

Customer Hardship Policy Guideline: NCOSS Submission to the AER

14 January 2019

NSW Council of Social Service (NCOSS) Hardship Policy Guideline Issues Paper Submission

Introduction

NCOSS welcomes the opportunity to contribute to the Australian Energy Regulator's (AER) development of a new Customer Hardship Policy Guideline (the Guideline).

NCOSS works with and for people experiencing poverty and disadvantage in NSW to make positive change in our communities.

The role of the AER in regulating compliance with the hardship protections in the Retail Law and Retail Rules requirements is important for people living in poverty and in households at risk of poverty. It is essential that retailers have policies, and more importantly practices, that provide support to people who struggle to pay energy bills. Alleviating the impost of the cost of energy bills through effective programs can positively impact on many aspects of people's lives.

This submission responds to three of the four consultation questions in the Hardship Policy Guideline Issues Paper. It includes recommendations to ensure that all consumers, and particularly to people living in poverty, or at risk of poverty, are able to access information and support. In addition to responding to the issues on which input has been sought, this submission includes general principles for reform beyond the Hardship Guideline.

It is noted that the findings from the 2017 Hardship Review, highlighted in the Issues Paper, reflect findings from research undertaken by NCOSS in 2017 on energy expenses for people in NSW living in low-income households. Key findings of this research (referred to hereafter as NCOSS research) related to energy retailers included:

- That supports provided by Government and energy retailers to customers experiencing 'hardship' are poorly understood, not well accessed, and often undermined by a lack of coordination.
- 8.4% of all respondents were unaware of retail payment extensions, 13.2% were unaware of the existence of retail payment plans, and 20.2% were not aware that retail hardship programs existed.
- Available assistance did not improve necessarily the financial sustainability of low-income households energy use in the long term¹.

The AER 2017 Hardship Review has not yet, to date, been publically released. It should be acknowledged that the findings of this review may be valuable to the many energy retailers and community organisations providing support to people who are struggling to pay energy bills, particularly in the context of the current Hardship Guideline reform. It is therefore recommended that this review is released publically.

Recommendation 1: The Australian Energy Regulator should release 2017 Hardship Review publically

For the purposes of this submission we have used the term 'hardship', though as will be explored in the submission, we recognise that this word is inherently problematic. NCOSS welcomes further

¹ NSW Council of Social Service, *Turning off the Lights, the Cost of Living Report* (2017) Sydney.

opportunity to consult with the AER on suitable terminology, and any other matters raised in this submission.

The following recommendations are made for the development of the new Guideline:

Recommendation 1: The Australian Energy Regulator should release 2017 Hardship Review publically.

Recommendation 2: There should be a national framework for energy concessions with a consistent eligibility criteria.

Recommendation 3: The Australian Energy Regulator should support increasing Newstart and other income support payments to reduce the disproportionate numbers of income support recipients falling into energy payment hardship.

Recommendation 4: The Guideline should include a clear and evidence-based definition of 'hardship'.

Recommendation 5: The policies retailers are required to adopt must be consistent with the new Hardship Guideline's definition of 'hardship'.

Recommendation 6: The definition of 'hardship' should be inclusive of all experiences of financial vulnerability.

Recommendation 7: The new Hardship Guideline should advise that customer-facing material should not use the term 'hardship'. Language used in all hardship policy, particularly where self-identification is relied upon, should be neutral and inclusive. In recognition of the importance of 'co-design', hardship customers should be consulted on terminology that resonates with them.

Recommendation 8: The new Hardship Guideline should include a requirement for organisations to have leaders and staff who are educated and who are expected to uphold respectful practice in their hardship work.

Recommendation 9: The new Hardship Guideline should identify acceptable outcomes, or clearly stated deliverables, for retailer-customer communications. For example that customers are heard, respected and informed. This should include investment in staff resources such as training in effective communication.

Recommendation 10: The new Hardship Guideline should provide direction to retailers on making best use of different channels and resources that can advise on creating effectively accessible communications.

