

researchacma
Evidence
that informs

Telco financial hardship programs: views from financial counsellors

Qualitative research

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About the research

We have undertaken research to:

- > explore the perspectives of financial counsellors (counsellors) who had supported clients in financial hardship arrangements with telcos in 2019–20
- > complement key findings from telecommunications (telco) industry data published in the ACMA's [Customer financial hardship in the telco industry: State of play report 2018–19](#)
- > help determine whether safeguards are providing appropriate support to vulnerable consumers
- > support our work program on telco consumer protections, including consumer financial hardship, a [compliance priority in 2020–21](#).

This research supports key priority 2 of our [Corporate plan 2020–21](#). This priority is to provide evidence of telecommunications consumer experience to inform government and rule-making processes, and to develop and implement a consumer vulnerability strategy.

Methodology

We conducted qualitative research via in-depth interviews with 10 counsellors registered with [Financial Counselling Australia](#)¹. All participants worked as a financial counsellor in Australia at the time of the interview and had at least one client in a telco financial hardship program in the 2019–20 financial year.

Interviews were conducted by phone between 1 October and 3 November 2020 and were approximately 45 minutes long, following a [discussion guide](#) we developed. Participants received an incentive.

At least one counsellor from each state and territory in Australia participated in the research. The research design, development of materials, interviews and analysis were undertaken by the ACMA's qualified professional researchers.

Counsellors were asked about their experience of working with telcos and other sectors for clients in financial hardship, examples of outcomes, the impact of COVID-19 and suggestions to improve telco financial hardship programs.

This report presents key findings from the interviews, as well as individual experiences and a selection of direct quotes from participants. It provides an in-depth view from the counsellors involved in this research and the experiences of their clients, covering a range of locations, genders, ages, time working as a financial counsellor and types of consumers they work with. It therefore provides a broad range of views; it is not representative of all counsellors or all consumers in financial hardship in Australia.

¹ Financial counsellors are qualified professionals who provide information, advice and advocacy to people in financial difficulty. Their services are non-judgmental, free, independent and confidential.

Financial counsellors are based in community organisations throughout Australia, from large charities to smaller community centres, as well as local government agencies.

www.financialcounsellingaustralia.org.au/about-financial-counselling.

Key findings

Financial counsellors reported a range of incidents experienced by their telco financial hardship clients in 2019–20. Key findings and themes included:

- > **Some cases of financial hardship could be prevented if telcos did not sell and ‘upsell’ to customers who cannot afford what is being sold or do not understand the financial implications of their purchase.** Income and affordability checks are reportedly not conducted appropriately in some instances. This has resulted in some customers being sold services or goods that are in excess or inappropriate for their needs, or high-value contracts being offered to those who cannot afford them. There were examples of some telco sales staff selling to customers who did not understand the contracts or services they were being offered. These practices can make vulnerable consumers more likely to experience financial hardship.
- > **Consumers view telco services as essential.** Counsellors reported that their customers value their telco services to the extent they prioritise paying them over other debts or household expenses. For some, prepaid services do not provide the services their households need so they are keen to stay connected using postpaid services.
- > **Inflexibility of contracts is an issue.** Counsellors report that some telcos seem willing to reduce payments or to waive a previous debt. However, there were many reports of telcos not allowing a customer in financial hardship to change to a cheaper plan and/or cheaper device, ‘give back’ a device they cannot afford or negotiate an early exit from a contract. Further examples of inflexibility included hardship arrangements with short-term payment plans featuring unrealistic payment amounts. Such arrangements set up a customer for arrears in the future, which delays or exacerbates the problem rather than providing a realistic arrangement for the customer. Short-term payments arrangements can be successful if appropriate for the customer and their hardship situation.
- > **Improvement is needed for customers and counsellors to contact appropriate telco financial hardship staff.** This includes telcos having call centre staff who are aware of financial hardship obligations and can efficiently direct callers, and hardship staff who are aware of and have the power to implement hardship provisions. There are reports of very positive experiences when a counsellor easily contacts a knowledgeable, proactive, empowered telco staff member who makes an effort to understand the situation and provide more than just standard scripted responses. However, there were reports of customers trying to contact their telco directly with hardship issues and feeling ‘threatened’ that if they did not contact a counsellor to act on their behalf, they would be unable to access hardship arrangements.
- > **The comparison with hardship teams at utilities and banks is not favourable.** Nearly all counsellors in this study report that telcos are more difficult to deal with compared to banks and utilities. Telcos are viewed by counsellors as the least flexible, not as clear in terms of the options available, and have the least accessible hardship policies and processes (not clear and/or not easily found on their websites).

