Retail Energy Family Violence Policy

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Purpose

Microgrid Power (MGP) is committed to ensuring the safety, wellbeing and dignity of customers affected by family violence.

This policy outlines the support available to all customers who may be experiencing or perpetrating family violence. We are committed to giving our customers (including former customers, who may be affected by family violence) and staff a safe and supportive environment to access relevant information and manage their personal and financial security.

This policy establishes the required framework to:

- prioritise the safety of affected customers as our *primary* consideration
- identify and support affected customers with compassion and flexibility
- protect customer information and prevent disclosure without consent
- provide payment support and tailored assistance in situations involving family violence
- Comply with all legal and regulatory obligations, including the National Energy Retail Rules (NERR), the Victorian Energy Retail Code of Practice (ERCOP), and the AER Family Violence Guidance for Energy Retailers (2025)

This policy must be read together with MGP's Hardship Policy, Complaints & Dispute Resolution Policy and Privacy Policy, all of which are published on our website.

Publication and access

We can send you a copy of this policy if you would like us to. We will make sure this policy is easy to find on our website so that you can print it or read it online with a quick exit feature to ensure

safe browsing. This policy is also available in large font, Easy English, screen-reader compatible formats, and can be translated into other languages if needed. Just let us know if you would like the policy in a different format or language.

We publish this policy in a dedicated, clearly labelled and easily accessible place on our website. The policy webpage includes a quick exit feature to support safe browsing.

What is Family violence?

Family violence means behaviour by a person towards a family member of that person that:

- is physically, sexually, emotionally or psychologically abusive
- is economically or financially abusive
- is threatening, coercive or controlling or
- causes a family member to fear for their, or another person's, safety or wellbeing.

Family violence also includes situations where a child hears, witnesses or is exposed to such behaviour.

MGP recognises that family violence impacts individuals differently based on gender, culture, disability, language, sexual orientation, age or socioeconomic factors.

For the avoidance of doubt, the term "family violence" in this policy has the meaning given in rule 3 of the National Energy Retail Rules (NERR), which adopts the meaning of "domestic abuse" in section 8(8) of the Intervention Orders (Prevention of Abuse) Act 2009 (SA), and, for customers in Victoria, the meaning given in section 5 of the Family Violence Protection Act 2008 (Vic). Where the two definitions differ, MGP will apply whichever definition is broader so that no affected customer receives a lesser standard of protection.

Scope

This policy applies to:

- any MGP customer or former customer affected by family violence
- any staff member experiencing or disclosing family violence
- any authorised representative, case worker or financial counsellor acting on behalf of a customer

A customer is considered an "affected customer" once MGP is informed. Evidence is **not required**.

The minimum protections described in this policy reflect the affected customer protections that apply, as a matter of law, to current and former small customers under Part 3A of the NERR and Part 7 of the Energy Retail Code of Practice (Vic). MGP extends the support described in this policy more broadly, including to staff members and large/small business customers where appropriate, without limiting the statutory protections available to small customers.

Principles

MGP commits to:

- safety being our paramount consideration in all interactions[1] by prioritizing a 'Recognise, Respond, Refer' model when interacting with affected customers.
- Taking your specific circumstances into account and discussing a safety plan with customers who have disclosed family violence to confirm and ensure the safety of the customer and their children.
- treating affected customers with dignity, empathy and respect
- minimising the need for repeat disclosures
- protecting confidential information from unauthorised disclosure
- avoiding any actions that could disadvantage or penalise affected customers
- ensuring no support actions breach contract obligations[2]
- providing accessible, inclusive and culturally safe support.

Identifying Affected Customers

Affected customers may be identified via

- self-disclosure
- disclosure by a financial counsellor, case worker or authorised representative
- employee observations of behaviours consistent with family violence (e.g., financial abuse indicators)
- requests to update account access, communication methods or security protections

MGP will never request you or a third party acting on your behalf to provide specific documentation or evidence before providing you with support under this policy or the Rules[3].

Where requested by the customer, MGP will assign the affected customer a dedicated contact (and a back-up contact) within our organisation, and will take reasonable steps to avoid the need for an affected customer to repeatedly disclose or refer to their experience of family violence in subsequent interactions, so as to provide for effective ongoing engagement.

Account Security

Once a customer is identified as an affected customer, MGP will[4]:

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[1] NERR r76D
[2] NERR r76K
[3] NERR r76I
[4] NERR r76G and ERC

- immediately flag the account as family violence protected
- restrict access to trained, authorised personnel only
- record safe communication preferences and ensure compliance
- disable automated messages unless confirmed safe
- ensure no written communication includes unnecessary personal details (e.g., full address)
- not disclose or provide access to any affected customer information to any other person (including a joint account holder) without explicit informed consent of the affected customer, unless required by law or necessary to prevent serious harm.
- support separation of accounts or changes to account authority where safe and practicable
- We may also offer additional account security measure such as customer defined code word, PIN identifier, or two factor authentication to verify your identity and prevent unauthorized access to your account.
- not require the payment of a security deposit by, and will waive any existing security deposit for, a customer who is or has been an affected customer, and will not charge a fee for making changes to account details under this policy
- support the removal of a joint account holder and, where requested and safe to do so, establish a new account in the affected customer's sole name using a simplified, expedited process, at no cost to the affected customer
- apply a secure verification process to confirm the legitimacy of any authorised representative, case worker or financial counsellor before accepting their authority to act on behalf of an affected customer

Communication

MGP will:

