

## **Essential Services Commission**

Report: Research with financial  
counsellors exploring the effectiveness of  
family violence provisions in the Victorian  
water customer codes

9 September 2022

# Table of contents

Executive summary .....	1
Findings in detail .....	4
Who we consulted .....	4
Overall experience .....	4
Access .....	5
Appropriateness of water business responses .....	7
Appropriateness of support options .....	8
Role of codes in supporting client responses .....	14
What is working well? .....	14
Issues and gaps in meeting client needs .....	15
New or emerging issues .....	17
What water businesses might do differently .....	17
Summary of barriers and enablers .....	19
Conclusion.....	21

This report was prepared for the Essential Services Commission as part of the 2022 review of the family violence provisions in the water customer codes. Changes to the *Water Industry Act 1994* mean the Water Customer Service Codes are now identified as Water Industry Standards. The new Water Industry Standards apply from 1 March 2023.



# Executive summary

The following report summarises the findings of a research project undertaken to explore the perspectives of financial counsellors who support clients with experience of family violence to engage with water businesses. This research will inform a review of the family violence provisions in the water customer service codes. It involved qualitative research conversations with 15 financial counsellors from across regional and metropolitan Victoria and an online survey (n=18). Fieldwork was undertaken in August and September 2022.

## Key findings

### Overall satisfaction was high

Financial counsellors' overall satisfaction with their interactions with water businesses was generally high. Compared with other organisations, water businesses were typically seen as easy to deal with and appropriately responsive to disclosures of family violence. Water debts were also typically seen as less challenging to resolve, partly because the debts are generally smaller and partly because the repercussions of falling behind with repayments are less immediate and less severe.

Financial counsellors felt that water businesses were mostly following good practice when engaging with clients who have disclosed family violence. This included:

- Redirecting enquiries to specialist teams
- Asking about safety and wellbeing
- Offering options to protect information privacy
- Believing victim-survivors and responding in an empathetic and non-judgmental manner
- Being open to working with financial counsellors and clients to tailor solutions that are in the best interests of clients rather than focusing on recouping debt or locking clients into unrealistic payment plans.

It was reported that most customer service staff seem to have had at least some training around hardship and family violence issues. This was felt to make all the difference in achieving good service delivery. In many cases, the person who takes the call can follow through until the matter is resolved, eliminating the need for clients to re-tell their story.

### Appropriateness of available options

The 'toolkit' of options for dealing with debt and addressing privacy concerns was generally seen as offering a holistic and flexible means of supporting clients with experience of family violence. Most financial counsellors were satisfied with the range of options available. However, not all were aware of the full suite of options available (for example, one financial counsellor was not aware that water businesses could waive debts.) There were also mixed reports with respect to how well the available remedies have been communicated. Financial counsellors who had been



working in the field for a number of years generally felt well informed. However, those who were new to the industry noted that it could be difficult to access information on options offered by different creditors.

Both the qualitative and quantitative data suggest that Utility Relief Grants, payment plans and matching, and extensions are accessed most often. Debt waivers or maintenance were less common. It also suggests that financial counsellors tend to recommend the option that will be easiest to negotiate on behalf of their client. For example, they are more likely to suggest a Utility Relief Grant over a debt waiver because experience has shown them that debt waivers are harder to achieve. However, they also consider the financial, emotional and administrative burden for clients.

**Utility Relief Grants** were a preferred option (instead of, or in addition to, a payment plan) because they meet the needs of customers without reducing revenue for water businesses. Overall, the process of applying for a grant was seen as straight forward, although concerns were raised around the timeframes for receiving an outcome (up to 8 weeks) as well as the government requirement to provide evidence of family violence to support the grant application. There were also complaints that not all water businesses offered clients a choice between completing the form via email or via phone.

Setting up a **payment plan** was another common solution for clients who have regular income. Whilst there were reports that water companies are less likely than other utilities to pressure clients into agreeing to a plan that they cannot afford to maintain, it appears that they do prefer that clients pay a nominal amount (for example, \$10 a week or month) rather than waive the debt in full. In some cases, the offer of payment plans are accompanied by matched payments or partial debt waivers.

Financial counsellors reported that **debt waivers** were not often accessed by clients for water business debts. This seems to be at least partly because Utility Relief Grants may be sufficient to cover the debt.

**Extensions** (also known as 'holds') were seen as useful in times of uncertainty – for example, if customers are going through a court case. But whilst having this as an option was seen as a positive, extensions were seen as unhelpful if they result in clients facing a larger debt without having resources to pay.

Financial counsellors reported that clients were rarely offered **maintenance/ appliance repair or replacement** as a solution for debt. (Some water businesses reportedly offer property or appliance maintenance as a means of preventing debt accumulating.)

## Engagement with water codes

The water codes and water business family violence provisions were not top of mind amongst financial counsellors. However, they can be a useful resource when they need to raise an issue or hold water businesses to account. Better awareness of the codes and provisions would support this.



## Issues and opportunities to better meet client needs

Whilst financial counsellors' experiences with water businesses have generally been good, there are a number of areas where water businesses might operate differently or better when responding to customers experiencing family violence.

