

The Family Violence Experts by Experience Framework Implementation Plan and Guidelines for the Essential Services Commission and essential service providers

Project Report

May 2022

Acknowledgement of Traditional Owners

Safe and Equal acknowledges Aboriginal and Torres Strait Islander peoples as the traditional and ongoing custodians of the lands on which we live and work. We pay respects to Elders past and present. We acknowledge that sovereignty has never been ceded and recognise First Nations peoples' rights to self-determination and continuing connections to land, waters, community and culture.

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About Safe and Equal

Safe and Equal is the peak body for specialist family violence services that provide support to victim survivors in Victoria. The interests of people experiencing, recovering from, or at risk of, family violence is at the heart of everything we do. Our vision is a world beyond family and gender-based violence, where women, children and people from marginalised communities are safe, thriving, and respected. We recognise the gendered nature of violence in our society, and the multiple intersecting forms of power and oppression which can compound the impacts of violence and limit people's access to services, support, and safety. We work closely and collaboratively with other organisations and support the leadership of victim survivors to amplify their voices and create change.

We provide specialist expertise across primary prevention, early intervention, response and recovery approaches and the inter-connections between them. Our work is focused on developing and advancing specialist practice for responding to victim survivors, building the capability of specialist family violence services and allied workforces, organisations and sectors that come into contact with victim-survivors; building the capabilities of workforces focused on primary prevention; and leading and contributing to the translation of evidence and research, practice expertise, and lived experience into safe and effective policy, system design and law reform.

We develop family violence practice and support workforces to ensure that victim survivors are safe, their rights are upheld, and their needs are met. The prevalence and impact of family and gender-based violence will be reduced because we are building a strong and effective workforce responding to victim survivors that can meet the needs of the community we serve, while also having a growing and impactful workforce working to prevent violence.

We work to strengthen and connect organisations, sectors, and systems to achieve safe and just outcomes for victim survivors irrespective of entry point, jurisdiction and individual circumstances. Joining efforts across prevention, response, and recovery we work to ensure the family violence system is informed and supported by a well-resourced and sustainable specialist sector. Our contributions to primary prevention workforces, initiatives and alliances contribute to social change for a safer and more respectful community.

We are building momentum for social change that drives meaningful action across institutions, settings, and systems for a safer and more equal society. Our workforce and practice development efforts are coupled with a partnership approach that builds community awareness and commitment to change. Our expertise and efforts enable citizens across the community to recognise and respond to family and gendered violence, hold perpetrators to account and support the ongoing recovery and empowerment of victim survivors.

We are a strong peak organisation providing sustainable and influential leadership to achieve our vision. The work we do and the way we work are integrated and align with our values. This is achieved through inclusive culture, and a safe and accessible workplace supported by robust systems and processes.

Project Aim

This project aims to provide evidence-based guidance about how the Essential Services Commission and essential providers engage with victim survivors of family violence. This includes guidance on better practice responses to victim survivors of family violence, and guidance on engaging victim survivors in the design, delivery and evaluation of the family violence reforms work and customer vulnerability work the commission is leading. This guidance is also relevant and applicable to essential service providers and other businesses who engage with victim survivors.

Contents

Project Background.....	5
Establishing the Evidence Base: Project Research & Consultations	8
Summary of literature review	8
Summary of Consultations.....	10
Recommendations.....	12
Appendix A: Literature Review	13
Appendix B: Consultation Report	21
References	31

Project Background

Safe and Equal, the peak body for specialist family violence services responding to victim survivors in Victoria, has partnered with the University of Melbourne's Safer Families Centre and the University's WEAVERS (Women and children who have Experienced Abuse and Violence: Advisors and Researchers) lived experience group, to deliver this project, commissioned by the Essential Services Commission (the commission). The guidance brings together the principles in the the commission's [Better Practice in Responding to Family Violence Guide](#) with the principles for working with survivor advocates from the [Family Violence Experts by Experience Framework](#), delivered by the University of Melbourne and the WEAVERS, and the principles for best practice responses to victim survivors outlined in the [Code of Practice for Specialist Family Violence Services for Victim Survivors](#).

Project Purpose and Audience

Since 2016, Essential Services Commission has played a leading role in the implementation of the Royal Commission into Family Violence recommendations linked to improving private sector responses to family violence and will have an ongoing role in this work. The commission identified the need for a guidance document to support staff across the commission to provide better practice responses to victim survivors of family violence, as well as better practice approaches to engaging with victim survivors in the design, delivery and evaluation of its family violence reforms and customer vulnerability work. This project provides practical guidance for the commission to inform the way it engages with survivor advocates and customers experiencing family violence, as well as provide practical guidance to organisations the commission works with. This guidance is divided into three sections:

- Part A Project report
- Part B Better Practice Responses to Victim Survivors of Family Violence
- Part C The Experts by Experience Implementation Plan for the commission

This guidance can be applied and adapted by essential service providers and other businesses to enable safe and appropriate responses to consumer's experiencing family violence and to support better practice engagement with survivor advocates.

Project Approach

The development of this guidance was informed by:

- A literature review
- Consultation with key stakeholders

The project team thanks those representatives from the Essential Services Commission, the water and energy providers, allied sector representatives and community sector representatives who contributed to the project and guidance development. The project team would like to extend special thanks to the survivor advocates who contributed to the project research and guidance development, including Lisa McAdams, Sapphire Sol and Rebeca Carro, as well as members from the WEAVERS, Amanda, Fiona and Georgina.

Key Terms

Aboriginal definition of family violence	The Victorian Indigenous Family Violence Task Force defined family violence in the context of Aboriginal communities as ‘an issue focused around a wide range of physical, emotional, sexual, social, spiritual, cultural, psychological and economic abuses that occur within families, intimate relationships, extended families, kinship networks and communities. It extends to one-on-one fighting, abuse of Indigenous community workers as well as self-harm, injury and suicide.’ The definition also acknowledges the spiritual and cultural perpetration of violence by non-Aboriginal people against Aboriginal partners which manifests as exclusion or isolation from Aboriginal culture and/or community. [DHHS, 2018]
Consumer participation	The process of ensuring that people with a lived experience are meaningfully involved in the planning, design and evaluation of programs, services, policies, and systems.
Diverse communities and at risk age groups	This includes the following groups: diverse cultural, linguistic and faith communities; people with a disability; people experiencing mental health issues; lesbian, gay, bisexual, transgender and gender diverse, intersex, queer/questioning, and asexual (LGBTIQ+A) people; women in or exiting prison or forensic institutions; people who work in the sex industry; people living in regional, remote and rural communities; male victims; older people, infants, children and young people (12–25 years of age). [FSV, 2021]
Elder abuse	Is any harm or mistreatment of an older person that is committed by someone with whom the older person has a relationship of trust. In the context of family violence, this may be elder abuse by any person who is a family member (such as their partner or adult children) or carer. Elder abuse may take any of the forms defined under ‘family violence’. [FSV, 2021]
Essential services	The electricity and gas, water, local government, and transport sectors.
Family Violence	Any behaviour that occurs in family, domestic or intimate relationships that is physically or sexually abusive; emotionally or psychologically abusive; economically abusive; threatening or coercive; or is in any other way controlling that causes a person to live in fear for their safety or wellbeing or that of another person. It includes any person that causes a child to hear or witness or otherwise be exposed to the effects of family violence. [FVPA, 2008]
FVPA	<i>Family Violence Protection Act 2008 (Vic)</i>
LGBTIQ+A people	Lesbian, Gay, Bisexual, Transgender and Gender Diverse, Intersex, Queer/Questioning, and Asexual people.
Perpetrator	The person who uses family violence. In some cases, there may be multiple perpetrators (and multiple victim-survivors) in the family. This term signifies the importance of placing responsibility with the person(s) who chooses to use violent, abusive and controlling behaviours to intimidate, harm and cause fear in another person. It is important to acknowledge that this term may not be preferred by some people and communities. Other expressions such as ‘person using (or choosing to use) family violence’ might be preferred instead, depending on context. Additionally, some victim-survivors may not relate to this term or find it alienating, and it is not a term that should be used in cases where an adolescent or young person is using violence against parents/carers or other family members. [Domestic Violence Victoria, 2020]
Perpetrator accountability	The process by which the perpetrator themselves acknowledges and takes responsibility for their choices to use family violence and works to change

