



# Hardship Policy

PowerHub Pty Ltd

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## 1. Introduction

This policy applies to all residential customers living in QLD, NSW, ACT, SA and TAS who find it hard to pay their energy bills due to hardship.

You might experience hardship because of factors like:

- death in the family;
- household illness;
- family violence;
- unemployment; and / or
- reduced income.

This policy explains:

- what we will do to help you manage your energy bills;
- how we consider your circumstances and needs; and
- your rights as a customer in our hardship program.

You can ask a support person to contact us, such as:

- a financial counsellor; or
- someone who helps you manage your energy bills.

We need your permission to talk to your support person.

If you nominate a support person or representative to act on your behalf, we will engage with your representative as if we were engaging with you and we will accept their consent and instructions as if it were you.

You may nominate a support person or representative to act on your behalf:

- over the phone, after establishing your identity to us;
- in writing by your signed letter to us; or
- by you or your attorney providing a copy of your Power of Attorney.

## 2. Objective

The objective of this document is to provide you with clear information about PowerHub's hardship policy and to ensure that you understand the options available if you are experiencing financial difficulties. PowerHub is committed to an effective and efficient hardship management process that is aligned with PowerHub's business values, core vision and strategic objectives.

This Policy:

- Is focused on your experience and expectations, and it recognises your rights as a customer;
- Sets the standards expected of PowerHub for identifying and interacting with you as you are experiencing financial hardship;
- Has been developed to be consistent with the Australian Energy Regulator (AER) 'AER Customer Hardship Policy Guideline'; and
- Forms part of PowerHub's Compliance Management System and Compliance Plan, which in turn are components of PowerHub's broader Governance, Risk and Compliance (GRC) framework.

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## 3. Policy

PowerHub acknowledges that energy supply is an essential household service. Through this policy, PowerHub commits to support your continued access to energy supply and to offer you assistance whilst you are experiencing financial hardship. In this context, service disconnection will only be pursued as a last resort and after all the avenues described within this policy have been exhausted.

### 3.1 Hardship Definition

A hardship customer is defined as a customer who has demonstrated a willingness to pay their energy bill but is unable to pay their bill due to financial hardship. Hardship may be short-lived (for example due to changes in your employment conditions, illness or other family crisis) or may be experienced over an extended period of time, affecting your ability to meet your financial obligations.

### 3.2 Hardship Identification

You can self-identify with PowerHub as being in financial hardship and seek advice from PowerHub with regard to your options as a consequence of financial hardship via our phone contact centres, email or website. If you have been identified by PowerHub as potentially experiencing hardship, PowerHub may send you a Hardship Information Pack together with your bill correspondence or contact you directly by phone. These interactions may enable you to self-identify and take the step to enrol in a hardship program.

#### What we will do to help you

We will tell you about our hardship program if:

- you tell us you are having trouble paying your bill;
- you are referred to our program by a financial counsellor or other community worker; or
- we are concerned that you may be experiencing financial hardship.

We will recommend that you speak to a staff member to help you join our hardship program if you have:

- a history of late payments;
- broken payment plans;
- requested payment extensions;
- received a disconnection warning notice; and/or
- been disconnected for non-payment.

We can also support you to join our hardship program if you tell us:

- you are eligible for a relief grant or other emergency assistance; or
- you have personal circumstances where hardship support may help. For example, death in the family or job loss.

You may have trouble paying your bills for different reasons. Please contact us so that we may discuss your individual situation.

Our staff are specially trained to help you with hardship. Our staff will:

- ask you a few questions about your circumstances; and
- work out if you can join the hardship program.

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We will assess your application for hardship assistance within 5 business days from receipt of the application.

We will let you know if you are accepted into our hardship program within 10 business days from receipt of the application.

If you are accepted into our hardship program, we will:

- tell you if you are on the right energy plan or if there is a better plan for you;
- tell you about government concessions, relief schemes or energy rebates you may be able to receive;
- give you suggestions about how to reduce your energy use; and
- talk to you about a payment amount that suits your circumstances.

We can send you a free copy of our hardship policy.

#### ***Self-Identification***

Where you self-identify with PowerHub as being in hardship, PowerHub will act promptly to inform you of the range of relevant options available under the PowerHub Hardship Program which are detailed at 3.6. We will work with you to define and agree on the most suitable course of action for you.

