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# Case studies for exempt sellers: family violence

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The following case studies have been designed to illustrate how an exempt seller may meet its obligations related to family violence under the Guideline. In some instances, they also include better practice that goes beyond the obligations for exempt sellers.

## Example 1 – Residential (caravan park)

- Margaret is the manager and owner of a caravan park and sells energy to her permanent residents as an exempt seller under a class R4 exemption. Margaret offers to provide a copy of her family violence policy to all residents at the start of their residency at the caravan park.
- Rachel, a permanent resident at a powered site, takes up Margaret's offer to provide a copy of the family violence policy upon move in. Rachel advises Margaret that her ex-partner has attempted to locate her and she had moved to Margaret's caravan park from interstate with her son a few months ago to avoid detection. Rachel tells Margaret she fears her ex-partner.
- Margaret uses this conversation to ask whether she can flag Rachel's file for family violence.
- With Rachel's permission, Margaret flags Rachel's file on the office computer with a code only Margaret and her office manager know the meaning of. This means they can easily identify Rachel's energy account as being for a customer affected by family violence and provide Rachel with protections, without requiring Rachel to disclose her situation again. The office computer is password protected. Rachel's file on the computer is further protected with an additional password, known only to Margaret and her office manager who does the energy billing.
- Margaret asks Rachel her preferred method of communication. Rachel responds that she would like to be communicated with via email and Margaret records this in Rachel's file. Margaret makes sure she only uses this method to contact Rachel.
- Margaret does not ask Rachel for a police report or other evidence to prove she is affected by family violence.
- Helping further, Margaret tells Rachel about the support services listed in her family violence policy, including the National 1800 RESPECT phone number.

- Rachel advises Margaret that she is struggling to pay her energy bills and Margaret works with Rachel to set up a payment plan for her energy costs.
- Considering Rachel's circumstances and the impact that de-energisation may have on her and her son's safety, Margaret reassures Rachel she will not disconnect her energy supply for non-payment. Margaret also tells Rachel about other supports available to her under Margaret's hardship policy.
- A few weeks later, Margaret receives a phone call from someone claiming to be a close friend of Rachel, asking if Rachel lives at the caravan park and what her site address is so they could come and visit. Margaret does not provide this information as it may be used to communicate with, or locate, Rachel. Margaret lets Rachel know about this phone call so she can plan for her own safety.



## Example 2 – Residential (retirement village)

- Milo is the manager of an over 60s retirement village in Cairns and sells energy to his permanent residents as an exempt seller under a class R3 exemption. Milo offers to provide a copy of his family violence policy to all residents at the start of their residency at the retirement village.
- Adam and Blair moved into a standalone villa in the retirement village a year ago and are sold energy by Milo under a joint account. Adam and Blair did not take up Milo's offer to provide a copy of his family violence policy when they moved in.
- Later, Blair advises Milo that she is affected by family violence. Blair explains that the perpetrator, Adam, has recently moved out of the retirement village and cannot be contacted, leaving Blair experiencing payment difficulties under their joint account, with significant energy debt and late payment fees.
- Milo follows his family violence policy and offers to provide Blair a copy. Milo does not ask Blair for any documentary evidence as a requirement for receiving further assistance and waives Blair's late payment fees.
- With Blair's permission, Milo flags Blair's account to identify her as an affected exempt customer to avoid Blair needing to repeat the disclosure. After asking Blair, Milo records Blair's preferred method of communication on her account as being a new PO Box address.
- Helping further, Milo provides Blair with information about local family violence support organisations, including the National 1800 RESPECT helpline and contact details for a local specialist community group who can help navigate her circumstances.
- Blair also advises Milo she is struggling to pay her energy bills. Milo works with her to set up a payment plan for her energy costs and advises her of the support available under Milo's hardship policy. Milo decides not to transfer Blair's energy debt to a third-party debt collector.

### Example 3 – Small business

- Seamus owns a small group of shops. Seamus sells his tenants energy via an embedded network as an exempt seller under a class [R1](#) exemption. Seamus offers to provide a copy of his family violence policy to all tenants at the start of their tenancy.
- Liji, one of Seamus’s commercial tenants, takes up Seamus’s offer to provide a copy of his family violence policy.
- A year later, Liji advises Seamus that she has recently separated from her partner, leaving a situation of family violence, and has moved out of the family home.
- Seamus does not ask Liji for documentary evidence of the family violence. With Liji’s permission, Seamus adds a symbol to the front of Liji’s paper file to identify her energy account as belonging to an affected exempt customer.
- After confirming and recording her preferred method of communication (a new postal address), Seamus keeps Liji’s file in his locked filing cabinet that only he and key staff have access to.
- Seamus waives the late payment fees associated with Liji’s energy debt.
- Seamus recognises that Liji may need extra support due to experiencing family violence and helps Liji by referring her to the support services listed in his family violence policy.

#### Quick tip

For more information see our [guidance for exempt sellers](#) and our [quick reference checklist](#).



### More information

#### Australian Energy Regulator

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