	their behaviour. It sits with all practitioners, organisations and systems through their collective, consistent response to promote perpetrators' capacity to take responsibility for their actions and impacts, through formal or informal services response mechanisms. [FSV, 2021]
Risk factors	Evidence-based factors that are associated with the likelihood of family violence occurring or the severity of the risk of family violence. [FSV, 2021]
Safety planning	A plan developed by the victim-survivor, typically with the support of a specialist family violence practitioner (or other professional), to help manage their own safety in the short to medium term, while other risk management actions and interventions are being organised. Safety plans should use a strengths-based approach and identify protective factors that build on what the victim-survivor is already doing and what works for their circumstances. [FSV, 2021]
Survivor Advocate	Victim survivors of family violence who are engaged in formal co-production activities and mechanisms to influence policy development, service planning and practice.
Victim survivor	The person, including adults, infants, children and young people, who has experienced family violence. This term acknowledges that the person subjected to family violence is both a victim of a crime and a human rights violation, and they are also a survivor with respect to their autonomy, strength and resilience. The term must not be used to wholly define a person. Experiencing family violence is a part of someone's life amongst many other experiences. Some people may prefer the term 'person experiencing (or has experienced) family violence'. Some people may prefer other terms or may not prefer any label or term at all. [Domestic Violence Victoria, 2020]

Establishing the Evidence Base: Project Research & Consultations

The role of the Essential Services Commission in improving responses to family violence and customer vulnerability.

The Essential Services Commission is Victoria's independent economic regulator established to promote the long-term interests of Victorian consumers with respect to the price, quality, and reliability of essential services. The commission regulates Victoria's energy, water, and transport sectors, and administer the local government Fair Go Rates system and the Victorian Energy Efficiency Targets scheme. Since 2016, Essential Services Commission has played a leading role in the implementation of the Royal Commission into Family Violence recommendations linked to improving private utility sector responses to family violence.

The 2016 Royal Commission into Family Violence recognised the long-term financial costs of family violence and made a series of recommendation to improve responses to family violence within the private sector. This included making key changes to the ways water and energy retailers respond to customers experiencing family violence. The commission has played a key role in leading the implementation of these recommendations, including the recommended changes to the Energy Retail Code (2019) and Customer Service Code — Urban Water Businesses (2017). The commission has worked closely with both sectors to support the reforms, delivering workshops with providers, and developing guidance for water and energy businesses to support compliance with the new regulations and developing guidance on better practice responses to customers experiencing family violence.

Moving forward it is anticipated staff across the commission will have an ongoing role to play in responding to customers experiencing family violence through its regulatory role, and leading activities to improve industry responses to family violence. The commission identified the need for a guidance document to support staff across the commission to provide better practice responses to victim survivors of family violence, as well as better practice approaches to engaging with victim survivors in the design, delivery and evaluation of its family violence reforms and customer vulnerability work. This guidance is also of use and importance to essential service providers and other private sector organisations to help build on what they may already doing to help support consumers experiencing family violence.

Summary of literature review

To establish the evidence base, the project team undertook a literature review to identify elements that guide better practice engagement with victim survivors in the improvement of Victorian utilities providers' responses to customers experiencing family violence. This involved a desk top review of key policy documents and research reports recommended by the project steering group, as well as relevant policy documents and academic literature regarding consumer participation at the intersection of human service provision, essential service provision and family violence.

Research was conducted with the following key considerations in mind:

- The commission’s regulatory functions, as well as the experiences of customers affected by family violence in interacting with their utility providers.
- Reflecting better practice for working with victim survivors of family violence and including specific considerations for engagement in the context of family violence risk.
- Better practice engagement with survivor advocates within the context of the commission and the businesses it works with.

The key findings from the literature review included:

- There is growing recognition of the role essential service providers play in providing fair and equitable responses to customer vulnerability, and that family violence is a particularly complex and dynamic form of customer vulnerability that requires specialist informed policy, process and training.
- To ensure more consistent better practice responses to energy and water customers experiencing family violence, customer support staff in energy and water sectors require more training and capability building resources to better recognise and respond to customers experiencing family violence.
- The literature recognises the value of client voices in the provision and governance of quality services, and there is a continuum of input of customer voices from the provision of person-centred service responses to formal engagement with clients as advisors and consultants.
- Organisations need to take a considered, trauma informed and comprehensive approach to working with survivor advocates to ensure safe, respectful and authentic engagement.

Common considerations for better practice engagement with survivor advocates include:

- Engagement with lived experience should be considered at all levels of relevant service planning, delivery and evaluation, with an approach that is connected to broader organisational strategy.
- The need for organisations to develop a consumer engagement plan, including an audit of organisation/service activities that could benefit from client engagement/survivor advocacy, organisational “readiness” for engagement with survivor advocates (i.e., policies, procedures and skilled staff).
- People with lived experience of a service have unique and valuable contributions to make in the improvement of service responses, and it is the responsibility of service providers to create opportunities and remove barriers for client engagement/survivor advocacy.
- A considered, trauma-informed approach from service providers in engagement with consumers/survivor advocates, and that proactively seeks to include diverse voices and experiences of family violence.
- When engagement with survivor advocates is done well it provides mutual benefit – empowerment to survivor advocates and opportunities for service providers to improve outcomes and better achieve their purpose.
- It is the organisation’s responsibility to provide consistent and transparent remuneration standards made available to survivor advocates before they are asked to commit to participate in an engagement.

- It is the organisation's responsibility to ensure representatives from the organisation working directly with survivor advocates are prepared for respectful and authentic engagement with consumer/survivor advocates.
- Consumer/survivor advocates are motivated by a desire to see change, and it is important organisations report back to them about the outcomes of their engagement.

