



Energy Experiences of Culturally and Linguistically Diverse People in the ACT

actcoss@actcoss.org.au

actcoss.org.au

02 6202 7200

ABN 81 818 839 988



About ACTCOSS

The ACT Council of Social Service Inc. (ACTCOSS) acknowledges Canberra has been built on the land of the Ngunnawal people. We pay respects to their Elders and recognise the strength and resilience of Aboriginal and/or Torres Strait Islander peoples. We celebrate Aboriginal and/or Torres Strait Islander cultures and ongoing contributions to the ACT community.

ACTCOSS advocates for social justice in the ACT and represents not-for-profit community organisations.

ACTCOSS is a member of the nationwide COSS Network, made up of each of the state and territory Councils and the national body, the Australian Council of Social Service (ACOSS).

ACTCOSS's vision is for Canberra to be a just, safe and sustainable community in which everyone has the opportunity for self-determination and a fair share of resources and services.

The membership of the Council includes the majority of community-based service providers in the social welfare area, a range of community associations and networks, self-help and consumer groups and interested individuals.

ACTCOSS advises that this document may be publicly distributed, including by placing a copy on our website.

Contact Details

Phone	02 6202 7200
Address	Weston Community Hub, 1/6 Gritten St, Weston ACT 2611
Email	actcoss@actcoss.org.au
Web	actcoss.org.au
CEO	Dr Devin Bowles

19 September 2025

© Copyright ACT Council of Social Service Incorporated

This publication is copyright, apart from use by those agencies for which it has been produced. Non-profit associations and groups have permission to reproduce parts of this publication as long as the original meaning is retained and proper credit is given to the ACT Council of Social Service Inc (ACTCOSS). All other individuals and Agencies seeking to reproduce material from this publication should obtain the permission of the CEO of ACTCOSS.

An ACT Government funded initiative.





Table of Contents

About ACTCOSS	2
About this Report	4
1. Why consider cultural and linguistic diversity in energy policy development?	5
2. Culturally and Linguistically Diverse	6
3. Barriers to energy equity for culturally and linguistically diverse people	8
4. Community sector perspectives	11
5. Retailer consideration of culturally and linguistically diverse energy consumers	17
Accessibility of website supports	18
Accessibility of retailer hardship policy documents for culturally and linguistically diverse consumers	20
6. Consideration of culturally and linguistically diverse energy consumer needs by government and public bodies	24
Australian Energy Regulator	24
ACT Civil and Administrative Tribunal (ACAT)	25
ACT Government	27
7. Recommendations	30
End Notes	33



About this Report

Multicultural ACT residents deserve to benefit from energy policies and supports in the same way as other Canberrans. However, they may face additional barriers that restrict their ability to do so.

The current context of a rapidly changing energy system presents an opportunity to meaningfully incorporate the needs of Canberrans into the current energy market and its underlying rules. This should include the needs culturally and linguistically diverse Canberrans.

Drawing on local insights, community engagement, and existing literature, this report provides a brief examination of:

- the impetus for considering the role of culture when designing energy policy and services
- the development of the term culturally and linguistically diverse or CALD
- the barriers culturally and linguistically diverse people face in gaining equitable access to energy services and supports
- the views of community service providers in the ACT on the energy experiences of their clients including culturally and linguistically diverse people
- a snapshot of culturally and linguistically diverse people in Canberra
- the degree to which the needs of culturally and linguistically diverse clients are considered in communications by retailers and government and public bodies.

The report concludes with recommendations on how some of the issues surfaced can be addressed.



1. Why consider cultural and linguistic diversity in energy policy development?

The term 'culture' is often exoticized and treated as something belonging only to people from non-dominant or minority groups. However, culture is something all groups possess.

Culture is a shared framework for understanding the world, relating to it, and moving through it. The term culture encompasses shared understandings and practices developed by groups in response to their surroundings. This includes matters as commonplace as when food should be cooked, what sources of information are reliable, what kinds of help individuals can expect from the community or government, or the appropriate response for failure to pay bills.

Cultural context directly influences how decisions are made and interpreted. For example, a decision-maker in the ACT assessing whether a rental property is "fit for human habitation" may consider a poorly insulated home that falls below outdoor winter temperatures to be acceptable, reflecting local norms that have long tolerated substandard thermal performance. In contrast, a decision-maker in Denmark, where housing standards prioritise insulation and thermal comfort, might deem the same property unfit. These differences are not technical alone, they are shaped by cultural expectations around comfort, safety, and what constitutes adequate shelter.

Recognizing that all policy and service design is shaped by culture allows us to better understand how cultural assumptions, dominant or otherwise, influence the way energy policies are developed, communicated, and delivered.



2. Culturally and Linguistically Diverse

Cultural and linguistic diversity can be defined in several ways. It may include factors such as a person's country of birth, ancestry, parents' country of birth, languages spoken, and religious affiliation. Typically, people who were born overseas, have at least one parent born overseas, and/or speak multiple languages are considered part of the CALD population. However, the definition of CALD is not fixed and can vary between reports and data sources, depending on the variables available.