Detailed findings

Factors leading to financial hardship

There are many reasons why telco customers seek hardship assistance. These include loss of employment, illness (of the individual or a family member), family breakdown and domestic violence. However, some counsellors also pointed to hardship caused by the actions of telcos – usually related to their selling practices.

Counsellors provided examples of telcos' selling practices that they saw as not sufficiently preventing customers from ending up in financial hardship arrangements.

Some counsellors reported that some financial hardship would be avoided by ensuring products, services and contracts are not sold to those who cannot afford them or do not have literacy or financial literacy to understand the commitment:

- *The problem is they've often signed themselves into contracts they can't afford.*
- *One person in [telco] who was from overseas told me that just because my client didn't speak English, it didn't mean it was the telco's job to make sure they understood the contract they were being sold, and I had to tell them that's not how it works in Australia.*
- *[Telcos] don't make it very easy for customers to understand the contract or what they are getting into.*

There were also reports that affordability checks were not always being conducted² appropriately:

- *The fact that somebody on a youth allowance can walk into a store and buy two iPhone Xs – there's no onus on any of these telecommunication companies to see if any of these plans are affordable for customers. As long as their credit file is clean, they can get whatever they want and you can buy a lot of things from a telecommunication shop these days, and with 3-year contracts, it sets them up for a long-term fail.*
- *The issue we've got is the lengthy, expensive contracts telecommunications companies are allowed to lock their customers into without any onus to see if it's going to be affordable. It's always the customer left holding the bag. If they hand back their device, there's cancellation fees, all sorts of bits and pieces ... I think the root cause of the inflexibility with hardship is how they've set up the contracts in the first place.*

² [Industry Code C628:2019 Telecommunications Consumer Protections Code](#), see section 6.1, existing requirements for responsible provision of Telecommunications Products, including assessment of capacity to pay.

Poor selling practices and issues with financial hardship arrangements were noted as being particularly prevalent in some remote Aboriginal and Torres Strait Islander communities:

- *Almost all [in the remote indigenous community] have [English] language and literacy barriers. However, they would be cold-called. If they were on prepaid, they would be sold an iPad or other services.*
- *They [Indigenous clients] watch Netflix, so get excess data charges because they don't understand. The bill keeps going up each month – for example, up to \$5,000. And the customer is not paying.*
- *They will usually go prepaid after being disconnected. But sometimes relatives will get 3 plans in their own name so others can access services.*
- *Those in remote Indigenous communities do not have computers or laptops at home. They are away a lot. Bills and letters come through the council office, so they have to go into the office to get bills. So sometimes they are overdue by the time they get the bill. They can't access the telco website or read the bill on their phone.*

Counsellors suggested the following could improve consumer outcomes:

- > telcos having low-priced products available and being more proactive in making consumers aware of them, not only to those in hardship
- > telcos ensuring they conduct income and affordability checks and follow responsible lending practices.

The importance of telco services to financial counsellors' clients

A common theme among the counsellors was that their clients regard telecommunications services as so important in their lives that they are an 'essential service'. Telco payments are often prioritised over many others.

One counsellor described telco services as being in the top 3 priorities for clients, along with housing and medication. Counsellors reported that some clients try to find savings or sought hardship assistance from other organisations so that they could pay telco bills.

For some customers, the fear of loss of their telco service meant that they accepted telco financial hardship payment arrangements that they were unlikely to meet, sometimes on multiple occasions.

On clients viewing telco services as essential, counsellors said:

- *Negotiating hardship on gas and electricity so they can afford to pay their telco. Keeping them housed, keeping them fed, their medications and these days, some [form of] access to telecommunications, these are the priorities.*
- *Telco is a massive expense for their budget but it's the expense they don't negotiate on. We don't dive into the telco expense enough because it's almost like having a car. I am seeing people give up car leases and get rid of the car to keep phone and internet connections.*
- *[describing a client in financial hardship] I just need to pay this debt, because I need it (my phone).*

Counsellors views on telco financial hardship arrangements

Counsellors were asked if they considered the experiences of their clients in financial hardship indicated the programs work well.