Recommendation 11: The new Hardship Guideline should ensure that customers requiring support are consistently identified and assessed using objective criteria. Where possible these customers must be supported to access individualised and appropriate payment and efficiency options that help to relieve their hardship.

Recommendation 12: The AER should follow the approach taken by the Victorian Essential Services Commission to encourage retailers to structure their hardship programs (including reporting of results) around desired customer outcomes.

It should be noted that there is considerable research and evidence, particularly from the US and UK, that has dispelled the myth that financial hardship mostly affects people on low incomes living

beyond their means. The evidence is that the causes of financial hardship are most about unforeseen disruptions in income that can happen to anyone.²

General principles for reform beyond the Hardship Guideline

The ability of people experiencing poverty and disadvantage to pay their energy bills will never be solely correlated with the effectiveness of hardship policies. Rather, debt accumulation and disconnection result from complex interactions between social and economic factors.³ Evidence shows that people's ability to pay energy bills is closely linked to the costs of other essentials such as housing, transport and medical expenses.⁴

NCOSS acknowledges that the AER is not in a position to address these well-known broader 'financial difficulty/hardship' issues. Nevertheless, we reiterate the concerns of other stakeholders that there are issues that will continue to undermine the effectiveness of hardship support policy and practice. In particular:

- the lack of a clear definition and shared understanding of 'hardship' or 'financial difficulty';
- the proposed Hardship Guideline does not address situations where people cannot afford ongoing energy use at all; and
- that Australia's concessions framework has been found to be *ad hoc*, inconsistent, complex, confusing and, in many cases, inadequate.⁵

Unless the longer-term factors that lead to financial problems are addressed, such as the low rate of Newstart and other income support measures, households will continue to be vulnerable.⁶ Research indicates that financial hardship should be addressed by policy intentions in a broader context.⁷ Longer-term factors need to be tackled through policy measures beyond the current process, and will require coordinated action by government, the community sector and retailers.

NCOSS is pleased that the AER will continue to work with stakeholders to continuously improve the regulatory framework with the aim of effective hardship protections for energy customers.

Recommendation 2: There should be a national framework for energy concessions with a consistent eligibility criteria.⁸

Recommendation 3: The Australian Energy Regulator should support increasing Newstart and other income support payments to reduce the disproportionate numbers of income support recipients falling into energy payment hardship.

² E Bourova, I Ramsay and P Ali, 'The experience of financial hardship in Australia: Causes, impacts and coping strategies' (2018) University of Melbourne Legal Studies Research Paper No. 805, *Journal of Consumer Policy*, 2

³ Public Interest Advocacy Centre, *Close to the Edge – a Qualitative and Quantitative Study* (2018). Available [here](#).

⁴ Australian Council of Social Service, Brotherhood of St Laurence and The Climate Institute, *Empowering Disadvantaged Households to Access Affordable, Clean Energy* (2017) 8. Available [here](#).

⁵ Financial Counselling Australia and Australian Communications Consumer Action Network, *Hardship Policies in Practice: A Comparative Study* (2014). Available [here](#).

⁶ Public Interest Advocacy Centre, above n 3, 9.

⁷ E Bourova, I Ramsay and P Ali, above n 2, 28.

⁸ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 28.

