

Carers Victoria Submission to Essential Services Commission's Getting to Fair: Advancing Equity draft Strategy consultation

February 2026

Introduction

Carers Victoria is pleased to provide this submission to the Essential Services Commission's Getting to Fair: Advancing Equity draft Strategy.

Carers Victoria is a for-purpose organisation working to make sure that the almost 1 million unpaid carers across the state are understood, recognised and supported as while it is an important role, it can also be a challenging one.

To progress our vision of a future in which all unpaid carers are recognised, valued and supported, we:

- provide them with free advice and information to help them in their role
- connect them to respite activities that allow them to take a break and recharge
- deliver events and education for carers and carer-interested organisations
- collect, analyse and release information about carers so their role and their needs are better understood.

These contribute to our purpose of advancing understanding of Victoria's unpaid carers and improving their access to assistance – whoever they are, wherever they live, and whomever may be in their care relationship/s. Every Victorian will know, need and/or be an unpaid carer at some point in their lives so the potential reach of our work is significant¹.

In this submission we use the definition of carer in the *Victorian Carer Recognition Act 2012*, which defines a carer as 'anyone (including carers aged under 18 years), who provides unpaid care to another person in a 'care relationship', who has a disability, mental illness, is an older person with care needs, or has an ongoing medical condition'².

Setting the Scene

At least 1 in 8 Victorians are unpaid carers and this number is growing as the population changes. The number of people needing care and assistance to remain independent at home is growing – and the complexity and intensity of care roles is increasing. Victorian Carer Survey data indicates that a third are now providing care to two or more people, and around 66% are caring for more than 60 hours in a week.

Unpaid carers represent a significant yet often invisible cohort. They provide critical care to people with disability, chronic illness, mental illness and ageing-related needs, frequently at substantial personal, financial and emotional cost.

¹ Further information about Carers Victoria can be accessed via our website, [Home page - Carers Victoria](#).

² Definition is from the *Victorian Carer Recognition Act 2012*. This definition is similar to that used in the *Australian Carer Recognition Act 2010* and should be used to ensure clarity (in terms of who carers are) and consistency across programs and services

Access to affordable, reliable and responsive essential services is crucial to the health and wellbeing of carers and the people they care for. Due to their role supporting someone with health care and/or behavioural needs, unpaid carers often have greater reliance on energy and water utilities (for example washing clothes and bedding, life support systems, monitoring systems and heating or cooling), as well as essential services like communications and transport. Carers also often have a disability themselves with two in five (39%) Australian carers reporting a disability, compared to 21% of Australians not in a care role³.

Carers are time poor and stressed. Victorian carers have lower wellbeing compared to other Victorians with one in two reporting high to very high levels of psychological distress. The time and stress associated with providing often intensive support and the complexity of the systems they need to navigate are key challenges carers face. The time required of their caring role often means they have limited capacity to manage changes to services or to engage with utility providers.

Carers are doing it tough financially and this makes it more difficult for them to manage and recover from price variability or supply disruptions. About 40% of respondents to the 2024 National Carer Survey 2024 said they spent more money than they received in a month, reflecting an erosion of savings and decreased capacity to cushion any unexpected expenses with financial reserves. The number of Victorian carers unable to heat or cool their home or pay utility bills on time has almost doubled between 2020 and 2024. Nearly two thirds (63%) of Victorian carers reported experiencing financial stress in 2025⁴, much higher than people who are not in care roles. A contributing factor is the relatively low workforce participation rate of primary carers (50%⁵ compared to 68% of the general Victorian population), with up to 38% of carers having to either reduce their workforce participation or stop work entirely because of their care role.⁶

Technological innovations, digitisation and new service delivery models have the potential to exacerbate inequitable access for vulnerable groups. Many carers tell us they have challenges with limited digital literacy, constrained time, unreliable internet access, and heightened stress. Taken together these challenges mean carers may often have reduced capacity to navigate complex online systems, monitor usage data or respond promptly to digital communications - increasing the risk of missed support, billing errors or disconnection. At the same time, rising costs of utilities, including telecommunications costs, can disproportionately impact carers who rely on these services more heavily. The risks associated with technological and service model innovation, can be mitigated through inclusive design, targeted protections and alternative access channels.