Opportunities for improvement include:

- **Addressing lack of transparency and clarity in support options.** There is a need to increase transparency and clarity about the available options for customers who are engaging directly with water businesses as well as for financial counsellors. Ideally this includes ways for clients to directly access supports that don't rely on disclosure to generalist customer service teams (e.g. including information on bills that highlights that trained teams with an understanding of family violence are available or advertising a phone line option that allows customers to be put straight through to the family violence specialist team).
- **Addressing inconsistencies within businesses and across the sector.** Whilst the sector overall is believed to be operating well, feedback from financial counsellors indicates that there is variation in levels of service within and between businesses. This suggests that additional coaching and training for water business staff may be valuable, so that best practice options are available to all water business customers, no matter which businesses they engage with. More broadly, there is an opportunity to provide a means of benchmarking water business performance and sharing experiences and good ideas.
- **Addressing the full range of life circumstances experienced by water business customers.** Financial counsellors reported that the options offered by water businesses can be less effective in instances where the cause of debt is likely to be ongoing and that water debts should be considered in the context of clients' life circumstances that may involve meeting other more pressing needs. Water businesses might also consider broader service sector collaboration to reduce the administrative burden of accessing multiple services and the need for victim-survivors to tell their story.
- **Addressing concerns around privacy.** Financial counsellors reported that clients in regional and rural areas can have very real concerns about perpetrators or their connections working in water businesses and being able to access information about them or control their account.



# Findings in detail

## Who we consulted

To provide a contextual understanding for the work of water businesses and financial counsellors, we undertook initial interviews with 3 people working in water business customer service teams and with Financial Counselling Victoria.

Financial counsellors were consulted through qualitative and quantitative research.

In the qualitative research, we spoke with 15 financial counsellors in regional and metropolitan Victoria via telephone and videoconference. This included in-depth interviews and small group discussions. Some were specialist family violence counsellors, others were generalists, and one specialised in supporting people affected by gambling. Whilst specialist family violence counsellors were working with people affected by family violence on a daily or weekly basis, the others were doing so less frequently.

A quantitative survey was promoted to financial counsellors through Financial Counselling Victoria and other networks. Only 18 financial counsellors responded to the survey, too few to undertake formal quantitative analysis. We have instead included head count responses throughout the report.

The following findings are based on the research conversations described above. Recognising the importance of other perspectives, the Essential Services Commission has also commissioned separate projects that will seek feedback from water business customers, as well as from water businesses. Because findings reflect the views of financial counsellors, we have used the term 'clients' to refer to water business customers throughout the report. Because financial counsellors engage with clients in times of financial hardship or uncertainty, this report doesn't reflect the experiences of people engaging with water businesses only to protect privacy, rather than managing both privacy and water debt.



## Overall experience

All of the financial counsellors we spoke to were regularly engaging with Victorian water businesses on behalf of their clients. Overall levels of satisfaction with their experience were high. Compared with other organisations, water businesses were typically seen as easy to deal with. However, water debts were also typically seen as less challenging to resolve. This is because:

- Water debts are generally for smaller amounts – according to these financial counsellors, most water bills are under the amount covered by the Utility Relief Grant (\$650), although they shared occasional examples where debts had accrued to amounts as high as \$14,000.





- The repercussions associated with falling behind in payments for a water debt were seen as less immediate and less severe than for other types of debt, such as a home mortgage or car loan. Whilst a house or car can be repossessed, they felt that water companies are unlikely to cut off someone’s water supply or take someone to court for an unpaid bill.
- Water businesses were – for the most part – considered to be responsible actors that are easy to engage with, are appropriately responsive to experiences of family violence and offer a suitable range of options to address debts.



*[Water businesses] are doing well. I have limited experience of water accounts causing issues – other creditors are often of more concern. Financial counsellor*

The exceptions to overall high levels of satisfaction were due to difficulties involved in understanding what water businesses offer, inconsistent responses to disclosures of family violence, barriers to accessing specific debt resolution mechanisms such as Utility Relief Grants or payment plans, and lack of appropriate debt resolution mechanisms in circumstances where a client’s outgoings outstrip their income on an ongoing basis.

Below we describe the experiences of financial counsellors in more detail, with respect to:

- Gaining access to water business customer service teams
- Appropriateness of water businesses’ response to experiences of family violence
- Appropriateness of debt resolution options.

We also discuss:

- The role of family violence provisions in the water codes and water business policies
- What is working well
- Issues and gaps in implementation
- What water businesses might do differently.

## Access

Although not all financial counsellors had contacted water companies to negotiate on a client’s behalf, most did so on a fairly regular basis. The key factors that improved their experience and access to solutions included recognition of their professional standing and authority to act and ongoing relationships of trust with water business customer service teams. They noted that having specialist customer service teams could be helpful, but not essential to achieving good access to decision-makers in water businesses.



### Negotiating on behalf of clients, and supporting clients to negotiate

Some financial counsellors were advocating to water businesses on behalf of clients, while



others were supporting clients to advocate for themselves.

Financial counsellors reported that clients were less likely to feel that engaging directly with water businesses was a good option for them if they:

- Had very negative experiences in the past with respect to creditors
- Were feeling anxious or overwhelmed by other aspects of their lives (including poor mental health or ongoing experiences of family violence)
- Spoke English as a second language.



