25 February 2026

By email only: engage@esc.vic.gov.au

Getting to Fair: Advancing Equity strategy consultation

Essential Services Commission

Dear Essential Services Commission,

Getting to Fair: Advancing Equity strategy consultation

Consumer Action welcomes the opportunity to provide our submission to the *Getting to Fair: Advancing Equity draft strategy consultation* by the Essential Services Commission (**ESC**). We provide our submission with the support and endorsement of our sector colleagues Financial Counselling Victoria (FCVic), Westjustice, South East Community Links (SECL), and Community Information and Support Victoria (CISVic).

We support the ESC's proposed approach to break down barriers to essential services outlined in the consultation paper[1], and share its view that concepts of social, environmental equity and justice are foundational factors to pursue this approach, and progress equity for Victorian consumers[2].

This strategy serves as an important signal to consumers and businesses about the ESC's commitment to ensuring Victorians' fair and equitable access to essential services. We have observed the past *Getting to Fair* strategy providing a vision and mandate for the ESC to focus on Victorians experiencing marginalisation and vulnerability. As such we often hold the ESC out as a leading regulator for consumers. However, marginalisation and vulnerability are persistent and, in some measures, including our own data, we see a deepening of vulnerability for many Victorians. We therefore support the continuation and development of *Getting to Fair* to increase the focus on Victorians experiencing vulnerability including ensuring that essential service retailers provide adequate support to these customers.

Consumer Action holds a longstanding commitment to ensuring Victorians have access to essential services fairly and equitably. This commitment includes providing assistance to Victorians experiencing marginalisation or vulnerability to receive fair and appropriate support from their essential service retailers.

In this submission, we provide findings from data collected from our financial counselling services to Victorians on the National Debt Helpline (**NDH**). We draw from the experiences shared by our clients, which enables us to

[1] Essential Services Commission, *Advancing Equity Strategy consultation paper*, December 2025, p.5
[2] *Ibid.* p.4

identify and highlight the additional barriers faced by people experiencing vulnerability and marginalisation. We affirm the ESC's position that these barriers can cause hidden liabilities for some Victorians, that can result in higher prices and degraded service quality.

We have focused on the specific experiences of particular cohorts contacting the NDH, with the view that highlighting these experiences can assist in addressing systemic inequities and barriers for people accessing essential services. We provide these with the view that they can support the ESC's integral work in promoting the long-term interests of all Victorians.

A summary of recommendations is available at **Appendix A**.

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Responses to consultation questions

Consideration of consumer vulnerability

We agree with the ESC's existing definition of consumer vulnerability outlined in the *Getting to Fair* strategy[3], and support the ESC continuing this definition in the *Advancing Equity Strategy*. We believe this definition supports identifying the broad range of individual and systemic level vulnerabilities and disadvantages that Victorian consumers can experience.

We note the important distinction raised in our report *Money Yarns, Stronger Futures* that in reference to First Nations peoples, we use the term vulnerability or vulnerable in reference to social and systemic barriers, and does not refer to an individual characteristic[4]. Similarly, we believe this concept of vulnerability should be applied to other cohorts of Victorian consumers, including those from culturally and linguistically diverse (**CALD**) communities, people with disabilities and other marginalised peoples. We believe that the definition of consumer vulnerability adopted in the Getting to Fair strategy meets these considerations, and we support its continued inclusion in the Advancing Equity Strategy.

Question 1. *Are there matters we should consider in evolving our Getting to Fair strategy to encompass both individual and system-level equity?*

We support the ESC's approach to broaden its focus to systemic factors that can impact equity of access to essential services. We have included below systemic-level issues experienced by particular cohorts in Victoria engaging with essential services, drawing from the data found through our frontline services on the Victorian NDH for the ESC to consider when developing actions to implement its strategic plan.

Question 2. *Do you think the priority themes are the right themes to help achieve our goal? If yes, is there a way we could strengthen or improve the themes? If no, are there other themes we should consider?*

We support the priority themes outlined in the discussion paper, and the focus on individual and systemic experiences of diverse consumer cohorts within the theme of regulatory inclusion[5]. As identified within the consumer voice pillar of the ESC's strategy, we support the ESC engaging directly with diverse consumer cohorts throughout the strategic plan period, to strengthen relationships and participation of consumers, and measure their experiences with essential service delivery over time as the strategy progresses. We believe this engagement could be included in both individual equity, in measuring the experiences of a diverse range of Victorian consumers engaging with their retailer or service providers in order to address gaps in service delivery, and provide industry standards for appropriate support. This would also provide insight into system-level inequities, for example, the comparison of access to payment difficulty support across different customer cohorts.

Question 3. *What can be done to support our regulated sectors embed considerations of justice and equity at both the individual and system level?*

We strongly agree with the ESC's proposal to explore principles-based and outcomes focused regulation, as a driver of addressing systemic inequity. A requirement for transparency of retailers' key data points relating to customer service from essential services sectors would support outcomes-focused regulation. This data should be provided at regular intervals by essential service retailers, in order to measure the effectiveness of principles-based regulation over time. For example, energy and water businesses could provide data on the proportion of their customers accessing translation and interpreter services in each given quarter of the year, supported by information about customers' ability to access translation services. The information campaign could be compared

[3] Essential Services Commission, *Getting to fair: Breaking down barriers to essential services,* August 2021, p.3
[4] Consumer Action, *Money Yarns, Stronger Futures: Integrated Practice Project Report 2021-2023*, July 2024, p.3
[5] Essential Services Commission, *Advancing Equity Strategy consultation paper*, December 2025, p.10

to any changes in proportions of customers accessing translation services, which in turn could help measure the effectiveness of the information distribution campaign.

