

Water Retailing to Vulnerable Customers

Good Practice Advocacy Guidelines

Who are these guidelines for?

The *Good Practice Advocacy Guidelines* are for organisations that undertake advocacy on behalf of consumers with water issues, on either a systemic or individual level. The Guidelines seek to better equip consumer advocates in their capacity to assist vulnerable water consumers with regard to dealing with water retailers and the water regulatory regime.

Who are vulnerable water consumers?

Vulnerable water consumers are those consumers who struggle to pay their bill on time, on most occasions, or who find it difficult to deal with other issues relevant to their water supply. This may include consumers who are: low-income earners and/or recipients of government benefits; consumers with a disability (and their carers); and consumers living in regional areas of South Australia.

What challenges do vulnerable water consumers face?

As an organisation that conducts advocacy for consumers you know that beyond simply having difficulty paying water bills, vulnerable consumers face a number of other challenges in managing their water bills. These include:

- accessing information about the supports available to assist with bill payments
- difficulty in understanding their water bill (e.g., fixed and variable costs)
- not being able to identify supply charges (when included in a council rates notice) and so do not understand what they are paying for
- time-consuming process for tenants to access concessions, as well as the challenge of not being the water customer as they do not have a customer relationship with the water retailer
- other barriers to seeking assistance, such as language barriers or lack of confidence.

Why is it important that these consumers have someone to advocate for them?

Vulnerable consumers are often not in a position to advocate for themselves with their water retailer for the reasons listed above. They need assistance to access and navigate the supports that water retailers have in place for vulnerable consumers. In these guidelines we refer to this as **advocacy for the individual**.

On a larger scale, advocacy at a systemic level is needed to influence changes to policy, systems and regulations to address the issues and concerns of vulnerable water consumers. These guidelines refer to this as **systemic advocacy**. Organisations who represent the interests of vulnerable consumers are well placed to undertake such work.

How can NGOs best advocate for the needs of vulnerable water consumers?

ADVOCACY FOR THE INDIVIDUAL

The guidelines in this section outline the practices conducive to conducting good advocacy for the individual. They are intended to enhance the activities already undertaken by your organisation when advocating for vulnerable consumers.

DEVELOP A GOOD RELATIONSHIP WITH WATER RETAILERS

A good relationship with the water retailer means that you are more likely to get better outcomes for clients. By building a trusting relationship with the water retailer, you will be better able to have open conversations about the needs of customers, potentially eligible for hardship programs.

- A key facilitator to building this relationship with water retailers is meeting face-to-face. This should be arranged directly with the water retailer's hardship team or through attending utility literacy events at which the retailer is present.
- Organisations could consider contacting the water retailer on a regular basis to enquire about their clients' water usage/forecast charges to ensure their client pays an adequate amount to cover the costs for that fortnight.

INCREASING CAPACITY IN ORGANISATIONS

Financial counsellors in organisations could benefit from utilities literacy training to gain better understanding of the specific issues associated with water bills and payments. This would also help financial counsellors to provide advice to clients on their water usage, and potential ways they could use water more efficiently to reduce bill costs. Utility literacy training is available through UnitingCare Wesley Bowden (<http://www.ucwb.org.au/financial-support/utilities-literacy.html>).

Training for organisations may assist in raising awareness of existing and new initiatives to alleviate financial pressures.

INCREASING VISIBILITY OF SERVICES AVAILABLE TO CONSUMERS

Organisations providing financial counselling services should be proactive in promoting their services and how it is beneficial to vulnerable consumers. This is to avoid consumers only accessing financial counselling as a last resort when they are in a dire financial situation.

- Financial counselling services should be advertised as free, confidential and independent.
- The State-wide Financial Counselling Telephone number (1800 007 007) should be promoted/made more visible in community organisations.
- Collaboration with other local organisations to determine the best way to promote services to hard-to-reach groups or Culturally and Linguistically Diverse background (CALD) consumers.

INCREASING CONSUMERS' CONFIDENCE TO ENABLE SELF-ADVOCACY

One of the end goals of advocacy for the individual should be to empower consumers to take on the advocacy for themselves. Increasing consumer confidence should be the focus for organisations, which will lead to longer term solutions for consumers.

