

# Residential Hardship (Customer Support) Policy



## 1 Purpose

This policy describes how South Gippsland Water supports residential customers experiencing financial hardship or other circumstances that impact on their ability to meet payment obligations and access SGW services generally.

## 2 Definitions and Acronyms

For the purposes of this policy only, the following shall mean:

**Customer Support Program:** The South Gippsland Water program that provides a range of support mechanisms as outlined in this policy to enable full and equitable access for eligible customers to water services, information resources, and communication with the Corporation, where personal circumstances currently render such difficult without the supports available through the Program. The Customer Support Program includes measures to respond to Financial Hardship as defined by the Essential Services Commission.

**Eligible Customer:** A natural person holding an account with the Corporation for water or wastewater services, through owning a declared residential property within a declared water district or occupying such a property as a tenant or through other legal arrangements with the owner.

**ESC:** Essential Services Commission.

**Financial Hardship:** A temporary or longer-term set of circumstances where a customer has the intention but not the financial capacity to make required payments within the corporation's usual payment terms. Where there are arrears there is not financial capacity to repay within 12-months while maintaining payment of new charges incurred during that period.

**Non-Residential Customer:** The following circumstances will in most circumstances (see paragraph 3.1.1 for exceptions) make the customer ineligible for accessing supports under this policy:

- Being identified as a business entity including an agricultural business (but excluding domestic use by account holders at their primary place of residence – see definition of Residential Customer below);
- An account relating to a property owned by the customer that is not the primary residence;
- Operating as a landlord;
- Service provision governed through a common-law contract with the Corporation such as a Water Services by Agreement customer;
- Occupying a property illegally; or
- Having been proven as previously acting in the adverse interests of the Corporation, such as engaging in water theft.

**Residential Customer:** A natural person owning or occupying (as a tenant or resident through private arrangements) a primary place of residence serviced by SGW, and for which they are responsible for the property service charge and/or consumption tariff.

**SGW:** South Gippsland Water.

**EWOV:** Energy and Water Ombudsman Victoria

## 3 Policy

### 3.1 Policy Statement

SGW recognises customers can experience a range of circumstances that affect their ability to access services or meet account obligations, either for a limited period of time, over an extended period of time or on a permanent basis. Through the Customer Support Program (the Program),

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the Corporation is committed to delivering a range of supports that respond to individual customer needs, with the goal of enabling uninterrupted access to all services through flexible and effective payment and communication mechanisms.

The Customer Support Program will deliver supports that ensures payment obligations are met over time, in a manner that responds to individual circumstances including, where appropriate, tariff relief or incentives.

A minimum set of obligations are outlined by the ESC in the Customer Service Code – Urban Water Businesses focussing on financial hardship and support customers experiencing family violence. This Policy responds directly to those code obligations. This policy includes measures that equate to a Financial Hardship Policy. In publishing this policy, SGW deems the obligation to publish its Financial Hardship Policy has been met.

## 3.1.1 Eligibility

An eligible customer may be nominated for inclusion in the Program either by themselves, the water business, an independent accredited financial counsellor or other relevant support or welfare agency. Information relating to the following, in part drawn from the *Victorian Water Industry Residential Hardship Guide 2008*, will be applied in deciding whether to offer Program participation.

- Eligibility for concessions;
- Confirmed status as a tenant;
- Previous application/s for the Utility Relief Grant Scheme including where unsuccessful;
- Payment history;
- Disclosure of family violence;
- Ill health or injury;
- Unemployment;
- Separation or divorce;
- Grief or loss;
- Other social circumstances that impact the ability to access services including difficulties communicating;
- Self-assessment by the customer where there are no objective contradictions known to SGW.

Where a customer has participated in the Program previously, re-entry to the Program, and therefore accessing supports under this Policy again, may resume upon circumstances arising consistent with the criteria above. There are no limits to the number of times a customer can enter and re-enter the Program.

In exceptional circumstances, assessed on a case by case basis, a customer otherwise deemed ineligible may be approved to access supports under this policy. Such assessment will be approved by the General Manager, People Culture and Customer.

## 3.1.2 Early Identification

Early identification of circumstances suggesting benefit for the customer in entering the Program will be prioritised through monitoring of account payment history, customer communications and training for SGW employees.

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### 3.1.3 Acceptance into Customer Support Program

Where an eligible customer is offered Program participation, they will be deemed as participating in the Customer Support Program upon the customer confirming their interest in, and acceptance of support arrangements specified in advance. Acceptance of terms may be through verbal or written acceptance, as most appropriate to the capacity and circumstances of the customer. Records will be maintained of acceptance specifics.