Relevant insights from the Victorian NDH

1. Energy hardship presenting on the NDH

In the following section, we provide an overview of energy hardship as it presents on the Victorian NDH services delivered by Consumer Action. We provide these insights to outline the systemic issues facing many low-income Victorians in affording the costs of energy as an essential service. The insights are drawn from our frontline financial counselling service on the Victorian NDH, where a client has contacted our services and raised energy (gas or electricity) as a presenting issue during their appointment. We refer to these clients as energy contacts throughout the following sections[6].

Energy remains a key presenting issue for Victorians contacting the NDH via Consumer Action

In 2023, Consumer Action recorded 12% of Victorians contacting the NDH raised energy issues, up from 10.7% in 2022[7]. In the 2025 year, 17% of all contacts to the NDH raised energy issues, marking an increase of 5% from 2023. The increase in people contacting the NDH with energy issues in the last three years demonstrates that for people experiencing financial hardship and debt, affording energy bills remains a deeply and widely felt issue for Victorians. The most common energy issues presenting on our frontlines can be broadly categorised into two main themes: increasing costs of electricity and gas that causes barriers to affordability and results in debt, and people experiencing a lack of appropriate assistance when experiencing payment difficulty.

Energy debt continues to increase year upon year

In October 2025, Consumer Action recorded the highest average single energy debt or combined (electricity and or gas) energy debt for any given month since we began reporting NDH energy debt through the Energy Assistance

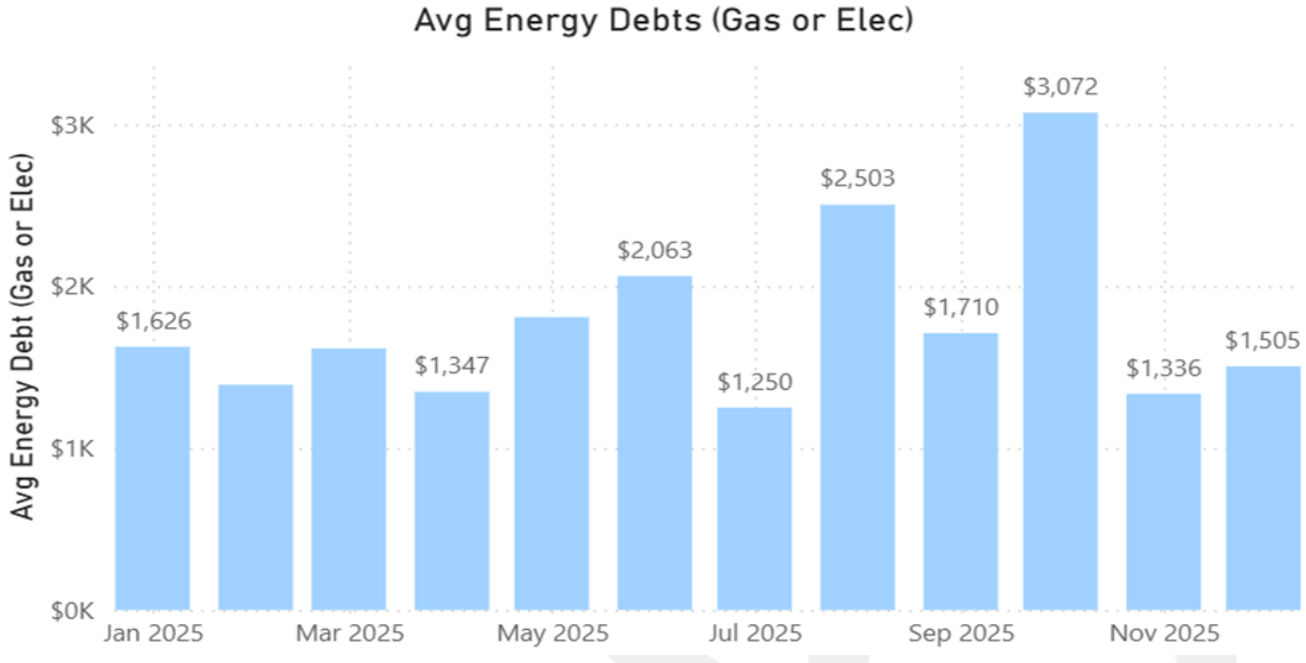

Figure 1 Average single energy debt of each month in 2025 recorded on the NDH

[6] The data provided in this submission has been recorded by financial counsellors during their phone appointments with their NDH clients. This data is recorded and uploaded in real-time each day, and can change with additional case data entered. The data included in this submission is as recorded in January 2026.

[7] Consumer Action, *Energy Assistance Report – Keeping the lights on* June 2024, p. 4 REPORT Energy Assistance Report 4th Edition: Keeping the Lights On - Consumer Action Law Centre

Report, from 2019 onwards. The recorded average energy debts (both single utility and combined gas and or electricity) were $1,000 higher than October 2024. October 2024 also recorded the highest average energy debts for that given year. The average gas or electricity debt in October 2025 ($3,072) was $983 higher than in October 2024 ($2,089). The average combined energy debt (gas and electricity) in October 2025 ($4,328) was $1,215 higher than October 2024 ($3,113). This concerning trend of growing average energy could illustrate the serious issue that as energy debt increases, resolving arrears becomes an entrenched burden for Victorians on low incomes.