The literature review can be found in Appendix A.

Summary of Consultations

As part of the guidance development a consultation process ran from November 2020 – February 2021, involving a broad range of stakeholders including staff across the Essential Services Commission, representatives from water and energy retailers, representatives from other allied industries such as banking and transport, representatives from the community services sector, and victim survivors of family violence. Several consultation methods were used to capture a broad range of insights, increase access and participation for both survivor advocates and industry representatives. The approach included:

- Online survey of victim survivors with experience accessing hardship support with essential service providers (four responses received).
- Online focus group with survivor advocates (The WEAVERS) followed by written responses (three participants).
- Interview with three survivor advocates with previous experience working with the commission, followed by written responses.
- Online survey of private sector and community sector representatives affiliated with the Better Practice Framework workshops facilitated by the Essential Services Commission (45 responses received).
- Online interviews with staff across the Essential Services Commission, representatives from water and energy retailers, representatives from other allied industries such as banking and transport, representatives from the community services sector (17 interviews with 26 representatives).
- A two-hour online workshop co-facilitated by Safe and Equal, and the University of Melbourne and the WEAVERS. The workshop was attended by four survivor advocates and 12 representatives from across the commission, utilities providers (water, energy and banking) and the community sector.
- A one-hour online consultation with three survivor advocates for the purpose of seeking feedback on the first draft of the report and guidance and directly hearing any suggestions for project report recommendations. This meeting also provided the opportunity to confirm how survivor advocates would like to be acknowledged and name in the report and thank them for their valuable contributions throughout the project.

The key findings from the consultations included:

- The victim survivors who contributed to the consultations noted how impactful family violence trauma and crisis can be on a customer's ability to process information, make decisions, and ask for what they need. The need for trauma informed, empathic, non-judgmental and accessible responses from their utilities providers was emphasised.

Victim survivors highlighted how impactful a positive or negative response from providers can be for someone experiencing family violence.

- There is a growing need for specialist informed standards for corporate family violence training, to provide foundational knowledge of family violence definitions, drivers and prevalence, indicators and risk, and better practice responses to family violence in the context of essential service providers. There is also a role for survivor advocates in the design, delivery, and evaluation of corporate family violence training.
- There is a tension in finding the balance between investing in building knowledge and capacity for all frontline staff across businesses to recognise and respond to family violence in their work, while also investing in the development of more specialised responses, including new structures and models of specialised hardship services.
- There are opportunities to increase the voices of victim survivors in evaluating the responses from businesses, both in terms of formal involvement of survivor advocates in evaluation of family violence reforms activities, and in embedding feedback mechanisms into hardship services.
- Those providers who had engaged with survivor advocates in their work highlighted the value of partnering with a community service provider with a survivor advocacy program, to provide professional development, support, and coordination with the advocate.
- Engagement with survivor advocates invariably leads to disclosures from other participants, and it is important to have supports in place for stakeholders, staff, and survivor advocates ahead of time. Employee Assistance Programs (EAP) are commonly the option provided to staff who require support. However, EAP providers are not always appropriately family violence informed.
- It is important to have a clear and concise policy and process in place for remunerating survivor advocates for their time, and for this to be proactively and transparently communicated with survivor advocates from the very start of any engagement.
- The commission's efforts to include lived experience of victim survivors and engage with survivor advocates in the family violence reforms work to date has been noted. Many industry stakeholders highlighted that hearing directly from survivor advocates in the Better Practice workshops and forums greatly influenced their understanding and perspective. The advocates who had engaged with the commission previously noted overall it was a positive experience, but there were learnings for how survivor advocates are introduced and how you prepare a large audience to engage with advocates in a forum context. The consultations also highlighted the need for some form of internal coordination or stewardship of engagement with survivor advocates across the activities of the commission to ensure consistent better practice is established and maintained.

The consultation report can be found in Appendix B.

Recommendations

The recommendations have been formulated based on the project outcomes and findings from consultations with victim-survivors, survivor advocates, staff across the Essential Services Commission, representatives from water and energy retailers, representatives from other allied industries.

Recommendations and next steps for the commission

Based on the project and consultation outcomes and findings, the following recommendations have been identified for the commission to implement better practice approaches to engaging with victim survivors in the design, delivery and evaluation of its family violence reforms and customer vulnerability work.

- Build on the work to date and continue to champion better practice engagement with survivor advocates and provide leadership to essential services. The project identified the commission is well paced to offer guidance to essential services on better practice engagement with survivor advocates.
- Establish an evaluation and monitoring plan for Family Violence Experts by Experience Framework Implementation Plan for the Essential Services Commission. This should include formal involvement of survivor advocates in evaluation activities.

Future recommendations and opportunities

Additionally, the project revealed several gaps in responses to victim survivors of family violence. While outside of the scope of the current project, these present opportunities the commission could consider supporting or facilitating in the future. These include:

- Develop a specialist informed family violence toolkit for essential service providers. A family violence toolkit could be developed to build on existing good practices within essential services to provide consistent tailored information, water and energy case studies and resources to strengthen capacity to identify and appropriately respond and refer when customers are impacted by family violence.
- Support the development of family violence specialist and survivor advocate informed standards for private utility company family violence training. Training of this nature would provide foundational knowledge of family violence definitions, drivers and prevalence, indicators and risk, and better practice responses to family violence in the context of essential service providers.
- Support the development of family violence standards checklist for Employee Assistant Program (EAP) utilised by essential service providers. This will ensure essential service providers are engaging EAP providers that are family violence informed and able to provide appropriate support to staff and survivor advocates with experiences of family violence or experiences of responding to the needs of victim-survivors through their work.
- Further explore the use of external specialist hardship responses and supporting the future work of the existing initiatives, such as Thriving Communities Partnership.

Appendix A: Literature Review

Purpose

To provide context and establish the evidence base for the development of the *Experts by Experience Framework: Implementation Plan and Guidelines for the Essential Services Commission*.

Research Question

What elements guide best practice engagement with victim survivors in the improvement of Victorian utilities providers' responses to customers experiencing family violence?

Methodology

Desk top review of key policy documents and research reports recommended by the project steering group, as well as key policy documents and academic literature regarding consumer participation at the intersection of human service provision, essential service provision and family violence.

Research was conducted with the following key considerations in mind:

- The commission's regulatory functions, as well as the experiences of customers affected by family violence in interacting with their utility providers.
- Reflecting best practice for working with victim survivors of family violence and including specific considerations for engagement in the context of family violence risk.
- Best practice engagement with survivor advocates within the context of the Essential Services Commission and the businesses it works with.

Consumer Vulnerability, Social Responsibility and Essential Service Provision

Historically the provision of essential services in Australia predominantly sat within the domain of the public good and government. In the 1970s there was concerted political effort to privatise the provision of some publicly held goods and services, and in subsequent decades this led to increased de-regulation of the provisions of goods and services [Solomon & Martin-Hobbs, 2018]. While these actions intended to create a competitive market and increase efficiencies in the delivery of services and choice for consumers, these actions also created gaps in service provisions with a cost to consumers [Solomon & Martin-Hobbs, 2018] and contributed to erosion in public trust [Consumer Policy Research Centre, 2017].

