



Consumer
Policy Research
Centre

Building Customer Trust

A principles and practice guide

June 2017



About the Consumer Policy Research Centre

The Consumer Policy Research Centre is dedicated to advancing the wellbeing of Victorian consumers. We believe that consumer interests – particularly those of low-income, disadvantaged, rural and regional consumers – must be a primary consideration in the development and implementation of consumer policy.

As the successor to the Consumer Utilities Advocacy Centre, we draw on the specialist utility policy knowledge developed over more than a decade representing consumers in energy and water policy debates and regulatory processes. We take the same rigorous, evidence-based approach to researching consumer issues relating to Australian Consumer Law and Victorian consumer property.

Our research is strategic and pragmatic, considering the policy environment and monitoring grassroots consumer issues. We identify projects that illuminate market dynamics and consumer behaviour, fill knowledge gaps and build an evidence base to influence policy. We work closely with government, industry stakeholders and community organisations to ensure our findings are translated into policy, programs and fair trading practices.

Acknowledgements

This project drew on the experience and insight of many organisations and individuals. We thank:

- ♦ the energy and water retailers that signed on to the project and committed time, energy and resources to it: AGL Energy, EnergyAustralia, Origin Energy, City West Water, South East Water and Yarra Valley Water
- ♦ our consumer Reference Group members: the Consumer Action Law Centre, Kildonan UnitingCare and the Victorian Council of Social Service
- ♦ the individual consumers who added an essential consumer perspective on the practices and principles
- ♦ the Energy and Water Ombudsman (Victoria) and the UK energy regulator, Ofgem, both of whom helped shape our thinking
- ♦ participants in two Building Customer Trust stakeholder workshops, whose feedback helped finalise the Principles and the ideas that will inform the next phase of the project: AGL Energy, Alinta Energy, AusNet Services, Australian Energy Council, Australian Energy Regulator, Barwon Water, City West Water, Coliban Water, Consumer Action Law Centre, Consumer Affairs Victoria, East Gippsland Water, Energy and Water Ombudsman (Victoria), Energy Consumers Australia, EnergyAustralia, Essential Services Commission, Gippsland Water, GloBird Energy, Jemena, Kildonan UnitingCare, Lumo Energy, Momentum Energy, North East Water, Pacific Hydro, Powershop, Red Energy, Simply Energy, South East Water, Victorian Council of Social Service, Vocus, Wannon Water, Water Services Association of Australia and Yarra Valley Water.

Disclaimer

This guide reports on a sample of practices that exemplify the Customer Trust Principles. The practices discussed are ones that were disclosed to the Consumer Policy Research Centre or that we observed in action during the research period with each participating retailer. The guide is not an exhaustive list of all good practices in place at these retailers; nor does it cover the trust-building practices of retailers who did not participate in the project. As such, the guide is not intended as a critical or comparative review of current practices. Nor is it intended to be prescriptive – its purpose is to offer ideas and stimulate thinking about how the principles might be applied in different business contexts.



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The Building Customer Trust project

This guide showcases practices that build customer trust, benefiting customers and retailers' alike. These practices, and the principles that underpin them, represent high standards that industry can aspire to. Derived directly from on-the-ground retailer experience, they are also realistic and achievable.

The guide is the culmination of a unique collaboration between consumer groups and industry, initiated in 2015 by the Consumer Policy Research Centre (formerly the Consumer Utilities Advocacy Centre).

We have always looked at energy and water through the prism of essential services, so ensuring fair access and treatment for vulnerable consumers has long been a focus of our work. While our past efforts typically focused on advocating for change, it was also clear that many retailers were already doing good work in this area. With this project, therefore, we decided to take a new approach, working with retailers to investigate and document existing practices that were working well. By highlighting and sharing these examples, we aim to encourage their wider adoption, guiding and lifting practice across the energy and water sectors.

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Focusing on trust

When we began this project, fairness was its central focus. We wanted to understand the principles and practices that underpinned fair treatment of customers and ensured access to essential energy and water services.

However, during the course of hundreds of hours spent observing business practices and speaking with staff and customers, we noticed the theme of 'trust' recurring continually. Within different retailers and across all business areas, staff repeatedly described strategies for building trust and spoke about its crucial role as an enabler of engagement and mutually beneficial outcomes.

We concluded that the goal of building customer trust is one that all energy and water retailers can embrace as a central business strategy. It is an objective that encompasses the original project goals of fair access and treatment, because these are what generate trust. At the same time, customer trust as a business strategy acknowledges businesses' legitimate business aims, and draws the link between fair customer treatment and business objectives. Focusing on customer trust in every interaction is, we believe, the smartest way of ensuring both access to essential services and business success.

Achieving and maintaining trust is an ongoing process: in each interaction, retailers need to demonstrate genuine integrity and the motivation to meet customer expectations. They must also have in place the resources and practices to deliver on commitments made to customers. Trust develops when this is done repeatedly over time.

¹ In this guide, we have used the term 'retailer' to refer to both energy retailers and water businesses engaged in retail activities.

Trust is relevant to all customers and each interaction that they have with retailers, but it is perhaps most crucial – and most at risk – when vulnerable customers are struggling to afford and maintain access to energy and water services. As the South East Water General Manager explained to us, trust develops in ‘moments of truth’, when a customer needs assistance and the retailer responds quickly and with impact. Hence the project retained its initial vulnerability focus, paying particular attention to how retailers can build trust with customers in financial difficulty who need assistance to stay connected.

What is trust?

A customer who has trust in their retailer believes the retailer is willing and able to deliver on expectations.² This belief does not form in a vacuum: it is built on perceptions of values and of competence. To develop trust, a customer must have reason to believe that a retailer has its customers’ best interests at heart, and that it has the knowledge and expertise to act accordingly.

Trust has benefits for customers, retailers and industries as a whole. In energy, trust gives customers the confidence and willingness to participate in the market, and to do so effectively.³ Retailers that have the trust of customers can draw on this to achieve their objectives and to weather difficult times. When drought necessitated restrictions, for example, water retailers were able to draw on customer trust and goodwill to conserve water and maintain supply. On the other hand, the degradation of trust can increase the cost of operations and block organisations from achieving their objectives.⁴

To develop trust, a customer must have reason to believe that a retailer has its customers’ best interests at heart, and that it has the knowledge and expertise to act accordingly.