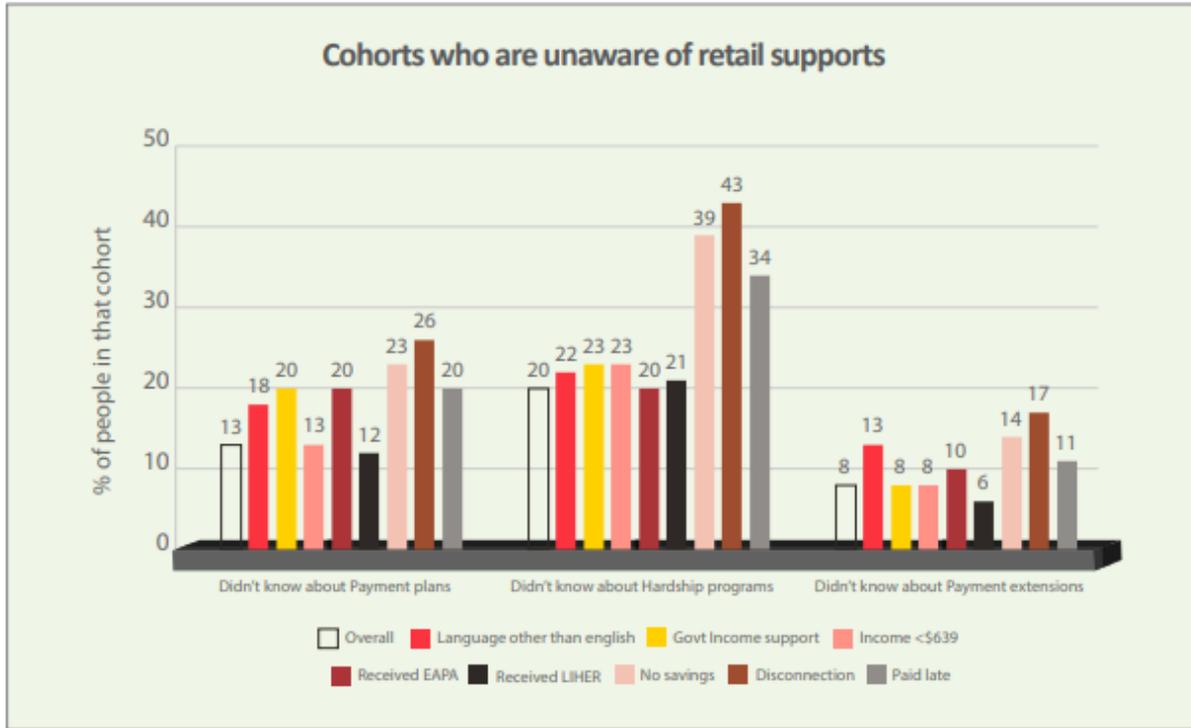
How should the Guideline best ensure that consumers are effectively informed about their rights?

Consumer experiences

Diana is 37-year old single woman with three children under the age of 18 living in a rental household in Bexley. She pays \$400 a week in rent, from a weekly after-tax income of \$630: a combination of part time work and income support payments. The household does not have any emergency savings and is not living in a secure situation. They often go without many of the basics, including medical treatment, and have to borrow money or pawn items to pay bills. They have received disconnection notices for both their gas and electricity supplies, although they have not yet been disconnected. Their last quarterly bills were \$500 for electricity and \$120 for gas. Despite the household's tenuous financial situation, they believed they were unable to access any of the supports on offer, including EAPA vouchers.

Figure 1: Case study from the 2017 NCOSS cost of living report.

NCOSS research found that although people are more likely to be aware of various retailer supports than of government supports, there remains a significant group of vulnerable households who do not realise that assistance is available from their retailer. Indeed, 20.2% of respondents were not aware that retail hardship programs even existed. Levels of awareness were even lower amongst households that spoke a language other than English at home, and households whose main source of income was an income support payment. Awareness of assistance measures was also particularly low amongst those who had paid late, been disconnected or accessed Emergency Accounts Payments Assistance (EAPA) vouchers.



Graph 1: Detailed look at those who were unaware of the various retailer supports and assistance schemes, broken down into particular cohorts who may be more likely to benefit from them. Source: the CoL Report.