#### ***Third-Party Identification***

PowerHub may also be contacted by your financial counsellor, support person or social welfare agencies acting on your behalf. In these instances, PowerHub will work collaboratively with you and the relevant agency or person to establish the most appropriate program for your circumstances.

We will need your permission to talk to your financial counsellor, support person or social welfare agency.

#### ***Identification by PowerHub***

Admitting to hardship may not be easy, therefore PowerHub will also proactively monitor late payments and payment extensions' history, to promptly identify and offer you assistance and viable options in case you are experiencing financial difficulties.

An early conversation about potential difficulties making payments can assist you in finding a timely solution. If you repeatedly fail to pay your bills by the due date or regularly request payment extensions, you will be identified as a customer experiencing financial difficulties. In addition to sending the Hardship Information Pack, PowerHub will contact you to prompt a discussion about your circumstances. You can expect to be contacted within 10 business days of PowerHub sending you the Hardship Information Pack.

### **3.3 PowerHub Assurances**

If you are experiencing hardship you can be assured of PowerHub's commitment to:

- Interact empathetically, with respect and understanding of your circumstances;
- Respond promptly and, if practical, enrol you in the PowerHub Hardship Program;
- Apply this policy in a transparent, consistent and fair manner;
- Provide you information on rebates and government concessions;
- Provide you information about local financial counselling, if required;
- Provide you information on efficient energy use;

- Agree on a fair and reasonable payment plan to be included in the PowerHub Hardship Program, if applicable; and
- Not disconnect you if you are enrolled in the PowerHub Hardship Program and you are making repayments in full and in a timely manner or you have been granted a payment extension.

#### **PowerHub will work with you**

If you have joined our hardship program, we will not:

- charge late payment fees;
- require a security deposit; or
- make changes to your plan without your agreement. For example, we will not put you on a shortened collection cycle unless you agree first.

### **3.4 Your commitment to PowerHub**

Whilst participating in the Hardship Program there are a few things we expect from you.

#### **What you must do**

- Provide an honest description to us of your financial circumstances;
- Tell us if your contact details change;
- Pay the agreed payment plan amounts by the due date; and
- Tell us if your situation changes and you can no longer make the payments in your plan. We can then review your payment arrangements.

PowerHub may stop helping you if:

- You stop making payments under your plan; or
- You do not tell us when your contact details change.

Additionally, if you have had two payment plans cancelled in the last 12 months because you did not follow your plan:

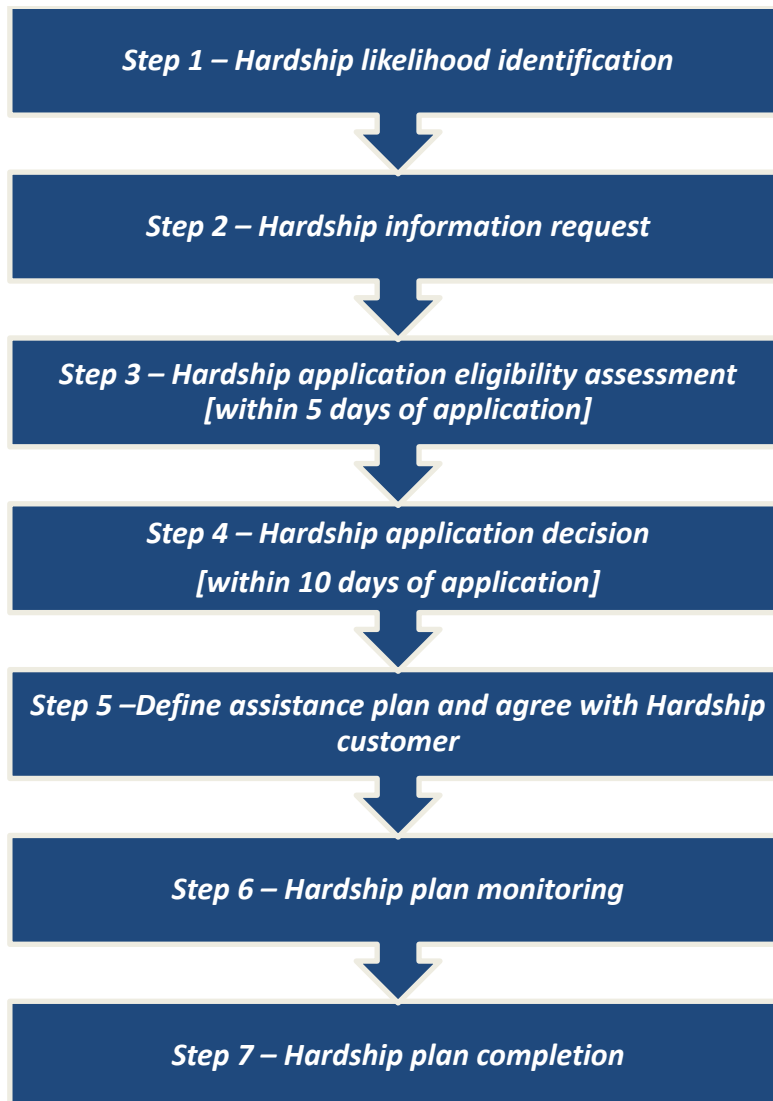
- we do not have to offer you another plan; and
- we might disconnect your energy.