In 1999 the Australian Bureau of Statistics developed a list of statistical indicators in response to a request from the Council of Ministers of Immigration and Multicultural Affairs for consistent set of variables to measure cultural and linguistic diversity in Australia.¹

In developing statistical indicators for multicultural Australians, the ABS was careful not to create a closed list of indicators on who could be regarded as culturally and linguistically diverse. Rather the ABS chose to create a baseline set of indicators. The indicators are divided into minimum core set of four conceptual indicator and a wider set of indicators that underpin these four core benchmarks.

The core indicators established by the ABS are:

- Country of birth of person
- Main language other than English spoken at home
- Proficiency in spoken English
- Indigenous status

The wider standard set of indicators that underpin these four core benchmarks are:

- Indigenous status
- Ancestry



- Country of birth of father
- Country of birth of mother
- First language
- Languages spoken at home
- Religious affiliation
- Year of arrival in Australia

In the absence of a conclusive set of indicators or a conclusive CALD definition, policy makers and academics have used differing variations of ABS indicators, with different weighting being assigned to different components.



3. Barriers to energy equity for culturally and linguistically diverse people

Culturally, and linguistically diverse people deserve to benefit from energy policies and supports the same way as other Canberrans. However, culturally and linguistically diverse people may face barriers in doing so.

(a) Limited retailer/ policy maker familiarity with diverse cultural perspectives and practices

Culture influences how people use energy, manage households, and interact with services. When retailers or policy makers are unfamiliar with the diverse ways in which CALD households utilise energy or access supports, they can overlook real energy needs and underserve these communities, creating policies and products which are mismatched with the lived reality of those who are affected.

For example, during the month of Ramadan many Muslim households are awake for longer, spending more time cooking festive dishes, hosting more frequent gatherings and engaging in cultural practices. This produces predictable short-term increases in energy use during the month of Ramadan.

In countries where this norm is recognised, additional financial assistance for households may be required by law or provided by government during the month of Ramadan, to reduce the risk of hardship from increased household expenditure on energy, food, and other bills.

However, in countries where this norm is not considered, concessions and other assistance measures may not be calibrated to account for these temporary spikes in energy. For instance, retailers unaware of these seasonal costs may press households into high or fixed repayment instalments that ignore the increased financial pressures households face during this time. This in turn leads to a high risk of default on repayment plans and a higher disconnection rate.



(b) Failure to address dominant norm bias

Dominant norm blindness refers to the assumption that some people are “cultural” while others merely exist. Viewed through this lens the practices of the dominant or majority group are viewed as neutral while the practices of other groups are viewed as deviations requiring special treatment.

Energy policies and products designed without the benefit of systems to surface dominant norm bias and evaluate the impacts of assumptions imported under the false sense of neutrality created by dominant norm bias can embed disadvantage into policies and products. This drives inequity, especially for groups whose norms and practices differ from those of the dominant group.

For example, if government assistance payments or energy concessions are designed around the norms of the majority cultural group, which generally favor smaller household sizes, this can unintentionally disadvantage households from more communal or collectivist cultural backgrounds. In these communities, cultural norms such as multigenerational living, extended family cohabitation, and caring for elderly relatives or recently arrived migrants within the home often lead to larger household sizes and, consequently, higher energy needs. When support is provided on a flat-rate or per-household basis without accounting for these differences, it can fall short of meeting the actual energy needs of these families, increasing their risk of energy stress or hardship.

Dominant norm bias can also lead to policy makers viewing larger households as “edge cases” or outliers, rather than the legitimate expression of common familial norms within a multicultural society. This in turn can lead to a de-prioritisation of efforts to develop more nuanced or flexible concession models, and failure to uphold government policy commitments to genuine multiculturalism.

(c) Limited availability of information in languages other than English

Most retailers and public bodies provide energy information almost exclusively in English. This limits CALD residents’ ability to compare energy plans and choose the best one for them. It can also limit their ability to access entitlements or efficiency programs which can help lower energy bills.



(d) Low accessibility of information provided in languages other than English

ACTCOSS analysis in sections five and six of this report show that often translated materials are not provided by retailers and public bodies. When they do, they are typically hard to access.

Information may be poorly signposted, buried deep within websites or documents, or require additional steps such as mailing to access. This creates barriers for people with lower digital literacy or limited English proficiency, undermining the usefulness of translated supports and perpetuating exclusion.

(e) Limited familiarity with existing systems and norms

Energy bills and contracts in Australia are often highly technical, full of jargon, and structured around assumptions that consumers know their rights, comparison tools, and complaint pathways. Recently arrived migrants including humanitarian entrants may not have prior experience with competitive retail energy markets or concession frameworks. They may also come from countries where energy is provided as a government service with fixed prices, meaning they are unfamiliar with concepts like choosing between retailers, negotiating hardship programs, or switching plans. This lack of exposure affects their energy practices and behaviors. It may make it harder to recognise entitlements or make choices about energy even when translations are available.