NCOSS and ACCAN research found that customers are not receiving all the concessions to which they are entitled. Customers are not effectively informed about hardship programs, they are not accessing enough or appropriate information about retailer hardship policies, and further, often are not accessing any information. This is despite more than a third of low income households paying electricity bills late and thus incurring significant fees or loss of discounts.⁹ Those in financial distress are being further disadvantaged due to this lack of information. This is a major concern and indicates that retailers are not engaging with their customers to ensure they are appropriately supported.¹⁰

Impediments or barriers to implementing change and effectively informing consumers about their rights

The definition of 'hardship': The current definition of a "hardship customer" is a residential customer of a retailer who is identified as experiencing financial payment difficulties due to hardship in accordance with the retailer's customer hardship policy.¹¹ The proposed standardised statements do not deal with the fact that retailer hardship policies could differ significantly in their operationalisation of the term 'hardship'.¹² The failure of the proposed standard statements to objectively identify what constitutes 'hardship' undermines the purpose of this Regulation. The Public Interest Advocacy Centre (PIAC) and the Victorian Essential Services Commission (ESC) have both found that where regulatory

⁹ NCOSS, above n 1, 16.

¹⁰ Ibid, 31.

¹¹ Schedule, National Energy Retail Law, Part 1, Division 1, section 2.

¹² Australian Energy Regulator, *Issues paper: Standardised Statements: customer hardship policies* (2018), 13.

bodies do not clearly define 'hardship' there is inconsistency of access to support and assistance, inconsistency in retailer responses and ineffective hardship support.¹³ Without a clear definition and common application of the concept of 'hardship', inequity will continue to plague access to this essential service.

Recommendation 4: The Guideline should include a clear and evidence-based definition of 'hardship'.

Recommendation 5: The policies retailers are required to adopt must be consistent with the new Hardship Guideline's definition of 'hardship'.

Differentiating the 'deserving' and 'underserving': NCOSS is concerned that the current Retail Law and the Hardship Regulation may result in differentiation between people experiencing payment difficulty due to 'hardship' and other people experiencing payment difficulty. Such a distinction may lead retailers to intrusively inquire into people's circumstances, and undertake moral or value judgements regarding their disadvantaged. Having clarity around what constitutes 'hardship' should address this issue.

Evidence shows that retailers' customer service staff have varying views and understandings of hardship. Some believe that it is something a consumer has to prove whereas others think that anyone can be vulnerable and genuinely wants to pay their debts.¹⁴ Where these value judgements fall does shape the way hardship policies operate within organisations. This has an impact on how people experiencing disadvantage engage with those policies. For example a retailer's use of language, whether they are referred to as 'customers' or 'debtors', will determine how they feel about their rights. Requirements for 'proof' of financial hardship; and whether customer are treated with respect and listened to.¹⁵

As noted, research on financial hardship has dispelled the popularly held assumption that financial hardship mainly affects the 'dishonest' or 'irresponsible' debtor who is intentionally avoiding their obligations or whose debts are the fault of their own profligate consumption.¹⁶ The reality is that the most common triggers or factors associated with 'slipping into hardship' are unforeseen expenses or a loss of income in the form of rapid change or illness; events outside a person's control. The impact of these triggers increase exponentially when combined with being an income support recipient.¹⁷ We know that determining the reasons for hardship is less important than establishing how a customer can be best supported to stay connected.¹⁸

Interestingly, in Australia there is an overrepresentation of women and people living in regional and rural areas experiencing financial hardship. Though more research is needed, the implications of this finding should be a serious consideration to for retailers in how to direct and shape their hardship programs.¹⁹

¹³ Essential Services Commission, *Energy Hardship Inquiry Final Report (2016)* available [here](#) and Public Interest Advocacy Centre, *Submission to Standardised Statements for use in Customer Hardship Policies Issues Paper (2018)*.

¹⁴ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 31.

¹⁵ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 4.

¹⁶ E Bourova, I Ramsay and P Ali, above n 2, 4.

¹⁷ *Ibid*, 11.

¹⁸ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 43

¹⁹ E Bourova, I Ramsay and P Ali, above n 2, 11 & 22

Recommendation 6: The definition of ‘hardship’ should be inclusive of all experiences of financial vulnerability.