### **3.5 Eligibility**

Any PowerHub customer is eligible for a payment extension if facing short-term financial difficulty. A payment extension can be set up via our phone contact centres, mail or website. A payment extension does not require or entail enrolment in the PowerHub Hardship Program.

The PowerHub Hardship Program is intended for residential customers experiencing financial difficulties over a medium to long-term period. To be considered for enrolment in the hardship program, you must have an active residential account and have or anticipate having an outstanding debt.

PowerHub's process for assessing a customer's eligibility for the Hardship Program and establishing the hardship plan includes the following steps.



#### ***Step 1 – Hardship likelihood identification***

PowerHub may establish that you are likely to be suffering from financial hardship by:

- analysing your overdue payment history in PowerHub's internal billing system; or
- receiving an inbound communication or query from you (or your representative or support person) regarding a missed payment, late payment or other existing or anticipated payment difficulty.

#### ***Step 2 – Hardship information request***

PowerHub will have an initial discussion with you (or your representative) to determine if a missed payment, late payment or other payment difficulty is due to:

- A. your omission or oversight;
- B. a one-off problem or short-term financial issue; or
- C. a more chronic payment problem.

For type A & B situations, PowerHub will discuss your circumstances with you (or your representative) and suggest a payment extension or a payment plan. If the debt is then extinguished, the process ends, and your account will return to normal billing cycle arrangements.

For a type C situation, PowerHub will engage with you to:

- inform you about PowerHub's Hardship Program and other available support (as detailed in this policy);
- initiate a Hardship application; and
- gather information to be used in your application assessment, for example, confirming:
  - the nature of your payment difficulties.
  - your expected future use of electricity.
  - your capacity and willingness to pay outstanding overdue amounts and future on-going electricity usage.
  - your access to government assistance, concessions, rebates, support services and financial counselling that can assist you in reducing your debt.

The information that we request for your hardship application eligibility assessment may include a statement of your financial position, or other evidence reasonably required to confirm that you are facing financial hardship.

### ***Step 3 – Hardship application eligibility assessment***

We will begin your hardship application eligibility assessment once we have received the information that we have requested from you (or your representative).

When assessing your application for enrolment in the Hardship Program, we will rely on the information that you have provided to us, and other information available to us that is relevant to your individual circumstances to:

- confirm that you cannot currently repay your debt in full;
- confirm that your debt cannot currently be repaid through regular payments over a 2-month period, while still paying future bills over that same period;
- analyse your payment history on the account to assess indications of past payment difficulties;
- take into consideration the cause of your financial hardship, and your financial outlook.

You may not be eligible to enrol in the PowerHub Hardship Program where you are:

- in debt due to fraudulent activity.
- dishonest in describing your financial circumstances.

If we deem that you are ineligible to be admitted to the PowerHub Hardship Program, then we will tell you why we have made this determination.

### ***Step 4 – Hardship application decision***

You will be notified of the decision to accept or reject your application for enrolment in the PowerHub Hardship Program within 10 business days of receipt of your application.

If rejected, we will provide you with the reasons for the rejection in writing.