(f) Overrepresentation in rental market

Migrants in Australia are more likely to be renters than the general population, especially in their early years of settlement.² Many face barriers to home ownership due to lower initial incomes, employment insecurity, and limited access to credit. As a result, they are less likely to have access to energy efficient appliances that can reduce bills, or more beneficial energy supports offered by government to homeowners.



4. Community sector perspectives

As part of a preliminary mapping of energy supports and issues in the ACT, ACTCOSS surveyed 28 organisations in July–August 2025. We received 30 completed responses (26 organisations submitted one form; two submitted two).³

The survey asked about clients' energy experiences generally and specifically those of culturally and linguistically diverse clients. These responses are provided below in the section titled client energy issues and capacity for energy education. Unless otherwise indicated the results of the survey provided below refer to response provided in relation to the respondent's client base in general.

Client energy issues and capacity for energy education

Respondents were asked to identify key energy issues raised by client's energy. The key issues identified are:

- affordability (83% of clients)
- difficulty keeping homes cool or warm (70%)
- lack of control over energy use especially in rental settings (53%)
- difficulty understanding bills or plans (40%)
- appliance issues (33%)

Respondents also noted the issue of energy hardship for clients that do not qualify for financial assistance and the role of inefficient housing in compounding the cost-of-living crisis their clients were experiencing.

“Some of our clients' houses are FREEZING, and hugely inefficient to heat, leading to ongoing cost of living crises.”

Quote from community worker supporting renters

Fifty seven percent of respondents affirmed there was potential to engage their clientele on energy issues, such as efficiency, affordability, or switching away from gas, while 33% noted that there may be potential to engage their clientele on energy issues.



Culturally and linguistically diverse client base

Many organisations serve culturally and linguistically diverse clients, though several were unsure of the share. Nine of 30 respondents (30%) reported that culturally and linguistically diverse clients people make up more than half of their client base.

The Australian Multicultural Action Network (AMAN), a not-for-profit organization dedicated to advocating for and supporting multicultural communities noted in its response that its clientele included people speaking “Arabic, Mandarin, Hindi, Tamil, Dari, Swahili, and more” languages. Another respondent noted reported high numbers of clients from Syrian and Afghan backgrounds and the need for more translated materials in Arabic and Farsi.

Experiences of culturally and linguistically diverse clientele

In its response to the ACTCOSS survey, AMAN noted that it sees “energy-related needs as increasingly urgent, and deeply connected to broader issues of equity, wellbeing, and social inclusion in culturally and linguistically diverse communities.” It noted “Many of the families and individuals we work with face compounded disadvantage when it comes to energy access, including:”

- “Housing insecurity and lack of control in rentals, which limit opportunity for upgrades or switching providers”
- “Digital exclusion, making it harder to access concessions, compare plans, or apply for support”
- “Language and literacy barriers, leading to confusion about bills, contracts, and entitlements”
- “Cultural norms and assumptions, which can affect energy use patterns or interactions with providers.”

AMAN also noted opportunities to engage people in energy issues, particularly through:

- “Community-led education in trusted spaces like temples, mosques, community halls, and schools”
- “Tailored outreach and multilingual tools that reflect real-life energy use scenarios for migrants and low-income households”



- “Collaborations with government and industry to make the energy transition fair, inclusive, and accessible to all”
- “Empowering culturally and linguistically diverse leaders to advocate for change and take part in energy planning, innovation, and policy.”

Interviews and responses from community organisations also pointed to the risks of supports that do not account for cultural differences. A program manager working with humanitarian visa holders reported an average household size of six to seven people and elevated hardship risks when assistance is provided on a flat-rate basis that does not scale to household size.

The negative compounding effects of poor rental housing conditions on the financial stability of these households was also noted by another respondent, along with the need for early energy education to reduce winter bill shock.

The table that follows lists survey respondent organisations, services they provide and their potential to engage existing clients on energy policy.



Table 1 – Summary of Survey Form Responses

Organisation	Services provided	Primary client groups	Energy supports provided	Culturally and linguistically diverse client base estimate	Potential to engage clients on energy
Advocacy for Inclusion	Provides advocacy services for people with disabilities.	People with disabilities, many of whom have lower incomes.	Links clients with relevant support services.	Under 25%	Maybe.
A Gender Agenda	Provides advocacy services, legal assistance, youth programs, peer support programs and employment or training to Trans and Gender Diverse People.	Trans and gender diverse people.	Help accessing utilities concessions.	Not sure	Maybe.
Australian Multicultural Action Network	Provides advocacy services and facilitates the exchange of information on diverse range of issues.	Primarily works with culturally and linguistically diverse people.	AMAN has supported clients with accessing utilities concessions, ACT government energy supports such as home energy support program, partnered in the delivery of information sessions on energy bills, distribution of information on energy supports.	95% or more	Yes.
Australian Red Cross	Settlement services.	Humanitarian program entrants.	Provides clients with help accessing ACT government energy supports, paying their bills and setting up utility connections.	Over 75%	Maybe.
Canberra PCYC	Delivers youth programs and food aid.	Young people and adults.	Refers clients to other organisations on energy matters, helps access utilities concession, and other ACT government supports.	Under 25%	Not sure.
Canberra Rape Crisis Centre	Provides a range of supports for people who have been subjected to rape. This includes advocacy, mental health services, legal services, employment training services, crisis support and trauma counselling services.	People affected by rape.	No.	Under 25%	Maybe.
Care Inc	Provides advocacy and financial counselling services.	Lower income groups, culturally and linguistically diverse people, people experiencing rental and mortgage stress	Accompanies clients to appointments where energy is discussed. Helps clients access utilities connections and other ACT government energy supports. Advocates on behalf of clients with energy retailers	Not sure	Yes.
Community Options	Provides case management services and linkages to specialist services.	People requiring end of life care at home, women with newborns, aged care, and National Disability Insurance (NDIS).	Help accessing utilities and paying bills.	25-50%	Yes.