### 3.1.4 Supports Available

Depending on individual circumstances customers will have different needs and require different solutions to respond to these needs. Supports available under the Program include:

- A flexible payment plan, consistent with the capacity of the customer to pay so long as debt /reduces during the period the plan is agreed for, and this period is no more than two years, with one year being the preferred plan period and offered as the first option. Plan conditions include exemption from interest charges whilst the agreement is honoured or in place;
- During the period of the agreement while terms are honoured, or following non-adherence that occurs before a final notice is issued, exempting customers from:
  - supply restriction;
  - legal action;
  - debt recovery costs;
  - waiving of any interest accrued prior to the customer being identified as eligible for hardship supports;
  - exempting the debt from the accrual of interest on overdue amounts during the customer's period of hardship.
- Complete or partial debt waiver, including (where a customer is eligible) as part of a payment incentive program;
- Offering information about or referral to government assistance programs, including the Utility Relief Grant Scheme, no-cost independent financial counsellors and, in the instance where Family Violence is disclosed, specialist Family Violence support services;
- Offering information on how to reduce water usage and improve water efficiency and referral to relevant government assistance or water efficiency programs as available;
- Access to a language interpreting service or a Text Telephone (TTY) facility at no cost to the customer;
- All published customer documents available in accessible formats, and format, language and delivery channel appropriate for audiences with diverse needs;
- An individual staff contact assigned;
- A written agreement specifying supports available, and terms of participation in the program.

Some of these supports are available to all customers and access to one or more of them does not of and by itself deem the customer as a participant of the Customer Support program.

### 3.1.5 The Agreement

Upon an agreement being reached SGW will, within 10 business days:

- Provide the customer with an introductory communication in writing confirming participation in the program and arrangements for participation;
- Include support agreement details, including payment arrangements;

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- Ensure the customer has information provided about their options to communicate concerns or disputes, and the resolution options available including the Corporation's dispute resolution policy and the customer's right to lodge a complaint with external dispute resolution forums, including the EWOV.

### 3.1.6 Dissolving the Agreement

Customers may cease to be eligible for, and exited from the Program if:

- The customer account is not in arrears and any other circumstances that have impacted ability to meet payment obligations or access services have resolved;
- Repeated and extended breach of the Customer Support Agreement has occurred, and no payments are made for a six-month period.

Where a customer is exited from the Customer Support Program with an account in arrears, they may be subject to debt collection processes. Interest will resume accruing in this circumstance and may be retrospectively applied. Where a property owner is participating in the Program and their property is sold, their eligibility for continuing inclusion in the Program will be assessed based on the circumstances of any new account established with SGW.

### 3.1.7 Dispute Resolution

Where support options cannot be agreed, or the Customer becomes dissatisfied with the agreement, SGW will again provide information about the Corporation's dispute resolution policy and the customer's right to lodge a complaint with external dispute resolution forums, including the EWOV.

## 3.2 Principles

SGW will:

- Treat all customers with sensitivity and without making value judgments;
- Always respect customer privacy in personal communications and in the handling of sensitive information in Corporation databases;
- Use communication methods that are appropriate to the needs of the customer including all resources being fully accessible to those with a disability, limitations in using or accessing digital technology, or social factors that impact how a customer interacts;
- Make all effort to identify any need for additional support early and prior to accounts moving into arrears;
- Reach agreement with eligible customers on the most appropriate support/s for their circumstances, including information about or referral to relevant regional support agencies, through respectful communication via means appropriate to the customer;
- Monitor the operation of customer support agreements to proactively identify any issues as early as possible, and communicate with customers to establish alternative arrangements if necessary;
- Detail the circumstances in which this policy will cease to apply to customers accessing supports;
- Ensure employees receive regular and broad training in working effectively with the range of customer circumstances and communication needs this policy supports.

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## 4 Responsibilities

To achieve this policy the following key roles, responsibilities, and commitments have been identified.

**General Manager People Culture & Customer** is responsible for:

- Maintaining a Customer Support Policy inclusive of Financial Hardship policy provisions;
- Ensuring communication of the policy across SGW;
- Ensuring all SGW staff are aware of their role in executing the policy;
- Approving all applications for hardship support that carries a financial cost within approved delegation.

**Customer Service Team Leader** is responsible for:

- Ensuring Customer Service team procedures align to this policy and accommodate whole of SGW customer interactions;
- Ensuring Customer Service staff are appropriately trained in dealing with customers experiencing financial hardship and other circumstances making them eligible for participation in the Customer Support Program;
- Ensuring this policy is understood by all Customer Service staff;
- Approving all applications for hardship support that carries a financial cost within approved financial delegation.

**Customer Service Staff** are responsible for:

- Participation in training relating to this policy;
- Always working consistently to this policy;
- Approving all applications for hardship support that carries a financial cost within approved financial delegation.

**SGW Employees** are responsible for:

- Participation in training relating to this policy;
- Referring customers to the Customer Support program where appropriate.

## 5 References

- Victorian Water Industry Association Industry Guide on Residential Hardship  
 Essential Services Commission Customer Service Code – Urban Water Businesses  
[PCS-004 Customer Account and Debt Management Policy](#)  
[PCS-028 Family Violence Policy](#)  
 SCS-004 Customer Account and Debt Management Procedure  
[SCS-004a Issuing Final Notices Procedure](#)

This document is to be reviewed in **August 2022** or earlier as required.  
 This document must not be released to external parties without approval by the  
 Managing Director.

DOCUMENT APPROVAL		
Senior Management Approval:	Meeting No.: 603	Date: 14/08/2019
Managing Director Signature:		