*Our local water provider is very good. But sometimes a client comes to us because they are too anxious to speak with the provider. This maybe because they have a history of not being believed or pushed to pay amounts they know they can't afford. Unfortunately, financial counsellors are usually treated with more respect than if the client is calling on their own. Financial counsellor*

## Recognition of financial counsellors' professional standing and authority to act

All financial counsellors in the qualitative sample reported that water businesses recognised their professional standing and authority to act. This contrasts with previous research undertaken for the Essential Services Commission where lack of acknowledgement emerged as a key issue and barrier to service access.<sup>1</sup>

However, some were frustrated that their authority to act did not extend to applying Centrelink concessions on clients' behalf.

## Accessing decision-makers in water businesses

Financial counsellors reported that having established relationships with water businesses made their work easier. Having a 'go to' person or team in a water business meant they could quickly engage as a trusted partner. Whilst the absence of these relationships did not prevent them from achieving the outcomes they were seeking, it was said to make it more difficult and less efficient. To illustrate, a financial counsellor said that first time they interacted with a water business, the representative they spoke to assumed that they would know what supports were on offer. This led to a misunderstanding about what was available to the client.

Financial counsellors also reported that having access to specialist hardship teams supported streamlined engagements and that specialist teams were better trained and had a deeper appreciation of the issues that clients could face. Compared with the service offered by specialist family violence teams in the larger banks or telecommunications companies, water businesses were slightly less well regarded. However, they were generally seen as much better to deal with than online-based services (including smaller financial institutions and internet providers), which only offer the option of automated or email-based communication. Water

---

<sup>1</sup>Available at: [www.esc.vic.gov.au/water/codes-and-guidelines/customer-service-codes/customer-service-code-review-2017-royal-commission-family-violence/water-code-outcomes-review-2019-family-violence-changes](http://www.esc.vic.gov.au/water/codes-and-guidelines/customer-service-codes/customer-service-code-review-2017-royal-commission-family-violence/water-code-outcomes-review-2019-family-violence-changes)



businesses were also felt to have substantially better practices compared with energy and gas retailers.



*They are quite quick to respond. They don't make clients jump through hoops. Sometimes when I am dealing with utilities, I have to speak to 3-4 people. With water, one person can resolve [the issues]. Financial counsellor*

*Water companies are definitely better than others. Take something as simple as getting a Utility Relief Grant or finding out balances, if you ring <water business>, you get an answer straight away. With <energy company>, it'll take 40 minutes - they'll send you to different departments. Financial counsellor*

*In utilities it's highly variable in the way they relate to vulnerable people but the water companies have been really consistent. It feels like you're dealing with a smaller, more competent department...They're great to deal with... they don't come back with unrealistic payment plans. Financial counsellor*

*They are really friendly. It is a small team and we are a small sector and all located in the same LGA. It works quite well. Financial counsellor*

*Yes, working with the specialist team saves the consumer a lot of trauma and having to repeat their story several times. Financial counsellor*

*There is a tailored support of the client whereby the representative of the water business is familiar with the case. The response is then tailored without the need for story repeating and inconsistent responses from the water business. Financial counsellor*

*The specialist understands complexities vulnerable clients experience. They are trained to appropriately communicate with and provide more flexible/tailored/appropriate solutions to these clients. Financial counsellor*

Good local financial counselling options and two-way referral processes between financial counsellors and water businesses were believed to create improved access to financial hardship or family violence provisions. However, financial counsellors we spoke to typically did not receive a lot of referrals from water businesses - most of their referrals come from other sources such as specialist family violence services or other community services. Energy utilities were also mentioned, perhaps because people who have debts with water businesses are also likely to have debts with energy companies and have contacted the latter first. Again, this suggests potential for more holistic service delivery.

## Appropriateness of water business responses

For the most part, financial counsellors reported that water businesses were very responsive when they understood that clients have experienced family violence. They were generally quick to:

- Redirect enquiries to specialist teams





- Ask about safety and wellbeing
- Offer options to protect information privacy
- Believe victim-survivors and respond in an empathetic and non-judgmental manner
- Tailor solutions to water debts that are in the best interests of clients.



*When I'm engaging with water businesses, and I mention family violence I get great support. Financial counsellor*

*They are really sensitive...They believe the [client's] story, no questions. Financial counsellor*

*They are really quite good, they are empathetic, make sure the customer is safe, they will offer stuff we don't ask for. They take initiative, don't give us the bare minimum. I have no complaints. Financial counsellor*

Of the 18 financial counsellors who completed the online survey, most reported that water businesses always or mostly:

- Provided information about hardship provisions (n=13)
- Tailored solutions to clients (n=12)
- Proactively addresses safety (n=11)
- Avoided the need to repeat disclosures (n=11).

The qualitative conversations revealed a few exceptions to this overall positive experience.

- One financial counsellor reported that a water business did not acknowledge a client's experience of family violence and was inflexible in the options offered to the client
- Another said a water business they dealt with tended to be quite suspicious about information provided in Utility Grant Relief applications
- Another described an instance where a friend of a perpetrator was employed in a water business, which led to a client's account being closed and the client without access to water.

In the quantitative sample, a financial counsellor described a water business that they believed behaved consistently poorly towards clients.