Utilities providers provide essential goods and services the public rely on for their health, safety and wellbeing [Essential Services Commission, 2017]. As such, essential services can be seen to hold social responsibilities even as they sit within the private domain [Consumer Policy Research Centre, 2017]. In recent years there has been growing recognition of the need for inclusive and effective responses to consumers experiencing vulnerability and hardship [Consumer Policy Research Centre, 2017; Hudson et al, 2020; Solomon & Martin-Hobbs, 2018; Thriving Communities Partnership, 2019]. There is also growing recognition that "vulnerability" is dynamic and can impact all consumers at different

times, and it is essential for engagement with consumers to understand their experience to ensure fair and equitable outcomes [Hudson et al, 2020].

The capacity for private companies to consistently demonstrate fair responses to customers experiencing vulnerability and hardship is viewed as critical for establishing and maintaining trust with consumers, a key element of profitable and sustainable business practice [Consumer Policy Research Centre, 2017; Solomon & Martin-Hobbs, 2018; Thriving Communities Partnership, 2019]. Family violence is recognised as one of many different drivers/contexts for consumer vulnerability [Consumer Policy Research Centre, 2017; Solomon & Martin-Hobbs, 2018; Thriving Communities Partnership, 2019].

Economic abuse is recognised as a form of family violence, and the short- and long-term financial impacts of family violence is well documented [Royal Commission into Family Violence, 2016]. Victim survivors may accrue debt with utilities providers due to increased financial instability through leaving an abusive relationship, and/or as a result of concerted efforts from abusers to intentionally accrue debt in the victim survivors' name [Consumer Utilities Advocacy Centre, 2014]. Victim survivors may contact utilities providers in the course of relocation in fleeing from an abusive relationship, in order to change contract details and conceal their whereabouts from perpetrators [Bond & Ulbrick, 2019]. The responses from utilities providers can support victim survivors to regain safety and stability and can also increase risk or inadvertently perpetuate abuse [Economic Abuse Reference Group, 2018; Essential Services Commission, 2018]. Additionally, some victim survivors face increased structural barriers to support and social discrimination based on their identity and social position, such as: socio-economic status; cultural identity; language and literacy; sexual orientation; physical and/or intellectual abilities; mental health; and age [Essential Services Commission, 2019; Thriving Communities Partnership, 2019].

The Royal Commission into Family Violence, the Essential Services Commission and Family Violence reforms in the Victorian water and energy sectors

The Royal Commission into Family Violence [2016] recognised the impacts of economic abuse and the long-term financial costs of family violence and made a series of recommendation to improve responses to family violence within the private sector. This included the following recommendation:

The Victorian Government work with the Essential Services Commission [within 12 months] to:

- *amend the Energy Retail Code and Customer Service Code—Urban Water Businesses to:*
- *list minimum eligibility criteria for access to hardship programs*
- *include family violence as an explicit eligibility criterion*
- *develop industry guidelines for energy and water retailers to require comprehensive and ongoing training of customer service staff to help them identify customers experiencing family violence and financial hardship*

- *publicise the availability of dispute resolution mechanisms for people affected by family violence*¹.

The Essential Services Commission has made significant headway on acquitting these recommendations, including the recommended changes to the Energy Retail Code (2019) and Customer Service Code—Urban Water Businesses (2017). The commission has worked closely with both sectors to support reforms, delivering capability building activities which have included facilitating workshops with providers and developing guidance for water and energy businesses to support compliance with the new regulations and establishment of best practice responses to customers experiencing family violence [Bond & Ulbrick, 2019; Essential Services Commission, 2019]. This guidance takes the form of the better practice guide [Essential Services Commission, 2019].

Recent evaluation commissioned by the commission regarding changes in consumer experiences following energy and water market reforms indicate there have been overall improvements in responses to customers experiencing family violence, but there continue to be inconsistencies in frontline responses and across different companies [Consumer Policy Research Centre, 2020; Essential Services Commission, 2019].

Themes emerging regarding work still to be done to improve responses to customers experiencing family violence include [Bond & Ulbrick, 2019; Consumer Policy Research Centre, 2020; Economic Abuse Reference Group, 2018; Essential Services Commission, 2018; Essential Services Commission, 2019; Venville, E., 2020]:

- The need for more comprehensive delivery of basic family violence training for customer service staff, as well as tailored family violence training for management and senior staff to ensure customers experiencing family violence are identified and provided with the right response.
- There are discrepancies between larger and smaller retailers, with larger retailers being seen as more consistently providing best-practice responses to customers experiencing family violence.
- Call centres based overseas present a specific issue, due to language barriers and differing understandings of family violence.
- There needs to be increased focus on clear and accessible provision of information to customers about hardship responses and where to access support, including communications that reflect the diversity of the Victorian community. This could include a dedicated promotional strategy.
- More streamlined and consistent processes for client-centred responses to customers in need of assistance – i.e., customers not having to provide unnecessary/burdensome evidence, not having to repeat story, strategies for improving responses where customers do not disclose experiences of family violence and/or do not contact provider with the assistance of a professional advocate.
- Customer trust that companies can keep their information confidential is low, particularly for regional-based companies.

¹ State of Victoria, Royal Commission into Family Violence: Summary and recommendations, Parl Paper No 132 (2014–16), pp. 75

The better practice guide [Essential Services Commission, 2019] indicates training and capability building is required in the following areas, informed by family violence specialists and survivor advocates:

- detecting the warning signs of family violence
- ensuring customer safety and confidentiality
- providing flexible and personalised solutions
- making referrals to support services (this can be transferring them directly to the appropriate team within the organisation or, if the customer is talking to the specialised team member, external referrals to support service organisations)
- respective organisations' family violence policies and responsibilities according to staff roles

Client Centered Responses

The literature reflects many synergies between client centred responses in community services and in the provision of essential services, including the proximity of client-centred responses with consumer participation [Consumer Policy Research Centre, 2020; Department of Health & Human Services, 2019; Domestic Violence Victoria, 2020; Economic Abuse Reference Group, 2018; Essential Services Commission, 2018; Essential Services Commission, 2019].

The Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim Survivors lists “Person-Centred Empowerment” as the second of its ten principles for best practice. The Code defines person-centred practice as proactively engaging victim survivors in decision making and ensuring service provision is flexible and tailored to the victim survivor’s individual needs [Domestic Violence Victoria, 2020].

The Client Voice Framework for Community Services [Department of Health & Human Services, 2019] includes person-centred practice in the continuum of inclusion of client experience in the design, delivery and evaluation of community services. The framework defines person centred practice as service responses shaped by individual client’s values, beliefs and circumstances, and their ability to meaningfully input into decisions affecting their lives.

