

Friday 6 September 2024

Essential Services Commission

By email: water.compliance@esc.vic.gov.au

To the Essential Services Commission,

RE: Proposed guideline on self-reporting non-compliance with the Water Industry Standards

I am writing on behalf of Financial Counselling Victoria (FCVic), the peak body for financial counsellors in Victoria who collectively assist more than 23,000 of the most vulnerable Victorians every year.

I write today on your consultation on the proposed guideline on self-reporting non-compliance with the Water Industry Standards and related materials. This is an important piece of guidance which promotes transparency and accountability for water businesses, and we support its overall purpose.

We do make three additional comments for your consideration, as follows:


1. **Experience of vulnerability** – The guidance and reporting template both use experience of family violence or use of life support equipment as examples of vulnerability, which is important. We suggest that other forms of vulnerability, such as those expressed in sections 13.6 and 13.7 of the Water Industry Standards (Urban) and 11.8 and 11.9 of the Water Industry Standards (Rural) relating to communication assistance, and those clauses relating to payment hardship should also be noted as other examples of vulnerability which should be reported.
2. **Complaints** – We suggest that the reporting template should provide more columns relating to any complaints made, as this helps to reinforce a customer empowerment approach. For instance, this may include reporting on how many complaints were resolved at the initial point of contact, how many were escalated through internal or external dispute resolution, the average length of resolution of a complaint, and final outcomes of complaints.
3. **The importance of staff training** – Financial counsellors often report that the main gap between best practice guidelines and obligations in industry standards is often in the adequacy of staff training, particularly in ensuring a high-quality standard level of training for all staff members rather than concentrating all skills and training within a specialised team.

As such, we suggest that all guidance to water businesses should include an emphasis on training staff appropriately. In this instance, page 2 of the draft guidance which notes “The Water Industry Standards place the obligation on the water business to identify and report to the commission.” could include a line of “Water businesses are

encouraged to ensure all staff understand how to identify reportable potential or actual non-compliance to the appropriate department within the business.”.

Thank you for your consideration. To discuss this letter further or for any further queries, please contact FCVic’s Advocacy Coordinator Amanda Chan on achan@fcvic.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Zyl', with a long horizontal flourish extending to the right.

Zyl Hovenga-Wauchope
Executive Officer
Financial Counselling Victoria