Domestic & Family Violence Hardship Policy (Embedded Network Customers)

1. Purpose

Realm is committed to supporting residential customers in embedded networks who are experiencing family or domestic violence. This policy outlines Realm's obligations under the Australian Energy Regulator (AER) Exempt Selling Guideline Version 7 and the National Energy Retail Rules (NERR), ensuring customers are treated with dignity, confidentiality, and safety.

2. Scope

This policy applies to:

- All Realm staff, contractors, and agents.
- All residential customers in embedded networks for which Realm is the billing agent or exempt seller.
- All network types: electricity, hot water, thermal energy, and water billing.

3. Regulatory Framework

This policy meets:

- AER Exempt Selling Guideline v7 mandatory condition: Family Violence Protections.
- National Energy Retail Rules (NERR) Part 3 protections.
- AER Family Violence Rule 2023 requirements.
- Relevant privacy and consumer protection legislation.

It applies regardless of the customer's exemption class (R1–R5) where family violence protections are mandated.

4. Definition of Family & Domestic Violence

Family or domestic violence includes violent, threatening, or abusive behaviour intended to coerce, control, or cause fear. This includes physical, psychological, technological, emotional, sexual, or financial abuse. Financial abuse includes misuse of utility accounts, meter access, disconnections, or withholding bill payments as a form of control.

5. Key Commitments

Realm commits to:

- Treat all affected customers with respect and without judgment.
- Ensure safe, confidential communication.
- Avoid any action that may increase risk (e.g., unsafe mail, contacting shared numbers).
- Provide flexible payment arrangements.
- Prevent disconnection while a DV arrangement is active.
- Apply protections regardless of evidence provided.
- Train staff in trauma-informed care and DV indicators.

6. Identification & Early Intervention

Realm will proactively identify potential family violence situations through:

- Customer disclosure.
- Requests for communication changes.
- Evidence of financial control or unexpected arrears.
- Sudden account access problems or unusual consumption patterns.

Realm will never require documentary proof. Customers will be supported based on disclosure alone.

7. Privacy, Safety & Confidentiality

Realm complies with all privacy laws and will:

- Restrict account access internally.
- Permit safe alternate contacts, emails, or portal credentials.
- Offer silent or secure billing methods on request.
- Prevent disclosure of account information to unauthorised individuals, including joint account holders if unsafe.

All DV customer files receive enhanced privacy protections.

8. Payment Assistance & Hardship Support

Customers affected by family violence are automatically considered hardship customers. Realm may offer:

- Flexible or temporarily paused payment arrangements.
- Fee waivers for late payment.
- Review of arrears and usage history.
- Removal of debt escalation or external collection activity.
- No disconnection of electricity, hot water, or water services while engaged in the program.
- Referral to financial counsellors or DV services.

9. Meter Access & Embedded Network Considerations

Realm acknowledges additional risks in embedded networks:

- Shared mailboxes and access areas.
- Multiple occupants listed on a single connection.
- Body Corporate involvement in meter rooms.

Realm will coordinate with site managers discreetly and safely when meter reads or access is required.

10. Staff Training Requirements

All Realm staff must:

- Complete DV awareness training annually.
- Understand embedded network-specific risks.
- Know how to apply hardship arrangements.
- Respond using trauma-informed communication.

Frontline staff receive enhanced training for sensitive customer interactions.

11. Governance & Compliance Monitoring

Realm will:

- Review this policy annually.
- Conduct quarterly internal audits of DV account handling.
- Report any significant breaches to the AER as required.
- Maintain a DV support register with strict confidentiality.

12. Version Control

Version: 1.0

Approved by: David Reid, Director

Effective Date: November 2025

Next Review: November 2026