*I have not found our water provider to show a caring nature to their clients, family violence or financial hardship. The representative is very judgemental of their circumstances and spends more time making inappropriate comments than listening actively to a client's situation. Financial counsellor*

## Appropriateness of support options

A number of supports are available to people with water debts who are experiencing family violence. In the section below we discuss the factors influencing which options are taken up, and the extent to which financial counsellors believe the options to be useful in meeting the needs of clients.



## Factors influencing which options are taken up

Client	Financial counsellor	Water businesses
Individual circumstances	Knowledge and experience	What's on offer
	Water debts not as serious as other debts	Communication of options
	Streamlining access/reducing administrative burden on clients	Streamlining access/reducing administrative burden on clients
		Perceptions of benefit

Financial counsellors reported that a number of factors influenced what was offered by water businesses and what financial counsellors requested, including:

- **Disclosure of family violence** – Receiving extra consideration with respect to family violence relies on clients disclosing this to financial counsellors and water businesses. Where family violence isn't disclosed to the water business, options such as additional privacy and account protections may not be offered. Financial counsellors typically didn't have visibility of the impacts of this on clients, however surmised that whilst water businesses were likely to meet people's financial hardship needs, they were less likely to tailor service delivery or possibly meet security needs.
- **Tailoring to individual circumstances** – Financial counsellors were alert to the need to tailor responses to meet the preferences and needs of individual clients and believed that this was best practice. For the most part, their interactions with customer service staff suggested that water businesses also understood and respected this need.
- **Financial counsellors' understanding of what is on offer** – Financial counsellors' understanding of the available options and supports was shaped by their interaction with individual businesses and what supports had been offered to them. This didn't always reflect a full understanding of what is possible. To illustrate, one financial counsellor in our small sample wasn't aware that water businesses can waive debts (the business they dealt with most didn't offer this). Another counsellor, new to the industry, was not aware that water businesses are required to publish their family violence policy on their website.
- **Financial counsellors' and water businesses' desire to find the most efficient solution for clients.** When reviewing the toolkit of options on offer, counsellors will generally select the option that will be easiest to negotiate. For example, if a Utility Relief Grant will cover a debt, they can reason that there isn't a need to seek a debt waiver which can be more challenging to achieve.
- **The extent to which a particular option will impose a financial or administrative burden on clients.** Financial counsellors emphasised that clients with experience of family violence are often in highly challenging circumstances and under significantly levels of emotional and financial stress. As such, they tend avoid options that could add to this burden. For example, they may suggest applying for a Utility Relief Grants on the grounds of financial hardship rather than family violence, so that clients do not have to re-tell their story or provide supporting documentation (such as a police report or Family Violence Intervention Order).



- **Perceptions of who has benefited from debt.** In some instances, water businesses appear to make decisions around whether to offer debt waivers based on perceptions of who benefited from the debt. In instances where both perpetrator and victim survivor have benefited from water use, businesses may be less likely to waive debt, without taking into account the role family violence may have played.

#### Explainer – available security and payment support options

##### *Security support options*

Water businesses can take steps to **protect the personal information** of clients by locking an account, using preferred means of contact, and changing account holder names.

##### *Payment support options*

- **Utility Relief Grants** – State government grants available to Victorians holding a concession card or are otherwise deemed to be low income or are experiencing family violence. Up to \$650 is available every two years to support paying overdue water bills. Applications are managed through water businesses.
- **Debt waivers** – Where a water business cancels all or part of a debt.
- **Payment holds or extensions** – Where a water business defers payment of a bill.
- **Payment plans** – Where a water business agrees upon a payment schedule with a client, usually based on a budget developed with a financial counsellor. Plans can be based on a nominal amount rather than reflecting the full extent of the debt.
- **Payment matching** – Where a water business agrees to match contributions as a means of encouraging payment.
- **Use of Centrepay** – Where people receiving Australian Government income support have living expenses such as rent and utilities paid directly by Services Australia, with the remainder of the income support payment then deposited directly to their bank account.
- **Repair and replacement** – Where it is identified that high water bills are a result of leaks or faulty appliances, water businesses can support repair and replacement.

## Communication of options

There were mixed reports from financial counsellors with respect to how well the available remedies have been communicated. Those who had been working in the field for a number of years generally felt well informed about the options. In fact, their ability to locate information and negotiate creative solutions was often a source of pride. However, financial counsellors who were new to the industry noted that it could be difficult to access information on options offered by different creditors. Water businesses are only one of a number of creditors that they deal with, and they felt that information on hardship provisions could be made easier to find.

In addition, financial counsellors felt that water companies should be far more transparent in their communications with the general public and in their direct interactions with clients about the options available to people experiencing financial hardship and family violence. Better promoting the available options to the community sector, and specialist family violence services, was also felt to be a priority.





*They should be more upfront with clients around what the options are if they're struggling to pay the bill, especially if it's due to family violence. Like put on the bill 'if you're struggling to pay your bill due to family or domestic violence, call us on this number, we can help'.*

This was supported by the survey findings. Of the 16 financial counsellors who completed the question about communication in the survey, n=10 reported that water businesses promoted their policies very well or well to them. The number who felt that businesses were doing a good job of promoting these to the general public or family violence services was even lower (n=7 and n=4 respectively).

