

# AMES Australia's feedback on the Essential Services Commission 'Getting to Fair' Strategy

June 2021

## Context

AMES Australia (AMES) is a statutory body and a significant provider of settlement, education, and employment services to newly arrived migrants and refugees in Australia. The overarching purpose of AMES work is to support migrants and refugees as they move from early settlement to independence and greater social and economic participation in Australia. AMES partners with professional, community and corporate organisations to ensure that refugees and migrants are connected to the networks and services that will best meet their goals and aspirations. AMES also provides jobactive employment services in Victoria and some areas of Western Sydney. A large percentage of AMES jobactive clients are from Culturally and Linguistically Diverse (CALD) backgrounds.

AMES welcomes the opportunity to provide feedback to the Essential Services Commission's draft 'Getting to Fair' Strategy by addressing the consultation questions. We were also a member of the Stakeholder Reference Group and participated in the four workshops facilitated by ESC regarding the development of this strategy.

## AMES response to the consultation questions:

- **Do you think implementing these goals will assist to improve outcomes for consumers? If not, why not? If yes, is there a way we could strengthen or improve our proposals further?**

Implementing the eight goals of the draft strategy should help to improve outcomes for consumers. For the goals and initiatives to be most effective, essential services must be responsive to the changing needs of consumers. COVID-19, bushfires and recent flooding events have exposed a greater number of consumers to vulnerability in ways that may not have been anticipated. Monitoring and reporting on progress in achieving the goals will help to identify what initiatives worked well and where more work may be needed to address consumer vulnerability in our rapidly changing environment. Having too many goals and initiatives may prevent quality progress being made. We recommend the overall number of goals be reduced and prioritised.

The Commission has highlighted that a three-year work plan for implementation, monitoring, evaluation and review will be developed as part of the final strategy. AMES welcomes this approach. Reporting on the progress to achieving the goals should be shared with consumers, industry sectors, and businesses. This will allow for greater transparency within essential services, highlight proven successes or identify what else could be done moving forward to address consumer vulnerability.

- **Do you think there are other goals or initiatives we should consider, within our scope of responsibility, that would better support consumers?**

We recommend the following actions are taken to better support consumers, especially those from CALD backgrounds:

1. **Provide greater access to, and awareness of, hardship programs to help consumers pay for essential services in times of temporary financial crisis, such as utility relief grants (ERGs).** AMES experience has shown that CALD consumers have little awareness of hardship programs that are available to them. This is often exacerbated by the lack of understanding of their consumer rights. AMES staff supported a number of refugee clients to apply for ERGs during COVID-19 due to their lack of understanding of the information needed to complete the application. For example, some clients did not know the name of their utility provider and had limited English and digital literacy, which made the process almost impossible for them to complete independently.
2. **Work with essential service providers to develop a checklist and train essential services frontline staff to identify consumers at risk of vulnerability.** This is a more proactive approach rather than waiting for consumers to default on their accounts.

3. **Ensure smaller language groups are given greater recognition.** Ethnic and language groups such as from Burma (eg. Chin, Rohingya) and Afghanistan (eg. Hazara) are often forgotten in communications/translations. Some groups may be illiterate in their own language and other means of communication should be considered such as in language podcasts and short videos. Ideally direct engagement with those communities would help providers better understand their customers and tailor programs accordingly.
4. **Ensure English language communication messaging is consistent.** For example, text messages can sometimes provide contradictory information that confuses CALD communities. Language should be simple and in plain English with no use of acronyms.
5. Ensure accounts and contracts use **plain English and are provided in community languages** when needed.
6. **Provide a simple, fair, economical, transparent service/contract as the default option.**
7. **Recruit CALD staff and provide cultural awareness training for staff within essential services.** Industry needs to be more agile and consumer focused than ever. Consumers experiencing vulnerability must know what mechanisms and supports are available to them to access and how to access them in a culturally safe way. Essential services also need to be recruiting staff representative of their diverse consumer base to better engage with their customers in first language.
8. **We support the recommendation by the Energy and Water Ombudsman (Victoria)<sup>1</sup> to customise strategies and in particular employ liaison officers to facilitate ‘culturally safe interactions and improve consumer outcomes’ for First Nations communities. This should also be extended to CALD communities** as it has been shown to be an effective model for other cohorts such as consumers with disability. AMES NDIS Disability Champions project provided information to CALD communities across Victoria about disability support services in their first languages through the recruitment of 12 ‘Community Champions’ from seven communities. By project completion it had provided over 60 sessions reaching 1,050 community members.

- **How well does the definition on page 18 align with the contemporary understanding of consumer vulnerability and its causes and impacts?**

AMES supports the working definition of consumer vulnerability. It describes vulnerability as an experience rather than an identity, which shifts the onus away from the consumer. While consumer vulnerability can be an individualised experience (eg. some consumers might be affected by multiple barriers at the same time) there are common barriers that many consumers face.

- **Given that ‘vulnerability’ is widely used and easily recognised by businesses, is the hybrid approach the best approach for the commission to take when communicating with stakeholders?**

The word ‘vulnerability’ can make people from CALD backgrounds (and others) feel stigmatised. Given the limitations of the language within the Legislative Framework, the hybrid approach suggested is appropriate. Terms such as a consumer equity, consumer wellbeing, and consumer resilience are not only more positive inclusive terms, use of the active voice suggests action is being taken to improve the consumer experience.

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<sup>1</sup> Energy and Water Ombudsman, ‘Missing the Mark: EWOV insights on the impact of the payment difficulty framework’, December 2020, pg.15.