The literature reflects that best practice responses to economic abuse and the financial impacts of family violence require a person-centred approach, and that businesses need the flexibility and agility to tailor responses according to the individual needs of consumers [Bond & Ulbrick, 2019; Consumer Policy Research Centre, 2017; Solomon & Martin-Hobbs, 2018; Thriving Communities Partnership, 2019]. Prioritising safety and choice for customers and staff impacted by family violence is also included in the Better Practice Principles developed by the Essential Services Commission [2019].

Some key themes emerging from the literature regarding best practice client centred responses to customers experiencing family violence include [Bond & Ulbrick, 2019; Consumer Policy Research Centre, 2017; Consumer Policy Research Centre, 2020; Solomon & Martin-Hobbs, 2018; Thriving Communities Partnership, 2019]:

- Whole of organisation strategy – that includes family violence consideration across all policy and service provision
- Buy in from the top – to demonstrate organisation’s commitment to providing best practice responses to family violence
- Training across the whole organisation – to respond to customers and staff – and adapted to different roles and levels of responsibility, including induction and refresher courses
- Avoiding requirements for evidence of family violence unless necessary
- Moving away from paper-based processes
- Avoiding the need for customers to repeat their story more than once
- Inclusive, accessible and simple provision of information about access to support and formal complaints processes – including access to interpreters and easy English resources
- Readily available information about hardship services, and access to hardship services
- Ensuring safety for staff and customers is paramount, including in handling of information
- Flexible and non-judgemental approach to debt management, tailored to the needs of the customer
- Proactive approach to mitigating risk for customers – including actively asking about potential concessions, flagging potential coercive decision making such as customers accepting risk or debt without obvious benefit
- Regular review of family violence policies, including monitoring effectiveness of application

The Value of Consumer Participation and Survivor Advocacy

The literature reflects that the lived experiences of consumers and customers provide the richest information about the efficacy of services and demonstrate accountability from services to the people they serve [Department of Health & Human Services, 2019; Domestic Violence Victoria, 2020; Hudson et al, 2020]. There is increasing expectation from government and other authorities that consumer/client experience is reflected in the design, delivery and evaluation of services to ensure quality service provision and governance [Department of Health & Human Services, 2019; Domestic Violence Victoria, 2020; Hudson et al, 2020].

Consumer participation as a concept and practice has been in circulation for decades, and over the years has taken many different forms and definitions – from consultation, co-commissioning, co-design, and co-delivery [Loeffler & Bovaird, 2016; Werner-Seidler & Shaw, 2019]. Different community sectors have approached consumer participation differently, with differing levels of intensity and different definitions [University of Melbourne, 2020; Domestic Violence Victoria, 2020].

It is commonly understood that there is a spectrum of engagement with clients/consumers in the design, delivery and evaluation, sometimes described as the “ladder of participation” – which can vary in intensity from informing, to coordinating, consulting, co-design and co-production [Loeffler and Bovaird, 2016; Werner-Seidler & Shaw, 2019; DHHS, 2019;

University of Melbourne, 2020]. There is a broad base of literature capturing different approaches and definitions of consumer participation, but gaps in evidence around the short- and long-term impacts of different approaches to consumer input into the design, delivery and evaluation of services [Loeffler and Bovaird, 2016]. In basic terms, the engagement with lived experience can vary from more passive “inform”, “consult” and “involve” activities, to more deeply engaged activities such as “collaborate”, “co-design” and “empower” that reflect more active and equal decision making between services and consumer participants [Lamb et al, 2020].

One of the key messages from the Royal Commission into Family Violence was the need to embed the lived experiences of victim survivors in all aspects of the family violence system and responses to family violence [State Government of Victoria, 2016]. The commission particularly highlighted the need for lived experience to inform policy development, service design and evaluation. Subsequent monitoring of the family violence reforms undertaken by the Family Violence Reforms Implementation Monitor have found that government’s response to increased inclusion of lived experience has focused on the establishment of the Victim Survivor Advisory Council Family [Violence Reforms Implementation Monitor, 2019], and more needs to be done to increase engagement with diverse voices, and for increased engagement with lived experience across the whole family violence system [Family Violence Reforms Implementation Monitor, 2018].

Within the family violence sector consumer participation is referred to with the term lived experience (Domestic Violence Victoria, 2020] or survivor advocacy [Lamb et al, 2020]. The Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim Survivors (Domestic Violence Victoria, 2020] recognises the inclusion of lived experience as a fundamental element that underpins all work undertaken by the sector, and a critical component of the specialist family violence praxis, and a key indicator for quality governance and leadership [Domestic Violence Victoria, 2020].

The better practice guide [Essential Services Commission, 2019] includes engaging with survivor advocates as one of the indicators under principle two, “Develop an informed approach that works for your organisation”. The framework indicates survivor advocacy application in the development of policy and provision of advice regarding potential impacts of different business practices on customers experiencing family violence.

Key Elements for Best Practice Engagement with Survivor Advocates

The Essential Services Commission has a Stakeholder Engagement Strategy (2019), that lists the following principles for best practice engagement: transparent and accountable; clarity on what, when and how consultation is undertaken, and publishing information about outcomes; engagement is considered, planned and genuine; engagement is inclusive; information is clear, accessible and simple to understand; continuous improvement processes built into consultation and engagement.

More recently the University of Melbourne was commissioned by the Essential Services Commission to develop guidance and principles for engagement with consumers experiencing vulnerability [Hudson et al, 2020], to inform a broader vulnerability strategy in development at the commission. This guidance identifies 10 key principles for regulators’ development, design and conduct of universal consumer engagement: inclusivity,

collaboration and co-design, diversity, transparency, investment of time and resources, respect, flexibility and willingness to reflect, adapt and improve.

The guidance identifies that all strategies for engaging with different consumer groups within the commission should align with these principles. Strategies for achieving this include establishing an all of organisation culture and approach to engagement; establishing a shared understanding of value of consumer experience; engagement approaches that reaches full breadth and diversity of consumer experiences; engagement designed to be accessible and inclusive.

The Client Voice Framework for Community Services [Department of Health & Human Services, 2019] was developed to provide guidance on inclusion of client voices for the broad spectrum of community services in Victoria. The framework links inclusion of client voice with quality governance and system accountability, as well as effective outcomes measurement.

The Family Violence Experts by Experience Framework [Lamb et al, 2020] was developed to guide collaborative engagement with survivor advocates by specialist family violence services. The framework is consistent with the Code of Practice: Principles and Standards for Specialist Family Violence Services for Victim-Survivors and was developed in partnership with the Weavers, a group of researchers with lived experience at the University of Melbourne.

