

CUSTOMER VULNERABILITY POLICY

Supporting our customers who are experiencing vulnerability

1. Purpose

The purpose of this policy is to acknowledge our need to be supportive of our customers and describe how South East Water works to support customers experiencing vulnerability.

Our priorities when working through your situation

- Make sure that you are safe
- Ensure the privacy of your personal details
- Understand your current situation
- Match the right support option for your circumstances
- Help you get back on your feet

2. Scope of policy

This document is a public statement of South East Waters approach to supporting our customers who are experiencing vulnerability and finding it difficult to meet their ongoing bills and/or any accrued liabilities. Through this policy we recognise that there are many reasons that drive affordability issues and our role is to support our customers through these issues to allow them to get back on track with their payments.

Through this policy we recognise that there are many reasons that drive customer vulnerability and our role is to support our customers through the challenges they may be facing.

Adapted from the definition of vulnerability provided by the ESC in it's Getting to fair final document (August 2021) South East Water works to the following definition of customer vulnerability

Vulnerability is a state in which a customer may experience payment difficulties at any time in their life due to both seen and unforeseen circumstance and find it difficult to manage their bill.

We recognise that vulnerability may be reflected through,

- **Social exclusion** from things such as age, language barriers, regional limitations, digital exclusion and disability
- **Physical and emotional harm** from natural disasters, poor mental health, and domestic violence
- **Economic reasons** that come from loss of employment, reduced income, illness or injury, relationship breakdowns and changes to family circumstances

Whilst this list is not exhaustive it recognises the breadth of circumstances that our customers face daily. We also acknowledge that our customers may experience these issues for varying lengths of time throughout their relationship with South East Water.

This policy applies to all South East Water customers who want to pay but can't pay everything in accordance with South East Water's standard payment terms. These customers can be identified either by themselves, South East Water, or an independent accredited financial counsellor.

3. Definitions

Within this policy, unless otherwise stated, the following definitions apply:

Community partner	South East Water engages a community partner to provide independent expert advice on our support for customers, and also as a referral point for those customers needing greater assistance. They offer free and confidential financial counselling to customers who require support with other creditors or in other areas of their lives and, where applicable, refer customers to other specialist agencies.
Customer Vulnerability program	A specialist team appropriately trained to deal with sensitive customer issues including ongoing account management for customers impacted by family violence. This team does not provide counselling service but can provide a range of practical support options and assist residential customers experiencing financial difficulty.
Hardship customer	A customer who wants to pay, but can't pay everything, is experiencing extreme or long term financial difficulties and in need of more extensive support.
Vulnerable customer	A customer at risk of being unable to meet their ongoing financial commitments.
South East Water Customer	The owner or occupier, including tenants, of a dwelling used for residential and non-residential purposes.

4. Supporting our customers experiencing vulnerability

STEP1. Understanding your situation and likely duration of support that you will require

Prior to being able to assist it is important to understand your situation. This will help in understanding the most appropriate options to assist you. Any information you can provide that helps us understand your current challenges and needs will assist in making sure the most effective support can be tailored to your circumstances.

South East Water will protect the privacy of your personal information and recognise the trust placed in us when you supply us with your personal information. We are bound by the Information Privacy Principles under the Privacy and Data Protection Act 2014 (Vic) "Privacy Legislation" our privacy Charter is available on our website

STEP 2. Understand your expectations of what support you need

We recognise that you may have some thoughts on the support you require. If you are clear with us on the outcomes you would like we can work on the solution that through working together will support you to get there.

STEP 3. Making an affordability assessment to determine the available options to assist

In working through any solution it is important to understand the your ability to, meet your ongoing usage bill, and, catch up on any outstanding amounts

Meet your ongoing usage bill

The understanding of this will assist in tailoring the right solution for you. Ultimately the first step is to ensure you can meet the ongoing bill. This is completed by confirming with you that you can pay for the ongoing usage. If the answer to this question is yes then the solutions offered will look to reducing or eliminating the outstanding amounts.

If the answer is no then understanding what is driving your current situation to determine additional support you may require such as from a financial counsellor to provide independent assistance with all of the current challenges you may be facing.

Catching up on any outstanding amounts

If you can meet your ongoing usage bills then focus turns to the repayment of the outstanding amount. Based on your self-assessment we seek to understand how much you can contribute to reducing the outstanding amount. Once we understanding what you can contribute and for how long we can work through the available support options to assist you through your current situation.

STEP 4. Match the appropriate solution to your current situation

The complexity of managing a diverse group of communities, cultures, and customers across an equally diverse set of circumstances requires South East Water to maintain a portfolio of options to support the different needs our customers face.