### Utility of available options

Both the qualitative and quantitative data indicate that Utility Relief Grants, payment plans, extensions and matching appear to be the options that are accessed most often. Debt waivers or maintenance were less common. Financial counsellors were generally satisfied with the suite of options available to meet the needs of their clients.



*I'm pretty happy with the options. You've got payment plans, waivers - water companies good with that if you ask - or debt relief grants. Financial counsellor*

### Utility Relief Grants

Utility Relief Grants appear to be a preferred option (instead of, or in addition to, a payment plan) as they meet the needs of customers (by cancelling or reducing debt) without reducing revenue for water businesses. Financial counsellors reported that the recent change to the grant structure has been an improvement - it means they can apply for financial aid on an ongoing basis rather than having to 'save up' debts to get to the threshold amount.

Overall, the benefits and process of applying for Utility Relief Grants were viewed very positively. However, there were some issues raised. These are detailed in the break out box overleaf.

#### Timeframes

The timeframes for receiving an outcome (up to 8 weeks) were seen as being too long, even though water businesses can offer to hold payments whilst the grants are being processed to reduce the financial impacts.



*It is quite a slow processing time, usually about 6-8 weeks. Financial counsellor*

#### Providing evidence of family violence

The government requirement to offer evidence of family violence to support the grant applicant can pose significant challenges for clients. Financial counsellors say that asking clients to re-tell their story or provide proof can be harmful, and lead to them feeling as if the system doesn't believe them. In many cases, people who have experience of family violence do not report this to the police or may be reluctant to pursue a Family Violence Intervention Order (FVIO). Sharing personal information with water businesses can also leave clients feeling uncomfortable and unsafe (particularly in regional and rural areas where staff involved in the application may know the client and/or the perpetrator). Financial counsellors reported that it can be easier to apply on financial hardship rather than domestic



violence grounds. They said they were as or more likely to apply for provisions designed to generally meet the needs of those experiencing financial hardship as they were to apply for specialist family violence provisions.



*I usually use financial hardship reasons. It is easier to get evidence. Most clients will meet the [financial hardship] criteria that housing is more than 30% of their income. Financial counsellor*

### Application process

Some financial counsellors had more positive experiences applying for grants by email, whilst others felt it was easier to do so by phone. However, depending on the water business, a choice wasn't always available. To illustrate, one financial counsellor was only able to apply by phone with a client present, and said that this was emotionally burdensome for clients and required logistical coordination – their preference would be for email. However, another financial counsellor felt that a telephone appointment was a streamlined way to access the payment for clients. This demonstrates that offering options can be important, and more likely to align with the trauma-informed principle of choice.



*I find it far easier to apply [for Utility Relief Grants] with power providers than I do with water companies. With power companies I can apply over email. Water require the clients to be on the phone, spending time going through a generic application which is unnecessary trauma. Financial counsellor*

### Debt waivers

Financial counsellors reported that debt waivers were not often accessed by clients for water business debts. As mentioned above, this seems to be at least partly because Utility Relief Grants provide an option to support clients whilst remunerating water businesses in full.



*It is not usual that we would need a debt waiver for water. Generally water bills can be covered by Utility Relief Grants. Financial counsellor*

However, beliefs about who is responsible for accumulating and benefiting from the debt could also be a barrier to accessing a debt waiver. Financial counsellors reported that creditors such as water businesses, other utilities, financial institutions and telecommunications companies appear more likely to consider debt waivers if it is believed that the perpetrator, rather than the victim-survivor, was 'responsible' for accumulating the debt. Where a victim-survivor has lived in the same property, the underlying assumption seems to be that they have also benefited from the water use. It was reported that this can make it harder to obtain a debt waiver.



*[The water business] might be more inclined to give a waiver if we can show that [the victim-survivor] didn't accrue debt. Financial counsellor*

*Sometimes creditors will get stuck on family violence and who got the benefit. Financial counsellor*

*When you're looking at clients who are exiting relationships – when the debts are in the name of the perpetrator, and they're trying to escape. When you*



*explain the situation, water companies will waive the debts. 9 out of 10 energy companies won't do that. Financial counsellor*

### **Payment plans and payment matching**

Putting in place a payment plan was another typical option for clients who have regular income. Depending on their income and other debts, the intention of the payment plan might be for the client to pay a reduced amount rather than the total debt. Whilst there were reports that water companies are less likely than other utilities to pressure clients into agreeing to a plan that they cannot afford to maintain, they do appear to prefer that clients pay a nominal amount (for example, \$10 a week or month) rather than waive the debt in full. Water businesses can sometimes tie payments to matched payments or partial debt waivers. As with extensions or holds, financial counsellors pointed out that if debts are accumulating faster than payments are made, this is not a sustainable solution.



