

CUSTOMER SUPPORT

A **Residential** customer experiencing hardship, can be defined as:

'Someone who is identified either by themselves, East Gippsland Water, or an independent accredited financial counsellor as having the intention but not the capacity to make the required payments within the timeframe set out in East Gippsland Water's payment terms.'

A **Non-Residential** customer experiencing hardship, can be defined as:

'An entity who is identified either by themselves, East Gippsland Water, or an independent accredited financial counsellor as having the intention but not the capacity to make the required payments within the timeframe set out in East Gippsland Water's payment terms.'

A **Small Business** customer is defined as non-employing or a business employing less than 20 people and with an active ABN.

PURPOSE

This standard operating procedure outlines the process and procedures to fulfil commitments and responsibilities that East Gippsland Water provides its customers to ensure a fair and consistent approach in managing customers in need of assistance; and a framework to support customers on a case-by-case basis who are affected by family violence and/or who are experiencing difficulty in paying their accounts.

East Gippsland Water is dedicated to providing prompt assistance and working with customers (or their nominated support person) towards solutions as a result of their individual situation.

Please note: this document is to be read in conjunction with East Gippsland Water's POL 020 Customer Support and SOP 144 Customer Charter.

HARDSHIP CUSTOMER DEFINED

East Gippsland Water identify two types of hardship customers; permanent and temporary. These two types of customers may have different characteristics and may require different types of assistance, which are assessed on a case-by-case basis.

Customers that are considered to be in the long-term or permanent group of hardship are generally those with low or fixed incomes. These customers may require ongoing assistance.

Customers that may be considered to be in temporary hardship are those that have experienced a sudden change in circumstances such as ill health, unemployment, separation, a death in the family, a loss arising from an accident, family violence or some other temporary difficulty. These customers generally require flexibility and temporary assistance such as an extension of time to pay, a one-off grant, or an alternative payment arrangement.

Any assistance or relief provided is dependent upon an internal evaluation of the individual circumstances appropriate to a particular customer; and assessed on case-by-case basis.

The degree of hardship will be determined by either an internal assessment process or by an independent accredited financial counsellor.

Where an assessment takes place to determine a customer's eligibility, consideration will be given to indicators, including but not limited to the following:

- eligibility for Commonwealth concession card;
- previous application(s) for a Utility Relief Grant Scheme (*irrespective of whether or not their application was successful*);
- payment history;
- affordability;
- request for information about alternative payment arrangements;
- sudden change of circumstances that adversely affect their ability to meet any financial obligations; or
- other objective criteria determined by East Gippsland Water as an indicator of hardship.

Although the above list is an indicator of possible hardship, each customer will be managed according to their individual circumstances as assessed by East Gippsland Water.

RIGHTS OF HARDSHIP CUSTOMERS

Customers experiencing hardship and/or family violence have the right to:

- Be treated with respect and sensitivity on a case-by-case basis and have their circumstances kept confidential;
- Receive information about alternative payment arrangements such as Commonwealth concessions, Utility Relief Grant Scheme (URGS), East Gippsland Water's policies and other internal and Government programs, which may assist in reducing their current arrears;
- Nominate an amount the customer can reasonably afford to pay on an arrangement plan;
- Choose from various payment methods in accordance with the customers' circumstances and capacity to pay and to receive written confirmation of the agreed alternative payment arrangement within 10 business days of an agreement being reached;
- Re-negotiate the amount of their arrangement if there is a change in their circumstances;
- Receive, at no cost to the customer, timely, independent, financial counselling from an accredited financial counsellor;
- Receive information on specialist support networks available;
- Request to have a support person nominated to act on the customer behalf;
- Request the redirection of a bill to another person for payment if that person agrees in writing;
- Request to have a billing cycle more frequently than quarterly (90 days), if agreed by East Gippsland Water;
- Receive communication assistance via a Telephone Interpreter or Telephone Typewriter service;
- Be shielded from legal action and additional debt recovery costs while they continue to make payments according to an agreed schedule of payments; or an agreed altered schedule of payments;

- Have access to water conservation or water efficiency information to assist in reducing consumption;
- Not have their water supply restricted as long as they meet agreed schedule of payments; or
- Be advised their right to lodge a complaint with the independent dispute resolution scheme (Energy and Water Ombudsman of Victoria) if their affordability issue is not resolved with East Gippsland Water.

PAYMENT ARRANGEMENTS

East Gippsland Water will negotiate flexible instalment plans and payment arrangements with customers to meet their need and ability to pay. Customers will be asked 'what they can afford'? East Gippsland Water strongly encourages regular payments to be made where possible, even when the amount is insufficient to cover the new charges as well as arrears.

An active arrangement will prevent any additional debt recovery costs, including interest charges on overdue amounts. The customer's account will continue to be monitored in an endeavour to avoid further hardship (indebtedness).