Project partners

To investigate the practices that build trust, we partnered with Australia’s three largest energy retailers, AGL Energy, EnergyAustralia and Origin Energy, along with the water retailers that service metropolitan Melbourne: City West Water, South East Water and Yarra Valley Water. These retailers all participated in and provided funding for the project.

We also formed a Reference Group to bring consumer voices into the project. The Reference Group, made up of Kildonan UnitingCare, the Victorian Council of Social Service and the Consumer Action Law Centre, offered a consumer perspective on the approach and findings at each stage of the project.

Research approach

For the project’s research phase, we visited each retailer for up to four days of intensive engagement and observation, spanning front-line customer service, hardship, collections, complaints, communications and sales areas. During our time immersed in these businesses, we reviewed documented policies and procedures and then investigated how they were implemented in practice, listening in on customer service calls and observing staff interactions with customers. Across the six retailers, we interviewed around 90 frontline staff, team leaders and senior managers, seeking their views on business policies, practices and procedures – particularly those that they thought worked particularly well at building customer trust.

2 Greenberg, Michael R (2014) ‘Energy policy and research: The underappreciation of trust’ *Energy Research and Social Science* 1:152–160.

3 Consumer Action Law Centre (2016) *Power Transformed: Unlocking effective competition and trust in the transforming energy market*, p. 5.

4 Ernst & Young (2013) *In utilities we trust?: How can energy providers win back the trust of their customers?*, p. 3; Greenberg, Michael R (2014) ‘Energy policy and research: The underappreciation of trust’ *Energy Research and Social Science* 1:153.

At the end of this process we developed individual reports for each retailer, documenting the good practices that we had seen in action. For us, these reports were an opportunity to confirm our understanding of what we had observed; for retailers, they were a reference that could be used to celebrate and sustain good practice.

We also gathered input directly from customers themselves. In May 2016, Kildonan UnitingCare facilitated a two-hour focus group discussion with 15 customers. The discussion explored their experiences with energy and water retailers as well as their needs, values and expectations. Some insights from the customer focus group are described or quoted in this guide.

Finally, we sought regulatory and ombudsman perspectives to develop our thinking on trust and fairness principles and practices. Victoria's Energy and Water Ombudsman spoke with us about how her office views fairness and works towards 'fair and reasonable' complaint outcomes. The Ombudsman also shared her perspective on effective practices and areas where improvements have been made. We also heard about the UK experience from Ofgem, the UK energy regulator whose fairness reforms provided some of the initial inspiration for this project.

Using this guide

This guide showcases retailer practices that build customer trust. All of the ideas and suggestions in this guide came from what we observed or were told by the participating retailers – so we know they are realistic, achievable and informed by on-the-ground experience. Retailer practices are diverse and continually evolving, and this guide captures only a selection of practices that we identified during the research. Retailers will have other practices in place that also align with the principles.

From the trust-building practices we observed, we distilled four underpinning Customer Trust Principles:

1. **Treat customers fairly.**
2. **Set customers up for success.**
3. **Embed a culture of customer trust in the business.**
4. **Create systems and processes that make it easy to build trust.**

Each chapter in the guide covers one of these principles, describing related policies, practices and initiatives, the rationales behind them, and some of the results that they have produced.

At the end of each chapter, a practice checklist summarises retailer actions and practices that relate to the principle. These checklists include some 'quick wins' – practices that should be easy for any retailer to implement – as well as more ambitious, overarching initiatives requiring substantial time, dedication and resources.

The checklists do not cover all possible practices, and no retailer will implement every practice listed. The purpose of these checklists is to provide ideas and inspiration, stimulating thinking about how the principles can be implemented in practice, improving service and building customer trust.

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Next steps

Work on the Building Customer Trust project is ongoing. The Consumer Policy Research Centre has consulted with stakeholders from across the energy and water industries, consumer and community groups and government to explore ways to embed the principles. This work will inform the next phase of the project. Retailers and other organisations keen to participate can contact the Consumer Policy Research Centre.



Principle 1.

Treat customers fairly

We treat customers with dignity, integrity and respect in every interaction.

The first customer trust principle is to treat customers fairly, with dignity, integrity and respect, in every interaction. As well as benefiting the customer, fair treatment is a key strategy for tackling the challenge of customer non-engagement. Fair treatment demonstrates a retailer's intention to prioritise customer interests. In turn, this encourages customers to engage, which is the first step towards building a relationship – or rebuilding a relationship that has broken down.

When customers have confidence that they will be treated fairly, engagement is of higher quality: customers are more likely to disclose their true circumstances in an open conversation, and to do so early, before issues become unmanageable. All of this makes it more likely that retailers and customers will find mutually agreeable solutions to problems.

Treating customers with dignity, integrity and respect

Working at the interface between customers and retailers, customer service staff lay the foundation for fair customer treatment and customer trust through their attitudes and the way they communicate. Customers report that they want customer service staff to treat them with dignity, integrity and respect.

Retailer staff across frontline, complaints and hardship areas explained to us that fair customer treatment starts with a friendly, non-judgemental attitude. This attitude is informed by understanding: of the challenging circumstances customers may be facing; of the fact that anyone can fall into hardship; and of the power imbalance and feelings of shame and embarrassment that can make it difficult for customers to engage.

With this knowledge front-of-mind, staff can manage difficult customer conversations in a sensitive, skilful way. To do this, they take time to build rapport at the beginning of a call, using open questions, active listening and empathetic statements to develop and demonstrate understanding. By making the customer feel heard and understood, these interactions can be pivotal to the trust-building process (see **Case study 1**).

Case study 1.

Origin Energy developing trust and encouraging engagement

A single mother with two young children, unemployed and living on Centrelink payments, called Origin Energy to make a payment arrangement. She had previously had a series of broken payment arrangements.

The staff member spent some time talking with the customer, finding out more about her life without being intrusive. Feeling more at ease, the customer disclosed that she was experiencing domestic violence. The staff member referred her to domestic violence support services and to the Salvation Army.

The staff member emphasised that to keep the customer connected, it was important that they develop a payment arrangement that was affordable and that the customer could maintain. The staff member also explained that if the customer couldn't make a payment, calling before it fell due would keep other avenues for assistance open.

Fair treatment demonstrates a retailer's intention to prioritise customer interests.

'If there's one thing this department has taught me it's that it can happen to anybody. With today's lifestyles, if one thing goes wrong, that's it.'

Origin Energy staff member

'You need to listen to the customer to get an understanding of their individual circumstances before you can start talking about payment arrangements. It's about building that relationship of trust first.'