At one end of the spectrum, there were many reports of financial hardship arrangements that were successful for their clients. Customers successfully exited the hardship arrangement and continued as a telco customer with a more appropriate plan or service for their needs and budget. Counsellors sometimes reported these customers as being loyal to the telco that assisted them. Counsellors described some customers reporting their experiences as 'truly amazing', 'empathetic', 'responsive' or 'a fair outcome'.

At the other end of the spectrum, the outcome of many interactions with financial hardship programs was not positive. This was often because clients were offered arrangements that had unrealistic payments and/or timeframes, or where debts were reduced but requests for flexibility to move to a cheaper contract or end a contract early were not granted. Customers could be left with accruing costs they were unable to pay and no long-term solution to their hardship.

Predictors of the failure of financial hardship arrangements raised by counsellors included:

- > Inflexibility in down-grading contracts to cheaper plans and/or cheaper devices during a contract or allowing an early exit from a contract. Inflexibility was common, even when it was evident that the customer was unlikely to be able to pay for the ongoing contract that was for an unaffordable amount.
- > Fee waivers or reductions in bills as part of financial hardship arrangements are not always sufficient if an unaffordable bill continues to accrue debt.
- > Short-term hardship payment plans may work well if a client is going to be able 'get back on their feet' and return to previous payment amounts. However, when the hardship is longer-term and more time is needed to pay than an initial short-term payment plan, or if an alternative arrangement is requested, it is more difficult to negotiate with telcos.
- > Unaffordable or unrealistic hardship arrangements that put clients in the position of still being in hardship in the future do not resolve the problem, only delay it.

These approaches did not enable the customer's broader financial stress to be addressed or deliver a longer-term solution to manage future commitments. In cases where domestic violence resulted in financial hardship for a client, a counsellor noted that in cases where a financial hardship arrangement of only a few months was offered, it was usually insufficient to allow a victim to pay a debt, re-organise her finances, perhaps reduce her telco contracts to more affordable plans and start a new life with a manageable arrangement.

Some counsellors report it is easier for them to deal with debt collectors after the telco has transferred the debt to collection agencies.

Counsellors reported the following reasons for negative outcomes:

- ☞ *We need to be able to adjust the contract back to something they can afford.*
- ☞ *I have to say that where there's hardship, short-term hardship, while their stated policy is that 'we'll [the telco will] work with you to adjust your plan', it's quite different in practice. And I would have to say it doesn't meet the hype and explanatory material on their websites about how they respond to*

hardship. Debt collectors have a better fundamental understanding of what is a recoverable debt and what is not.

- *I think the hardship agreements are not really working, because a hardship agreement is usually for 3 months and then everything's back to normal.*
- *They don't work particularly well, due to the fact that by the time the client comes to the service, they're generally in multiple, locked-in contracts where there's very little flexibility as to how we can assist the client, long term.*
- *They [financial hardship arrangements] can work well. There are lots of dependencies: which telco, who you get through to, and what situation your client is in. If the client fits the criteria, then it can work well.*

Counsellors suggested the following would improve consumer outcomes:

- > Telcos being more flexible, particularly in cases of severe hardship, with hardship agreements that can apply over a longer period for customers who need more time to successfully complete a hardship arrangement.
- > Telcos finding some middle ground in negotiations with customers in hardship, where the client and telco may both have to compromise, rather than the telco trying to avoid any loss.

Some counsellors pointed to the increased likelihood of a successful outcome for their client once they (counsellors) are involved, showing inconsistency in the application of telco financial hardship processes and policies:

- *Inconsistency is the problem. Frequently they [financial hardship processes] work better when financial counsellors are involved than when clients try, which is a real problem.*
- *I think for the client contacting themselves, then 'no' [financial hardship arrangements do not work well], but once we get involved, we seem to have a better success rate.*

Contacting telco financial hardship teams

Counsellors interviewed sometimes reported difficulty in reaching the right contact at a telco provider to deal with hardship requests. However, counsellors differed about which telcos they found easier or harder to contact.

A difficulty for some counsellors is the process of contacting hardship teams via general call centres. Staff in call centres were sometimes reported to be slow to put a call through to a hardship team or were unaware that an option for an issue to be dealt with by the telco's hardship team was available.

It is also difficult for customers trying to negotiate hardship arrangements for themselves to speak to the right contact at their telco provider. There were reports by counsellors of individual customers who had attempted to contact the telco directly and found it difficult, making some angry and frustrated. Counsellors reported that for their clients with lower levels of financial literacy, it could be even more difficult.