‘Hardship’ is actually an unhelpful term: Customers rarely use the word ‘hardship’²⁰ and even if they are financially vulnerable, are frequently reluctant about or do not relate to ‘needing’ this type of support.²¹ The use of the term ‘hardship’ may be a barrier to customers being effectively informed about their rights and entitlements.

NCOSS research found that many people living on very low incomes identified that they ‘did not need’ retailer supports in the preceding 12 months. Overall 71.8% said they did not need hardship assistance. This group included many people who showed signs of financial stress and would therefore be likely to benefit from assistance. Cohorts such as people receiving government support payments, people who accessed EAPA vouchers and support rebates, people with no savings, and people with the lowest incomes, were more likely than others to say they did not need hardship assistance.²² This is backed-up by other research, which has found that only a quarter of respondents who were experiencing financial hardship and were unable to pay a debt actually accessed any hardship assistance.²³

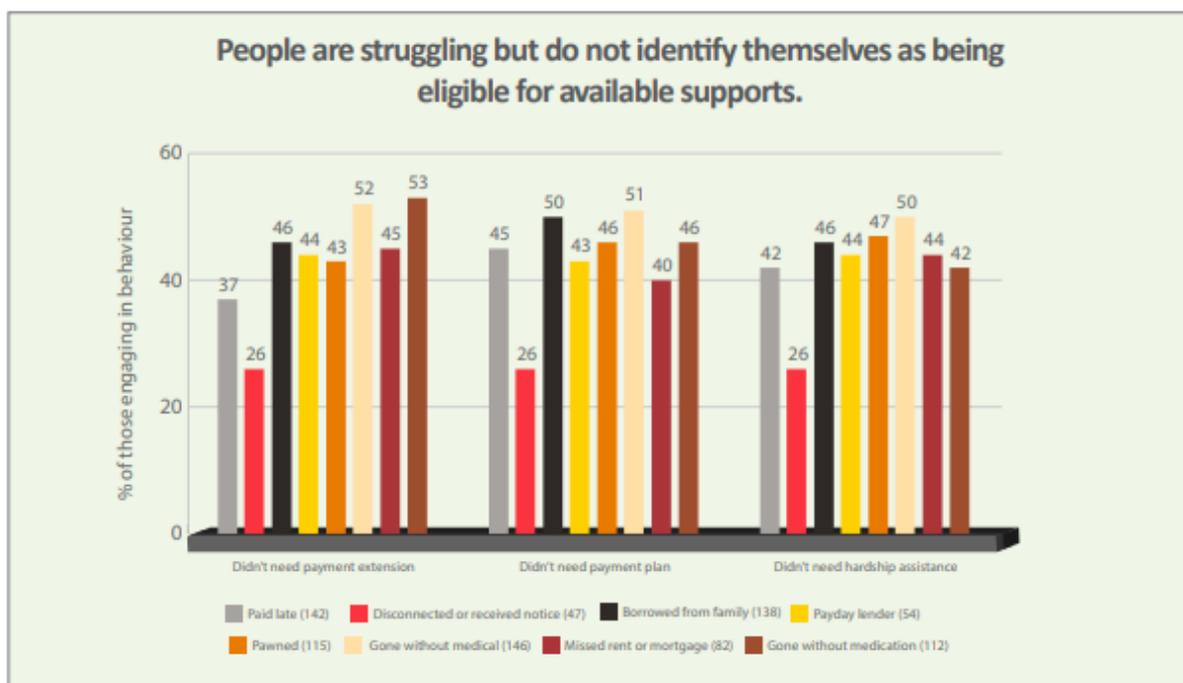
Recommendation 7: The new Hardship Guideline should advise that customer-facing material should not use the term ‘hardship’. Language used in all hardship policy, particularly where self-identification is relied upon, should be neutral and inclusive. In recognition of the importance of ‘co-design’, hardship customers should be consulted on terminology that resonates with them.

²⁰ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 42.

²¹ Australian Energy Regulator, *Review of energy retailers’ hardship policies and practices* (2015), 3 and NSW Council of Social Service above n 1, 24 & 33.

