ability to pay your energy bills, we will take this into account when supporting you.

## **8. Help with payment difficulties**

If you are affected by family violence and are struggling to pay your energy bills, contact us for help as soon as possible. We can offer support, including:

- Payment plans or flexible payment arrangements that suit your circumstances
- If you are on a payment plan and have missed payments, working with you to set up a new payment plan or revised payment arrangement
- Waiving late payment fees associated with your energy debt
- Explaining the payment difficulty support options available to small business customers and providing relevant information on request
- Working with you before taking debt recovery action, including considering whether another person is jointly responsible for the account or debt.

We will consider how family violence has impacted your ability to pay your energy bills. We will not disconnect your energy supply if unpaid energy bills resulted from family violence or if disconnection would impact your safety.

## 9. Staff, agents and contractors

Clarence Property will ensure employees and relevant agents or contractors who assist with embedded network accounts understand this policy and know how to respond safely and respectfully when a customer identifies that they are affected by family violence.

This includes recognising that a customer may not use the words “family violence” when asking for help, taking care with customer information, using the customer’s preferred communication method, and referring customers to appropriate support services.

## 10. Support services

If you or someone else is in immediate danger, call 000. The following free and confidential services may also help.

Service	Contact details	What they can help with
<b>000 Emergency Services</b>	Call 000	Immediate danger or urgent emergency assistance.
<b>1800RESPECT</b>	1800 737 732	National family, domestic and sexual violence counselling, information and support.
<b>Lifeline</b>	13 11 14	24-hour crisis support and emotional wellbeing support.
<b>MensLine Australia</b>	1300 789 978	Telephone and online support for men with relationship and wellbeing concerns.
<b>National Debt Helpline</b>	1800 007 007	Free financial counselling and support for people experiencing payment difficulty or financial stress.

## 11. Complaints

If you are not satisfied with how we have handled your situation, you can contact Clarence Property first using the contact details below. You may also contact the free and independent energy ombudsman in your state if the ombudsman scheme is available for your customer type and complaint.

State	Service	Contact details
<b>New South Wales</b>	Energy & Water Ombudsman NSW (EWON)	1800 246 545; ewon.com.au
<b>Queensland</b>	Energy and Water Ombudsman Queensland (EWOQ)	1800 662 837; ewoq.com.au



## 12. How to reach us and access this policy

You can contact Clarence Property about your energy account or this policy using the contact details below:

Contact field	Details
Contact name / role	Compliance Officer
Phone	1300 382 862
Email	<a href="mailto:Enquiry@clarencproperty.com.au">Enquiry@clarencproperty.com.au</a>
Postal address	P.O Box 5062 Robina Town Centre Qld 4230
Website / policy link	<a href="https://www.clarencproperty.com.au/policy/r1FamilyandDomesticViolence">https://www.clarencproperty.com.au/policy/r1FamilyandDomesticViolence</a>

A copy of this policy is available free of charge on request and at the website address above. We will provide it in hard copy or electronically on request.