If we accept you into the PowerHub Hardship Program, a case manager will be assigned to your case and a hardship plan will be proposed and presented for your consideration. The plan will include the contact details of the PowerHub case manager, and details of how long the plan will run for, the



number of instalment payments that you must pay, the amount of each instalment, and a description of how the instalments have been calculated.

#### ***Step 5 – Define assistance plan and agree with Hardship customer***

The appointed case manager will contact you to discuss the proposed hardship plan and confirm or adjust the plan to ensure that it is acceptable and suitable for your current situation.

Once you agree to the implementation of the Hardship plan, PowerHub will provide a written copy of the agreed Hardship plan for your records.

#### ***Step 6 – Hardship plan monitoring***

PowerHub will monitor your ongoing compliance with the plan, and the PowerHub case manager will follow up with you to manage ongoing customer care and support.

#### ***Step 7 – Hardship plan completion***

The PowerHub case manager will contact you upon successful completion of the program, and to discuss ongoing billing arrangement options, and to reassure you that you may apply to re-enter the Hardship Program if you face hardship again.

### **3.6 PowerHub Hardship Programs and Services**

As a hardship customer, you can access a range of programs and services to help you including alternative payment options, financial counselling services, access concession programs and implement energy efficiency measures.

#### **What PowerHub will do**

We will consider your individual situation to find the right programs (e.g. concession programs) or services that meet your needs.

PowerHub's Hardship Program is personalized to your circumstances and ability to pay. Options will be discussed with you to ensure that the program is fit for purpose. During the course of the agreed program, PowerHub will continuously monitor compliance and perform, at minimum, quarterly reviews to ensure the program remains suitable to your circumstances.

#### ***Payment Options***

##### **What will PowerHub do**

There are different payment options available to hardship customers, including:

- Payment plans;
- Centrepay;
- Direct Debit; and
- External concession programs.

If you miss a payment, we will contact you to see if you need help. We will contact you by telephone in the first instance, followed by other methods including your preferred method of communication.

#### ***Payment Plans***

When you are in our hardship program, we will offer you flexible payment options to suit your individual situation.

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A plan will be defined to allow you to pay for energy usage on an ongoing basis, and to pay overdue amounts through regular, reasonable and manageable instalments over an agreed period of time. The frequency of payments for the overdue amounts will be determined on a case-by-case basis and may be amended during the life of the plan upon mutual agreement between you and PowerHub via your preferred communication method. PowerHub will give you the option of paying the agreed instalments in advance or in arrears and you will be able to cancel your payment plan by contacting PowerHub.

To make your payment plan, we will consider:

- how much you can pay;
- how much you owe; and
- how much energy we expect you will use in the next 12 months.

This will help us figure out a payment plan that is right for you.

We will offer a payment plan to suit your situation. This will include payments to cover:

- what you owe; and
- an amount to cover your energy use.

Once we agree to a payment plan, PowerHub will send you the information in writing including:

- who you can contact for more help;
- how long the payment plan will go for;
- the amount you will pay each time;
- how many payments you need to make;
- when you need to make your payments (this is also called the frequency of the payments); and
- how we worked out your payments.

During the program, PowerHub will actively engage with you to adapt or review the payment amounts as required. Initially, you will be expected to agree to a minimum payment equivalent to what you can afford, in order to demonstrate your willingness to pay. Subsequently, PowerHub will work with you to adapt or review the payment amounts, the frequency of payments and terms whilst taking account of your circumstances.

### ***Capacity to Pay***

Capacity to pay relates to the household's ability to meet their expenses within their current level of income while maintaining a basic standard of living.

Your capacity to pay assessment will be discussed with you and will take into consideration:

- your current situation;
- your ability to make a payment;
- your available payment methods;
- the amount you advised that you can currently afford;
- your energy consumption level and expected consumption needs over the next 12 months;
- your total arrears owing amount; and
- other information that you are willing to provide regarding your capacity to pay.

PowerHub will work with you to find a solution acceptable to both parties.

Depending on the rules in our hardship policy, we may be able to remove some debt, fees or charges you owe.

### ***Centrepay***

You can choose to use Centrepay if you are eligible.

