Wednesday 18 February 2026

Essential Services Commission
Level 8, 570 Bourke St
Melbourne VIC 3000
Via consultation website: engage.vic.gov.au

Dear Gerard and team,

RE: Getting to Fair: Advancing Equity strategy consultation

Financial Counselling Victoria (FCVic) welcomes the opportunity to provide feedback on the draft *Getting to Fair: Advancing Equity* strategy, informed by the input of our member financial counsellors. We strongly support the ESC's continued focus on fairness and equity in essential services regulation, particularly in the current context of ongoing cost-of-living pressures, a changing energy market and clear evidence of variability in service provider conduct and responses to consumer vulnerability.

Firstly, we commend the ESC for maintaining its existing definition of consumer vulnerability. The emphasis on barriers rather than individual characteristics remains critical and reflects what financial counsellors see every day in their work with Victorians facing hardship. Framing vulnerability as a product of systemic, event-based and market factors appropriately situates responsibility on regulators and service providers to design fairer systems, rather than expecting consumers to navigate increasingly complex environments alone.

We also welcome the strategy's explicit consideration of systemic equity barriers from the outset. Broadening the focus beyond individual access issues to include system-level responses is critical. This approach reflects the structural drivers of harm experienced by many consumers, including unaffordable pricing structures, rigid hardship frameworks, poor engagement practices and the cumulative impacts of disadvantage.

The overall strategy is sound and provides a strong foundation. From our perspective, the success of the strategy will ultimately depend on how priority actions are set, resourced and implemented in practice. Therefore, we encourage the Commission to provide greater clarity and transparency around decision-making processes.

In particular, we are interested in how consumers and community organisations will meaningfully contribute to informing annual priority actions and resourcing decisions. While the strategy appropriately highlights the importance of consumer voice, it would be strengthened by clearer commitments around co-design, lived experience involvement and feedback loops that demonstrate how input influences outcomes.

Similarly, greater transparency around how regulatory priorities are determined would support confidence in the framework. This includes clarity about the data, insights, stakeholder input and other factors that shape decisions, as well as how trade-offs are assessed when not all equity issues can be addressed at once. Publicly articulating these inputs would align well with the ESC's Strategic Plan's focus on integrity and trust.

We also encourage the ESC to explicitly recognise the role of financial counsellors as a key source of system intelligence. Financial counsellors work at the frontline of consumer harm and are uniquely placed to identify emerging risks, systemic failures and the real-world impacts of regulatory settings. Ongoing, structured engagement with the financial counselling sector would strengthen data and insights, support earlier intervention, and ensure reforms remain grounded in lived experience.

Additional areas for consideration include ensuring that a (very welcome) principles-based and outcomes-focused regulation such as a positive consumer duty does not unintentionally weaken enforceable protections, embedding equity considerations into pricing and affordability decisions more explicitly, and developing clear measures of success that more fully reflect consumer outcomes.

Overall, FCVic strongly supports the direction of the Advancing Equity strategy and sees it as an important step toward more just and inclusive essential services. We look forward to continuing to work collaboratively with the ESC to ensure the strategy delivers tangible improvements for consumers experiencing vulnerability and financial hardship.

Thank you for your consideration of the above feedback. Please contact FCVic's Advocacy Manager Amanda Chan on [redacted] if you have further questions.

Regards,

[redacted]

Zyl Hovenga-Wauchope
Chief Executive Officer
Financial Counselling Victoria