*Payment plans don't really work unless you are keeping up with usage you are still going to have a debt accumulating. Financial counsellor*

*When people flee, they typically have a raft of debts and very little resources to set themselves up. I think there is a case for utilities and creditors to play a role in recovery. If that is 1-2 years [of reduced bills] then so be it. Financial counsellor*

*When leaving a violent relationship, a lot of things might change, budgets are fluid. Sometimes my clients are homeless, sometimes they are paying rent and utility bills on two properties. This leads to tricky conversations and obstacles. Financial counsellor*

### **Extensions or 'holds'**

Financial counsellors reported that extensions, or 'holds' as they are commonly referred to, could be useful in times of uncertainty. To illustrate, we heard of numerous examples where extensions or holds were applied for customers going through court cases. Whilst this was welcomed as a flexible approach, extensions could be unhelpful if water debts were still accumulating. Financial counsellors said that ultimately clients would face a larger debt without necessarily having more resources to pay.

### **Reduction in water usage through maintenance/appliance repair or replacement**

Financial counsellors reported that clients were rarely offered maintenance/ appliance repair or replacement as a solution.

### **Privacy protections**

Financial counsellors didn't typically have deep insight into how privacy protections were being offered and clients' privacy upheld. There appears to be an opportunity to undertake additional communication/training on this topic.



## Role of codes in supporting client responses

Although some of the financial counsellors we spoke to as part of the qualitative research were aware that there are water business customer service codes, they were not familiar with the details of these codes. They were typically more likely to refer to the policies of individual water businesses than the codes and often more interested in the tactics (options such as Utility Relief Grants, for example) than the strategies or logic behind them. In the survey, only 5 of the 18 respondents said they were very familiar with the water codes and 6 were familiar with the financial hardship/family violence policies of the water businesses they deal with.

Financial counsellors who were new to the industry noted that it can be difficult to build a good understanding of all the policies and options that are relevant to clients because they deal with so many businesses (across a large number of sectors).



*I know there's a code and I've probably got a copy of it here somewhere but if I need to refer to anything it would be the Financial Hardship Framework not code that sits behind it. Financial counsellor*

*It's been many a year since I've had to pull out the code and wave it around at a water company. I guess that's a good sign, that I haven't had to play hard ball with them. Mostly they've been great. Financial counsellor*

But whilst the water codes and water business family violence provisions are not top of mind, financial counsellors reported that they can be a useful resource when they need to raise an issue or hold water businesses to account. Better awareness of the codes and provisions would support this, as would avenues for reporting breaches.

## What is working well?



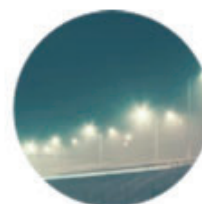
**Community orientation**  
Water companies were seen to be more pro-social and connected to the communities they serve



**Staff capability**  
Training / staff mostly following best practice



**Problem solving**  
Willingness to offer tailored solutions/be creative



**Personalised approach**  
Offering continuity of contact

According to the financial counsellors we spoke to, **water companies were seen to be more pro-social and connected to the communities they serve** than most energy and telecommunications retailers where the culture was more corporate, and sales focused. Financial counsellors reported that most customer service staff in water companies seem to have had at least some **training** around hardship and family violence issues and were family violence informed. This was felt to make all the difference in achieving good service delivery.

For the most part, water business staff were reported to be compassionate, non-judgemental,



and open to working with financial counsellors and clients to find solutions that were in the best interests of vulnerable clients, rather than focusing on recouping debt or locking clients into unrealistic payment plans.

Financial counsellors also said that water business customer service staff were mostly following good practice when engaging with clients who have disclosed family violence. Examples of this included not pressing for details, demanding proof, or handballing between departments. In many cases, the person who takes the call can follow through until the matter is resolved, eliminating the need for clients to re-tell their story.



*They know what they're doing, they're able to do it all within the same department... they seem to be better trained. They're a bit wobbly when they're new, but once they're got some experience, they're generally very good.*  
Financial counsellor

*They don't tend to ask for supporting documents to prove family violence. That's a big taboo and they respect that.*  
Financial counsellor

The **'toolkit' of options** for dealing with debt was generally seen as offering a holistic and flexible means of supporting clients with experience of family violence. (As we explain below, the exception is where financial counsellors and clients lack awareness of all of their options or where the client's circumstances are particularly complex.)

Water businesses' **willingness to offer tailored solutions and practice flexibility and responsiveness** was also believed to be a key strength. For example:

- using holds to support those going through uncertain times
- visiting clients and introducing the option of hardship provisions before introducing more punitive approaches (such as flow restrictions)
- in some cases, offering additional supports, such as a Coles voucher or help with maintenance, which was seen as a thoughtful and kind gesture.

It was also reported that some water businesses appear to take pride in their ability to offer a **more personalised approach**, where customers identified as needing more support had the opportunity to engage with the same customer service team member over time, enabling rapport and relationship building.

## Issues and gaps in meeting client needs

Financial counsellors pointed out that whilst their experience with water businesses has generally been good, there are several possible system gaps or shortfalls that might limit support available to clients.

### Addressing lack of transparency and clarity in support options.

Accessing specialist family violence supports relies on people knowing that these exist and being willing to disclose their circumstances to water business customer service teams.

Financial counsellors believe that if customers contact water businesses directly and don't have



access to specialist advice they are much less likely to be aware of or ask for the full gamut of support options that are available to them. Moreover, financial counsellors who are new to the industry or have a narrow experience of water businesses may not have a good or full understanding of the options on offer.