²² NSW Council of Social Service above n 1, 33.

²³ E Bourova, I Ramsay and P Ali, above n 2, 17.



Graph 2: People experiencing indicators of financial stress who do not identify themselves as needing retailer supports and assistance. Source: the CoL Report

How should the Guideline support consistent application of the Retail Law Minimum Standards?

Consumer experiences

NCOSS research found that the people who are most negatively impacted by the failures of the retail energy market are the people who can least afford it, and who also are largely unengaged with their energy retailers.²⁴

The Retail Law requires hardship policies to, at a minimum, identify customers experiencing payment difficulties due to hardship, respond, provide options, communicate government concession and other relevant programs, and review the appropriateness of the customer's plan. Despite this baseline, NCOSS research found that in many cases, vulnerable people and families do not know about energy assistance or do not stick with it.²⁵ This indicates that the minimum standards are not being applied consistently.

Impediments or barriers to implementing change and consistently applying the Retail Law

Attitudes and culture are critical for sustaining good performance: The need for a positive approach to engagement and communication is not a new finding. The AER 2015 review of energy retailers customer hardship programs identified respectful practice to be of fundamental importance.²⁶ Staff

²⁴ NSW Council of Social Service above n 1, 28.

²⁵ NSW Council of Social Service above n 1, 23.

²⁶ Australian Energy Regulator, *Review of energy retailers' hardship policies and practices* (2015), 3.

dealing with hardship programs must be trained, committed and adequately resourced. Cultural leadership must come from the CEO and senior staff.²⁷ NCOSS research in 2017 reiterate the findings of the 2015 AER review.

Recommendation 8: The new Hardship Guideline should include a requirement for organisations to have leaders and staff who are educated and who are expected to uphold respectful practice in their hardship work.

Effective and sensitive communication are vital to engagement: Research has found that shame and embarrassment are significant barriers to successful assistance to meet their energy costs.²⁸ In turn therefore, a significant practical impediment to retailers implementing effective hardship programs, and customers remaining engaged in them, is their staff developing the skills to become effective communicators.²⁹ Staff training and skills development can explain in a meaningful way what it can be like to experience financial hardship. Good practices identified in the ACCAN report included training about mental illness/suicide, open-ended questioning techniques, and solutions focused training. Ongoing monitoring of staff after training is suggested to ensure that the training was actually applied. Regular opportunities for debriefing and individual coaching are also important.³⁰ Skilled communicators will better facilitate retailer engagement with people who make contact or receive contact regarding hardship.

Recommendation 9: The new Hardship Guideline should identify acceptable outcomes, or clearly stated deliverables, for retailer-customer communications. For example that customers are heard, respected and informed. This should include investment in staff resources such as training in effective communication.³¹

How should the Guideline support consumers most in need of hardship assistance to receive it?

Consumer experiences

Finding support is too difficult: People experiencing stress or crisis, the people who most need support, have the least time and capacity to search for it. However, we know there is low awareness of hardship programs. NCOSS research found that more than 20% of participants didn't know that retailers had hardship programs, let alone how to take part.³² Awareness is even lower amongst households that speak a language other than English and those whose main source of income is an income support payment. Research shows that 'not knowing where to go' is a significant barrier to getting assistance.³³ A number of other factors, such as the retailer's promotion of hardship assistance and staff behaviour upon enquiries about it, also play a role. Those most in need must be

²⁷ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5, 26.

²⁸ NSW Council of Social Service above n 1, 24

²⁹ Public Interest Advocacy Centre, above n 3, 30.

³⁰ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5.

³¹ Victorian Council of Social Service, VCOSS Submission on ESC Proposed Payment Difficulty Framework (2017), 10. Available [here](#).

³² NSW Council of Social Service above n 2.

³³ Public Interest Advocacy Centre, above n 3, 47.

able to quickly understand how to get assistance. If people are aware of assistance, they may also seek help early, reducing later problems.