Yarra Valley Water staff member

To help develop staff skills in managing sensitive customer conversations, retailers can draw on advice and training provided by community organisations with experience in this area.

Making fair treatment consistent

Trust takes time to develop, building over the course of repeated positive experiences. The corollary of this is that fair treatment must be a consistent thread running through every customer interaction, regardless of the business area or the individual staff member involved. Fair treatment should also be applied consistently to all customers, regardless of their point in the customer continuum and whether they have missed a payment or failed to engage in the past.

Retailers have many ways of supporting consistency. At Origin Energy, consistency is explicitly promoted as a business value and practice, backed up in value statements, customer interaction frameworks and quality assurance processes. More broadly, consistency is supported by documented processes and procedures that are easy for staff to access and follow.

Training – discussed in more detail under *Principle 4* – is another plank that supports consistency. Retailers can even embed fair customer treatment into outsourcing agreements so that it extends to customers' interactions with third-party agencies (see **Case study 2**).

Case study 2. Yarra Valley Water's collection strategy

Motivated to treat customers fairly – even via partner services – Yarra Valley Water worked intensively with its third-party mercantile collection agencies to embed respectful treatment of customers and fair outcomes.

At the outset, welfare agency Kildonan UnitingCare was invited to visit each collection agency to identify any gaps in practices. Implementation of the customer focused strategy required extensive staff training, instilling the Yarra Valley Water culture. Several tactics were used to build better relationships with partner services to align culturally with Yarra Valley Water's values. 'Buddy' sessions with Yarra Valley Water staff, call listening and interaction with Yarra Valley Water's Customer Support Team were all extremely valuable. Staff from the Yarra Valley Water Customer Debt Management team also went out to each collection agency to answer questions and address any issues.

Once consistency was established, it was proactively maintained through ongoing interaction, feedback and quality assurance, led by a dedicated Relationship Manager.

The strategy has resulted in lower complaints and an increase in the revenue collected. Most importantly, it has created a better experience for customers by helping to ensure that Yarra Valley Water's partners know exactly what is expected of them.

'After many years with a physical and cultural distance between Yarra Valley Water and previous collection agencies, it was really important that the new model incorporated some fundamental points to move towards making the strategy successful when it came to training and culture. We want the best outcome for our customers, and for them to feel comfortable accepting the assistance available when needed. To achieve this, we need our partners to genuinely adopt our culture and values, so that our customers are always treated with respect and dignity.'

Yarra Valley Water
staff member

Practice checklist

Principle 1.

Treat customers fairly

Based on our observation of participating retailers, this checklist summarises some of the practices that retailers may use to build trust by treating customers fairly in every interaction.

- Encourage and support customers when they take steps to make positive changes.
- Develop a process for discussing payment difficulty with customers in a sensitive and empathetic way. For example:
 1. Acknowledge and thank the customer for making contact and seeking assistance.
 2. Before discussing options, take some time to build comfort and rapport and develop an understanding of the customer's situation. This step includes:
 - ◆ adopting a friendly, personable manner, normalising the support process rather than emphasising vulnerability
 - ◆ asking open questions to get a sense of the bigger picture for the household
 - ◆ using active listening – repeating back what the customer has said – to both check and demonstrate understanding
 - ◆ where appropriate, offering empathy by acknowledging how the customer is likely to be feeling
 - ◆ validating the customer's account of their circumstances, their payment difficulties and their previous interactions with the business
 - ◆ listening for what the customer might be communicating 'in code' or leaving unsaid because they are uncomfortable with disclosure.
 3. Based on an understanding of the customer's specific circumstances and needs, outline their options or a suggested course of action, and invite the customer's opinion and agreement.
 4. Follow up with extra questions that confirm the customer's understanding and 'reality check' their capacity to fulfil what is being agreed.
- Remind frontline staff of business frameworks, practices and values that support fairness at regular meetings or 'huddles', and offer other refreshers and reminders so that fair customer treatment is front-of-mind.
- Document processes and procedures for assisting customers and make them easy for staff to access and use.
- Hold workshops among team leaders to discuss staff performance and develop mechanisms to measure and track consistency across teams.
- Develop and implement a strategy for extending customer trust principles and practices to community partners and third-party agencies such as subcontractors. This might include:
 - ◆ involving a welfare or financial counselling organisation to identify gaps in agency practices
 - ◆ holding Q&A sessions at the agency to answer questions and address issues
 - ◆ having agency staff visit for 'buddy' sessions, call listening and discussions with internal staff
 - ◆ establishing processes for ongoing interaction, feedback and quality assurance
 - ◆ appointing a dedicated relationship manager
 - ◆ reviewing contractual arrangements to ensure alignment to Customer Trust Principles.

Principle 2.

Set customers up for success

We ensure our customers:

- ◆ are aware of their rights and responsibilities
- ◆ are provided with the information and assistance they need to use and pay for their energy and water services
- ◆ have products and services appropriate to their individual needs.

The second customer trust principle is to set customers up for success. By making the upfront effort to understand and meet customer needs, retailers powerfully demonstrate their interest in customers' wellbeing. The time and effort invested in opening lines of communication, empowering customers and starting the customer on a positive path also reduces the likelihood of problems that could degrade trust in the future.

Connecting with the community

For many retailers, connecting with the community through partnerships and face-to-face outreach is a foundational step towards setting customers up for success. These community connections build trust and open a crucial avenue for communication with customers who may not otherwise engage.

Retailers – particularly water retailers, which are tied to specific geographical communities – often have informal or formal relationships with government and community agencies. City West Water, for example, has an extensive network that includes financial counselling organisations, community legal centres, emergency services, police, and refugee and migrant agencies. This network of trusted intermediaries links City West Water to customers in the community that it might not otherwise reach, particularly new arrivals and the significant refugee population in Melbourne's West.

South East Water's partnership with community agency Good Shepherd Youth and Family Services (see **Case study 3**) is another illustration of the benefits of partnering with community agencies. Soon, retailers who want to support financial counselling casework will be able to contribute funds to the Financial Counselling Foundation. The Foundation, which is being set up by Financial Counselling Australia, is a charitable trust that funds financial counselling casework. The trust structure avoids the potential conflict of interest issues that may arise with direct funding from industry:⁵

Retailers can also set customers up for success less directly by contributing to overall community wellbeing and resilience – an approach that can form part of a corporate social responsibility strategy. For example, prompted by its own research into energy disadvantage 'hotspots', AGL Energy formed a partnership with the Smith Family, providing funding for programs that support disadvantaged young people in their educational and career pathways.