In figure 2 below, we have collated the two most common types of median fortnightly income types (Centrelink and employment) for all clients contacting Consumer Action's legal and financial counselling services, and compared these medians with the recorded average combined energy debt recorded from Victorians contacting the NDH with energy issues[8]. Figure 2 outlines that the rate in which energy debts are increasing outpace the increase of median income.

Average energy debts compared to median fortnightly income reported to Consumer Action

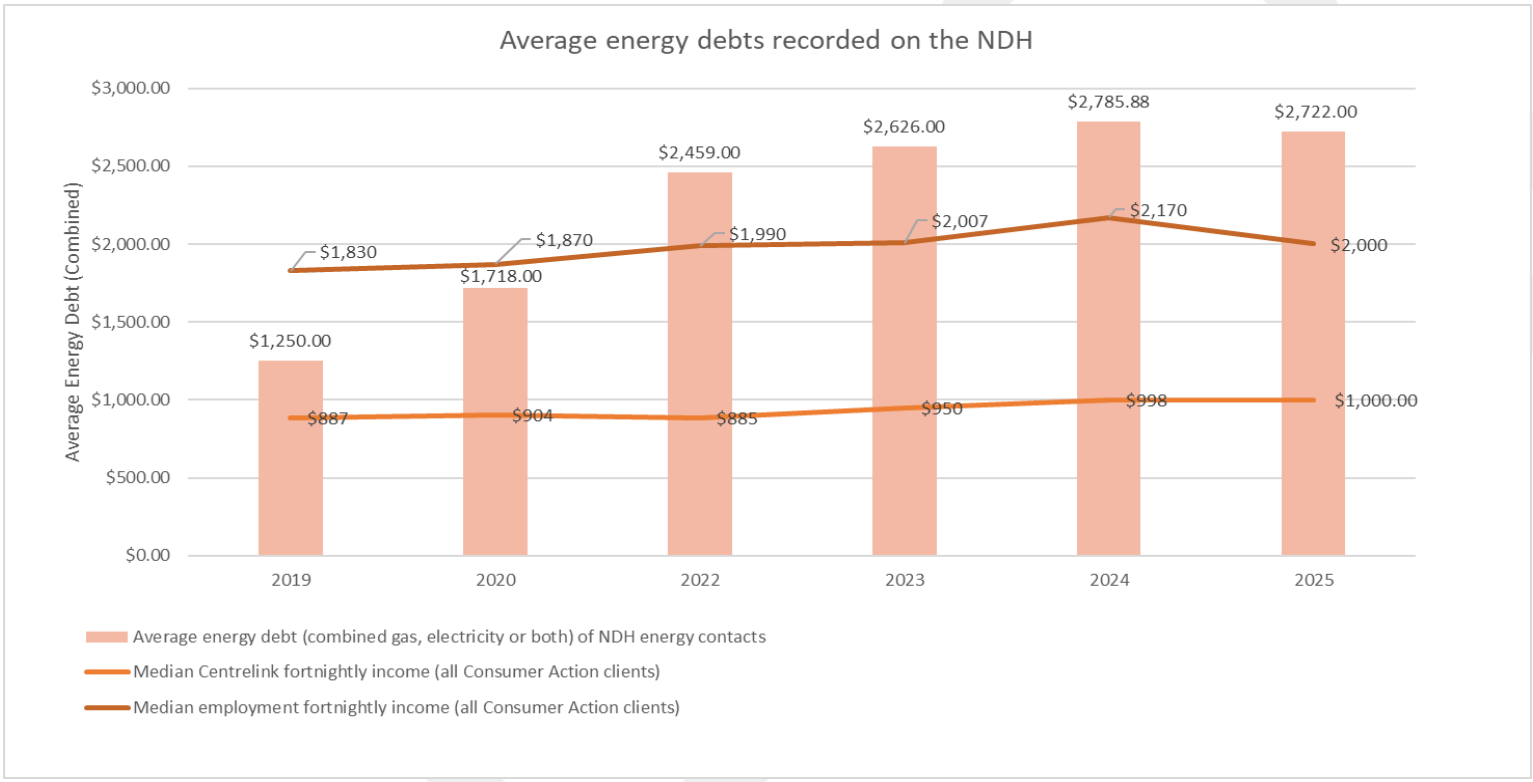

Figure 2 Average combined energy debts of NDH energy contacts from 2019 - 2025, combined with median fortnightly Centrelink and employment income types for all financial counselling and legal clients to Consumer Action

Data sources: All CALC Financial Counselling and Legal Files median fortnightly incomes each Financial Year from 2019 – 2025; CALC Energy Assistance Reports average combined energy debt (2019-2023) & CALC Energy Dashboard Average energy debts (2024, 2025)

Exploring options to reduce higher energy costs is critical for Victorian consumers

We strongly support the ESC's inclusion of their intention to explore options to reduce higher energy costs faced by some consumers experiencing vulnerability[9]. Through our frontline services on the NDH, our clients have indicated the cost of energy as a key issue when seeking assistance from us. As outlined above, energy debt has continued to grow since we began reporting recorded energy debts in 2019.