Community Services #1	Provides food pantry services, community transport, social support groups, childcare, aged care and other practical and emotional supports to ACT and NSW residents.	Primarily works with older people, lower income groups, socially isolated people, children, families and people from culturally and linguistically diverse backgrounds.	-	Under 25%	Not sure.
Conservation Council ACT Region	Advocacy.	Broad based environmental community and activists.	No.	Under 25%	Yes.
Council on the Ageing (COTA) ACT	Advocacy services, housing/homelessness support and seniors' events.	Older people and their family	Refers clients to other services, conducts seasonal energy talks.	Not sure.	Maybe.
Doris Women's Refuge Inc.	Provides housing, homelessness support and advocacy services.	Women and children requiring shelter after leaving domestic, family and sexual violence.	Refers clients to other services for energy related issues. Accompanies clients to appointments where energy is discussed. Helps clients access utilities concession and other ACT government energy supports.	50–75%	Yes.
Helping ACT	Provides food aid and settlement support, housing/homelessness support.	Lower income groups, refugees, those with health issues or disabilities	No.	50–75%	Maybe.
My Coaching My Future	Free, confidential coaching for women in the ACT who have moved on from a violent relationship.	Women who are rebuilding their lives following their exit from violent relationships.	Refers clients to other services for energy support, helps clients access ACT government energy supports, and provides heaters and curtains.	25–50%	Yes.
Migrant and Refugee Settlement Services (MARSS)	Settlement support.	Refugees, migrants and people from culturally and linguistically diverse backgrounds.	Provides clients with help accessing energy concessions and other ACT government supports.	100%	Yes.
Meridian	Provides advocacy, aged care health or mental health services.	People who identify as LGBTIQA or are living with HIV.	Accompanies clients to appointments where energy is discussed. Helps clients access utilities connections and other ACT government energy supports.	25–50%	Yes.
Palliative Care ACT	Provides palliative and respite care.	People requiring palliative care.	Links clients with relevant support services.	Under 25%	No.
Perinatal Wellbeing Centre	Provides physical health and mental health services.	Women from a range of backgrounds across childbearing years.	No.	Under 25%	Maybe.
Sisters in Spirit Aboriginal Corporation (SISAC)	Provides advocacy services, legal assistance, and housing/homelessness support.	Aboriginal people.	Accompanies clients to appointments where energy is discussed. Helps clients access utilities connections and other ACT government energy supports.	50–75%	Yes.



St John's Care	Provides advocacy services, employment or training services, food aid, health or mental health services and housing/homelessness support.	Lower income groups and other persons in need.	Accompanies clients to appointments where energy is discussed. Helps clients access utilities connections and other ACT government energy supports.	25–50%	Yes.
St Vincent de Paul	Provides housing and homelessness support, food aid, youth programs, settlement support, and emergency support.	Primarily works with lower income households.	Runs an inhouse energy support program funded by the ACT government. The program delivers home energy assessments, energy advice, draught proofing and curtains for eligible households.	Not sure.	Yes.
The Smith Family	Education support.	Lower income families, refugees from culturally and linguistically diverse background and Aboriginal and Torres Strait Island families.	Help accessing ACT government energy supports.	25–50%	Maybe.
Jigsaw Australia	Provides employment or training services.	Adults with a Disability.	No.	Not sure.	Maybe.
Woden Community Service / Northside Community Service	Provides, aged care, health or mental health services, housing/homelessness support, youth programs, and early learning services.	Broad cross-section of community.	Refers clients to other services and helps clients access utilities concessions.	25–50%	Yes.
Women's Health Matters	Advocacy and bilingual Health Education.	Women and gender diverse people, migrant and refugee women, women who have newly arrived to the ACT, and women who have experienced violence and trauma.	No.	N/A	Yes.
Yedding Mura Aboriginal Corporation	Indigenous justice clients and their families.	Aboriginal and Torres Strait Islander Community.	Helps clients interacting with the ACT Justice systems through energy bill supports or attending meetings on energy issues. Also helps clients access the utilities concession and other ACT government energy supports.	Over 75%	Maybe.



5. Retailer consideration of culturally and linguistically diverse energy consumers

This section provides a preliminary analysis of the degree to which the needs of energy consumers who are culturally and linguistically diverse are considered in public facing communications by energy retailers.

To conduct this analysis ACTCOSS examined the retailer's website, and hardship policy documents published on the retailer's website.