'Our outreach program breaks down barriers and helps create a connectedness between our business and the wider community. A customer may be too embarrassed, proud or nervous to ask for assistance. In situations where customers wouldn't want to call us, we become a link for them in a relaxed setting where they can open up and talk to a real person 'unofficially' about their individual circumstances.'

Yarra Valley Water outreach program staff member

'These past two sessions we had with you were really enjoyable and also enlightened us to how we can save money and how much water we can save at the moment in the dam. After these sessions, I will change the way I use water at home.'

Student feedback to City West Water

⁵ For further information about the Foundation, contact Financial Counselling Australia at info@financialcounsellingaustralia.org.au.



Community outreach is a related trust-building practice. Attending community events humanises the interaction between retailer and customer, creating a space for informal, face-to-face conversations. By allowing for questions and discussions that customers might not feel comfortable broaching over the phone, community outreach can help retailers understand the issues customers are facing first hand, and enable breakthrough with non-engaging customers. Interactions at outreach events can build these customers' confidence, which encourages them to make contact with any future enquiries or complaints. Outreach conversations can also have a ripple effect as word grows throughout the community.

Providing information and building awareness

Retailers can set customers up for success by equipping them with information and awareness. Information and education strategies should focus on customer rights and responsibilities and the knowledge that customers need to use and pay for energy and water services.

Retailers can share this knowledge in many ways, including through outreach programs. For example, South East Water gives presentations to community groups and agencies. City West Water, with its extremely diverse customer base, also has a strong community education program that helps customers to understand the water system. City West Water developed a three-unit water syllabus for English as an Additional Language students at Adult Multicultural Education Services and other local service providers. The syllabus includes information around the quality and safety of drinking water from the tap, using water efficiently and receiving and paying a bill. This syllabus is now in use by all three metropolitan water retailers. Illustrating another approach, AGL Energy reaches customers via community workers, hosting energy information days and train-the-trainer sessions through a partnership with St Vincent de Paul Society.

Outreach efforts can be complemented with written information shared in print or online. City West Water, South East Water and Yarra Valley Water each has an online portal with information about customer support, water efficiency and how to read bills, among other advice; energy retailers offer similar customer portals. AGL Energy through its partnership with St Vincent de Paul developed an unbranded, printed customer advice pack with information about support and entitlements.

Customer service interactions and complaints handling sometimes present more opportunities to inform and educate. Both energy and water retailers described how complaints about high usage can – once errors have been ruled out – be used to build customers' understanding of their consumption, empowering them to make changes. EnergyAustralia staff, for example, described going through smart meter data with customers, working with them to pinpoint periods of high use, identify high-consumption appliances, and find opportunities for energy-saving behaviour change.

'How do you connect with people who have an inability to connect with the market and get access to the services available? Through capacity building, train-the-trainer sessions, community outreach and providing easily accessible information for customers.'

AGL Energy staff member

'We have a policy we always follow, but then we would always need to be assisting on an individual basis, because all situations and circumstances are not going to be the same.'

Origin Energy staff member



This type of advice can be strengthened with material assistance and tools that help customers to monitor and manage their usage – something that customers in our focus group told us they would like to see more of. Consumption monitoring tools can benefit customers if they are cost-effective and simple to use. South East Water is exploring the use of such tools with its Aquatrip meter trial. These water meters tell customers, in real time, how much water they are using, and alert them to possible leaks and taps left on. Using the meter, a customer can set a consumption target according to their budget, receiving an alert when their usage approaches this level. Appliance repair or replacement is another strategy to help customers in severe hardship to reduce high consumption.

To communicate information effectively, retailers need to adapt to customers' individual communication needs. Retailers and customers alike told us that simplicity is usually key, whether information is shared orally or in print. Retailers can also encourage communication and engagement by offering customers multiple contact channels and, where possible, self-service options, so that customers can interact in the way that is most comfortable for them.

For communication with Culturally and Linguistically Diverse customers, retailers can provide written information in other languages and styles that better reflect the community they are working with. They can also offer interpreter services where customers require them. Understanding the importance of staff having language skills that reflect the cultural diversity of its customers, Yarra Valley Water created a team of bilingual customer service consultants who are deeply familiar with the business and can communicate with customers in their own language. Yarra Valley Water has also developed other mediums of communication, including animations and plain English documents.

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Providing appropriate products and services

The beginning of the customer relationship is a critical opportunity to place customers in a good starting position. Energy and water retailers alike can offer information about efficient usage and ensure that eligible customers have concessions applied to their accounts. Energy retailers can also develop point-of-sale procedures to place customers on the best tariff for their circumstances and incorporate additional support into their plan if necessary. At EnergyAustralia, for example, sales staff try to determine whether the customer might require a payment plan. These conversations can be sensitive, however, so a reassuring, non-judgemental approach is required.

Offering appropriate assistance when difficulties arise

In cases of financial difficulty, treating customers fairly also means offering appropriate assistance. The first step is ascertaining a customer's individual circumstances. Customers told us that they want retailers to make an effort to understand their personal situation and present alternatives; retailers also acknowledged that this understanding is the foundation for developing a sustainable solution. Origin Energy, for example, emphasised the importance of having policies and processes that are flexible and responsive enough to meet individual needs and to adapt as customer's circumstances change.

Once a customer's circumstances are understood, a retailer can propose solutions – this works best when it is a process of negotiation, rather than imposition. Retailer staff told us that when customers are encouraged to participate meaningfully in this negotiation, they are more likely to understand and fulfil the agreements that are made. For retailers, this can mean accepting a lower payment plan for an initial period, allowing the customer to develop a payment routine and, if applicable, make behavioural or other changes to lower consumption.

Retailers have social responsibilities as essential service providers. While they are not equipped to directly resolve customers' underlying problems, retailers are an important point of contact and can assist customers by referring them to support services. One initiative that facilitates this process is CareRing, led by Kildonan UnitingCare in partnership with community agencies, government, utilities and financial services providers. Through CareRing, customers can access external support services through a centralised, coordinated contact point. Referring customers to CareRing allows retailer staff to meaningfully assist customers without stepping outside the boundaries of their role.

'It's about designing and supporting an equitable service experience that is consistent to ensure all customers are treated respectfully and can access the fullest extent of available benefits and choice. It also means that we treat customers as individuals and through this we tailor our offering to best suit their needs and apply discretion to specific customer circumstances.'