- take reasonable steps to elicit the affected customer's preferred, safe method of communication (email, phone, postal address or via a third party) and offer alternative methods of communication if the preferred method is not practicable.
- clearly record and follow these preferences
- check in with the customer if communication preferences may no longer be safe
- ensure communication is trauma-informed, respectful and culturally sensitive.
- ensure you will not be in breach of your customer retail contract if you are unable to fulfil an obligation under that contract because you are using your preferred method of communication with us
- ensure where your preferred method of communication is via an authorised third party (such as a support worker, financial counsellor or other person you have authorised to act on your behalf), we will accept that authority and communicate with that third party rather than you directly, unless and until you tell us otherwise
- not send communications to a previous address once you have given us a new one, and will manually review any automated communications before they are sent to reduce the risk of a message inadvertently reaching a perpetrator

Training and Awareness

Ongoing training is provided to every person (including employees, agents and contractors) acting on our behalf who may engage with affected customers, managers of any person who may engage with affected customers and also anyone responsible for systems and processes that guide interactions with small customers. All MGP senior management, staff responsible for customer systems, frontline, billing, collections, hardship and complaints staff must complete mandatory training (at least annually or more often if guidance changes)[5] that covers:

- How to identify affected customers using the Recognise, Respond, Refer model
- understanding family violence and its impacts
- recognising indicators of family violence
- trauma-informed and culturally safe communication
- intersectionality and diversity considerations
- safety planning and risk awareness
- account security and information protection

internal escalation and support processes

Training materials will be reviewed and updated at least once every 12 months to ensure they remain current and effective, with feedback from staff and, where appropriate, affected customers considered and incorporated to improve training content and delivery.

Minimising Repeat Disclosures

MGP will[6]:

- maintain secure and clear account notes to prevent the need for customers to re-tell their story
- ensure authorised staff have appropriate visibility without compromising confidentiality
- review internal processes to continually reduce unnecessary questioning or re-disclosure.

Assistance, Hardship and Payment Support

Where you are affected by family violence, MGP will:

- recognise family violence as a likely cause of hardship[7] or payment difficulties
- provide access to hardship programs and tailored payment plans, and not refuse you a payment

[5] NERR r76B, ERC
[6] NERR r76C
[7] NERR r76E

plan because of previously cancelled payment plans or an illegal energy use conviction where another person may have been jointly or severally responsible

- where you are on a standard retail contract, accept Centrepay as a payment option; where you are on a market retail contract, allow you to use Centrepay if it is available under that contract; and where Centrepay is not available under your market retail contract, review that contract and, if a suitable alternative contract offering Centrepay is identified, transfer you to it with your explicit informed consent, or if no suitable alternative contract is identified, make Centrepay available under your existing contract – at no cost to you for the review, the switch, or ending your existing contract early
- waive any late payment fees, offer other fee waivers, debt review and flexible payment arrangements, and promptly identify where debt can be waived or suspended in part or in full, particularly where we assess that it may have been accrued as a result of financial abuse
- before taking any action to recover arrears, or transferring debt to a third party debt collector, consider your individual circumstances, the potential impact of that action on you at that time, and whether any other person is jointly or severally responsible for the energy usage that led to the arrears, and pause or modify debt collection activity where appropriate
- before arranging disconnection, take into account the potential impact on you, including on your safety and wellbeing, and whether any other person is jointly or severally responsible for the non-payment, and not arrange disconnection unless we have formed the view that it will not cause you harm.

Your situation will be managed with flexibility, in collaboration with external support services where appropriate, and in line with our hardship policy (which can be found at https://www.microgridpower.com.au/documents).

Emergency Assistance

Where safe and appropriate, MGP may:

- assist the customer in developing a safety-aligned account management plan
- contact emergency services at the customer's request or where staff believe immediate harm is likely
- refer customers to specialist family violence, counselling and financial support services

External Support Services

MGP will maintain an up-to-date list of external support services, published on our website and provide this at a time and in a manner that is safe, respectful and appropriate given the affected customer's circumstances. This includes:

24/7 Family Violence Support

- 1800 RESPECT – 1800 737 732
- Safe At Home – 1800 633 937
- Emergency Accommodation – 1800 800 588
- National Trauma & Recovery Service – 1800 385 578
- Rainbow Family Violence Helpline – 1800 497 212

Counselling and Support

- SHE – 6278 9090
- Sexual Assault Support Services – 6231 1811
- Family Violence Crisis & Support – 1800 608 122
- Bravehearts (children) – 1800 272 831
- Kids Helpline – 1800 551 800

Support for Men

- Men's Referral Service – 1300 766 491
- Don't Become That Man – 1300 243 413

Financial Counselling

- National Debt Helpline – 1800 007 007

Interpreter services

- TIS National – 131 450

Complaints and Escalation

If a customer is dissatisfied with how MGP has managed their situation, they may lodge a complaint under our Complaints and Dispute Resolution Policy, available on our website.

If unresolved, customers may contact their state Energy Ombudsman.

Record Keeping

MGP will maintain[8]:

- secure, access-restricted records for affected customers for at least 2 years, or where there are any active complaints or disputes, for the period the complaint or dispute remains unresolved,

[8] ERC Part 7

whichever is the longer period.

- logs of all interactions and disclosures with affected customers
- documentation of staff authorised to access affected accounts
- audit trails of account changes and information access.

Policy Review

This Policy will be reviewed at least every 12 months or earlier if relevant laws, regulations or best practices are updated.

Feedback from staff and customers will inform future updates.

To support continuous improvement, MGP will collect internal data on the operation of this policy (for example, the number of affected customers supported and referrals made), monitor feedback from affected customers and staff, and conduct periodic internal audits of the systems and processes supporting this policy, using this information to inform future training, process improvements and updates to this policy.

Contact Us

At any time, if you have concerns about your well-being or need support with your energy account, please do not hesitate to contact us. You can reach us via email at support@microgridpower.com.au by mail at PO Box 634 Terrigal NSW 2260 or by phone at 1300 647 888.