East Gippsland Water have a variety of flexible payment plans available to assist customers in hardship, as demonstrated below:

Instalment Plans / Payment Arrangements

- | | |
|-----------------|---|
| Amount | <ul style="list-style-type: none"> ○ As indicated on the account balance ○ As projected for future bills/usage ○ Customers capacity to pay |
| Frequency | <ul style="list-style-type: none"> ○ Weekly ○ Fortnightly ○ Monthly (<i>approval required</i>) ○ Payment extensions |
| Payment Options | <ul style="list-style-type: none"> ○ Easyway Payment card (via Australia Post) ○ AustPost Billpay ○ Direct Debit ○ Centrepay ○ BPay ○ Post - cheque and money order (no cash) ○ Credit Card (by phone) |
| Access | <ul style="list-style-type: none"> ○ In person at 133 Macleod St, Bairnsdale Victoria 3875 ○ By phone to 1800 671 841 (Monday to Friday 8.30am–5.00pm) |

On establishing a flexible payment plan or a revised plan, East Gippsland Water will give the customer a schedule of payments in writing, showing:

- the total number of payments to be made;



- the period over which the payments are to be made;
- the date by which each payment must be made; and
- the amount of each payment.

East Gippsland Water is not required to offer a customer a flexible payment plan if the customer has, in the previous 12 months, had two flexible payment plans cancelled due to non-payment unless the customer provides a fair and reasonable assurance (based on the circumstances) to East Gippsland Water that the customer will comply with the plan.

FINANCIAL ASSISTANCE OPTIONS

East Gippsland Water have a variety of financial assistance options available to assist customers in hardship, which are provided to encourage customers to:

- Establish a regular payment routine;
- Reduce the arrears amount;
- Prevent interest and future debt;
- Build and encourage a relationship of trust with East Gippsland Water;
- Raise the profile of water as an essential service when paying accounts.

The following financial assistance options are available to customers (subject to eligibility):

Pay'n'Save

Residential and Non-Residential (incl. Small Business) customers can apply for a Pay'n'Save plan, which provides assistance to those customers who are experiencing long-term or temporary financial hardship. A Pay'n'Save Plan offers customers in arrears, who are maintaining an agreed payment arrangement; an equal incentive payment.

For every three consecutive payments made by the customer, East Gippsland Water will also make a payment to the account. The customer must meet East Gippsland Water's internal eligibility criteria.

The Pay'n'Save plan will not continue after the arrears are cleared, resulting in an account balance going into credit.

Incentive payments will be applied prior to each account being issued. Any customer who has failed to maintain their agreed payment arrangement, shall forfeit their incentive payment. Incentive payments will not be applied retrospectively.

A customer is eligible to be on the Pay'n'Save plan for a period of up to 12 months, however can reapply for the Pay'n'Save plan after 12 months, which will be dependent on the customers individual circumstances at that time.

Utility Relief Grant Scheme Program

Residential customers can apply for the Victorian Government Utility Relief Grant Scheme (URGS) program. Eligible customers can receive up to a maximum of \$650 in a two-year period. This program is available to customers who hold an eligible concession card or are a part of a low-income household. The customer must meet the Departments of Families,

Fairness and Housing URGS eligibility criteria to be successful in receiving financial assistance.

As an added incentive, East Gippsland Water will provide an additional one-off payment to customers who have been successful under the URGS program; and who have a remaining account balance of \$150 or greater. This one-off payment is 20 percent of that approved URGS payment (e.g. \$650 URGS payment equates to a \$130 one-off East Gippsland Water payment).

Community Rebate Program

Residential customer can apply for the Victorian Government Community Rebate (CRP) Program. Eligible customers can receive a free water efficiency audit from a licensed plumber, contracted by East Gippsland Water, to assist in reducing their water use.

This program is available to customers who either hold an eligible concession card, are an East Gippsland Water customer, have had a recent high-water usage or are a part of a low-income household. Eligible customers may then receive assistance of up to a maximum of \$1,000 from the CRP for agreed products or services.

Water Efficiency Rebate Program

Residential and Non-Residential (incl. Small Business) customers can be rewarded for their efforts to be water efficient around the home, garden or small business, by receiving financial rebates on a range of water efficient products and appliances. This Water Efficiency Rebate program aims to assist eligible customers in maximising their water savings by installing water efficient products to replace inefficient ones and may receive up to a maximum of \$1,500 in rebates for agreed products.

The customer must meet East Gippsland Water's Water Efficiency Rebate Program eligibility criteria to be successful in receiving a financial rebate. Current rebates are available for products purchased and installed between 1 July 2023 and 30 June 2028. For information on customer eligibility and/or eligible products, please contact our Customer, Community and Communications Team.

MANAGEMENT OF CUSTOMERS EXPERIENCING FINANCIAL HARDSHIP

A customer participating in a Customer Support program:

- Will be given the opportunity to nominate an amount and frequency that they feel they can realistically afford to avoid any further payment defaults.
- Should agree to a schedule of payments plan not exceeding 12 months, or some other agreed period appropriate to East Gippsland Water to recover both the amount in arrears, and enable the customer to meet future bills.
- Shall have interest and debt recovery action suspended for a reasonable period to allow a revised payment proposal and schedule of payments plan to be established.