Yarra Valley Water manager



Case study 3. South East Water's long-running partnership with Good Shepherd

South East Water has working relationships with a number of community organisations. This includes a partnership with Good Shepherd Youth and Family Services, a community agency focused on supporting women through financial counselling, microfinance, family services and other community programs. The long-running partnership, established in 2002, focuses on supporting both customers in financial difficulty and the South East Water staff who work with them.

Through the partnership, South East Water funds three Good Shepherd financial counsellors to support customers across its service area. For one day each week, the team leader and financial counsellor take up residency at South East Water. There they provide free, confidential and independent financial counselling to South East Water customers; work with staff to identify and assist customers in financial difficulty; and advise on South East Water's hardship-related policies and procedures, staff training materials and policy submissions.

The benefits of this partnership flow in two directions. By referring customers in financial difficulty to Good Shepherd's financial counsellors, South East Water can build trust and rapport with these customers. The financial counsellor's assistance results in a more complete understanding of customer circumstances and more sustainable solutions to problems with the customer's water account.

The partnership also creates new pathways for access and communication with vulnerable customers, who are referred to South East Water via Good Shepherd and other community agencies in South East Water's networks. Without this trusted intermediary, these customers may have been reluctant to contact South East Water directly.

'There are organisations where a customer calls and they tell them what the customer has to pay and the customer says, "OK", but then they never pay it. We make sure that we explain to them what the outcomes could be, but give them the opportunity for them to be empowered to say, "I can afford to pay this much". And we might say, "Let's review". The customer needs to be able to get off the phone and have felt in control of the decisions that were made, rather than being dictated to.'

City West Water
staff member

Practice checklist

Principle 2. Set customers up for success

Based on our observation of participating retailers, this checklist summarises some of the practices that retailers may use to build trust by setting customers up for success.

- Ensure that oral and written information:
 - ◆ uses concepts and terminology that customers understand
 - ◆ is translated or interpreted where necessary
 - ◆ is appropriate for the individual's level of understanding.
- Provide information and education materials in common community languages.
- Develop an advice pack with simple information about customer protections, concessions and rebates and hardship assistance.
- Communicate with hard-to-reach customers through community outreach, creating an informal environment for face-to-face discussions.
- Support organisations that tackle the underlying causes of disadvantage and vulnerability in the community.
- Establish links with key community leaders and agencies in the service area.
- Establish and use referral pathways to external support agencies (including financial counselling agencies) for customers who have underlying issues contributing to payment difficulty, such as mortgage stress, family violence, mental health issues or drug and alcohol abuse.
- Offer educational presentations to community groups on customer rights and responsibilities, energy or water systems and usage.
- Provide community agencies and workers with training, information and materials that equip them to support customers in their dealings with retailers.
- Foster connection with the community by maintaining a visible physical presence and strong telephone advice service.
- Provide energy and water efficiency advice at the point of sale or connection, before customers have fallen into difficulty.
- Ensure that eligible customers have concessions applied to their accounts when the connection is established.
- Consider a policy of not requiring documentation or verification of customers' hardship circumstances.
- Regularly review hardship arrangements to check that things are on the right track, and be ready to adapt arrangements that are not working.
- Accept lower payment arrangements as a temporary measure where appropriate, to allow customers to get used to making regular payments, improve their financial situation and/or reduce their consumption.
- For customers with unexpected high bills, jointly examine consumption data to pinpoint areas of high use and their potential causes.
- Ensure customers are aware of flexible payment options suited to their situation.
- Develop business procedures to elicit information from new customers and place them on the most appropriate tariff and payment method for their circumstances.
- Partner with a financial counselling organisation to assist customers in financial difficulty and open up referral pathways into the business. A donation to the Financial Counselling Foundation is one option for achieving this⁶.
- Offer appliance replacement or repair to customers in hardship with high consumption.
- Help customers manage their usage and avoid debt with proactive measures such as SMS notifications of high or abnormal usage and payment due dates.
- Develop English as an Additional Language material that can inform and educate Culturally and Linguistically Diverse communities and new arrivals on energy or water services and payment.
- Identify bilingual staff who can act as in-house interpreters for customers with limited English.

⁶ The Financial Counselling Foundation is a charitable trust being set up by Financial Counselling Australia. The purpose of the fund is to distribute funding from industry for financial counselling casework. For further information about the Foundation, contact Financial Counselling Australia at info@financialcounsellingaustralia.org.au

- ❑ Create an online one-stop-shop for customers to access alternative payment arrangements, financial counselling, consumption audits, energy or water efficiency information, and information about concessions and grants.
- ❑ Provide self-service options and alternative communication channels such as email, phone, call-back and live webchat, so that customers can interact with the business in a way that is comfortable for them.
- ❑ Develop a strategy to engage hard-to-reach and non-engaged customers.
- ❑ Create a separate team for supporting customers with serious financial difficulties, recruiting staff with the personal qualities needed to continually handle difficult calls and setting performance objectives and measures that reflect the different way staff should work with vulnerable customers.
- ❑ Set up cross-utility referral processes to refer customers between support staff at energy and water retailers.



Principle 3. Embed a culture of customer trust in the business

We make fair customer treatment part of the culture of our business by:

- ♦ committing to these principles at the board and senior management level
- ♦ doing what we say we will do
- ♦ understanding that energy and water are essential services that should be accessible to all
- ♦ striving for continuous improvement in customer experience.

The third principle is to embed a culture of customer trust in the business. Sound policies and procedures are important, but they rely on the foundation of a business culture that embraces customer service, fairness and trust as core goals. With this orientation, retailers can create and demonstrate the intention to put customer interests first.

Committing at the senior level

Boards and senior management must model a customer focus if this is to be embraced by staff at all levels. Often, the first step in driving a customer focus is embedding it in values and strategy. EnergyAustralia, for example, identified three core values to guide staff action: 'lead change', 'do the right thing' and 'customers are our priority'. Staff told us that implementation of these values had made a difference to their work. Similarly, Yarra Valley Water's 2020 Corporate Strategy embedded 'customer and community centricity' and 'exemplary service' as core business values. These values are championed by the Managing Director, setting the tone across the entire business.

Senior management can reinforce the customer focus by rolling out policies in a way that establishes them in the business culture. When AGL Energy implemented a new domestic violence policy, it created awareness and engagement among staff by promoting the new policy on the intranet, in blogs and social media, and in print material around the office. Staff were trained in the new procedures and participated in fundraising events. AGL Energy was the first private company to join other Melbourne landmarks in lighting their building orange to support the Victoria Against Violence campaign⁷. These steps helped to integrate and embed the policy into both business practices and staff thinking.