Centrepay is a free service you can use to help pay your bills. Centrepay can automatically take an amount of money from your Centrelink payments to go toward energy bills and expenses.

If you receive Centrelink benefits or allowances, then you are eligible for Centrepay. Centrepay enables regular deductions to be made from your Centrelink payments to pay your PowerHub bills. PowerHub encourages Centrepay deductions to contribute toward the payment of a customer's bills and can support hardship customers in setting up this payment method.

### ***Direct Debit***

Paying by Direct Debit demonstrates willingness and commitment from you to adhere to the Hardship Program. PowerHub encourages you to make payments on a weekly or fortnightly schedule by Direct Debit.

## **3.7 Other support programs to help you pay your energy bill**

### ***External Concession Programs***

Depending on the state or territory you live in, there are other supports to help you pay your energy bills.

#### **What we will do**

We will tell you about other ways you can get help to pay your energy bill, such as:

- government relief schemes;
- energy rebates;
- concession programs; and
- financial counselling services.

#### **What we need you to do**

If you find out you are eligible for these programs, let us know as soon as possible so that PowerHub can help you.

PowerHub will support you in accessing any state government assistance for which you are eligible and will help with the assistance application if required. If requested and duly authorized by you, PowerHub will submit the applications on your behalf directly with the appropriate concession programs or agencies.

State government energy bill assistance programs include rebates or concessions for customers with low income, life support or medical needs. Further information on available state assistance programs can be found online:

Nationwide [www.energy.gov.au](http://www.energy.gov.au)

QLD [www.qld.gov.au/community/cost-of-living-support/concessions/energy-concessions](http://www.qld.gov.au/community/cost-of-living-support/concessions/energy-concessions)

NSW <https://www.energy.nsw.gov.au/households/rebates-grants-and-schemes>

SA [www.sa.gov.au/topics/energy-and-environment/energy-bills/financial-assistance](http://www.sa.gov.au/topics/energy-and-environment/energy-bills/financial-assistance)

VIC <https://services.dffh.vic.gov.au/concessions-and-benefits>

ACT <https://www.revenue.act.gov.au/community-assistance>

### **Financial Counselling**

PowerHub will encourage you to speak to accredited local financial counsellors and if required (or requested and authorised by you to do so), PowerHub will work in coordination with your financial counsellor to establish your ability to pay which is a key component of the PowerHub Hardship Program - Capacity to Pay assessment.

*Financial counsellors are non-judgmental, qualified professionals who provide information, support and advocacy to people in financial difficulty. Usually working in community organisations, their services are free, independent and confidential. To talk to a financial counsellor phone 1800 007 007. Further information can also be found at [www.financialcounsellingaustralia.org.au](http://www.financialcounsellingaustralia.org.au).*

### **National Debt Helpline**

The National Debt Helpline (NDH) may also be of assistance if you are having problems with debt. The NDH website provides simple guides on how you can better manage debt at [www.ndh.org.au](http://www.ndh.org.au).

NDH has independent financial counsellors that you can speak to confidentially and for free over the phone on 1800 007 007.

You can also find a financial counsellor in your local area through their interactive map at <https://ndh.org.au/financial-counselling/find-a-financial-counsellor/>.

### **MoneySmart**

The MoneySmart website which is run by the Australian Securities and Investments Commission (ASIC) also has tips and tools to help you make the most of your money at [www.moneysmart.gov.au](http://www.moneysmart.gov.au).

### **Energy Audit and Efficiency**

#### **PowerHub can help you save energy**

Using less energy can save you money.

#### **What we will do**

When you join our hardship program, we can give you tips to use less energy. This can be different depending on the state or territory you live in.

Whilst on the PowerHub Hardship Program, you will receive support in managing and understanding your energy consumption. This will enable you to reduce your energy usage where appropriate and manage your consumption and assist you to extinguish your debt in the shortest time possible.

Self-assessable energy audit information will be included in the PowerHub Hardship Program enrolment pack and you will be able to access support over the phone to perform the audit and implement the energy savings measures identified.

PowerHub will also support you to access financial assistance to buy efficient appliances through the No Interest Loans Scheme (NILS) which is a nationwide program, or through other more suitable local energy efficiency programs.