Hardship policy documents are documents retailers are legally required to publish and make accessible to clients experiencing payment difficulty. Hardship policy documents and their accessibility was considered in this analysis due to their central role in outlining entitlements, processes, and contact pathways for customers at risk of energy hardship.

Websites were examined in this analysis on the basis that they are the retailers' primary public-facing channel for communicating with current and prospective customers.

Due to the limited scope of this report other means of communication such as billing inserts, direct mail, customer service centers, and advertising were excluded from this analysis. The degree to which each provider's energy service offerings and products take into consideration different cultural needs of consumers is also outside the scope of this report.

Though excluded from the scope of this report, analysis of the degree to which other means of communication and energy product or service delivery takes in to account the needs of culturally and linguistically diverse people is likely to be useful in surfacing further challenges which may exist for culturally and linguistically diverse people in gaining equitable access to energy services and supports.

This analysis includes retailers advertising offers on the AER's Energy Made Easy website and those identified as active and operating in the ACT by the Independent Competition Regulatory Commission to ensure relevance of results to the ACT context.



Accessibility of website supports

Of the fifteen energy retailers operating in the ACT, seven provide information about interpreter services for culturally and linguistically diverse customers on at least one page on their websites.

However, in most cases, this information was presented only in English, raising concerns about its accessibility for people from non-English-speaking backgrounds. Only one retailer offered access to multilingual support that was identifiable from the home page, though even then this option was not prominently displayed. In many instances, customers were required to navigate away from the home page and click through multiple English-language menus before accessing information about interpreter services.

These findings highlight potential barriers to accessing support and suggest a need for improved visibility and accessibility of culturally and linguistically diverse -relevant information on retailer websites.

A detailed breakdown of energy retailer website accessibility for people from culturally and linguistically diverse backgrounds is provided below in Table 2.



Table 2 – Retailer website support analysis

Retailer	Supports for culturally and linguistically diverse customers visible from home page?	Supports for culturally and linguistically diverse customers available on help page?	Supports for culturally and linguistically diverse customers available on contact us page?	Electricity Market Share ⁴
Origin	No.	No.	Yes. Interpreter services are advertised in at least 5 different dialects/languages.	17%
ActewAGL	No.	No.	Yes. Interpreter services advertised in English.	92%
Energy Australia	No.	No.	No.	4%
Amber	No.	No separate help page. Website's help tab does not display culturally and linguistically diverse specific supports.	No.	N/A.
Red Energy	No.	No.	No.	4%
Energy Locals	No.	No separate help page. Help tab does not display culturally and linguistically diverse specific supports.	No.	1%
Cova Energy	No.	No.	No.	N/A.
Discover Energy	No.	No.	No.	N/A.
Local Volts	No.	No separate help page. Help tab does not display culturally and linguistically diverse specific supports	No.	N/A.
Nectr	No.	Yes, interpreter services advertised in English	No.	N/A.
Next Business Energy	No.	No separate help page.	Yes. Interpreter services advertised in seven dialects/languages	N/A.
Engie	No.	Yes, interpreter services advertised in ten dialects/languages.	Yes. Interpreter services advertised in English.	N/A.
The Embedded Networks Company Trading as Seene	Yes. Discreet tab directs users to a contact form in 2 different languages/dialects.	No separate help page. Help question box available in English on home page.	Yes. Interpreter services advertised in five different dialects/ languages.	N/A.
AGL	No.	Yes. Interpreter services advertised in five dialects/languages.	Yes. Interpreter services advertised in English	N/A.
Perpetual Energy	No.	No separate help page.	No.	Gas only.



Accessibility of retailer hardship policy documents for culturally and linguistically diverse consumers

The review of hardship policies from 15 energy retailers operating in the ACT surfaced several issues that may impact culturally and linguistically diverse customers in accessing hardship supports. These include:

(a) Website navigation challenges restricting access to hardship policies

Hardship policies are not always easy to locate on retailer websites. Navigating to these documents typically requires at least moderate familiarity with English and may present challenges to customers with low digital literacy. In some cases, policies are nested behind multiple menus or accessible only after locating small hyperlinks embedded in broader content.

(b) Poor visibility and placement of language services

Most hardship policies included information about translation or interpreter services. However, the way in which this information was provided reduced the likelihood of readers with limited English language proficiency encountering or recognising the assistance being provided.

For instance, details about translation services and the availability of alternative-language versions of hardship policies were typically presented only in English. They often appeared in later sections of lengthy documents, without clear signposting, or in large unbroken blocks of text that did not follow Plain English or Easy English principles. Information about whether these services are free to use was also not provided consistently.

Alternative language versions of hardship policies were not published on websites consistently. At least one retailer directed customers to an invalid link to access alternative language versions of the policy. Many retailers required retailers to undertake additional steps such as contacting the retailer directly to gain access to translated, Easy English and Plain English versions of the policy, further reducing accessibility.



(c) Challenges accessing information about third-party delegation

Customers are entitled to authorize third parties to communicate with retailers and act on their behalf when dealing with energy retailers. Despite the importance of this support for people who are less familiar with the English language, hardship policies often failed to clearly communicate the process for engaging this support. Where this information was provided, it was often embedded within dense policy text in language that did not meet plain English guidelines.