With commitment at the highest level, retailers can also implement business structures that encourage a customer focus. EnergyAustralia, for example, made the decision to strengthen the link between hardship and complaints staff, organising them under the Customer Vulnerability and Recovery umbrella and creating a procedure for reframing and referring high bill complaints that pointed to underlying financial difficulty. This close link gives EnergyAustralia complaints staff extra tools to resolve disputes and repair relationships, and reinforces a cultural focus on getting customers 'back on the right track'.

'Culture eats strategy for breakfast. We get lots of requests to help set up and inform hardship programs at other companies. However, we believe our program has been successful because it's embedded in who we are and we live the philosophy. Where it becomes a box-ticking exercise, and companies are not up for the challenge, then the program won't work as well. We spend a lot of time developing and fostering our desired culture throughout the organisation, which then flows through to strategy and practices.'

Yarra Valley Water
General Manager

⁷ As part of the Victoria Against Violence campaign, iconic buildings and landmarks throughout Victoria were illuminated in orange to raise awareness of family violence.

Finally, senior management can help to embed a culture of customer trust by using targets and incentives, rewarding behaviours and linking customer outcomes to performance management systems. City West Water, for example, described a number of KPIs and 'aspirational targets' directly focused on trust-building activities.

Similarly, by setting Customer Support Team measures that reflect the different needs of vulnerable customers, Yarra Valley Water demonstrates genuine top-down commitment and supports and encourages staff to enact – rather than just espouse – fair, trust-building practices.

Doing what is promised

By encouraging a cultural focus on following through on commitments made to customers, retailers can develop a track record of delivering on customer expectations. Doing what is promised demonstrates competence and good intentions, building the foundation for customer trust. By communicating progress with customers throughout this process, retailers can ensure that customers are aware that commitments have not been forgotten.

Origin Energy staff who work with customers experiencing payment difficulty described a direct link between fulfilling their commitments and developing the customer trust that encourages disclosure and engagement. Similarly, recognising the importance of follow-through when a customer has complained, AGL Energy implemented a new process to enable individual customer resolution staff to complete all follow-up tasks, delivering on commitments made to particular customers. AGL Energy also described how a commitment to fulfilling promises was crucial to a successful demand management trial it conducted (see [Case Study 4](#)).

Case Study 4. AGL Energy's successful trial

Together with distributor United Energy, AGL Energy conducted a demand management trial through which around 70 Victorian customers allowed United Energy to control the temperature in their homes via cloud-interfaced air conditioners. The goal was to control and reduce usage and bills without diminishing comfort in the home.

At the beginning of the trial, customers were sceptical that AGL Energy and United Energy could deliver on their commitment with a successful trial. The companies took time to understand customer needs and expectations and to clearly communicate the purpose and risks of the trial. This, in combination with delivering on the expected outcomes, was key to customer satisfaction and building trust.

At the end of the trial, 90% of customers reported they would have AGL Energy and United Energy manage their energy full time, while 88% said they would recommend AGL Energy as a retailer.

By encouraging a cultural focus on following through on commitments made to customers, retailers can develop a track-record of delivering on customer expectations. Doing what is promised demonstrates competence and good intentions, building the foundation for customer trust. By communicating progress with customers throughout this process, retailers can ensure that customers are aware that commitments have not been forgotten.

'There are three core values that we as a leadership group will communicate really strongly and it's something that can resonate with these guys [staff] as well. They are very relatable. It makes it easy for staff to understand which direction they should be going in to assist the customer.'

EnergyAustralia manager



Understanding energy and water as essential services

Retailers that have embedded customer trust in the culture recognise that energy and water are not ordinary retail products, but essential services that support health, wellbeing and social and economic participation. They understand that loss of supply has an enormously detrimental impact on customers.

Retailers that appreciate the role of energy and water in customers' lives are better placed to embrace their social responsibility as suppliers of essential services. In turn, this understanding and commitment flows through into staff behaviour and business decisions that help to build customer trust. EnergyAustralia's Customer Immersion Experience (see [Case study 5](#)) is one example of how retailers can foster an appreciation of the essential nature of energy and water services.

'We have good leaders that recognise and have for a long time advocated that, as an essential service provider, we always have to be mindful of our role in society.'

AGL Energy staff member

Case study 5. EnergyAustralia's Customer Immersion Experience

At the direction of EnergyAustralia's Managing Director, the company's training department developed the Senior Management Immersion Program. The program built senior managers' in-depth, practical understanding of the business by immersing them in different business areas, including the Customer Vulnerability and Recovery teams.

Participants listened to a presentation, delivered by the Customer Vulnerability and Recovery team leader, on EnergyAustralia's work to understand the needs of its customer base and improve the programs that help customers stay connected to supply. Participants also listened in on customer calls and engaged with the Energy and Water Ombudsman (Victoria) and Kildonan UnitingCare, learning about their roles and their work with vulnerable customers.

The aim of these activities was to give senior managers an understanding of the needs of customers, the importance of fair access to the essential service, and the real challenges some customers face in maintaining that access.

The program raised awareness about vulnerability and generated buy-in for programs and strategies designed to facilitate fair access. From these beginnings, the program evolved and extended into a Customer Immersion Experience open to all leaders in the organisation.

'The real value in being out there talking to people at events is not to be seen – although that is good for us – but to listen, and to be able to bring that back to try to help people.'

City West Water
General Manager

Striving for continuous improvement

If they are to continue meeting expectations, retailers need to monitor and understand customer and community needs as they evolve. To do this, retailers make deliberate efforts to capture on-the-ground customer insights from outreach activities and engagement with community agencies.

For example, EnergyAustralia and Kildonan UnitingCare have jointly employed a Community Engagement Officer, whose role is both to develop and run grassroots community education and to feed insights on customer experiences and challenges back into the business. EnergyAustralia also stays in touch with on-the-ground developments by sponsoring and attending events such as financial counselling conferences. Similarly, City West Water's extensive outreach program is seen as having a dual purpose. As well as giving the retailer a face in the community, it works as a non-traditional form of consultation.



Practice checklist

Principle 3.

Embed a culture of customer trust in the business

Based on our observation of participating retailers, this checklist summarises some of the practices that retailers may use to embed a culture of customer trust.

