

25 June 2021

Ms Peta Farquhar  
Essential Services Commission  
Level 8, 570 Bourke Street  
Melbourne VIC 3000

By email: [REDACTED]

Dear Ms Farquhar

## **Draft 'Getting to fair' strategy**

Good Shepherd welcomes the ESC's draft strategy to support customers experiencing or at risk of vulnerability – 'Getting to fair: Breaking down barriers to essential services'.

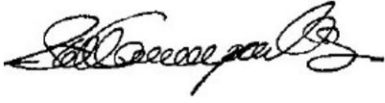
At Good Shepherd we tackle the significant issues affecting women, girls and families, by providing crisis services, housing, financial wellbeing services, and access to safe and affordable finance. Access to affordable essential services is a critical part of women's financial wellbeing, yet many Australian women [experience vulnerabilities](#) that make access difficult, compromising their ability to care for themselves and their families, work, study, and connect with others.

We know from our programs that 'vulnerability' is situational and socially constructed. Good Shepherd financial counsellors see vulnerabilities caused by excessively priced products, inappropriate communication and engagement styles, a lack of proactive identification of hardship risks, and poor responses to self-identified hardship. These vulnerabilities are not inevitable, and can be ameliorated or avoided through better business practice. We know from our leadership of the [Financial Inclusion Action Plan program](#) that good practice in this area is achievable and benefits both business and customers.

Good Shepherd endorses the submission by the Victorian Council of Social Service on the ESC's draft strategy dated June 2021. We consider the strategy provides a pathway to a better collective understanding of consumer vulnerability that can inform and motivate business, regulatory and government responses; more rigorous integration of consumer perspectives into the ESC's work; and an overarching framework for connecting and successfully implementing the various regulatory measures that help to address consumer vulnerability, including the payment difficulty framework and family violence minimum standards.

We welcome further engagement with the ESC as it progresses work on the 'Getting to fair' strategy. Please contact Heather Saunders, A/G General Manager Service & Strategy [REDACTED] if you would like to discuss Good Shepherd's perspectives at any stage.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stella Avramopoulos', written in a cursive style.

Stella Avramopoulos  
CEO, Good Shepherd Australia New Zealand