Counsellors also reported difficulties when their client's only means of contact was via an app provided by the telco. It required internet access for the client to contact their telco, and for the client to be at the counsellor's office when they contact the telco jointly.

- ☞ *[With a telco] there is a whole rigmarole of having to explain to 4 or 5 people and eventually being sent information on financial hardship. It should ring a bell for them when you talk about needing financial hardship assistance.*
- ☞ *It's very difficult to get past the initial call centre.*
- ☞ *We're supposed to have a dedicated number for advocates and financial counsellors, but we end up getting a generalised area and we ask for a specific hardship department or a specialised advocate, spokesperson or person who deals with advocates and financial counsellors, there's a general ignorance.*

Counsellors reported additional frustrations with inflexibility, lack of training, language issues and a lack of understanding of Australian consumers among some call centre staff:

- ☞ *Those with overseas call centres can have staff who aren't as good. Training is needed for call centre staff, no matter where they're located, on local [Australian] requirements. It might be OK when you get to the resolutions team, but a client's first contact re hardship is with call centre staff – there needs to be more training before the hardship team.*
- ☞ *Overseas call centres are terrible. Because they have to stick to a script, they're not inclined to be able to actually understand what you're trying to explain and then be able to give you some sort of an answer.*
- ☞ *They outsource a lot of their work overseas/offshore ... their command of English is really lacking ... and they're hard to understand. And this is the client's perspective, this is not only my perspective – so hard to understand, such thick accents. And some of them are just outright rude. And they fail to understand the Australian context.*

Counsellors suggested the following would improve consumer outcomes:

- > Having financial hardship information that is easy to access and easy to understand for customers and counsellors – on websites and on bills.
- > Giving customers the choice to negotiate their own financial hardship arrangements if they contact the telco directly or be referred to a financial counsellor for assistance.
- > Clearly communicating channels for counsellors to contact telco financial hardship teams directly.
- > Making it easier to reach hardship assistance staff by phone – not all customers have access to computers or laptops, they may only have a phone, and may not always be able to access the internet (to communicate via an app or email).
- > Not limiting customers and counsellors to only being able to contact their telco via an app on the client's phone.
- > Having consistent knowledge and training among staff, beginning with those at the call centre who can forward calls, and those in the hardship teams who are aware of all the options available to assist those in hardship.

Examples of outcomes for clients

Counsellors were asked to provide specific examples of telco financial hardship arrangements that had and hadn't worked well, for their clients.

Some examples of **positive outcomes** included:

- > A client with a disability that made it impossible to use a smart phone was instructed by her telco to visit a store. At the store, the smart phone was taken back, and a store voucher was given that allowed the outright purchase of an 'ability phone', which could be easily used.
- > A young client obtained a phone contract and was relying on others to pay the cost, which did not occur and resulted in a large debt. After contact by the counsellor, the telco waived the debt.
- > A client suddenly unemployed due to illness and unable to return to work had a mobile phone, tablet and pay TV. The telco took the tablet back and cancelled the contract. For the mobile phone, the client paid out the remainder of the contract for the cost of the handset, even though they were less than half-way through the contract. Their existing phone number was transferred to a more affordable prepaid option and the client was pleased to keep the handset. The pay TV contract was varied to a less expensive option.
- > A pensioner client signed up for 2 tablets and more data than they needed (or could afford). The telco accepted the return of the hardware, waived the contract and changed the client to a sim-only plan – and waived a \$2,000 debt.

Counsellors provided several examples of positive outcomes for clients in financial hardship who were suffering domestic violence. It was noted that telcos often have clear policies for domestic violence victims:

- > A client had both telco and utility debts. The telco debt was waived.
- > A client with young children had their debt wiped.
- > A client had a range of debts. The telco accepted the return of the phone and cancelled their debts and remaining contract. The client was blocked from entering a postpaid arrangement with that telco for 5 years.
- > A client had their debt halved by the telco so that they could manage to pay out the remainder of their contract and retain their handset.

In other examples, counsellors described **negative outcomes** for their clients:

- > A client with a disability who was vulnerable to being approached online provided their personal details to a malicious party and had phones purchased fraudulently in their name. As the client was not on a Centrelink benefit and had no proof of disability, it was difficult to negotiate with their telco. The client had to provide evidence of vulnerability by obtaining certificates from doctors to enter a hardship arrangement, the counsellor reported the telco was uncooperative throughout long negotiations during which the debt continued to increase.
- > A large family with parents on pensions and school-aged children had substantial telco costs of \$500 per month. Their telco adjusted their contract but reduced the monthly cost only by \$40.
- > A client who had previously been a victim of domestic violence found further debts (taken out by their now ex-partner after the end of the relationship). The client had not sought medical treatment or counselling in recent years and could not produce evidence of domestic violence. Being asked for evidence by the telco caused her to re-live the violence. This client had been with the same counsellor for years, and the counsellor's record of working with this client was not sufficient for the telco.