- Draw on frontline staff members' knowledge of customer needs, experiences, concerns and systemic issues, for example, in regular one-on-one and team discussions.
- Gather intelligence on customer and community needs by feeding insights from community agencies and outreach activities back into the business.
- Sponsor and attend community agency events such as financial counselling conferences and bring insights back to the business.
- Employ a community engagement officer to run community education projects and feedback information about social trends and customer experiences and needs.
- Work with ombudsmen to deepen knowledge of good industry practice; identify emerging customer trends and systemic issues; improve complaint handling and support; and inform staff training and development.
- Create opportunities for executives and managers to learn about customer vulnerability through immersion in relevant parts of the business.
- Recognise and promote customer service, customer trust, customer-centricity or similar concepts as core business values:
 - ◆ involve staff in strategic planning activities centred on customer values
 - ◆ convey these values and create an aspirational culture
 - ◆ make values easy to understand and relatable to work situations
 - ◆ promote values and discuss vulnerability in communications to staff, such as internal newsletters and blogs.
- Support customer trust outcomes through performance management systems and indicators.
- Include targets around customer trust in executive and board level reporting metrics.
- Consider ways of reinforcing a customer focus through business structures, for example, by strengthening the links between complaints, disconnection and hardship teams.

Principle 4.

Create systems and processes that make it easy to build trust

We provide consistent and appropriate customer service because:

- ◆ **we have efficient processes for our customers**
- ◆ **our employees are appropriately trained and supported**
- ◆ **we anticipate and respond to changing community and customer needs**
- ◆ **we find effective solutions to concerns raised by our customers**
- ◆ **we prioritise early identification of, and respond to, customer financial difficulty.**

The final customer trust principle is creating systems and processes that make it easy to build trust. With good systems and processes that staff are trained and supported to work with, retailers can deliver on customer expectations, which supports trust.

Making processes efficient

When retailers have efficient customer service processes in place, it is easy for staff to assist customers quickly and effectively. South East Water's overhaul of its leak allowance policy and related procedures illustrates the benefits of efficiency for both customers and business. Under the old process, applying for a leak allowance was time-consuming and cumbersome. Applications took about three weeks to finalise, which led to customer complaints.

The new process – which takes the customer's unique circumstances into account and eliminates paperwork – sees applications processed and finalised within one or two phone calls. As applications are now done over the phone, it is also easier for staff to refer customers to Good Shepherd or other social services where appropriate. Staff see the new procedure as fairer, more flexible and more inclusive in its coverage of customers. South East Water expects the reform to increase customer satisfaction and ease for staff, and lead to a reduction in complaints.

As applications are now done over the phone, it is also easier for staff to refer customers to Good Shepherd or other social services where appropriate.

Training and supporting employees

To implement the systems and processes that build trust, retailer staff need to be trained and supported. Clear, documented policies and procedures are one component of this: they guide staff and help to ensure that the customer experience is consistent. Several retailers described placing a heavy emphasis on training and coaching. At AGL Energy, for example, team leaders are required to ensure they spend at least two hours each day on quality coaching.

At Yarra Valley Water, all staff – even third-party contractors, such as plumbers – are trained to identify potentially vulnerable customers and engage with them in a sensitive way. For staff working very closely with vulnerable customers, comprehensive training and extensive procedures are balanced with a measure of flexibility. Staff have a framework to guide them but are empowered to use their judgement and discretion to work with customers to find solutions.

'I think when you offer those sorts of things to team members, they realise they are working in a fair environment. I think that translates through to your work and the way you treat other people, because I guess attitudes are contagious at the end of the day.'

Origin Energy
staff member



The workplace culture is equally important. We heard that a supportive environment is crucial for staff who do the difficult work of assisting vulnerable customers. Origin Energy staff drew a direct link between fair, supportive work policies and culture and their capacity and willingness to offer a good customer experience.

At Yarra Valley Water, management strives to create what they termed a 'constructive' culture, where people are encouraged to be involved in others' successes and to have a say on decisions that affect them. Ongoing support and acknowledgement help staff to handle tough calls. At South East Water, one-on-one meetings between staff and Good Shepherd's financial counsellor perform a similar function, giving staff reassurance and an opportunity to talk about their work.

Responding to customer needs and finding effective solutions

Retailers can also demonstrate a commitment to customer interests by putting in place systems for identifying and resolving customer concerns. Here, the focus should extend beyond the reactive resolution of individual customer concerns to encompass proactive identification of systemic issues and efforts to address root causes.

Processes to identify and address concerns can be incorporated into frontline customer service delivery. AGL Energy, for example, collects ratings for customer service calls, allowing customers to assign a score of 1 to 5 and make a comment. For every very poor score (1), team leaders are expected to review the call and follow up with face-to-face feedback to the staff member. The team leader then makes an outbound call to the customer to get their perspective on where the service went wrong, what could have been done differently, and what they would like to see next time.

EnergyAustralia recognises that frontline staff, who interact with customers daily, are an invaluable source of information about customer needs and experiences, including any emerging systemic issues. Management regularly meet with frontline staff to discuss these issues. EnergyAustralia has a continuous improvement process that allows all staff to bring attention to customer issues and concerns.

'We took a proactive approach instead of waiting for them to call us again and again.'

EnergyAustralia
staff member

Retailers can also demonstrate a commitment to customer interests by putting in place systems for identifying and resolving customer concerns.

Internal and external dispute resolution processes present obvious opportunities for retailers to address customer issues both individually and systemically. EnergyAustralia created an outbound resolution team to proactively identify and address customer concerns. Referring to a register of customers who have called EnergyAustralia repeatedly in a short period, the team makes outbound calls to ask whether customers' issues have been resolved and whether further action or escalation is needed. Staff reported that customers welcome this approach.

In a similar change, Yarra Valley Water introduced a strategic initiative to resolve customer concerns before they became Ombudsman complaints. Under the strategy, once a customer has raised an issue twice and indicates they remain dissatisfied, the matter is automatically escalated to the Customer Relations Team for resolution. Part of the implementation of the change was to shift internal perceptions of escalation so that it is not seen as a failing, but as a positive commitment to fixing customer issues.

Complaints can bring to light systemic issues, so retailers can use internal and external dispute resolution processes to identify the root cause of problems and prevent their reoccurrence. As part of its continuous improvement strategy, EnergyAustralia meets regularly with energy ombudsmen. Ombudsman case clarification meetings, training, sharing of good industry practice and systemic issues reporting all help EnergyAustralia to identify gaps and potential improvements.