More information on energy efficiency can also be found at:

[www.energy.gov.au](http://www.energy.gov.au)

<https://www.energy.gov.au/households>

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<https://www.energy.gov.au/households/household-guides>

### ***Charges***

A copy of this policy is freely available to you upon request via the PowerHub contact channels and is also available online at [www.powerhub.net.au](http://www.powerhub.net.au). A free copy of this policy will be sent to you if we suspect that you may be experiencing hardship.

PowerHub will not charge you any fees, late payment fees or security deposits whilst you are actively participating in a PowerHub Hardship Program and complying with the agreed terms of the program. You will also be shielded from credit collection activities whilst participating in the PowerHub Hardship Program.

### ***Energy Plan***

We want to check you have the right Energy Plan.

We will see if another energy plan may be better for you. If you agree, PowerHub can transfer you to a better energy plan for free.

### **What we will do**

When you join our hardship program, we will talk to you about your energy use and whether you are on the right plan.

If we think that there is a better energy plan for you, we will:

- explain why the plan is better; and
- ask if you'd like to transfer to the new plan for free.

We will only talk to you about energy plans that we can offer.

Upon your enrolment in the PowerHub Hardship Program, PowerHub will also update its Energy Supply Agreement (ESA) to reflect the new conditions and rights relevant to both parties. PowerHub will seek explicit informed consent from you in this regard. The review of the ESA will be performed for free.

### ***Confidentiality***

Your Privacy will be protected at all times. We are committed to maintaining the confidentiality of personal information under our privacy policy and we will not disclose your personal information to third parties without your consent unless required to do so by law.

### ***Program Completion***

Upon successful completion of the program, PowerHub will contact you via your preferred contact method to acknowledge your success in completing the program and discuss if another payment plan or more frequent billing will help you to better manage ongoing bills. PowerHub will also reassure you of your ability to return to a PowerHub Hardship Program provided that the eligibility criteria are again met.

## **3.8 Information and Enrolment**

You may request further information or enrol in the PowerHub Hardship Program directly with PowerHub through the following channels:

Telephone      1300 760 623

Monday to Friday (excluding Public Holidays): 8:30am to 5:30pm  
(AEST/AEDT)

Email	<a href="mailto:hardship@powerhub.net.au">hardship@powerhub.net.au</a>
Website	<a href="http://www.powerhub.net.au">www.powerhub.net.au</a>
Mail	PowerHub Hardship Support, PO Box 110, Spring Hill QLD 4000

### 3.9 Customers with diverse communication needs

PowerHub is committed to supporting customers with diverse communication needs. These include, but are not limited to:

- Customers with low English literacy, including customers from culturally and linguistically diverse backgrounds;
- Customers without internet access;
- Customers in remote areas; and
- Customers with a disability.

#### *Language Assistance*

If you require interpreter services for languages other than English, you are encouraged to call 1300 196 673 and we will organise an interpreter to assist you.

English	For interpreter assistance please phone 1300 196 673
Italian	Per assistenza di interpretariato, La preghiamo di telefonare 1300 196 673
Arabic	1300 196 673 لطلب المساعدة في الترجمة أو الفوريّة يرجى الاتصال بـ
Chinese	如需翻译协助，请致电1300 196 673
Greek	Αν χρειάζεστε διερμηνέα, τηλεφωνήστε στο 1300 196 673
Spanish	Para la asistencia de un intérprete llame al 1300 196 673
Vietnamese	Đ- được trợ giúp từ phiên dịch viên, vui lòng gọi điện thoại 1300 196 673

#### *Customers without internet access or living in remote areas*

Customers in remote areas or without internet access who wish to access PowerHub's policies online are encouraged to visit their closest Services Australia location which provides free self-service internet facilities to people living in rural, regional and remote areas. To find your closest location where you can access computers and phones free of charge, refer to: <https://findus.servicesaustralia.gov.au/>.

#### *Help for people with hearing or speech difficulties*

The National Relay Service (NRS) is a government initiative that allows people who are deaf, hard of hearing and/or have a speech impairment to make and receive phone calls.

To contact PowerHub through the NRS, visit the NRS website at <https://www.accesshub.gov.au/> to choose your preferred access point or call the NRS Helpdesk on 1800 555 660.