It is important that carer's unique perspectives are captured in consultations about the future of services they rely on to ensure their own and others' ongoing health and wellbeing. Creating just and equitable outcomes means addressing the individual and systemic barriers to carers' access to essential services and ensuring that future planning and annual work programs aligned to the goals of the *Advancing Equity* Strategy reflect carers' needs.

³ Australian Bureau of Statistics, Survey of Disability, Ageing and Carers 2021, Victorian Tables.

⁴ *Ibid*

⁵ [Disability, Ageing and Carers, Australia: Summary of Findings, 2022 | Australian Bureau of Statistics](#), accessed 19 January 2026

⁶ Carers NSW, (2025) 2024 National Carer Survey. Summary Report. Carers NSW North Sydney

Recommendations

Are there matters we should consider in evolving our strategy to encompass both individual and system level equity?

The *Advancing Equity* Strategy presents an important opportunity to embed equity at the core of essential services regulation. Carers Victoria is pleased to see the emphasis on access, inclusivity and responsiveness, including a self-determination framework for First Nations people and an Energy Justice Framework included in the draft Strategy. We further support the strategy's definition of consumer vulnerability, especially in how this definition highlights the role of regulators and businesses in supporting vulnerable consumers.

However, the ESC should be more ambitious than just maintaining current levels of support for vulnerable groups. We recommend that the ESC explicitly mandates a consumer duty of care for essential services (whereby retailers must ensure their services are affordable for people on low incomes) and recognises unpaid carers as a priority cohort for targeted support.

Recommendation one: The ESC explicitly mandate a consumer duty of care for essential services and recognise unpaid carers as a priority cohort for targeted support.

Do you think the priority themes are the right themes to help achieve our goal?

If yes, is there a way we could strengthen or improve the themes?

If no, are there other themes we should consider?

The three priority themes (business conduct, system level responses and regulatory inclusion) appropriately recognise that inequitable access to essential services is driven by systemic, structural and regulatory design factors, not only by individual vulnerability or consumer behaviour. However, the themes could be strengthened by providing more explicit signals to address consumer vulnerability and stronger accountability mechanisms for service providers. Examples of explicit signals that could be adopted see recommendations 2 to 5.

What can be done to support our regulated sectors embed considerations of justice and equity at both the individual and system level?

Recommendation two: Embed carer specific equity outcomes and indicators into performance frameworks and reporting across energy, water and transport.

Utility retailers typically offer hardship support and/or flexible payment arrangements for people experiencing financial difficulty but there is limited data at a **systems level** on the effectiveness, quality and outcome of hardship policies, whether they are helping people get out of debt, and if they are supporting people in a timely way.

The Consumer Action Law Centre's 2024 Report 'Keeping The Lights On - How Victoria's energy policies are impacting Victorian households', highlights how energy hardship is disproportionately impacting single mothers, renters and low-income Victorians. The Report contains two case studies about carers and their experiences of financial hardship and accrual of energy-related debts. The carer case studies highlight that:

- carers can accumulate debt or high levels of debt because of delays in processing applications by Centrelink,
- carers who leave the workforce abruptly may struggle to adjust to low income from Centrelink or no income during waiting periods,

- significant care roles take a toll, and time and effort to deal with energy retailers may be limited,
- carers may require specialist support from interpreters so that safeguards like the Utility Relief Grant and Payment Difficulty Framework (including genuinely affordable payment plans), are implemented by energy retailers, and
- carers are vulnerable to threats of disconnection.

Aligned to the *Advancing Equity Strategy*'s objective of shifting from abstract compliance to measurable equity outcomes for different consumer cohorts, the ESC should integrate explicit, carer-related equity outcomes into relevant codes, standards and performance frameworks. Indicators could include:

- accessibility and timeliness of hardship assistance
- responsiveness to carers' time and care constraints
- communication clarity and service flexibility, and
- rates of disconnection or enforcement action affecting carer households (with the onus on companies to show that disconnection is the genuine last resort).

Recommendation three: Mandate carer friendly engagement and communication practices.