Retailers can develop an overarching strategy for using customer feedback to inform corporate strategy and decision-making, supporting continuous improvement. At the time of our visit, South East Water was in the process of developing a customer experience framework that cut across the entire business. The aim of the framework is to ensure that customer feedback and insights are fed upwards so that management can identify whether and how the business is meeting customer and community needs, and where improvements can be made.

Retailers can develop an overarching strategy for using customer feedback to inform corporate strategy and decision-making, supporting continuous improvement.



Finally and more broadly, retailers' day-to-day operations generate powerful customer data that can be harnessed to inform understanding of policy and regulatory issues. Recognising the contribution that it could make to policy development, AGL Energy made aggregated customer data available to St Vincent de Paul Society for its Households in the Dark research, which examined disconnections across South Australia, Victoria, New South Wales and South-East Queensland.

Prioritising early identification and response to payment difficulty

Often, customers experiencing payment difficulty do not seek or receive assistance until debt has built up or disconnection or restriction are imminent. By this point, the relationship is likely to have become strained or to have broken down. Retailers can help to prevent this by putting in place processes for identifying and reaching out to potentially vulnerable customers before problems develop or deepen.

City West Water has found creative ways to do this, profiled in Case Study 6. A similar initiative at Yarra Valley Water ran several pilot programs that targeted customers who were likely to be entitled to a concession, but who were not registered and therefore not receiving the concession. One target group was public housing tenants. Yarra Valley Water identified its public housing tenant customers with no or inactive concessions, and sent them simple concession forms along with a reply paid envelope. This resulted in many more of these potentially vulnerable customers receiving the concessions they were entitled to, helping to reduce cost of living pressures.

Complaints can bring to light systemic issues, so retailers can use internal and external dispute resolution processes to identify the root cause of problems and prevent their reoccurrence.



Case study 6. City West Water's proactive assistance and outreach

City West Water regularly identifies potentially vulnerable customers through system searches targeting different combinations of characteristics. This information is used to proactively contact customers to offer support or raise awareness about entitlements. In one pilot example, City West Water made outbound calls to customers who hadn't renewed their concession entitlements.

Another pilot aimed to identify and target 'hidden cohorts' of vulnerable customers, such as pensioners who continue to pay their bill on time, despite inexplicable high usage, potentially causing these consumers to forgo other essentials. This pilot picked up a customer with a zero balance despite a recent bill of over \$3,000. The subsequent investigation found that there was a previously unidentified leak on the customer's property, but because the customer paid their bill automatically via direct debit, payment continued even when usage and the bill escalated dramatically. The investigation also found the customer had a mental illness, and while they managed day-to-day life, events outside of the norm caused them enormous stress. Although the customer was anxious about people coming onto the property, by collaborating with a family member, City West Water was able to complete an audit, identify and repair the issue, and make the necessary adjustments to the account.

City West Water also uses outreach to respond to emerging areas of vulnerability. The retailer operates in Melbourne's Western suburbs, a manufacturing region where factory closures can abruptly put a group of customers out of work. When City West Water learns of a closure, it visits the business to share information about the support it can offer to customers if and when it is needed.

Although the customer was anxious about people coming onto the property, by collaborating with a family member, City West Water was able to complete an audit, identify and repair the issue, and make the necessary adjustments to the account.

Practice checklist

Principle 4.

Create systems and processes that make it easy to build trust

Based on our observation of participating retailers, this checklist summarises some of the systems and processes that retailers can put in place to make it easy to build customer trust.

- Acknowledge staff for handling difficult calls and encourage colleagues to support each other.
- Create opportunities for staff engaging with vulnerable customers to learn from financial counsellor feedback and ideas.
- Proactively identify likely eligible concession customers and send concession application forms or contact the customer to discuss.
- Provide regular updates or a direct contact line to customers who have raised concerns.
- Put in place a minimum coaching time requirement for team leaders.
- Look for opportunities to streamline processes for applying and qualifying for grants, concessions and allowances.
- Use system searches with different combinations of indicators to identify potentially vulnerable customers and proactively communicate their entitlements to them.
- Gather feedback at the end of each customer service call and proactively follow-up with dissatisfied customers.
- Keep some complaint handling within service teams to encourage ownership and learning, or strengthen links between complaints and service teams.
- Develop a robust process for automatic internal escalation so that complaints specialists have an opportunity to resolve issues before they reach the Ombudsman. Recast internal escalation as a positive commitment to resolving customer issues.
- Train staff comprehensively in:
 - ◆ awareness of energy and water as essential services
 - ◆ identifying vulnerability
 - ◆ skills and resilience to manage difficult conversations with customers.
- Support staff engaging with vulnerable customers by complementing clear policies and processes with a measure of flexibility, so that staff can use their judgement and discretion to find fair and workable solutions.
- Extend basic hardship training to all customer-facing employees, including third-party employees.
- Develop processes to anticipate and proactively identify common customer problems and incorporate these insights into the design of new systems and products.
- Allow researchers access to de-identified customer data in order to develop insights and supportive solutions to address financial difficulty.
- Trial different early intervention and engagement approaches.
- Create an outbound resolutions team that contacts customers proactively where there are indicators of dissatisfaction (such as multiple calls within a short period).
- Develop a framework to feed customer feedback upwards to senior management where it can inform corporate strategy and decision-making, including encouraging senior management to hear directly from customers.

Customer Trust Principles

Our commitment to our customers:

1. Treat customers fairly.

We treat customers with dignity, integrity and respect in every interaction.

2. Set customers up for success.

We ensure our customers:

- ◆ are aware of their rights and responsibilities
- ◆ are provided with the information and assistance they need to use and pay for their energy and water services
- ◆ have products and services appropriate to their individual needs.



3. Embed a culture of customer trust in the business.

We make fair customer treatment part of the culture of our business by:

- ◆ committing to these principles at the board and senior management level
- ◆ doing what we say we will do
- ◆ understanding that energy and water are essential services that should be accessible to all
- ◆ striving for continuous improvement in customer experience.

4. Create systems and processes that make it easy to build trust.

We provide consistent and appropriate customer service because:

- ◆ we have efficient processes for our customers
- ◆ our employees are appropriately trained and supported
- ◆ we anticipate and respond to changing community and customer needs
- ◆ we find effective solutions to concerns raised by our customers
- ◆ we prioritise early identification of, and respond to, customer financial difficulty.