- > A client had lengthy discussions with a telco the counsellor described as 'uncooperative' and the debt was sent to a debt collector. As this client was eligible to be added to the national hardship register³, the debt should never be collected, and the telco should have been aware of that.
- > A client of limited means had an internet service that had a poor performance from the time it was connected. The client did not want to pay for a service they did not receive. The telco refused (on multiple occasions) to acknowledge they could monitor the connection to determine whether it was working. The counsellor subsequently found out such monitoring is possible. The client's claim was not believed, even though their data use decreased markedly with the new service. After some concessions by the telco, the client paid out some of the bill and left the telco.
- > An older client who was recovering from serious illness and had a partner with cancer had a bill of around \$400, which caused high levels of stress. The telco was unwilling to assist, which resulted (in this instance) in the counselling organisation providing financial assistance for the client to pay the bill.
- > A client who was the victim of domestic violence found it difficult to have her husband removed from her telco plan as it was part of a bundled family package and her husband was refusing to allow the plan to be cancelled. The counsellor also had to explain the importance of not allowing the husband to access her new address or to access any details about their children as he had attempted to get that information from the telco.
- > Clients were told in a threatening or unhelpful manner by their telco that they needed to contact a counsellor to access hardship assistance.

Dealing with telcos during COVID-19

The impacts of COVID-19 for counsellors dealing with telcos included:

- > telco staff being harder to contact as some were working remotely
- > being diverted to call centres more frequently, or different financial hardship teams
- > experiencing a longer time to get things done, with more follow up needed
- > being requested to contact telcos via email rather than phone, which meant questions were answered or matters resolved more slowly than usual
- > more empathy being shown by some telcos
- > fewer accounts being referred to debt collectors
- > seeing fewer clients than before COVID-19, except for those counsellors specialising in domestic violence
- > some clients having more income in 2020 as a result of pandemic income supplements, and some consequently purchasing new telco products, which counsellors were concerned may become unaffordable when COVID-19 support changes, which may lead to an increase in the number of financial hardship cases
- > seeing 'first-time' clients, such as those who had lost work for an extended period, international students, and business owners and operators who had reduced or no cashflow to pay their telco contracts.

³ The [national hardship register](#) is a joint initiative between the Australian Collectors and Debt Buyers Association and the community sector to protect those consumers who experience long-term and severe financial hardship from unnecessary debt collection activity.

The role of the Telecommunication Industry Ombudsman Scheme

The research interviews did not question counsellors about the Telecommunication Industry Ombudsman (TIO) Scheme, however it was raised spontaneously by some.

Counsellors appeared to understand the role of the TIO and when they may be able to assist. One counsellor noted that they were trying to educate their clients about the need to negotiate directly with the telco first, before contacting the TIO. A counsellor noted that her organisation had prepared guidelines to assist other counsellors in preparing a telco complaint to the TIO, including how to structure the complaint and key words to use. Another counsellor reported they advised a client that mentioning they have made an enquiry to the TIO was sufficient to prompt a telco to act in financial hardship cases.

Some counsellors found they needed to obtain a TIO enquiry/case number to prompt action from telcos – to indicate that they had a case they could take to the TIO if they did not get a response.

About taking up financial hardship issues with the TIO, counsellors said:

- *I use the TIO probably as a go-to because I know they will get a result. If I have problems, I am more likely to go to the TIO ... than I would go to AFCA⁴ for a banking complaint.*
- *You don't use the ombudsman as a threat. TIO will give me an enquiry number, not a complaint but it is fairly strongly signal that I think: this is a strong enough case and I've talked to the ombudsman about it, I'm preparing ... I can't use the ombudsman as an option if there's no merit.*
- *The best way to get to the right department is to go to the ombudsman.*
- *[Telco] not helpful whatsoever, we needed to make a payment on a client's account, and the client couldn't remember their login details so we both tried to ring. On hold for 40 mins and then the call was disconnected. This went on for weeks, they were trying, I was trying, we could not get through. They couldn't access their email so couldn't reset their password; it was an awful experience. We'd leave messages to be called back and no-one would call us back. We raised it with the ombudsman and funnily enough, someone was back in contact within 24 hours.*

Comparison of telco financial hardship programs with other sectors

The majority of counsellors in this study regarded financial hardship programs offered by utilities and banks as better than those offered by telcos.