### Addressing inconsistencies within businesses and across the sector

Whilst water businesses are generally believed to be operating well, feedback from financial counsellors indicates that there is variation in levels of service within and between businesses. This includes the extent to which customer service staff engage empathetically and with respect with clients, and whether the full range of debt resolution and privacy protection options is made readily available.

Financial counsellors noted that the sheer range of options available to resolve debt and meet privacy needs means that some clients may need help to interpret the options and decide on the best course of action.



*A lot of people struggle because of the amount of options on offer, and they don't necessarily know which one will fit them. The Utility Relief Grant forms, for example, could be simpler, especially for people with literacy issues. Financial counsellor*

### Addressing the full range of life circumstances experienced by clients experiencing family violence

Financial counsellors reported that the options offered by water businesses can be less effective in instances where the cause of debt is likely to be ongoing. This includes where people are experiencing ongoing abuse, where outgoings exceed income (as may exist in instances of ongoing financial coercion) and where people's living circumstances and sources of income are uncertain (for instance, immediately after leaving a violent relationship). These circumstances appear to be fundamentally at odds with water businesses' desire to resolve debt and manage business sustainability.

Financial counsellors also felt that water debts should be considered in the context of clients' life circumstances that may involve meeting other more pressing needs (such as the need to find safe housing, to feed and clothe children, or attend court) as well as servicing other debts. In this broader context, water debts may be a low priority and the effort required to resolve these can be seen as disproportionate.



*People are engaging with financial counselling, but how many other support services are they liaising with at any one time? In our experience, people sporadically engage or disengage with financial counsellors. They are dealing with trying to get AVOs, lawyers, court proceedings, safety, children's safety, trying to find accommodation as well as finding time for us. Financial counsellor*

### Privacy

Financial counsellors reported that clients in regional and rural areas can have very real



concerns about perpetrators or their connections working in water businesses and being able to access information about them or control their account. (It was reported that in one case, a perpetrator who worked in the company water was able to access the client's account and cut off her water supply). Concerns around privacy is a barrier to service access, especially in regional areas, and need to be addressed.

## New or emerging issues

The increasing cost of living and creditors reactivating debt collection arrangements post COVID mean that, increasingly, people may be less able to pay back debts on a payment plan, particularly if trying to make do on income support payments.

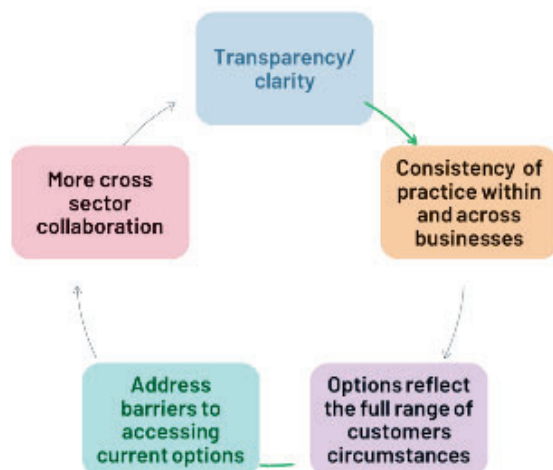
Paying a water bill can be very low on people's list of priorities – in some situations, financial counsellors are recommending that clients do nothing, and ignore the water debt, and focus on more pressing issues (like rent and food).



*People have competing priorities and their income going nowhere near meeting these. I find that more and more people can't pay all bills. You see this with power clients. Bills come in \$10,000 in arrears for gas and electricity and people can't pay it. They just let the debt accumulate. We haven't seen this situation with water yet, but I fear it could come. Financial counsellor*

*I would love to see more economic options. Clients can only access the Utility Relief Grant once every two years. \$650 across two years goes very quickly. Financial counsellor*

## What water businesses might do differently



There are a number of areas where water businesses might operate differently or better when responding to customers experiencing family violence. We note that any changes will need to balance the tension between identifying what good practice looks like while avoiding being prescriptive so that responses can still be tailored to individual customer preferences, needs and circumstances.

These are summarised in the diagram at left and outlined in more detail below.

### Transparency /clarity

There is a need to increase transparency and clarity about the available options for clients who are engaging directly with water businesses as well as for financial counsellors.

For financial counsellors, providing an easy way to get a full understanding of all the options offered by each water business would help them better advocate for their clients. For instance,



better promoting the Energy and Water Ombudsman Victoria (EWOV) 'cheat sheet' or other easily accessible online resources. Better promoting both family violence policies and the water codes would also be valuable.

Better promoting the options on offer to clients with experiences of family violence is important. Promotion should consider natural touchpoints such as water company communication and community services that clients are already engaging with, and that warm referrals may be needed by some clients. This will be even more critical where clients have barriers to access due to concerns about cultural safety, lack of access to appropriate communication technology, having an intellectual disability and not speaking English.

Information provision should consider the need to provide reassurance that contact points are family violence informed, and are quick and easy to access. For example, this could involve including information on bills that highlights that trained teams with an understanding of family violence are available or advertising a phone line option that allows customers to be put straight through to the family violence specialist team.

This information will ideally be accompanied by the option to access support to navigate options. Financial counsellors noted that they can have waiting lists, and that some people might be trying to navigate debts without knowing that they have the option of further support.

The idea of 'informed support' has been raised in this context – support needs to recognise that clients may be experiencing a sense of overwhelm or heightened anxiety, however, still provide clients with choice and control and not reduce agency.