Once the nature of your situation is understood it is easier to match potential support options. Any support plan will be realistic and where possible provide opportunities for South East Water to support you. This support can take the effect of,

- Allowing you more time to pay, spreading out the outstanding amount to be paid over a longer time frame of up to 24 months.
- Where opportunities are identified South East Water will assist in ensuring you receive any government benefits you may be eligible for such as an Utility Relief Grant (URG) and use of government concessions
- Assisting you in understanding your water usage, conducting water audits and provide plumbing assistance for any works that may be required to your property
- The provision of South East Water grants to assist in clearing outstanding amounts
- Connection with an independent Financial Counsellor who can assist you in understanding options available to you that will assist not just with your dealings with South East Water but other organisations such as banks

5. Policy statement

South East Water is committed to assisting customers who need support. Support can vary and may consist of a range of options. These include but are not limited to:

- Payment plans
- More time to pay
- Water usage advice
- Hardship relief grant scheme (sewerage connection scheme)
- Water audits and related plumbing works
- Government grants
- Financial counselling
- Debt waivers

We understand that our customers may experience financial hardship, at any time. Our customers in hardship are treated with understanding, sensitivity, and respect and without value judgement, and their circumstances are kept confidential.

While customers are actively engaged with the Customer Care program, their account will be exempt from having their water supply restricted and any legal action or additional debt recovery costs. This may include waiving any interest accrued prior to the customer being identified as in hardship and exempting the debt from accruing further interest.

5.1 Family violence

Any customer identified as experiencing or being impacted by family violence will be eligible for entry into the Customer Care program. Customers will be offered a tailored solution and support options. While customers are being supported they will receive one on-one case management, where practical, to minimise repeat disclosure.

5.2 Privacy

We appreciate the importance of protecting our customers' personal information and recognise the trust placed in us when they supply us with their personal information. We are bound by the Information Privacy Principles under the Privacy and Data Protection Act 2014 (Vic) "Privacy Legislation". Our Privacy Charter is available on our website.

5.3 Your Commitment to us

We will do our best to assist you in getting/ maintaining your account under control and will put that commitment in writing to you once we have an agreement in place.

However in return we ask that you:

- Maintain this agreement
- Keep us informed of any changes to your circumstances
- Contact us if you are finding it too difficult to meet your payments
- Seek the services of a financial counsellor if required.
- Where appropriate, make the required changes to use less water
- Stay in contact. We may contact you every now and then to check in to ensure everything is going ok.

5.4 Exiting the Program

Customers who have been successful in getting their account back on track, will upon mutual agreement be exited from our programs.

Customers who do not demonstrate genuine efforts to make payments in accordance with the agreed payment plan, reduce their water usage and/or communicate with us, risk being exited from our assist program and placed into our normal debt recovery cycle.

5.5 Policy access and review

This policy is published on the South East Water website and is available upon request.

This policy and supporting processes will be reviewed to ensure they comply with all applicable statutory and regulatory requirements and other related obligations.

5.6 Dispute resolution

In accordance with our Customer Charter, a customer will be offered information on South East Water's dispute resolution process and their right to lodge a complaint with

the Energy and Water Ombudsman of Victoria (EWOV) upon request if they are dissatisfied with the resolution offered by South East Water.

6. Communicate with us

We recognise that those experiencing vulnerability can find dealing with financial situations confronting and stressful. At South East Water our first priority is to make sure you get the right support that will assist you through your current situation as quickly as possible.

Requests for assistance need not be lodged in writing. South East Water is happy to receive your requests via the following methods



Web

www.southeastwater.org.au/support



Email

Support@sew.com.au



Phone

0395523540



Mail

P.O Box 2268 Seaford
Vic 3199

We also invite all customers experiencing vulnerability to keep South East Water informed.

Options available to assist those who might need additional assistance in communicating with us

If English is not your first language and you would like to communicate in a preferred language other than English you can access the Australian Governments free interpreting service by contact the National Translating and Interpreting Service (TIS) on 1800 131 450 or for further information about phone and on-site service please visit the TIS website <https://www.tisnational.gov.au>

For people who are deaf, hard of hearing or have a speech impairment, the National Relay Service provides free assistance. 24-hour contact information can be found on the National Relay Service website:

<https://www.communications.gov.au/what-we-do/phone/services-people-disability/accesshub/national-relay-service>

For anyone requiring an Auslan interpreter, please access the National Auslan Interpreter Booking and Payment System or contact us and we can assist with making this booking. <https://www.nabs.org.au/>

Response timeframes

Acknowledgement of receipt of your request verbal or in writing within 5 business days.
Responding to your request verbal or in writing within 10 Business days.

Our ask of you

Please keep us informed of your situation. The more we know, the greater we can support you.

7. Related policies

BS 2485 Customer Charter
BS 2792 Family Violence Support Policy

7.1. Legislative compliance

Essential Services Commission Customer Service Code Urban Water Businesses

8. Approval

Approved by:	Executive Management
Approved on:	3 August 2021
Sponsor:	General Manager Customer and Community
Implementation:	Affordability and Payments Leadership Group
Review date:	2 years from approval