The Client Voice Framework [Department of Health & Human Services, 2019] and Experts by Experience Framework [Lamb et al, 2020] were both developed within the context of human service provision in Victoria. Both provide practical guidance and capability building resources to support organisations to engage with clients/survivor advocates in alignment with framework principles. There are key synergies including:

- Service providers need to genuinely value lived experience expertise, and demonstrate this by taking a considered approach in their engagement with survivor advocates – having a client/consumer/survivor advocacy engagement plan developed with buy-in from “the top” is recommended
- Service providers must proactively and systematically assess opportunities for consumer input into the design, delivery and evaluation of services
- There are power differences between consumer/survivor advocates and employees of services, and a considered approach to recognising, addressing and mitigating power imbalances is key
- Service providers need to be proactive in ensuring the inclusion of diverse voices and experiences of family violence, recognising there are increased barriers for some survivor advocates due to structural and social discrimination.
- There are different levels of engagement depending on resourcing, time, and the activity. It is important for organisations to be transparent about the level of input and influence consumer/survivor advocates will have and clearly communicate the purpose of the engagement.
- It is the organisation’s responsibility to set the scene with clear communication and genuine, respectful engagement.

- Closing the feedback loop – reporting back to survivor advocates the outcomes of their involvement.
- Providing trauma informed support and understanding unique risk considerations for survivor advocates.
- Remuneration – the organisation must compensate survivor advocates for their time and resource them to participate with additional resourcing for childcare and travel costs.

Common considerations for best practice engagement with survivor advocates (clients with lived experience of family violence) include:

- Engagement with lived experience should be considered at all levels of relevant service planning, delivery and evaluation, with an approach that is connected to broader organisational strategy.
- The need for organisations to develop a consumer engagement plan, including an audit of organisation/service activities that could benefit from client engagement/survivor advocacy, organisational “readiness” for engagement with survivor advocates (i.e. policies, procedures and skilled staff).
- People with lived experience of a service have unique and valuable contributions to make in the improvement of service responses, and it is the responsibility of service providers to create opportunities and remove barriers for client engagement/survivor advocacy.
- A considered, trauma-informed approach from service providers in engagement with consumers/survivor advocates, and that proactively seeks to include diverse voices and experiences of family violence.
- When engagement with survivor advocates is done well it provides mutual benefit – empowerment to survivor advocates and opportunities for service providers to improve outcomes and better achieve their purpose
- It is the organisation’s responsibility to provide adequate remuneration to consumer/survivor advocates, and to ensure representatives from the organisation working directly with survivor advocates are prepared for respectful and authentic engagement with consumer/survivor advocates.
- Consumer/survivor advocates are motivated by a desire to see change, and it is important organisations report back to them about the outcomes of their engagement.

Conclusion

To ensure more consistent best practice responses to energy and water customers experiencing family violence, customer support staff in energy and water sectors require more training and capability building resources to better recognise and respond to customers experiencing family violence within the context of their work.

The literature demonstrates consistent recognition of the value of client voices in the provision and governance of quality services, and there is a continuum of input of customer voices from the provision of person-centred service responses to formal engagement with clients as advisors and consultants. Organisations need to take a considered, trauma informed and comprehensive approach to working with survivor advocates to ensure safe, respectful and authentic engagement.

Appendix B: Consultation Report

As part of the guidance development a consultation process ran from November 2020 – February 2021, involving a broad range of stakeholders including staff across the Essential Services Commission, representatives from water and energy retailers, representatives from other allied industries such as banking and transport, representatives from the community services sector, and victim survivors of family violence. Several consultation methods were used to capture a broad range of insights, increase access and participation for both survivor advocates and industry representatives.

The consultation process was designed to:

- A. Identify the elements that guide best practice engagement with victim survivors in the improvement of Victorian utilities providers' responses to customers experiencing family violence.
- B. Evaluate the current understanding of value and best practice engagement of survivor advocacy in improving responses to customers experiencing family violence, and the experiences of survivor advocates in their previous engagement with the commission.
- C. Scope opportunities to increase and improve engagement with people with lived experience in the design, delivery and evaluation of family violence reforms work within the context of water and energy companies and understanding the business context for the development of guidance.

The consultation methodology

- Online survey of victim survivors with experience accessing hardship support with essential service providers (four responses received).
- Online focus group with survivor advocates (The WEAVERS) followed by written responses (three participants).
- Interview with three survivor advocates with previous experience working with the commission, followed by written responses.
- Online survey of private sector and community sector representatives affiliated with the Better Practice Framework workshops facilitated by the Essential Services Commission (45 responses received).
- Online interviews with staff across the Essential Services Commission, representatives from water and energy retailers, representatives from other allied industries such as banking and transport, representatives from the community services sector (17 interviews with 26 representatives).
- A two-hour online workshop co-facilitated by Safe and Equal, and the University of Melbourne and the Weavers. The workshop was attended by four survivor advocates and 12 representatives from across the commission, utilities providers (water, energy and banking) and the community sector.

Outcomes of consultation with victim survivors and survivor advocates

Victim survivors with experience accessing hardship services.

You don't have to have had our experiences to show a caring empathic manner to the Survivor. You also don't need to understand it, we just need your help.

- Consultation Participant, Survivor Advocate

In the consultation survivor advocates were asked a range of questions about their experiences accessing hardship support from utilities providers within the context of experiencing family violence, what responses they received that supported them, and what responses hindered them, as well as ideas they had regarding ways essential service providers can improve responses to customers experiencing family violence.

Key themes included:

- Understanding the many forms and impacts of family violence is key, as is understanding the impacts of this trauma on a customer.
- Essential service providers have more power than they might recognise – power to help and power to harm
- It is important that information is readily available about hardship responses for customers experiencing family violence, and the processes are as streamlined as possible.
- There are skills that people can learn to help convey they are actively listening without judge, hearing what the customer is telling them they need and genuinely wanting to work together for the best outcome.
- Some advocates identified the possibility and need for a highly skilled centralised hardship agency, external to any individual business to support best practice responses to customers experiencing family violence.

Providing client-centered responses:

1. Language and tone matters
2. One point of contact and only having to tell story once
3. Being believed and not having to provide proof
4. Flexibility around payment options and application processes (need to tailor options)
5. Do not talk over the customer, give them options where possible
6. Have referral options available,
7. Proactively addressing language barriers

When survivors are planning to leave/have left, their stress, distress and trauma levels are likely to be so elevated that often they can't think straight or process even the most basic information.

- Consultation Participant, Survivor Advocate

Survivor advocates with experience working with the commission on family violence reforms work.

My experience was empowering... and showed me how much more work is needed in order to address the issues that corporates have with regard to family violence.

- Consultation Participant, Survivor Advocate

In the consultation the advocates were asked about their engagement experience with the commission, and input about ways essential service providers can improve responses to customers experiencing family violence, as well as ways services can improve engagement with survivor advocates to inform their family violence work.

- The experience working with the commission was positive overall, but there is room for improvement particularly in facilitating events with a diverse range of stakeholders and providing opportunities for feedback.
- Best practice engagement with survivor advocates in family violence work requires respect for the expertise, consideration for the advocate as an individual, and clarity of purpose and process
- Remuneration that reflects engagement with them as subject matter experts.
- Understanding how long the advocate has been out of crisis and supports in place
- Awareness of triggers for the advocate, and particular safety or legal considerations
- Clear process for providing information about the engagement and following up with the advocate for feedback and to communicate outcomes
- Transparent conversation about payment rates, number of hours, and process/form of payment
- Client-centered responses to customers experiencing family violence requires foundational knowledge of family violence, advanced interpersonal skills, and clarity of role and process.