It should also be noted that the availability of this support is often undermined by retailers attempting to contact customers directly despite third party delegation arrangements being put in place. This creates further barriers for those relying on such supports to navigate the system. This experience was reported by several culturally and linguistically diverse clients of community organisations

(d) Lack of clarity on culturally and linguistically diverse community engagement and support pathways

Several retailers reference commitments to engage with culturally and linguistically diverse community groups or provide flyers to customers who may face language or cultural barriers. However, these commitments are often vague and lack implementation detail. Retailers rarely include contact points, phone numbers, or emails for culturally and linguistically diverse groups to follow up, and there is little transparency about which community organisations, if any, are currently engaged, affecting a consumer's ability to reach out and connect to the community organisation for support.

(e) Limited access to energy efficiency and assistance resources

Many retailers include information about how to reduce energy use or improve household energy efficiency as part of their hardship support. However, this information is almost always available only in English, even when the broader policy mentions language assistance. This limits the practical accessibility of energy saving advice for non-English-speaking households.

The table below provides a breakdown of how culturally and linguistically diverse support needs were considered by retailers in their published hardship policies.



Table 3 – Retailer Hardship policy analysis

Retailer	Translation Services	Prominence of translation support	Other prominent supports for culturally and linguistically diverse customers
Origin	Yes.	Translation services are advertised in English on the first page of the hardship policy document, and in other languages on the last page of a 22-page document.	No.
ActewAGL	Yes.	Translation services are advertised only in English and appear on page 9 of an 11-page document, under a non-intuitive heading. The lack of plain-English wording and signposting reduces visibility for culturally and linguistically diverse customers	No.
Energy Australia	Yes.	Plain English and Easy English versions of the hardship policy are available on the website. Availability of translated versions of hardship policies are advertised in English on the website as well as the different versions of the hardship policies, towards the mid-section of these documents. Availability of translation services are also mentioned on the different versions of the hardship policy document. This service is advertised towards the mid-section of these documents.	Translated versions of the hardship policy are available and published on the website in Vietnamese, Cantonese, Italian, Arabic and Mandarin.
Amber	Yes.	Translation services are advertised on the last page of a 12-page document under the heading 'additional assistance and support'. The section does not utilise Plain English principles to promote user understanding but does refer readers to the AER's Easy English hardship policy document.	No.
Red Energy	Yes.	Interpreter services and the availability of translated versions of the hardship policy are mentioned in page 5 of the 15-page hardship policy document in English. The services are advertised in a dense block of text, that does not utilise plain or easy English principles to improve readability. The paragraph also fails to include direct links or numbers to the services described, instead it encourages the reader to visit the retailer's website or their last bill for that information.	Although translated versions of the hardship policy are available on request, they are not easily accessible; they require the person with language barriers to navigate additional layers to receive the policy.
Energy Locals		Hardship supports are offered on page 14 of the 15-page hardship policy document in Italian Spanish, Vietnamese, Arabic, Greek, Hindi and Chinese.	No.
Cova U Energy		A free interpreter service is advertised in English on page 16, and 18 of the 19-page hardship policy document. Interpreter services are also advertised in Greek, Simplified Chinese, Vietnamese, Italian, Arabic, and Spanish on page 19 of the document. Availability of language service can also be identified from contents page of the document.	No.
Discover Energy		Interpreter services are advertised on page 12 of the 20-page hardship policy document in English, Vietnamese, Arabic, Spanish, Italian, Greek and Traditional Chinese	Availability of a bilingual customer service team trained in efficient energy use of energy and the hardship policy for non-English speaking households is also advertised in English in page 12 of the hardship policy document. The hardship policy mentions a commitment to engage with community organisations that support culturally and linguistically diverse communities and to provide flyers to customers facing communication barriers. However, it is unclear whether these flyers are offered in languages other than English. The policy does not specify which culturally



Retailer	Translation Services	Prominence of translation support	Other prominent supports for culturally and linguistically diverse customers
			and linguistically diverse groups the retailer works with or how such groups can engage with the retailer.
Local Volts		An interpreter service is advertised on page 3 of the 12-page hardship policy document.	No.
Nectr		Availability of interpreter services is advertised in English on the webpage containing the hardship policy pages 1 and 7 of the 8-page hardship policy document.	A commitment to meet with community organisations that support culturally and linguistically diverse customers in order to promote the retailer's hardship program and seek feedback is included in page 7 of the hardship policy. However, no information is provided on how such groups can initiate contact with the retailer, or groups the retailer may already have established relationships within the community.
Next Business Energy		Availability of translation services are prominently displayed, in the page immediately after the cover page of the hardship policy document and before the contents page of the document. Translation services are advertised in the native scripts for Vietnamese, Arabic, Spanish, Italian, Greek, and Simplified Chinese, on page 2 of the 15-page hardship policy document	No.
Engie		Availability of translation services is prominently displayed in on the first page of the 9-page document in 7 languages.	No.
The Embedded Networks Company Trading as Seene		The English language version of the hardship policy advertises availability of free translation services on page 8 of the 11-page hardship policy document. Although Plain English, Easy English, Arabic, Cantonese, Italian, Mandarin, and Vietnamese, versions of the hardship policy documents are advertised in the English language version of the hardship policy, the link provided to access those services is no longer valid.	No.
AGL		AGL does not have an ACT specific energy hardship policy. It does however contain a one-page summary of a national hardship policy. This document does not provide information on translation services. The webpage, the document is published on does advertise availability of a translation service in English.	No.
Perpetual Energy		Information about translation services is located on page 3 of a 14-page hardship policy document. It is written in English and presented within a large, unbroken block of text, alongside information about other support options. The section is not distinctly marked or separated from surrounding blocks of text which provide information to customer with other accessibility needs.	No.