### 3.10 Making a Complaint

All PowerHub customers have the right to raise a complaint. Complaints can be addressed by phone at 1300 196 673, by email at [support@powerhub.net.au](mailto:support@powerhub.net.au) or by Mail to PO Box 110 Spring Hill QLD 4000.

More information about making a complaint can be found on PowerHub's website through the Standard Complaints & Dispute Resolution Policy & Procedure.

If you are not satisfied with the way in which PowerHub has handled a complaint or dispute, you can request to have the complaint addressed by a more senior manager. As a last resort, independent dispute resolution may be available through the relevant state energy ombudsman or alternative dispute resolution agency

<b>Queensland</b>		Energy & Water Ombudsman QLD
	Website	<a href="http://www.ewoq.com.au">www.ewoq.com.au</a>
	Phone	1800 662 837
	Email	<a href="https://www.ewoq.com.au/contact-us">https://www.ewoq.com.au/contact-us</a>
	Mail	PO Box 3640, South Brisbane BC Qld 4101
<b>New South Wales</b>		Energy & Water Ombudsman NSW
	Website	<a href="http://www.ewon.com.au">www.ewon.com.au</a>
	Phone	1800 246 545
	Email	<a href="mailto:complaints@ewon.com.au">complaints@ewon.com.au</a>
	Mail	Reply Paid 86550, Sydney South NSW 1234
<b>South Australia</b>		Energy & Water Ombudsman SA
	Website	<a href="http://www.ewosa.com.au">www.ewosa.com.au</a>
	Phone	1800 665 565
	Mail	GPO Box 2947, Adelaide, SA, 5001
<b>Victoria</b>		Energy and Water Ombudsman Victoria
	Website	<a href="http://www.ewov.com.au">www.ewov.com.au</a>
	Phone	1800 500 509
	Email	<a href="mailto:ewovinfo@ewov.com.au">ewovinfo@ewov.com.au</a>
	Mail	Reply Paid 469, Melbourne VIC 8060
<b>Tasmania</b>		Energy Ombudsman Tasmania
	Website	<a href="http://www.energyombudsman.tas.gov.au">www.energyombudsman.tas.gov.au</a>
	Phone	1800 001 170
	Email	<a href="mailto:energy.ombudsman@ombudsman.tas.gov.au">energy.ombudsman@ombudsman.tas.gov.au</a>
	Mail	GPO Box 960 Hobart 7001

### 3.11 Visibility and Awareness

This policy will remain accessible and visible on the PowerHub website.

<https://powerhub.net.au/hardship-program/>

PowerHub will also raise awareness about the PowerHub Hardship Program with the Building Manager and Body Corporate Committee during the embedded network implementation and at

regular intervals thereafter. The community consultation process will also provide hardship information directly to the embedded network customers.

For all PowerHub customers, including those unable to access the internet and in remote locations, a reference to the PowerHub Hardship Policy will be included on or with customer invoices.

Customers without internet access may phone or write to PowerHub and request a copy of the PowerHub Hardship Policy, which PowerHub will send to the customer free of charge.

Telephone	1300 760 623 Monday to Friday (excluding Public Holidays): 8:30am to 5:30pm (AEST/AEDT)
Mail	PowerHub Hardship Support, PO Box 110, Spring Hill QLD 4000

### 3.12 Training

PowerHub will ensure that our internal and external customer support teams are adequately trained to help customers in financial hardship. Training material reviews and refresher workshops will be conducted on a regular basis.

Training and workshops include, but are not limited to, the following key areas:

- PowerHub hardship policy, procedures and work instructions;
- Hardship identification indicators and triggers;
- Adequate and respectful communication skills;
- Social and community issues awareness;
- Government-funded concession schemes;
- Energy efficiency measures and funding programs;
- Regulatory and Legal Compliance; and
- AER's Sustainable payment plans framework.

### 3.13 Continual Improvement

PowerHub has systems in place to enable us to meet our obligations with respect to customer hardship in:

- the Retail Law,
- the Retail Rules,
- the AER Customer Hardship Policy Guideline, and
- this PowerHub Hardship Policy.

PowerHub will work with staff, customers, building managers, body corporate committees, and other interested parties to improve this policy on a regular basis. This Policy is to be reviewed annually by the Executive Management Team (EMT) to ensure it is delivering effective outcomes.