Customers experiencing hardship and/or family violence can request East Gippsland Water's 'Guide to Support Services' form, which provides information on free independent financial counsellors and/or other specialist support networks.

East Gippsland Water must confirm the details of the schedule of payments for the agreed flexible instalment plan and/or payment arrangements in writing within 10 business days.

Customers have the right to re-negotiate the amount of their arrangement if there is a change in their circumstances.

Legal action, water supply restriction and additional debt recovery costs will not be instigated against a customer who continues to make regular payments according to the agreed schedule of payments.

Customers that fail to meet the schedule of payments under the agreed arrangement and do not advise East Gippsland Water of changes to the arrangement within the spirit of this document will have normal debt collection processes activated which may lead to further costs and legal action.

East Gippsland Water is committed to being pro-active in providing potential hardship customers with information regarding our Customer Support. This may involve meetings onsite or home/site visits to customers to initiate communication and engagement to discuss concession entitlements, Government schemes and alternative payment arrangements.

MANAGEMENT OF CUSTOMERS EXPERIENCING FAMILY VIOLENCE

East Gippsland Water will case manage customers affected by family violence on an individual basis with consideration given to debt waiver or deferment, allocation of debt and debt collection activities, financial assistance programs, concessions and Utility Relief Grant eligibility.

The customer will be referred to a staff member within the Customer, Community and Communications Team to be case managed and if the customer will engage with our financial assistance program, East Gippsland Water will cease debt collection recovery, legal action and associated costs.

East Gippsland Water has an internal process to identify these customers and ensure their details are managed with a high degree of privacy and sensitivity. All staff are trained to identify and engage with family violence customers. Our staff are aware of the importance of specialist help for family violence victims and are trained to provide information to customers regarding appropriate referral pathways.

PROVISION OF INFORMATION

East Gippsland Water will be pro-active in providing potential hardship customers with timely information regarding payment assistance, including:

- An invitation to contact us to discuss alternative schedule of payment arrangements;
- Information about concession eligibility and other Government funded assistance programs (eg. application for a Utility Relief Grant Scheme) no later than the issuing of the third notice/request for payment.

Payment notices will include details to remind eligible concession card holder customers of their obligations to provide their concession card details to East Gippsland Water to receive their entitlements. Notices will also include information on payment assistance and hardship programs.

Customers that have been identified as hardship customers will receive access to any current East Gippsland Water and Government funded water conservation incentives.

East Gippsland Water will provide customers access to a free Telephone Interpreter Service (TIS) to customers from non-English speaking backgrounds; and a Telephone Typewriter (TTY) service for speech and hearing-impaired customers.

East Gippsland Water will use reasonable endeavours to resolve, in good faith, any dispute directly with its customers and others affected by its operations.

Customers will be advised about their right to lodge a complaint with a dispute resolution scheme (Energy and Water Ombudsman of Victoria) if their affordability issue is not resolved by East Gippsland Water.

POL 020 Customer Support Policy will be made publicly available through our website or in hard copy at our Bairnsdale Office.

STAFF TRAINING

East Gippsland Water's Customer Community and Communications staff will complete training and refresher programs to ensure that they understand this procedure and that they are trained to deal sensitively and without making value judgements with customers experiencing hardship and/or family violence.

Training will ensure staff are well informed about:

- East Gippsland Water programs;
- East Gippsland Water policies and standard operating procedures
- Government funded concession schemes;
- Customer's legal rights and responsibilities e.g. Energy and Water Ombudsman of Victoria (EWOV);
- Industry Code of Practice for Hardship Customers.

Training will be made available from internal and external sources, on a range of topics, to assist the Customer, Community and Communications Team understand the issues confronting East Gippsland Water's hardship customers and to ensure these customers are treated respectfully, non-judgementally and confidentially.

EFFICIENCY FOCUS

An important element of East Gippsland Water's response to customers experiencing hardship is to help them manage their water consumption and assisting customers to control their water costs.

The Customer, Community and Communications Team will offer advice about water saving in and around the house and garden, will send information to assist customers in the management of their water usage and will refer customers to any relevant government funded programs (i.e. Community Rebate Program).

If a property is recognised as registering an unusually high consumption for a particular billing period, the customer will be issued with a 'High Read' letter. This letter advises the customer prior to their account being issued, of the high consumption and expresses East Gippsland Water's concerns about a possible leak at the property. The letter also explains what action the customer needs to take to ascertain what the problem is.

CONTINUAL IMPROVEMENT

East Gippsland Water is committed to continual improvement in the manner it deals with customers experiencing hardship. East Gippsland Water will continue to attend and participate in industry forums to gain a better understanding of the issues that face low income and vulnerable customers in an effort to be better equipped to provide the necessary assistance.

REVIEW

This standard operating procedure will be reviewed at least annually to ensure it is adequate to meet changing customer needs.

REFERENCES

- POL 020 Customer Support
- POL 045 Customer Charter
- SOP 144 Customer Charter
- POL 064 Family Violence
- SOP 177A Family Violence Guidelines – Customers
- POL 055 Debt Management
- SOP 048 Complaints Water and Sewerage Rates