Victims become hypersensitive to cues of abuse and verbal tone is a big one. Creating an open, clear and gentle tone is really important for a support person to cultivate.

- Consultation Participant, Survivor Advocate

Tips for better practice engagement with survivor advocates:

1. Take time to consider the other participants in the engagement and their family violence literacy and provide them with information about the role of the advocates beforehand.
2. Providing opportunities for advocates to introduce themselves and their expertise to participants.
3. Check in with the advocate beforehand about how they would like to be introduced, confidentiality, name use, etc
4. Provide information to the advocate beforehand about the nature and purpose of the engagement, the audience and participants, and the kind of input the organisers would like from the advocate.
5. Building in opportunities for feedback and outcomes after the engagement

Outcomes of consultation with industry stakeholders

There need to be consistent responses from all providers, so we get the same outcomes for clients regardless of provider.

- Consultation Participant, Industry Stakeholder

In the consultation representatives from the Essential Services Commission, water retailers, energy retailers, other essential service providers and community services organisations were asked a range of questions about their experiences working with customers impacted by family violence, industry efforts to improve responses to customers and staff impacted by family violence, their organisation's engagement with survivor advocacy to inform responses to family violence and opportunities to both increase engagement with people with lived experience, and what forms of guidance and capacity building support works well in their business context.

We have summarised and grouped the responses by key themes:

A lot of work has been done with water and energy providers, but further work is required to improve family violence understanding and response.

Challenges engaging with customers experiencing family violence.

- Working with trauma and building trust with customers, and complexity with limited support and services. Not all customers are willing to disclose.
- Victim survivors not being aware of their rights, or unaware of debts – and not responding until the problem has become significant.
- Understanding indicators of family violence, which can be subtle.
- Working with perpetrators of family violence.
- Ensuring confidentiality and navigating this with other services.
- Vicarious trauma impacts on staff, and their own experiences of family violence being triggered.
- Holding boundaries and clarity of role, while also responding with empathy, and setting realistic expectations about what help is available.
- Lack of formal policy or training in how to navigate these difficult conversations.
- Differing access to support and services depending on geographic location (i.e., in rural areas where there are limited service options)
- Knowing how to initiate the conversation and help the customer feel confident to disclose – then knowing what to do when they do.
- Ensuring customers receive consistent responses – with or without an advocate from a community service provider.

Skills needed for client centered responses to customers experiencing family violence.

A common response was around people having “soft skills” to navigate these conversations. This includes:

- Empathy (not sympathy), active listening, non-judgmental responses
- Conflict management – for navigating difficult conversations, understanding trauma

- Connection to broader training and policy around working with customers experiencing family violence
- Considerations for how you recruit to these roles – personality traits

Many participants flagged the need for foundational understanding of family violence:

- Understanding basics of family violence – coercion and control, forms of family violence and impacts of trauma, the cycle of violence and risks in leaving, impacts on different communities and relationship contexts of family violence.
- Awareness of family violence risk and indicators – checking safety
- Training around self-care and vicarious trauma.

Another common response was clarity on role and responsibilities.

- What we do as a regulatory service does have impact on customers experiencing family violence
- Understanding it is a priority for the organisation and why it is important
- Being clear on scope of role – and what actions/processes/options are available to enable a customer to decide for themselves as much as possible, supporting and being clear – not ‘rescuing’.

Increasing and improving corporate family violence training across the board

- The need for consistent, specialist informed training was highlighted in the consultations, and among industry stakeholders there was a spectrum of approaches taken from inhouse, to private corporate training to partnering with specialist community providers.
- The training, policy and process work also needs to incorporate responding to staff and colleagues experiencing and/or using family violence.
- The training needs to understand the business context of the providers and incorporate internal policy and process along with foundational knowledge.
- The challenge of keeping family violence awareness and work alive for staff across different levels and roles, inducting new staff, providing refresher training all highlighted.
- The challenge of training and engaging offshore call centre staff particularly highlighted.
- The important role of lived experience in informing and being part of training highlighted, with many observing the value of having someone with lived experience in conveying the importance and relevance of the family violence reforms in the business context.

Improving and increasing access to specialised hardship responses

- To ensure consistent responses and that customers experiencing family violence are getting through to the hardship support they need, there is a clear need to invest in increasing awareness and skills to respond to customers experiencing family violence with all staff at different levels across all businesses, and this needs to occur through training, policy and process achieved by top level buy-in and a whole of organisation approach sustained overtime.

- Due to the complexity of family violence, the limitations of business and the role of customer support staff, there is also the need for investment in more comprehensive, consistent and coordinated specialist hardship response.
- Some consultation participants identified the need/value/option of an external, more specialised hardship service.
- Many stakeholders from industry identified the value of including case studies in the guidance, to highlight relevance of the family violence reforms work to their role, scope of interventions/responses expected, and examples of tangible actions that can be taken to improve responses to family violence in the business context. Including the scenarios of family violence in the workplace context, examples of approaches taken by businesses, and examples of outcomes.

Online and customer call centers (need) to be easy to access and ask all necessary questions; clients are not aware of supports available and the utility providers need to be transparent regarding their support offers. It should be something a person can do without a support worker.

- Consultation Participant, Industry Stakeholder

Increasing engagement with people with lived experience in the family violence work.

The commission's engagement with survivor advocates to date

- The consultations across sectors highlighted how well received the commission's engagement approach in the family violence reforms has been, and the role of engagement with and promoting the voices of lived experience in the work.
- The consultations revealed there may be expanding activities in terms of engagement with survivor advocates, and that there is a need to establish internal coordination and quality assurance processes around this.

Centering client voices in monitoring and evaluating outcomes

- In addition to the continued work required to embed the family violence reforms consistently across industries and businesses, the consultations revealed there are opportunities for survivor advocates to have input into the monitoring and evaluation of efforts to improve family violence responses.

Actions, resources, & strategies for better engagement with survivor advocates

1. Clear parameters – about who the guidance is for.
2. Checklist and “how to” guide including: diversity of representation; explaining purpose and format of engagement with advocates, supports and disclosures, managing payment, managing safety and confidentiality with advocates.
3. Forums and case studies to discuss value, approach, and examples of engagement approaches across different industries.
4. Building internal skills and capability for engaging with advocates
5. Within a large organisation, clear delegation and coordination
6. Matrix of engagement levels and types of activities/areas of influence.

- The consultations also revealed opportunities for companies to embed feedback processes into hardship responses, with few businesses having made provisions for customers to review the support/service received once referred to the hardship team.

Outcomes of co-design workshop with survivor advocates and industry stakeholders

The purpose of the workshop was to build on the outcomes of the earlier consultations, and workshop potential solutions and guidance. The workshop participants were each allocated into one of three breakout rooms for facilitated discussion about two themes emerging from consultations undertaken to date.