[8] While these cohorts are not directly analogous, the comparison is indicative of a risk of entrenched or long term energy debt.
[9] Essential Services Commission, *Advancing Equity Strategy consultation paper*, December 2025, p10

While issues regarding retailers' compliance with payment difficulty assistance obligations remains a necessary priority, payment assistance measures may not resolve entrenched energy debt for many low-income Victorians. We believe it is critical to address the underlying issue of energy affordability for low-income Victorians. In our view, the ESC's commitment to explore measures to reduce energy costs is a crucial step in ensuring the long-term interests of Victorian consumers in receiving affordable energy.

To this end, we welcome the adoption of the Energy Retail Code of Practice reforms including the automatic best offer switch for customers experiencing payment difficulty[10], and support the ESC and Victorian Government exploring a stable low-cost electricity price for low-income Victorians, such as a social tariff. We believe a social tariff for electricity would assist in reducing the increase in system-level energy debt, and provide low-income Victorians access to affordable essential services.

[10] Essential Services Commission, *Energy Consumer Reforms: Final Decision,* 30 September 2025, p.11

2. Systemic barriers experienced by cohorts contacting the NDH

The following findings from our NDH energy data is drawn from comparing certain demographic cohorts who present on the NDH with energy issues, compared to NDH energy contacts who have not identified themselves in that cohort. For example, we have compared First Nations energy contacts to NDH energy contacts who have not identified as First Nations. We have also compared NDH energy contacts who noted speaking a language other than English at home (LOTE) to NDH energy contacts who only speak English at home.

First Nations people in Victoria contacting the NDH

Note on methodology for First Nations clients on the NDH

When speaking with all NDH contacts, in most cases, the financial counsellor will ask if the client identifies as Aboriginal or Torres Strait Islander. If the client prefers not to say, or if the question isn't asked, we have included these in 'Unknown'. If the client answers yes, the financial counsellor will record in the clients file that they are Aboriginal, Torres Strait Islander, or both as relevant. In this submission, we refer to all clients who have identified as Aboriginal or Torres Strait Islander as First Nations clients.

First Nations clients contacting the NDH face additional barriers to affordable energy and assistance

Of First Nations contacts to the NDH who raised energy issues during their appointment, compared to non-First Nations contacts, Consumer Action has found First Nations clients are more likely to be experiencing one or more demographic factors or life impacts that can create additional barriers to affordable energy, or receiving appropriate assistance for their energy accounts.

We note the important distinction raised in our report Money Yarns, Stronger Futures that we are using the term vulnerability or vulnerable in reference to social and systemic barriers, and this does not refer to an individual characteristic[11].

> *"First Nations peoples are some of the world's strongest and most resilient people and it is due to historical and ongoing systemic racism that to be an Indigenous Australian equates to a social and systemic vulnerability"*
>
> Money Yarns, Stronger Futures: Integrated Practice Project Report, Consumer Action 2024

Electricity is the most common presenting issue for First Nations clients

When speaking to a Consumer Action financial counsellor on the Victorian NDH, callers will raise the key issues that have brought them to our service. In 2025, electricity has been recorded as the first most common presenting issue for all First Nations contacts to the NDH, with approximately 26% of contacts raising energy issues during their appointment.

In comparison, a lower proportion of non-First Nations clients contacted the NDH and raised an energy-related issue and electricity ranked as the fifth most common presenting issue for non-First Nations clients in 2025. These findings suggest that the ESC and essential services industries could give further priority to First Nations cohorts in providing appropriate and tailored resources, information and support regarding energy consumer protections and available assistance.

[11] Consumer Action, *Money Yarns, Stronger Futures: Integrated Practice Project Report 2021-2023*, July 2024, p.3

There is a persistent income gap for First Nations peoples

Recent national findings recorded a median weekly household income gap of $316 in 2021 for First Nations adults in Australia compared to non-First Nations adults[12]. Similar to national findings, Consumer Action has found that in 2025, First Nations energy contacts to the NDH reported living with an average of $102 less in fortnightly income to non-First Nations energy contacts.

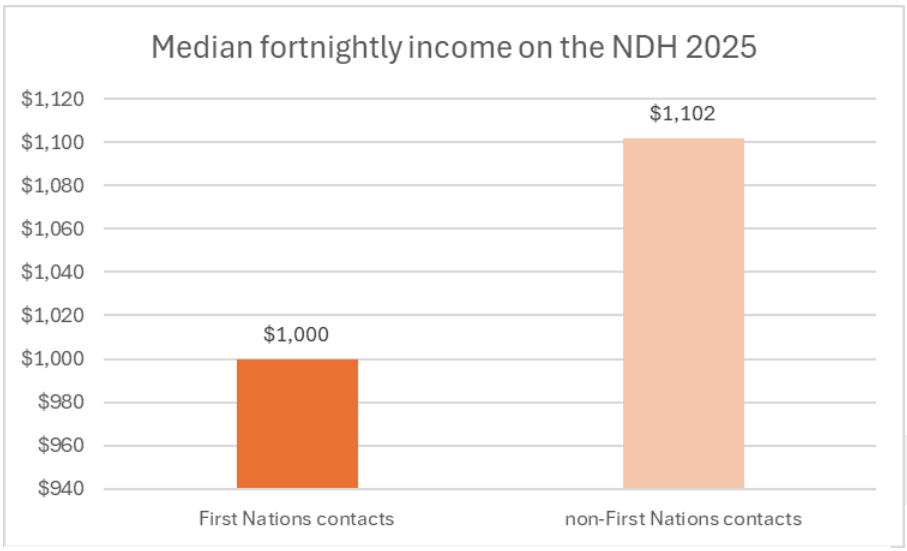

Figure 3 NDH 2025 energy contacts recorded median fortnightly income. This includes all income types such as Centrelink incomes, employment incomes or other income types.