6. Consideration of culturally and linguistically diverse energy consumer needs by government and public bodies

This section documents the degree to which culturally and linguistically diverse energy user needs are considered by public bodies and authorities in the ACT, and market bodies which have a formal role to play in the energy retail market such as the Australian Energy Regulator.

Australian Energy Regulator

The Australian Energy Regulator (AER) is the national regulator responsible for overseeing energy markets and networks in most Australian jurisdictions, including the ACT. Its role includes setting network revenue allowances, monitoring energy retailer performance, enforcing compliance with energy laws, creating guidelines for retailer obligations, and protecting the interests of energy consumers.

While the AER has a general mandate to consider the interests of energy consumers, there is no explicit requirement for it to systematically assess how its policies, guidelines, or decisions may affect consumers with different cultural or linguistic needs. The lack of systems to consistently review energy guidelines and policies developed by the AER increases the risk of dominant norm bias impacting the AER's work. Unaddressed dominant norm bias may negatively affect the energy experience of culturally and linguistically diverse people.

The AER's Consumer Consultative Group (CCG) provides a feedback channel for community representatives, and its current membership includes an organization that brings culturally and linguistically diverse perspectives to selected issues. However, ongoing culturally and linguistically diverse representation is not mandated. Participating consumer organizations also face resource constraints that can limit the depth and timeliness of their input. In addition, the CCG is advisory and issue-specific rather than a systematic screening mechanism for the AER's routine policies and guidelines, which means potential culturally and linguistically diverse impacts may not be identified or escalated consistently.



The AER also operates the Energy Made Easy comparison website. This website supports a core principle of the Australian energy market design: that information is power, and that consumers empowered with information are more likely to make better energy decisions such as choosing more cost-effective energy plans.

Unfortunately, the Energy Made Easy website is limited in its ability to empower culturally and linguistically diverse energy consumers, particularly for those with limited English proficiency. This is because the website is primarily designed for an English-speaking audience. It does not prominently feature multilingual information on the homepage and although the availability of translation support is noted on the contact page, it is unlikely to be as easy to use as a website which the user can access at any time, in a language with which they are familiar.

The AER's official website provides some support for culturally and linguistically diverse consumers. Translated resources in multiple languages are available within two clicks of the homepage and include guidance for customers who are having difficulty with their energy retailer or need help navigating their options. The AER's "Contact Us" page also promotes access to a government-run interpreter service. These supports could be more visible e.g. on the home page which may increase use and access by people with limited English familiarity.

ACT Civil and Administrative Tribunal (ACAT)

The ACT Civil and Administrative Tribunal (ACAT) serves as the energy and water ombudsman for the ACT, offering an accessible dispute resolution service for energy consumers. All energy retailers entering the ACT energy market must notify ACAT when entering the ACT energy market and provide basic information about their operations. This enables ACAT to effectively fulfil its complaint handling and disconnection protection functions.

ACAT provides assistance to energy consumers through its complaints handling process, which can be initiated online, via a PDF form, or by calling a dedicated phone line. Consumers can lodge complaints on a range of issues including suspected overcharging, wrongful disconnection, debt collection practices, network faults, and unplanned outages.

ACAT operates as an impartial third party, offering guidance based on legislation and its experience facilitating resolutions with senior representatives from the relevant utility provider. If informal resolution is not successful, ACAT may make formal recommendations, refer the matter to a conference or hearing, or close the complaint.



ACAT also plays a critical role in protecting ACT residents from disconnection due to inability to pay. Consumers who are at risk of, or have received notice of, disconnection may lodge a request with ACAT to pause or prevent the disconnection. Although customers are encouraged to initiate contact, retailers also frequently refer at-risk customers directly to ACAT. Once a complaint is received, ACAT may issue a temporary order halting disconnection while it investigates. During this process, ACAT engages with both the customer and the retailer, and may facilitate arrangements such as full or partial debt discharge, the establishment of payment plans, or retailer-led debt waivers. These options are not always prominently advertised but are often applied in practice.

Support for culturally and linguistically diverse persons

ACAT offers interpretation services to support culturally and linguistically diverse residents. Interpreters can assist over the phone or attend in person. Customers must request this support at least five business days in advance, and are encouraged to specify the required language, dialect, and preferred gender of the interpreter, if relevant. ACAT notes that in some cases it may not be able to provide interpreter services, although the circumstances when this situation may arise are not clearly set out in its public facing information materials.

