

Water Codes Review 2019 | Stakeholder Working Group | Meeting 2: Customer Communication | Minutes

10.30am – 1.30pm
 Tuesday 8 October 2019
 Melbourne Marriott Hotel
 Corner Lonsdale and Exhibition Streets, Melbourne 3000

Agenda

When	What	Who
10.15 - 10.30am	Arrival	Lucy Weston and Kat George
10.30 - 10.40am	Welcome Housekeeping Overview of agenda	Kat George
10.40 - 10.50pm	Recap of meeting 1	Lucy Weston
10.50 - 12.00pm	Activity #1: Billing and customer charters	Kat George and Lucy Weston
12.00 - 12.30pm	Lunch	All
12.30 - 1.30pm	Activity #2: Principles vs minimum standards	Kat George and Lucy Weston

Attendance

Name	Position	Organisation
Kat George	Policy Adviser	Essential Services Commission

Lucy Weston	Manager	Essential Services Commission
Anna Quayle	Senior Policy Adviser	Department of Environment, Land, Water and Planning
Cara Machell	Communication Specialist	Yarra Valley Water
Chris McLeod	Customer Liaison	Barwon Water
Fabian McCloy	Head of Customer and Community	Goulburn-Murray Water
Kerri Imlach	Manager Customer Service	North East Water
Paul Clark	General Manager, Customer and Community	Gippsland Water
Rosemary Lowe	Strategic Projects, Customer and Community Relations Lead	Western Water
Steven Briggs	Billing Manager	GWM Water
Traci Pevy	Manager of Customer Experience	Lower Murray Water
Zac Gillam	Senior Policy and Stakeholder Engagement Officer	Energy and Water Ombudsman (Victoria)

Apologies

Name	Position	Organisation
Kerri Noonan	Executive General Manager Customer and Community	Coliban Water

Welcome and housekeeping

Facilitated by Kat George and Lucy Weston

- The Working Group was welcomed and thanked for their attendance.
- Minutes from each Working Group will be circulated in the week following the Working Group meeting, and published on the Essential Services Commission's website, on the [resources page for the Water Codes Review 2019](#).

Activity #1: Billing and customer charters

Facilitated by Lucy Weston, Project Manager—Customer Engagement

Lucy asked our Working Group to consider the sections of the water customer service codes relating to billing and customer charters. Through reading and talking about these parts of the codes, the Working Group identified the following challenges and opportunities:

Billing

Challenges	Opportunities
There are currently many items that are mandatory on a bill.	While existing billing elements are fair and reasonable, there may be elements of a bill that are discretionary based on customer preference. These might be better communicated using images, with some more general information better suited to the website or portal.
The prevalence of mandatory elements contributes to reduced font size and bills being difficult to understand.	The industry could take on a greater role in bill design.
New forms of technology and communication are not expressly accounted for or facilitated in the codes.	Communicating via SMS is increasingly seen by customers as desirable and effective. However, this is not well supported in the codes.
The codes are silent on summary bills, or on what content should appear in a summary bill that is sent electronically.	The codes could give businesses the express ability to send a summary bill through an alternative format, with a link to the full bill.
The inclusion of a graph on a bill is not always useful.	Graphs can be excellent visual guides to aid communication with customers over the phone. The codes could provide for flexibility and discretion as to when particular items are included on a bill.
Many consumers see water as a low interest service so it difficult to engage customers without the clear purpose the bill creates.	In their current format bills may serve a dual purpose, contributing to perceptions of transparency and customer value.

Bills are also a vehicle for seasonal messaging such as water savings.

Customer charters

Challenges	Opportunities
The intent of the charter is not clear.	Tailored charters focused on T consumer rights and responsibilities so that at a glance, customers know what to expect from water businesses (and what water businesses expect from them).
The language in customer charters is currently too legalistic, and not user friendly.	Focus could be dot points, Plain English, and images around key responsibility areas. Customers could be referred to websites or fact sheets for detailed policies, key processes, manuals or documents. Greater use of Easy English would serve the accessibility needs of a broad range of customers.
Websites often act as a charter proxy for customers seeking information, but not all customers are digitally literate.	Each business to retain the responsibility of solving how to make printed material available when customers seek detailed review of their consumer rights. This is already the case for customers seeking to access a high unexpected leak allowance (HULA).