One counsellor described an approach used by utilities in their state, where a utility will agree to a schedule of payments during hardship. After meeting a number of on-time payments (for example, the first 3), the utility will then 'pay' one of the payments. The client is rewarded by a further reduction in debt and being able to clear the debt sooner and is encouraged to continue making their own payments.

⁴ [The Australian Financial Complaints Authority](#) provides consumers and small business with independent dispute resolution for financial complaints.

A few counsellors described the ease of using the 'more streamlined' pack, or 'toolkit' that is sent out by banks when a financial hardship query is raised with a bank. The kit clearly explains the supporting information that is needed and advises them to state what financial hardship arrangements they are seeking.

One counsellor suggested that it would be helpful if the telco industry provided training or refreshers to counsellors to better understand the hardship options available and be able to assist their clients to effectively arrange telco financial hardship plans. Counsellors noted that training, refresher materials and updates were commonly provided by other sectors such as utilities and banking.

When comparing telco financial hardship programs with other sectors, counsellors said:

- *They [banks and utilities] have a specialised team or a team that deals specifically with financial counsellors ... it's only when what you are asking for is outside the boundaries of their policy of what that particular team can deal with or that they're not prepared to work with you, that you need to go to the ombudsman.*

- *The major banks are better than the minor banks. Even a second- or third-tier bank, where they're using offshore call centres, they're not as good as the majors [banks], [but] they still have a designated area, designated specialist, a person with the skills. When I contact [two telcos named], I don't get the sense the person understands what I'm talking about or what role I play.*

- *The major utilities, all of those have a designated hardship area, we contact them, and they know who we are and what they've got to do, and they're much more responsive.*

Appendix

Discussion guide summary

Introduction to interviews

Participants were told:

- > the interview would be around 45 minutes
- > an explanation of ACMA's role as a Commonwealth statutory authority that regulates communications and media services in Australia
- > the interview content was confidential, no names or identify information about counsellors and their clients will be published
- > the interview information would not be shared with organisations outside the ACMA and the collection and storage of information complies with the Privacy Act
- > they needed to give permission for interviews to be recorded.

Financial hardship – demographic questions for counsellors

- > Location, time in industry, number of current clients, how clients start work with the counsellor (for example, referral or direct approach).
- > Any specialisations in types of clients or types of financial hardship.

Interview questions for counsellors

1. Overall, do you think that telco financial hardship programs work well, or not so well, for your clients? And why do you think that?
2. How easy or hard has it been to deal with the telcos on behalf of your clients? Are some telcos easier to work with than others? In what aspects?
 - a) The telco's own processes in relation to financial hardship?
 - b) Being able to contact the right person for your clients' financial hardship plans?
 - c) The telco staff's knowledge of their own financial hardship programs?
Why do you think that is the case? Can you give me some examples?
3. (If you deal with financial hardship programs in other sectors as well, e.g. electricity or gas) How do the financial hardship programs in the telco sector compare to financial hardship programs in other sectors? Are they better or worse? In which ways?
4. Overall, do you think that telco financial hardship programs have actually helped your clients? In what kinds of ways?
5. Do you have a 'good news' story about one of your clients successfully completing a telco financial hardship arrangement?
6. And an example when a financial hardship program did not work well for one of your clients? Why didn't it go well? What was the outcome?
7. Have you seen a difference in financial hardship cases being referred to you that you think are specifically due to COVID-19? More cases/fewer cases? Different types of clients, changes to the type of hardship or situations that your clients are facing? In what way? Can you give me some examples?
8. How have the telcos dealt with those COVID situations? Have you noticed any changes in the telco's processes (including being able to contact the correct person and telco staff knowledge) – good or bad?
9. If you could make any recommendations to improve telco financial hardship programs, what would they be, and why?

10. For someone who is struggling with their telco bills what would you advise them to do? Would you encourage them to contact a financial counsellor like yourself? In what ways could you help them get back on their feet?
11. Do you have any final comments or suggestions for us?

This research was carried out in full compliance with The Research Society Code of Professional Behaviour, the *Privacy Act 1988* and the Research Calls Industry Standard.