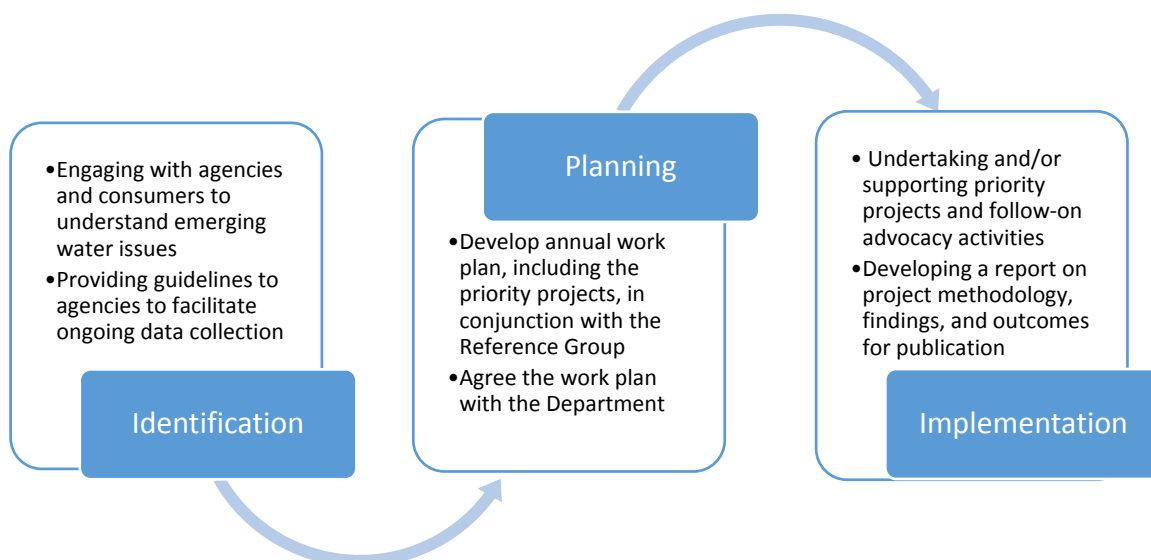
- Provide guidance, training and encouragement to consumers to increase their confidence to advocate on their own behalf.
- Encourage consumers to contact their water retailer themselves with their financial counsellor as a first step with the counsellor stepping in only if required.

- Provide consumers with utility literacy education, to enable consumers to understand how their water bills works, what hardship programs and concessions they can access, and how to do so. Where an organisation does not have funding to provide this service, they should refer the consumer to another suitable organisation.
- Provide consumers with financial literacy education can help prevent future issues and provide consumer with the knowledge and confidence to manage their own finances. Where an organisation does not have funding to provide this service, they should refer the consumer to another suitable organisation.
- Collaborate with local organisations to tailor training to suit the local consumer group, for example, providing culturally appropriate training, or access to a translator.

SYSTEMIC ADVOCACY

To influence changes at a systemic level a coordinated, collaborative approach is needed. The guidelines in this section outline the steps to take to effectively conduct and coordinate systemic advocacy. Figure 1 below shows the range of potential activities that could be undertaken by the organisation undertaking the coordination role for systemic advocacy in the water sector.

Figure 1: Systemic advocacy activities



Source: KPMG

ESTABLISH A REFERENCE GROUP

A Reference Group should be established to promote sharing of information, and to bring together a range of expertise to guide the advocacy activities.

- The Reference Group should involve peak bodies, consumer advocates and representatives who are interested in addressing issues relating to the water sector.
- Review the membership of the Reference Group at least every two to three years and ensure that membership is rotated to allow for diversity of thought and perspectives.
- Involve the Reference Group in the development of the Annual Work Plan and review of all deliverables from the priority projects implemented based on the Annual Work Plan.
- Seek advice on ad-hoc basis from the Reference Group as needed with matters relating to research methodology and advocacy activities.

DEVELOP AN ANNUAL WORK PLAN

It is important to develop an Annual Work Plan to detail the advocacy activities to be undertaken for the year and to provide a way to monitor progress. The following steps should be utilised in developing the work plan.

- Conduct consultations with agencies and consumers to understand issues and areas requiring further research and advocacy on annual basis.
- Coordinate and agree the development of the annual work plan, in conjunction with the Reference Group (see next section), the Department of Communities and Social Inclusion (the department) and the Essential Services Commission South Australia (ESCOSA).
- Determine, in conjunction with the Reference Group, which consumer advocates would be best placed to lead, undertake and/or coordinate the research and advocacy tasks and determine the level of collaboration.
- Review the Work Plan bi-annually and monitor progress.