Activity #2: A principles-based vs a minimum standards-based approach

Facilitated by Kat George, Policy Adviser—Customer Engagement

Kat led the Working Group through discussion of a what a proactive approach to customer communication would look like in practice. The Working Group considered the relative merits of a principles-based vs a minimum standards based approach to customer engagement, were this to be introduced into the code.

Principles based approach

Advantages	Disadvantages
Flexibility—businesses could tailor their approach the principle, as long as they fulfil the objective.	Principles may also be highly inflexible, particularly if they are in opposition to the outcomes sought by a customer.
Is focused on outcome rather than process, or outputs. It articulates a clear purpose, rather than a task that must be done.	Focusing on meeting principles may lead to customers perceiving that businesses are less focused on their individual needs. It may inadvertently lead to a less tailored approach.
May facilitate improved businesses and customer engagement—moving towards collaborative relationships.	Any wholesale change in approach may undermine work previously done to build relationships with customers.
Acknowledges that not all businesses are the same.	Businesses creating their own rules based on principles, may lead to inconsistency and uncertainty for customers.
May lead to better return on investment due to greater effectiveness in achieving consumer outcomes.	May be expensive to implement due to increased training costs. .
May be easier to implement if the principles complement or align with an organisation's existing strategic focus.	May create inconsistency and uncertainty for customers at an operational level.
Provides for communicating a clear set of consumer expectations and helps customers to feel supported.	May create uncertainty about the nature of the specific assistance customers can access.

Allows for consistency across the regulatory framework, aligning with the outcomes-based approach of the commission's pricing framework.

Inappropriate or poorly articulated principles may lead to reduced flexibility and poor customer outcomes.

Minimum standards-based approach

Advantages	Disadvantages
Consistency across industry at the minimum of what the customer can expect. Does not preclude businesses going above the minimum standard.	May lead to tick-the-box exercise, with some businesses focusing on compliance with minimum standards rather than quality consumer outcomes.
Easier to enforce compliance.	May legitimise a business adopting a compliance focus at the expense of innovation.
Customers know what to expect—very predictable.	May not accommodate evolving customer expectations or disruptive technologies.
Easy to train staff in minimum standards.	Training may focus on rules at the expense of identifying and delivering quality customer outcomes.
Easier to resolve complaints.	May limit early intervention and prevent proactive resolution of disputes.
Codifying existing industry practice.	Unnecessarily codifying what water businesses already do.

Reflections on the purpose of reform

A theme explored during both the morning and afternoon sessions was the intent and purpose of the water customer service codes, as well as customer charters. In the words of one working group member:

'What is the intent of the code? Is it to encourage the relationship between water businesses and customers, or is it to control the relationship between water businesses and customers?'

- Paul Clark, Gippsland Water

While the 'purpose' of the codes and customer charters is not explicitly identified as an agenda item in the remaining working group sessions, we encourage broad ranging discussion during working groups, including on the intent and purpose of the code. We look forward to further consultation on this and other issues raised through these meetings.

Next steps

Our next Working Group meeting will be held on Monday 18 November 2019. This meeting will focus on customer communication, including:

- the hardship GSL and 'reasonable endeavours' checklist
- debt and restriction
- interest charges

We will hear from speakers at this Working Group, including:

- Kate Symons, Chairperson, Essential Services Commission
- Gerard Brody, CEO, Consumer Action Law Centre
- Denis Nelthorpe, CEO, Western Community Legal Centre

A discussion guide for this meeting has been circulated to the Working Group and will be published on the Commission's website.

If you have any questions or feedback please contact Kat George, Policy Adviser, on Kat.George@esc.vic.gov.au or (03) 9032 1392 with questions, thoughts and ideas.