While Consumer Action's findings represent a smaller gap in income, both figures highlight that the gap in income for First Nations Victorians can be a significant barrier to affording energy, among other household costs. We have found there can be higher or lower average debt amounts for First Nations and non-First Nations energy contacts depending on a given time period. However, the financial gap in income for First Nations contacts to the NDH identified in figure 3 alongside other increased systemic barriers such as labour market discrimination[13], uneven access to health services, and geographic location and caring responsibilities that can contribute to disadvantage[14], can entrench the challenges of resolving energy debt for First Nations clients.

Higher likelihood of shared or single parent households

We have found that, when compared to all non-First Nations energy contacts to the NDH in 2025, First Nations people were 8% more likely to be a single parent with children, and 7% more likely to live in another type of family arrangement, see figure 4 below.

These findings suggest that First Nations people contacting the NDH in energy hardship may be more likely to be living with multiple family members in the one household, and consequently could require higher energy usage. This would result in higher bills, and for single parents with children, this issue is magnified with only one bill payer in the household.

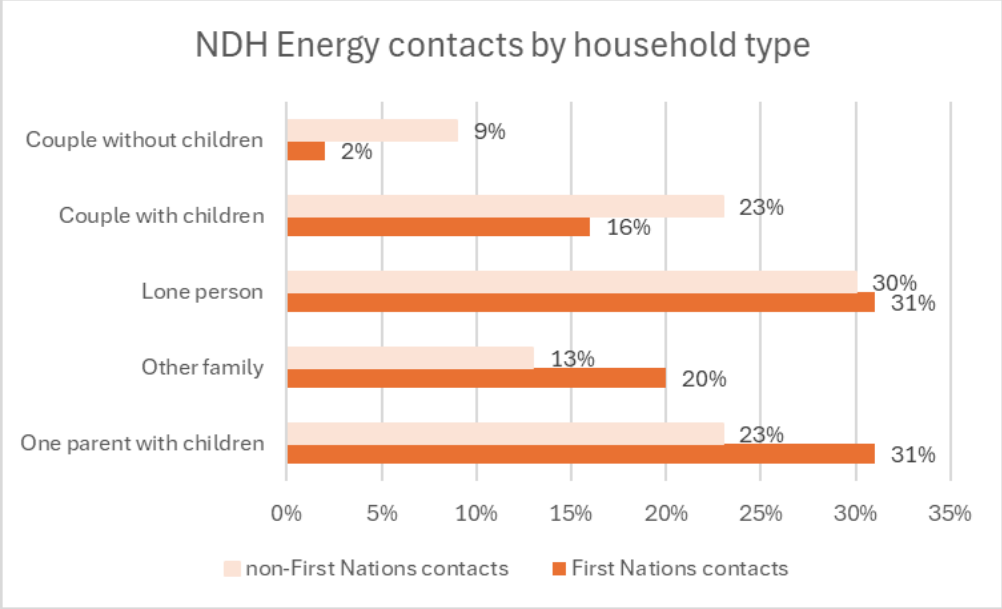

Figure 4 Comparative proportions of household types of energy contacts recorded on the NDH in 2025

[12] Australian Institute of Health and Welfare, *Aboriginal and Torres Strait Islander Health Performance Framework,* 2.08 Income - AIHW Indigenous HPF
[13] Biddle, N., Howlett, M., Hunter, B., & Paradies, Y. (2013). Labour market and other discrimination facing Indigenous Australians. *Australian Journal of Labour Economics*, *16*(1), 91-113.
[14] Australian Institute of Health and Welfare, *Aboriginal and Torres Strait Islander Health Performance Framework,* 2.08 Income - AIHW Indigenous HPF Implications

First Nations clients record higher rates of experiencing retailer issues

First Nations contacts to the NDH with energy issues appear more likely to report inadequate assistance from their energy retailer when compared to non-First Nations energy contacts. In our most recent *Energy Assistance Report* we found similar findings, that First Nations people were 7% more likely to experience a type of Payment Difficulty Framework breach by their retailer[15].

In figure 5, we have compared the two most commonly presenting retailer issues recorded during financial counselling appointments on the Victorian NDH as a proportion of the number of First Nation and non-First Nations energy contacts. These are retailers' lack of assistance with the Utility Relief Grant to their customers, and clients reporting they have an unaffordable payment plans with their energy retailer.