The ESC should require service providers to use communication and engagement approaches that reduce the informational and administrative burden that currently presents a systemic barrier to carers' access to essential services. Some examples of communication and engagement practices tailored to unpaid carers include:

- carer-aware customer service training
- plain language information about hardship and payment supports for carers (in formats and communication modes they are most likely to understand and be able to access),
- flexible contact options (for example extended call-back windows, limited wait-times for call centre queries, multi-channel communication options), and
- proactive outreach to high-risk carer households.

Recommendation four: Require targeted affordability protections and flexible payment options for carers

Recognising carers' increased risk of financial stress due to reduced workforce participation and high care-related costs, the ESC should encourage utility suppliers to implement:

- increased financial hardship supports such as automatically transferring a customer to a cheaper plan once a certain trigger/threshold is reached,
- more flexible payment plans,
- stronger protection for disconnection and punitive enforcement,
- automatic referrals to hardship programs for identified carer households, and
- forgiving debt when a person reaches a certain trigger or threshold.

Is there anything else we should be doing to ensure the success of this strategy?

Recommendation five: Collect data on unpaid carers' experiences of essential services

In line with the *Advancing Equity Strategy*'s emphasis on better understanding diverse consumer experiences, the ESC should require utility retailers to collect and report systems-level data on service access, affordability stress, complaints, disconnections,

hardship program use and support uptake by unpaid carers as well as carers' perspectives on the outcome of these interventions. Ideally, disaggregated data would be publicly available and could be used by policy makers, the regulator and utility companies to:

- improve understanding of diverse experience and how market changes are affecting different groups- including carers,
- enable transparent monitoring of whether existing supports are improving outcomes for this cohort,
- help design affordability measures with carers in mind, using evidence-based interventions that reflect their patterns of service use and directly address barriers that carers are facing, and
- inform targeted regulatory interventions.

Recommendation six: Establish formal partnerships with representative community sector organisations, including Carers Victoria, to co-design/inform regulatory guidance, and share perspectives on systemic barriers

To realise the Strategy's commitment to data and insights, consumer voice and inclusive system design, the ESC should establish formal partnerships with key advocacy bodies and consumer groups, including Carers Victoria.

These partnerships would enable participation from carers with lived experience and ensure regulatory design and implementation reflects real-world barriers rather than assumptions. Partnerships should be used to (for example):

- co-design regulatory guidance and equity benchmarks for service providers,
- identify emerging systemic risks for carers' access to essential services, and
- review hardship supports and late payment enforcement practices.

What challenges or barriers might make it harder to deliver this Strategy?

The Strategy lists four pillars that are foundational elements supporting its implementation (internal capability, data and insights, consumer voice and collaboration). Carers Victoria agrees that these elements are key enablers, and it will also be critical for the ESC to have the necessary powers and adequate resources to effectively carry out its functions and, when necessary, hold retailers to account.

We further highlight the importance of consistency and trust in building and maintaining collaborative relationships with the community sector. The Strategy's commitment to equity and just outcomes will be supported by the ESC demonstrating effective engagement with the community sector, alongside its work with the energy sector and consideration of relevant policy, regulatory, or economic shifts in the broader environment.

The Caring Costs



1.75+ million

Victorians are directly impacted by care relationships



Health and wellbeing

Victorian carers have lower wellbeing compared to Victorians who do not have a care role.

Average wellbeing



High stress



1 in 2 carers

Report high to very high levels of psychological distress.

Feelings of isolation



Time commitments and financial pressures both contribute to carers feeling highly isolated.

Financial hardship

The number of carers in financial distress has more than doubled over the past three years.

Financial stress



More carers are going without meals, unable to heat or cool their home or pay utility bills on time.

Cost of living



1 in 3 carers have extra expenses

related to their care role, in addition to meeting their own needs.



1/3 don't always have access to enough food.



\$18B estimated replacement cost of Victoria's unpaid carers

Equivalent to state and local government spend on health care.

Number of care recipients



1/3

Victorian carers care for more than one person
(National Carer Survey data)

Intensity of care roles



2/3

are either caring for more than 60 hours per week or 24/7.



1/3

of carers of older people provide this support without any formal services.