## Consistency of practice within and across businesses

This study has highlighted the need to ensure consistency of practice within and across businesses so that that best practice options are available to all water business customers, no matter which businesses they engage with. The data suggest that that addressing consistency requires change at the level of:

- **Sector:** Water businesses appear to operate in a relatively siloed fashion when it comes to offering additional supports to customers. There is an opportunity to provide a means of benchmarking water business performance and developing ways to share experiences and good ideas. For example, this might involve developing a self-assessment tool where water business can self-audit the quality of their response and get a sense of the relative maturity of their business. It could also include the development of communities of practice where businesses can learn from each other and workshop solutions to common problems.
- **Business:** The role of senior leadership in setting culture, and resourcing specialist teams and training all staff to a minimum level is critical. Processes such as sending out automated letters can unwittingly contribute to distress and privacy breaches, and will ideally be audited. Better protections against perpetrators or their connections working in water, and developing solutions that meet regional water business customer concerns about privacy will also be important.
- **Individual:** Feedback from water businesses suggested that in many organisations family violence training for staff has not been provided over the last few years due to COVID. There



is a need for businesses to consider refreshing training with respect to trauma and family violence and coaching staff to ensure greater consistency in the application of the water codes. Coaching needs to reflect that staff can unconsciously hold biases about family violence that don't support a strengths based approach, and that empathetic communication doesn't come naturally to all.

### Options reflect the full range of customer circumstances

Water businesses might consider broader service sector collaboration to reduce the administrative burden of accessing multiple services and the need for victim-survivors to tell their story more than once (similar to the Thriving Communities One Stop One Story project).



*Most of the people with family violence experience are accessing a few services at once. They have to access so many services to get their needs met. If we have the client's permission, we can collaborate. For example, housing often wants to know where they're at with finances. If a client has a social or support worker they might help gather documents that we need to do our role. Financial counsellor*

### Address barriers to accessing current debt resolution options

Water businesses may consider addressing barriers to clients accessing debt waivers, the Utility Relief Grants, and payment plans. Barriers include inconsistent access to options, for some, a lack of suitable options, and requirements to provide evidence that aren't always managed in a trauma informed way or easy to meet. We note that the state government requirement for proof of family violence for the Utility Relief Grant is not a water business responsibility, but an area where water businesses might advocate for change.

In addition, there is a need to balance efficient debt resolution with meeting other needs (for example, offering higher order benefits such as maintenance).

## Summary of barriers and enablers

Below we have summarised barriers and enablers to clients accessing water business debt resolution and privacy protection services, and opportunities to address this.

Point in time	Awareness	Enquiry	Consideration of options	Maintenance
Barriers to service access for clients	Lack of readily available public information on supports for people experiencing family violence and financial hardship	Lack of clear pathways in or warm referrals Reluctance to disclose family violence - and hence be connected with appropriate support Judgemental / non empathetic water	Multitude of options - can be difficult to navigate or know rights without support Uncertainty about living circumstances and income	Ongoing disconnect between outgoings and income or complex life circumstances



		<p>business customer staff</p> <p>Perpetrators / their connections working in water businesses</p> <p>Lack of privacy in regional areas</p>	<p>Not all options available to all clients</p> <p>Barriers to uptake of some options (e.g. Utility Relief Grant)</p> <p>Clients have competing life challenges</p>	
<i>Drivers to service access for clients</i>	<p>Knowledgeable and experienced financial counsellors</p> <p>Connection to the service sector including specialist family violence services</p>	<p>Ready access to specialist, trained hardship teams</p> <p>Positive water business culture</p>	<p>Low administrative burden to uptake of options</p> <p>Options are provided in a timely fashion</p>	<p>Water businesses support clients according to their preferences</p>
<i>Opportunities to improve access</i>	<p>Better promotion of family violence/financial hardship provisions at access points where clients are likely to see this (e.g. bills, community services, council websites)</p>	<p>Reassurance that contact points are family violence informed, are quick and easy to access etc.</p> <p>Improve consistency of water business practice through training and development of communities of practice</p>	<p>Increased support for clients to make informed choices (when advisors such as financial counsellors aren't present)</p> <p>Address barriers to accessing current options</p>	<p>Water businesses consistently provide support according to client preferences</p>



# Conclusion

The findings of this research suggest that, for the most part, water companies are following good practice when working with financial counsellors to find solutions for clients who have experienced domestic violence. It also seems that the toolkit of remedies available provides sufficient flexibility to address the needs and preferences of most.

But whilst these are encouraging findings, there are opportunities to do better. A key concern has to do with the issues raised around privacy, particularly for those living in regional and rural areas. Although reports that perpetrators working in water businesses had been able to access the personal details and control the accounts of victim-survivors of domestic violence were infrequent, incidents such as these pose a significant safety risk and must be urgently addressed.

The findings also suggest the need for greater clarity and transparency around the suite of options available to customers who have experience of financial hardship and/or family violence, including pathways that do not rely on people disclosure of family violence. Increasing training and coaching opportunities for staff as well as ways for companies to assess performance against industry benchmarks and best practice could also help to address inconsistencies in practice within water businesses and across the sector as a whole.