COORDINATE AND UNDERTAKE HIGH-QUALITY, EVIDENCE-BASED RESEARCH

High-quality, evidence-based research is key to engaging those you are advocating to on behalf of vulnerable consumers. The research should involve robust **data collection, consultations and desktop research**. Keep in the mind the following steps when undertaking research:

- Engage consumer advocates who work directly with vulnerable water consumers to collect data in a systematic manner.
- develop standardised guidelines or tools (e.g. surveys) to enable ongoing data collection from agencies (and eventually water retailers) to identify emerging issues on an ongoing basis.
- Continually collect data which will help inform the priority water projects (future research and advocacy).
- Engage with consumers in a meaningful way.

Meaningful engagement to understand vulnerable consumers' views

To ensure meaningful engagement with vulnerable consumers:

- Define the objectives and purpose for the consultation.
- Have transparent engagement process through using a variety of communication methods (e.g. local newspapers, local radio stations, websites, etc.).
- Allow adequate time to consult.
- Consult with a diverse range of stakeholders.
- Overcome barriers to participation for consumers, including identifying key contacts in communities or local community organisations to access hard to reach consumers, and take into consideration transportation.
- Target groups that are usually underrepresented in consultations.
- Be prepared to challenge your own views.
- Consider all feedback received.
- Acknowledge people's expertise and provide formal acknowledgement to participants for their time and knowledge.

- Consider the avenues you use to communicate with vulnerable consumers, as well as what it looks like and how easy it is to read.

Communicating with consumers

Communication with consumers should be:

- available online and through other media.
 - printed clearly.
 - have appropriate design and graphics (e.g., font size, colour).
 - Be in multiple languages where possible.
- Take into consideration the views and requirements of water regulators and providers, as well as consumers when undertaking consultation activities.
 - Research should be fed back to a central repository for submissions and information sharing with ESCOSA.
 - Collaboration between consumer advocates is encouraged as a collective voice can be stronger for advocating policy/regulatory changes. It can also provide a stronger evidence for the research.

COORDINATE AND CONDUCT TARGETED ADVOCACY ACTIVITIES

Advocacy activities should be coordinated and targeted. This is to ensure that those working towards a similar outcome are working together so there is no duplication amongst and that work stays within the defined scope of the issue. The following points should be considered when undertaking advocacy activities.

- Build knowledge of water regulation, infrastructure and pricing settings or engage with others who have this knowledge.
- Establish and maintain relationships with key stakeholders responsible for changing policies, systems and regulations.
- Establish a policy and campaign function which focuses on advocating consumers' interests, including those relating to water, through existing regulatory processes and forums.
- Utilise the reports and publications arising from the priority projects as a basis for conducting or supporting systemic advocacy activities such as meetings with ESCOSA, EWOSA, government, the Residential Tenancy Tribunal and the water retailers; proposals and submissions; and presentations.
- Utilise other advocacy channels available, such as media, to influence changes to policies, systems and regulations.
- Tackle issues that will have the greatest impact, and consider the balance between long-term and short-term issues.
- Work in proactive and responsive ways, for example, conducting advocacy work in response to government and regulatory processes is responsive advocacy.
- Collaborate with different organisations, including peak bodies and service providers, to add weight to the advocacy work, and bring in knowledge about the needs and interests of a range of consumers (particularly where they may differ across consumer groups).

DEVELOP INTERNAL REPORTS AND EXTERNAL PUBLICATIONS

Reports and publications ensure that the research and advocacy activities you have undertaken are recorded and available to those who are responsible for setting policy and regulation. When developing reports take into consideration the following.

- Ensure that publications appropriately acknowledge the sources and research undertaken by the various parties involved.

- Include in your reports: an Executive Summary, an Introduction, a section explaining the approach and methodology including any challenges and limitations encountered, the findings and recommendations, the conclusion and bibliography (where appropriate).
- Directly provide publications to the relevant government department and minister, and hold awareness raising events with relevant stakeholders.
- Make sure public reports are available on the internet.
- Monitor the reach of your reports by tracking the number of downloads (or requests for copies).
- Ensure that there is a system in place to store reports and research so that they can be built upon in the future.

Checklist

Use these checklists to help you monitor the way in which you are advocating for vulnerable consumers.

ADVOCACY FOR THE INDIVIDUAL

Have you:

- sought to develop a good relationship with water retailers?
- undertaken relevant training, such as utility literacy training?
- increased the visibility of services available at your organisation and more broadly?
- sought to increase consumers' confidence to empower them to advocate on their own behalf?

SYSTEMIC ADVOCACY

Have you:

- developed your Annual Work Plan?
- established a Reference Group?
- ensured that any research you have undertaken has been evidence-based and of a high quality?
- undertaken advocacy activities, ensuring they have been targeted and coordinated?
- developed internal reports and external publications to document the research and activities undertaken?