Current supports are not accessible: The present AEC discussion paper refers to the ‘general accessibility’ of hardship policies, and states that information should be clear and readily accessible both online and offline, and be ‘jargon-free’, perhaps incorporating graphics and flow-charts. This is a positive start to ensuring that customers are meaningfully informed.

At present many retailers lack intuitively locatable and easy to read information about the availability of hardship programs.³⁴ The way current policies are written and made available to the community may be undermining their effectiveness.

Making complex information accessible to diverse communities is a skill. There is evidence on what works and doesn’t work. The accessibility needs of people with intellectual disability, sensory disability and people from non-English speaking backgrounds, online and on paper are very different. Retailers should be required to seek expertise in information accessibility to apply to their hardship policy materials. Rigorously developed resources such as the Centre for Applied Disability Research R2A Guide for Accessible Written Communication³⁵ and the University of Melbourne’s resource on making information accessible to everyone³⁶ can help to ensure that communication is equitably presented to the whole community.

Recommendation 10: The new Hardship Guideline should provide direction to retailers on making best use of different channels and resources that can advise on creating effectively accessible communications.

Too little too late - customers would benefit from early, proactive and sensitive identification: One of the best ways to stop people getting disconnected is to identify and provide assistance as early as possible.³⁷ The earlier customers experiencing financial problems are identified, the more options they have to overcome their difficulties.³⁸ The evidence tells us also that to be successful, early identification cannot rely on self-referral. A proactive approach to identifying customers in need of support is generally found to be more successful than waiting for customers to make contact with a retailer.³⁹ Yet, problems with identifying customers at an appropriate stage has been a known issue for retailers for years.⁴⁰ Retailers do not always proactively identify people in need, are not clear about where people need to go to seek help, and can fail to provide appropriate assistance.⁴¹

People facing disconnection may only find out about assistance for payment once they have already failed to pay. People sometimes do not engage or struggle to remain engaged with hardship programs

³⁴ Australian Energy Regulator, *Review of energy retailers’ hardship policies and practices* (2015), 4.

³⁵ The Research to Action Guide is available [here](#).

³⁶ More information is available [here](#).

³⁷ Public Interest Advocacy Centre, above n 3, 31.

³⁸ Financial Counselling Australia and Australian Communications Consumer Action Network, above n 5.

³⁹ Australian Energy Regulator, *Review of energy retailers’ hardship policies and practices* (2015), and E Bourova, I Ramsay and P Ali, ‘The experience of financial hardship in Australia: Causes, impacts and coping strategies’ (2018) University of Melbourne Legal Studies Research Paper No. 805, *Journal of Consumer Policy*, 28.

⁴⁰ Australian Energy Regulator, above n 39, 4.

⁴¹ Public Interest Advocacy Centre, above n 3, 11

because they are already behind and for cumulative reasons beyond their control, such as family violence, major health problems, language barriers, low literacy levels or other factors.⁴² People can give up on engaging with their retailer even having commenced a hardship program, because they feel all hope is lost and there is no way to resolve their payment problems.⁴³

While hardship can happen suddenly, risk of disconnection as a result of financial vulnerability occurs with known indicators and patterns. Research with people who have been disconnected found that the disconnection was a situation that had been coming for a long time; they had been living 'on the edge' for a considerable period.⁴⁴ This means obvious indicators such as customers' debt accumulation and late payments, and even making contact with the retailer but not going into a hardship program, should be flags to the retailer that action is required.

The Victorian Essential Services Commission (ESC) payment difficulty framework sets up a standard and objective debt-trigger point for early identification of customers experiencing difficulty who then must be offered access to tailored advice and assistance through retailer hardship policies.⁴⁵

Recommendation 11: The new Hardship Guideline should ensure that customers requiring support are consistently identified and assessed using objective criteria. Where possible these customers must be supported to access individualised and appropriate payment and efficiency options that help to relieve their hardship.