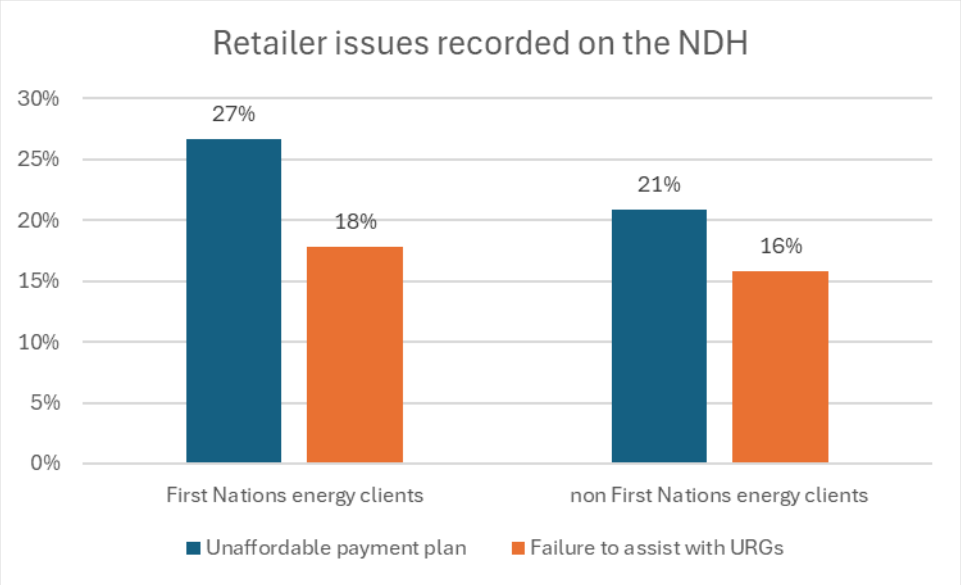

Figure 5 Comparative proportions – retailer issues reported by relevant cohort represented as a proportion of total number of First Nations and non-First Nations energy clients on the NDH in 2025

Consumer Action recorded that the number of reports of an unaffordable payment plan for a gas and or electricity account represents 27% of the number of First Nations energy contacts, compared to 21% for non-First Nations energy contacts. We recorded that the number of reports of a retailer not providing adequate assistance in applying for the Utility Relief Grant represents 18% of the number of First Nations energy contacts, compared to 16% for non-First Nations energy contacts.

Money Yarns, Stronger Futures Report findings

Consumer Action has engaged with First Nations peoples in Victoria through our community engagement projects, and through the Integrated Practice Project spanning more than five years, in partnership with Victorian Aboriginal Legal Service (**VALS**). Through this project, interviews were conducted with First Nations participants, who provided insights into their experiences with essential service retailers. When asked if they would prefer their

> *"I think that they do need to be culturally safe and aware. They need to ask the question too "are you Aboriginal or Torres Strait Islander", I have never been asked."* – Interview participant
>
> *"No cultural safety - you never feel respected even though you have just told them your whole life story and it feels like you are talking to a robot. It doesn't help if you get angry with them"* – Interview participant
>
> *Money Yarns, Stronger Futures: Integrated Practice Project Report*, Consumer Action 2024 p.31

[15] Consumer Action, *Keeping the Lights On – Energy Assistance Report 4th Edition*, June 2024, p.35

retailer to ask if they identify as Aboriginal or Torres Strait Islander, some participants responded with the following quotes which were published in the Money Yarns, Stronger Futures Integrated Practice Project Report[16].

Embedding First Nations self determination is critical to advancing equity

We welcome the commitment by the ESC to establish a First Nations Self Determination framework announced in the Advancing Equity Strategy consultation paper[17], and submit that this framework must be developed in close partnership with First Nations representatives, and broader community.

We strongly support the ESC continuing to prioritise building their partnerships and collaboration with First Nations representatives, as demonstrated in their actions outlined in the Getting to Fair final report[18]. We submit that the ESC could establish roundtable engagements for First Nations representatives and community members to provide input and guidance to a Self Determination Framework, as part of building on the existing Getting to Fair workstream.

We reaffirm our recommendation from the *Money Yarns, Stronger Futures* report that:

> ***Recommendation: Redesign of the essential services delivery model with First Nations people***
>
> *First Nations Peoples must have culturally safe access to essential services. The Essential Services Commission (ESC) should work in close partnership with First Nations representatives to understand the impacts of service delivery models and find ways to ensure essential services retailers work in ways that are culturally safe and appropriate to the needs of First Nations people and communities.*
>
> - *Money Yarns, Stronger Futures: Integrated Practice Project Report*, Consumer Action 2024 p.31

To this end, we provide one recommendation of how this could be implemented as part of the Advancing Equity Strategy and First Nations Self Determination Framework

RECOMMENDATION 1. For the ESC to establish regular First Nations only roundtable engagements as part of its First Nations Self Determination Framework

[16] Consumer Action, *Money Yarns, Stronger Futures: Integrated Practice Project Report 2021-2023*, July 2024
[17] Essential Services Commission, *Advancing Equity Strategy consultation paper*, December 2025, p.8
[18] Essential Services Commission, *Getting to fair: Breaking down barriers to essential services,* August 2021,pp. 11-12

Culturally and Linguistically Diverse Victorians contacting the NDH

Note on methodology

Consumer Action records whether a client speaks a language other than English (LOTE) at home, however we do not collect any additional information that would identify whether the client is culturally or linguistically diverse (**CALD**). The identifier of speaking a language other than English is not an adequate measure of the total proportion of ethnically, culturally or linguistically diverse people contacting the NDH, as it is generally defined[19]. There is a significant proportion of Victorians of culturally diverse backgrounds who speak multiple languages at home including English, who may use English when communicating with their retailer or community sector services instead of advocating for a translation service. Due to our data collection only recording LOTE, this means that we are not able to measure the experiences of broader CALD communities at this time.

