From: [redacted]
To: Engage
Subject: Feedback on Getting to Fair Advancing Equity Strategy [SEC=OFFICIAL]
Date: Thursday, 19 February 2026 9:32:38 AM
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Hi,

Please find below GMW's feedback on the *Getting to Fair – Advancing Equity Strategy* that has been out for consultation. Unfortunately, I was unable to upload our response via the portal as it had already closed. Sincere apologies for missing yesterday's deadline.

Many thanks,
Kate Biglin

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GMW welcomes the Getting to Fair – Advancing Equity Strategy and appreciates the stronger emphasis on fairness and equity. We have identified some practical challenges for regional organisations that we consider important to note.

GMW supports the strengthened focus on fairness and equity. However, meeting the strategy's data expectations will be challenging for regional organisations like ours. Our core systems were designed for asset, property and billing functions, not for capturing demographic, cultural, digital access or other equity related indicators. GMW is currently going through a tender process for a Customer Relationship Management system and a new Billing System that will go some way to improving our data. However, many of our customers engage infrequently or choose not to disclose personal circumstances, which limits visibility of vulnerability and "invisible" cohorts. As digital inclusion varies greatly across our region, relying on digital engagement data alone can create blind spots. Together, these factors mean GMW may not yet be able to provide the level of segmented, evidence-based equity analysis the strategy seeks, despite strong local knowledge and a commitment to fair service delivery.

GMW also notes the significant uplift expected through the forthcoming First Nations Self Determination Framework. Unlike urban water authorities, GMW operates across a very large geographic region with many Traditional Owner groups and multiple formal RAPs, each with distinct cultural, historical and governance contexts. This means the shift from project-based consultation to embedding self-determination in regulatory decision making, engagement and operational processes presents additional complexity for regional organisations. Clear guidance will be needed to understand how GMW can meaningfully and consistently apply self-determination principles across such a diverse cultural landscape while ensuring respectful, place based engagement aligned with each Traditional Owner group's expectations.

The strategy's focus on preventing inequitable outcomes arising from long term transitions – including climate impacts, digital change and cost of living pressures – is strongly supported. To implement this effectively, GMW and our counterparts would benefit from practical tools for assessing the equity impacts of these transitions, particularly in rural contexts where impacts vary widely between customer groups.

More broadly, guidance will be needed on how regulated entities can identify and address systemic inequities, not just individual barriers. To this end, it would be helpful for the ESC to provide templates or tools for assessing equity impacts at a system level, as well as training and community of practice opportunities to build capability across the sector.

Goulburn-Murray WATER

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We acknowledge Victorian Traditional Owners and their Elders past and present as the original custodians of Victoria's land and waters and commit to genuinely partnering with them and Victoria's Aboriginal community to progress their aspirations.

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Classified by: [redacted] on: 19/02/2026 9:32:02 AM