Improving and increasing corporate family violence training

- While senior leadership of providers are in favor of upskilling staff in responding to family violence, at the operational level there is resistance to training frontline staff due to the need for backfill and cost. The issue of who will be paying for that is central.
- Training needs to be part of compliance, make it compulsory (like other areas are) and ensure family violence training is built into the 'risk framework' for businesses- i.e., not rolling out the training is a compliance breach.
- Important not to be prescriptive with training but require some minimum standards of what training should entail but leave some room for modification for individual businesses. Must ensure the question is asked 'is this training safe' that should be the minimum requirement.
- The messages in training should be simplified: 1) listen well, 2) be empathetic, 3) refer people to hardship support.
- The system is currently too reliant on a champion within the business pushing the need for training and finding a small pot of money to do it.
- Concerns about variable quality of training provided especially when it is done "in house" without any subject matter expert involvement.
- Shift thinking about offshore call centers as a potential reciprocal source of expertise for responding to culturally diverse clients in Australia, and how this can be considered in training.

Considerations for a structural investment in external specialised hardship responses

- Cost/benefit analysis of investing in structural change such as this; how to weigh up/balance need to increase awareness and skills across base alongside investment in hardship responses.
- Current work occurring at Thriving Communities Partnership (TCP) – The One Stop One Story is a digital platform not specifically designed for family violence but for hardship generally- just connecting clients with hardship teams. There is no person/call center in this model currently. Roll out of the TCP model is occurring later this year for an 18-month pilot for family violence clients firstly, this will give information about whether this model is useful and worth pursuing further.

- Key challenges are the fact the definition of 'hardship support' varies between providers and a need to ensure the process is 'safe' for clients. No guarantees that this approach will work.
- Potential if it is successful for it to grow into something more like a Hub with personnel but it is currently difficult to plan beyond the pilot.

Increasing consistency in family violence responses, and embedding client voice into monitoring and evaluation

- Concerns and risks – range of businesses are committed to providing good responses and engaging advocates, however there is concern expressed if this is not coordinated or standardised.
- Internal family violence capacity and capability is still inconsistent across and within industry – services mindful of wanting to ensure we are providing safe and respectful opportunities to inform evaluation – need to develop guidelines internally.
- Work needs to be done to establish baselines, indicators and monitoring activities. Currently feedback from staff/ conversations/ flags on customer profiles/ internal access to leave and EAP/ little info really to how this is monitored.
- Embed processes for engaging existing survivor advocate panels that are available for fee for service consultation or coproduction, including who to contact, how and process for engagement. Embedding into process considerations for engaging advocates from diverse backgrounds and experiences.
- Establish organisation-specific panel or specific group of advocates to provide advice on monitoring or for evaluating responses while being mindful of what is sustainable and appropriate to the commission and industry.
- Previous experiences engaging the 'Speaking Out Program' have been positive – with a coordinator facilitating connections, providing guidance how to do this in a safe and effective way.
- Understanding levels of participation for survivor advocates at different points in monitoring and evaluation activities, that includes real assessment and communication of level of influence advocates can have. The Experts by Experience Framework lists the different types of engagement (feedback – co-design and co-production) which can help industry decide what type/level of engagement is appropriate.
- The potential role of the commission
 - Maintaining a list or database of advocacy groups
 - Providing guidance on how to engage survivor advocates (The Family Violence Experts by Experience Framework provides best practice principles and guidance, but flagged there could be considerations for the industry that the commission could provide support around)
 - Building survivor advocate knowledge of the industry to support their understanding of the limitations and context.
 - Businesses have their own commercial structures and incentives. The commission cannot create one process/needs to be adaptive for the company - *“the commission might be the perfect facilitator/rather than prescriber.”*

- What opportunities are there for embedding feedback processes into hardship responses and complaints processes?
 - Feedback is collected from customers at the end of a call (survey/score). However, for most businesses this is not included for hardship clients. Sense that it is inappropriate, not the right time in crisis and not safe to expect customers to provide feedback currently.
 - Opportunity to explore opportunities to collect feedback down the track, months, or years from customers that have accessed hardship.
 - Opportunity to develop or seek feedback with the support of survivor advocates.

Alignment of the commission's work with survivor advocates with the Family Violence Expert by Experience principles

- Survivor advocate participants shared experience of their engagement as advocates with the commission, coming to speak at one of the Better Practice workshops. They shared they felt respected and valued by the commission staff, but they experienced some resistance and disrespectful engagement from some workshop participants who were customer service staff from a retailer. They shared that if they had been given more of an opportunity to introduce themselves and frame their expertise as people with lived experience, this may have helped to mitigate this.
- The group discussed the value of having a readiness assessment tool for engagement organisers to assess the participants/audience family violence literacy and experience engaging with survivor advocates, to inform planning, and how much set up is required around setting expectations and everyone in the room understanding what will happen.
- The advocates highlighted the importance of an intentional process of providing advocates with clear information and expectations around the kind of engagement, the audience, the content, what kind of expertise or story to bring to the discussion. Clarity of purpose and transparency regarding process and outcomes is key. They also highlighted the value of meeting the organisers and other advocates beforehand if possible, and the opportunity to introduce themselves and frame their expertise and experience with the audience. It is important too that advocates have access to support and professional development to develop skills as an advocate and ensure their own safety and wellbeing.
- The advocates also highlighted the need to intentionally include a diversity of experience, and for facilitators to get clarity on the kinds of experiences and expertise they are looking for from advocates (i.e., different forms and contexts of family violence).
- Group discussion about value of using examples of best practice and case studies that demonstrate there is not “one way” for disclosures to occur, or areas of work family violence might impact customers. WIRE shared that they provide information regarding basic legal advice/consideration for advocates to consider ahead of engagement (i.e., pending family court matters etc.), to support informed decision making around what to share.
- There was discussion also about the number of disclosures that occur – both for organizational facilitators/organizers, and survivor advocates. Setting up intentional

and visible supports for all participants is an important part of planning also, for example Employment Assistance Providers onsite for some workshop events.

- There are challenges within industry around paying advocates, with many departments not securing internal funding to pay for engagement, and/or there not being streamlined processes for paying individuals (without arduous supplier procurement processes and/or longer timelines to get people “on the books”). This is where engaging advocates via a community organization can help bypass some of this complexity. The advocates flagged this is an opportunity for internal advocacy to have the value of lived experience recognised by a company to inform their products, as well as the importance of proactively having the conversation about payment with advocates at the start.

The need for coordinated approaches to engaging survivor advocates

- The group discussed the need for co-ordination around consumer engagement more broadly at the commission because some people may want to engage advocates in a different way and for different purposes. Identified possible solution - a central co-ordination team / person that any event that may consider employing survivor advocates must go through.
- The group also discussed the value of being able to engage a supported advocacy program through a community organization, to also be providing that coordination, quality assurance and continuity of support for survivor advocates.

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