Impediments and barriers to those most in need of hardship support actually receiving it

Current requirements have a focus on processes rather than outcomes: Outcomes are the positive changes that happen for people as a consequence of an activity; as a result of a process or program.⁴⁶ The current requirement for retailers to include processes and options in their hardship policies⁴⁷ is not translating into improved outcomes for people.

In recognition of this, the AER discussion paper regarding proposed standardised statements suggested that strengthening hardship obligations will assist in more effectively monitoring how retailers are implementing their hardship policies, and allow the AER to take action where necessary. The paper also points out that consistent, action-based standardised statements would permit the AER greater oversight as to how retailers are applying their hardship policies in practice.⁴⁸ Taking this approach one step further, this submission proposes that the AER and energy retailers look to the health and community service sectors in designing the supports they intend to provide.

Prompted by a series of Productivity Commission reports, the health and community services sectors are reforming toward increased competition, choice and outcomes measurement as a way to

⁴² Victorian Council of Social Service, above n 36, 14.

⁴³ Ibid, 14.

⁴⁴ Public Interest Advocacy Centre, above n 3, 29.

⁴⁵ Essential Services Commission, *Supporting Customers, Avoiding Labels: Energy Hardship Inquiry Final Report* (2016). Available [here](#) and Public Interest Advocacy Centre, *Submission to Standardised Statements for use in Customer Hardship Policies Issues Paper* (2018).

⁴⁶ Clemmie Baker, 'How to adopt an outcomes focussed approach', *Social Ventures Australia* (28 March 2018), available online [here](#).

⁴⁷ As per Section 44 of the Retail Law requirements

⁴⁸ Australian Energy Regulator, *Issues paper. Standardised Statements: customer hardship policies* (2018), 11.

improve, and prove, effectiveness.⁴⁹ As hardship policies should be viewed as social good programs in a competitive market, they too should look to outcomes as a way of designing and applying programs.

Outcomes are direct, clearly stated benefits to stakeholders that a program exists to serve.⁵⁰ Outcomes specify what a program delivers, to whom, over what time and to what standard. They are definable, measurable and easily understood and help organisations prove to stakeholders that what they are doing is working. Importantly, policies that are oriented toward outcomes help organisations improve what they are doing through better information and evaluation.⁵¹ By reorienting standardised statements and hardship policies as a whole toward outcomes, retailers' organisational attitudes, cultures, and skills in applying in hardship practices will fall into place. The goal will no longer be to have a hardship procedure, but to make a positive difference for people experiencing financial hardship.

The recent Victorian Essential Services Commission Payment Difficulty Framework has put a focus on outcomes and customer entitlements rather than processes and compliance.⁵² Ongoing review of this framework will determine its impact.

In this way, clear and objective criteria for supports will emerge. Retailer implementation plans and even 'action statements' should be organised around the clear, measurable outcomes they are intended to achieve. The way that a retailer gets to the outcome can vary based on customer needs, with the guidance of 'obligations' to work effectively and respectfully with customers, as outlined in the ESC framework.⁵³

Outcomes frameworks and guidance are well researched and widely available.

Recommendation 12: The AER should follow the approach taken by the Victorian Essential Services Commission to encourage retailers to structure their hardship programs (including reporting of results) around desired customer outcomes.

Conclusion

Evidence tells us that clarity in the basic definition of what this Guideline sets out to achieve will go a long way to improving current practice. So too will effective and respectful communication and an emphasis on outcomes. Having said this, there are larger contextual issues that will perennially make some people very vulnerable to being unable to pay their utility bills. In order to address this, we must achieve larger social policy outcomes.

⁴⁹ Productivity Commission Reports include '*Introducing Competition and Informed User Choice into Human Services: Reforms to Human Service*', available [here](#).

⁵⁰ Robert Penna, *The Nonprofit Outcomes Toolbox: A Complete Guide to Program Effectiveness, Performance Measurement, and Results* (John Wiley and Sons Inc., 2014).

⁵¹ Ibid.

⁵² Essential Services Commission, *Payment Difficulty Framework* (2017), viii.

⁵³ Ibid, xii

About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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