Over a quarter of NDH energy contacts speak a language other than English at home

Clients who have recorded speaking a language other than English at home make up 27% of all NDH energy contacts, representing over a quarter of NDH energy contacts in 2025. This proportion is similar to previous NDH reported demographics, such as in 2024 where we recorded 25% of all NDH energy contacts identified being LOTE speaking clients[20].

CALD Victorians are recorded experiencing higher rates of retailer issues

In the figure below, we have compared the number of reports of the two most commonly presenting retailer issues recorded during financial counselling appointments on the Victorian NDH as a proportion of the total number of energy contacts who speak a language other than English at home compared to non-LOTE speaking clients.

We have found that the number of reports of an issue receiving assistance from their retailer, when represented as a proportion of total energy contacts, is higher for clients who speak LOTE at home than clients who speak English at home. This higher proportion of reports may suggest that issues regarding retailer assistance could be more widespread for CALD communities, considering the experiences shared by LOTE clients on the NDH.

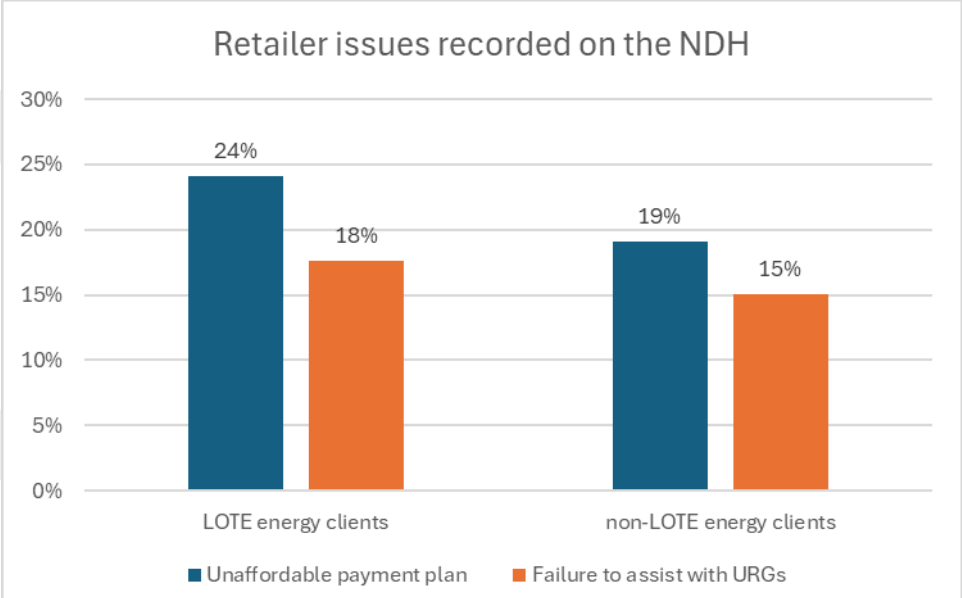

Figure 6 Comparative proportions – retailer issues reported by relevant cohort represented as a proportion of total number of LOTE and non-LOTE clients on the NDH in 2025

Further information is required to measure retailers' translation service provision to their customers

As part of our data analysis, we review all financial counselling case notes for energy contacts to the NDH. Through this analysis in 2025, we have found that LOTE speaking energy contacts have not stated to the financial counsellor that their retailer has provided them translation services during their phone calls with their retailer. This may

[19] Jupp, K. M. (1976). The Borrie Report: Background, Findings, Recommendations. Population and Development Review, 2(1), 65–77. https://doi.org/10.2307/1971531

[20] Consumer Action, *Keeping the Lights On – Energy Assistance Report 4th Edition*, June 2024, p. 37

suggest that there is an under-usage of translation services by retailers for Victorian consumers who may require or prefer a translator.

We support the ESC investigating existing retailer practices in their obligation to provide translation and interpretation services to their customer, and submit it would be relevant to ascertain retailers' proportion of customers using translation services at regular intervals in order to understand whether appropriate provision of translation is occurring, in addition to measuring any increases or decreases in meeting this requirement over time.

RECOMMENDATION 2. For the ESC to conduct a systemic investigation into essential service retailers' provision of translation services to their customers, including by requesting retailer data on the proportion of customers utilising translation services at regular intervals.

Considerations for intersecting vulnerabilities

Case Study – Rosa

Rosa* lives alone in her mortgaged home. Her income comes from the Disability Support Pension and occasional casual work.

Rosa recently experienced family violence and subsequently lost her casual employment. This led to significant financial stress. Prior to losing this work, Rosa was generally able to manage her household expenses. Since the reduction in her income, she has struggled to meet basic needs and reported that she has gone without food in order to pay essential bills.

When Rosa contacted the NDH, she had an outstanding electricity bill of over $1,400, as well as other secured debts. She explained that she had previously been on a fortnightly payment plan of approximately $50 for her electricity account. However, her energy retailer repeatedly cancelled the payment arrangement, claiming that payments had not been received and requesting proof of payment.

Each time the payment plan was cancelled, the retailer increased the required repayment amount. As a result, the fortnightly payment amount was increased to $90, which Rosa could not afford.

Rosa advised the NDH financial counsellor that her home does not have a gas connection and that she only uses electricity and solar power. She was unsure why her electricity bills were so high given her limited energy usage.

Rosa has made ongoing efforts to reduce her electricity debt, including successfully accessing a Utility Relief Grant. Despite these efforts, she remains under significant financial pressure due to reduced income and rising essential costs.

*name changed

In the case study above, Rosa is experiencing issues with insecure employment, family violence, low and reduced income, and by virtue of living alone, is the sole bill payer in her household. Rosa's case study above provides a real-life example of the compounding impacts that can occur for Victorians who are experiencing multiple vulnerabilities and systemic barriers.

We provide this case study to demonstrate that in considering systemic barriers as part of the Advancing Equity strategy, the application of intersectional analysis of vulnerabilities should be applied, in order to understand the impacts on people experiencing vulnerabilities.

We support the ESC engaging directly with people who have lived experience of intersecting vulnerabilities, from a diverse range of backgrounds. We believe that engagements such as roundtable forums directly with consumers would enable the Commission to gain a deeper understanding of the complex impacts on Victorian consumers. Importantly, it would also facilitate an opportunity for Victorian consumers to directly engage with the ESC's strategic priority process, by providing their direct experience and insights. We believe that this approach aligns with the ESC's purpose in ensuring the long-term interests of Victorian consumers.

RECOMMENDATION 3. For the ESC to facilitate engagements directly with Victorian consumers experiencing vulnerability to seek their input into regulatory priorities, as part of implementing the Advancing Equity Strategy

Please contact Senior Policy Officer **Eirene Tsolidis Noyce** at **Consumer Action Law Centre** at [redacted] if you have any questions about this submission.

Yours Sincerely,

[redacted]

Stephanie Tonkin | CEO
Consumer Action Law Centre

[redacted]

Zyl Hovenga-Wauchope | CEO
Financial Counselling Victoria

[redacted]

Peter McNamara | CEO
South East Community Links

[redacted]

Kate Wheller | CEO
Community Information and Support Victoria

[redacted]

Melissa Hardham | CEO
Westjustice

[redacted]

Nadia Harrison | CEO
Mortgage Stress Victoria

APPENDIX A - SUMMARY OF RECOMMENDATIONS

RECOMMENDATION 1. For the ESC to establish regular First Nations only roundtable engagements as part of their First Nations Self Determination Framework

RECOMMENDATION 2. For the ESC to conduct a systemic investigation into essential services retailers provision of translation services to their customers, including by requesting retailer data on the proportion of customers utilising translation services at regular intervals

RECOMMENDATION 3. For the ESC to facilitate engagements directly with Victorian consumers experiencing vulnerability to seek their input into regulatory priorities, as part of implementing the Advancing Equity Strategy

About our organisations

About Consumer Action

Consumer Action is an independent, not-for profit consumer organisation with deep expertise in consumer and consumer credit laws, policy and direct knowledge of people's experience of modern markets. We work for a just marketplace, where people have power and business plays fair. We make life easier for people experiencing vulnerability and disadvantage in Australia, through financial counselling, legal advice, legal representation, policy work and campaigns. Based in Melbourne, our direct services assist Victorians and our advocacy supports a just marketplace for all Australians.

About Financial Counselling Victoria

FCVic is the peak body and professional association for financial counsellors in Victoria. We provide resources and support to financial counsellors and their agencies who assist vulnerable Victorians experiencing financial difficulty. We work with government, banks, utilities, insurers, debt collection and other stakeholders to improve approaches to financial difficulty for vulnerable Victorians. As the peak body representing financial counsellors, we are not only advocates for the continued funding and expansion of the sector to meet community need, we are also the primary support and development body focused on professionalising and resourcing the sector.

About WEstjustice

Westjustice is a community organisation that provides free legal help to people in the Western suburbs of Melbourne. We can help with a broad range of everyday legal problems including consumer disputes, credit and debt, family law and family violence, fines, motor vehicle accidents, tenancy, youth criminal law and more. Westjustice is also the current convenor of the FCVic Essential Services Network

About South East Community Links (SECL)

SECL.is a trusted community organisation dedicated to improving outcomes for people in our community who face barriers and difficulty, to live our vision to ensure every person counts and every system is fair. We value inclusion, equality, compassion, dignity and choice and we're committed to working together with multicultural communities across the south eastern suburbs of Melbourne to offer meaningful programs and services. The help we provide leads to improved social and economic outcomes for people facing barriers to living a full life.

About Community Information and Support Victoria (CISVic)

CISVic is the peak body representing local community information and support services (formerly Citizens Advice Bureaus). Our local services assist people experiencing personal and financial difficulties by providing information, referral and support services including Emergency Relief.

About Mortgage Stress Victoria (MSV)

Mortgage Stress Victoria (MSV) is a free specialist service funded by the Victorian Government. We help Victorians in mortgage stress to stay in their homes sustainably. Our team consists of lawyers, financial counsellors, and social workers. Our vision is fair mortgages an secure housing for homeowners in debt. MSV began as a pilot project, servicing Melbourne's western suburbs only. Originally auspiced by Westjustice, MSV is now a statewide service offering in-person and remote appointments from our Melbourne CBD office.