ACAT also offers "interpreter cards", wallet-sized cards similar to those reproduced below in Figure 1. These cards are written primarily in English, with only the name of the language printed in native script. This design raises significant accessibility concerns, as it assumes the cardholder can confidently present a card whose contents they may not be able to read or understand. For the card to be effective and empowering, it should ideally also include a translated version of the message in the cardholder's own language.

Analysis of ACAT's website which advertises its culturally and linguistically diverse supports reveals placement of information regarding these services could be a barrier to accessing these supports. For instance, information about language assistance is only accessible after navigating several layers of content and reading large blocks of English-language text, which may significantly limit awareness and uptake among those with limited English proficiency.



Figure 1



**PLEASE ARRANGE FOR
AN INTERPRETER**

I speak:

हिंदी

Hindi



ACT Government policy requires the ACT Civil and Administrative Tribunal administration to provide interpreters free of charge to people with limited English proficiency. Please arrange an interpreter in the language shown on the front of this card through TIS National (131 450). You will also need your work area's TIS Client Code.

ACT Government

This section analyses the accessibility of three types of energy information provided through ACT Government websites.

Information on energy efficiency and energy upgrade supports

The ACT Government's energy efficiency and energy upgrade supports are primarily promoted through two websites: the Everyday Climate Choices and the Make Your Next Choice Electric websites.

The Everyday Climate Choices website features a Google Translate web tool embedded across its pages. This tool is likely to improve accessibility for users with limited English proficiency who are fluent in other languages. However, the extent of improved access is highly dependent on the accuracy and clarity of Google Translate's automated translations feature which this report does not assess. The effectiveness of the tool is also somewhat limited by the fact that the website links to websites and documents that are not automatically translated.



The Make Your Next Choice Electric website features a tab in the top right-hand corner of the website which translates web content into multiple languages. Translations are available in Arabic, Simplified Chinese, English, French, German, Indonesian, Korean, Portuguese Spanish, Thai and Vietnamese. Accuracy of translations and readability of the translated versions of the website were not assessed. It is not clear whether the translations represent a reliable source of information for culturally and linguistically diverse members whose primary language proficiency is in a language other than English.

Information on energy concessions and bill rebates

The ACT Government provides information on concessions and bill rebates through the 'ACT Government Website' the 'ACT Revenue Office' website.

The 'ACT Government website' promotes itself as a streamlined entry point for accessing government services and information. It features content on a wide range of topics likely to be of interest to ACT residents, including concessions and utility bill rebates.

The website's home page features a drop-down menu of languages into which the website can be translated. This translation service which is provided by Google Translate is subject to the potential shortcomings discussed above. The website also includes links at the top and bottom of the home page to 'accessibility'. This links users to a disclaimer stating that translations provided by the third-party language services cannot be relied upon. It also directs users to information on a free telephone interpreting service. The telephone interpreting service is advertised in the native script of 22 different languages and dialects.

The ACT Revenue Office website provides information on a number of assistance measures including energy concessions. The website's home page contains a link labelled "languages". The link directs users to a Telephone interpreter service and advertises the TIS in the native script for 15 different languages. The website does not specify whether the service is free to use. This could discourage access for some lower income residents.

The website home page also includes a link to the ACT Government's commitment to increase accessibility and a standard which is to ensure accessibility of the website. The standard includes useful guidance for culturally and linguistically diverse web users. For example, it highlights the importance of avoiding language that relies on idioms or phrases whose meaning cannot be understood from the individual words, or that cannot be translated directly without losing their cultural or language-specific meaning (e.g. the English phrase "spilling the beans").



However, the standard's primary focus appears to be people with disabilities and accordingly contains few recommendations pertinent to people whose primary difficulty in accessing the website's content stems from their limited familiarity with English.

Availability of energy programs targeted towards culturally and linguistically diverse groups

A review of publicly available information did not identify any ACT Government energy programs specifically targeting the needs of people from culturally and linguistically diverse backgrounds.



7. Recommendations

The energy experience of culturally and linguistically diverse people can be improved by:

(a) Increasing familiarity with differing energy norms

Taking steps to increase policy maker and retailer familiarity with the energy norms of culturally and linguistically diverse people in the ACT can ensure policies and service offerings that are developed by these groups meet the needs of culturally and linguistically diverse persons in the ACT. Increased familiarity may be achieved by commissioning research on the energy norms of culturally and linguistically diverse populations with a significant presence in the ACT.

(b) Review key energy supports and policies for dominant norm bias

Existing energy supports such as flat rate concessions and hardship policies should be reviewed with the aim of identifying and addressing disparities embedded into such policies as a result of dominant culture norms being treated as impact neutral assumptions.

(c) Embed systems for inclusive policy design

Governments and institutions genuinely committed to multiculturalism demonstrate this through inclusive policy design that addresses dominant norm bias and accounts for cultural and structural differences.

Inclusive policy design requires collection and use of disaggregated data, culturally informed consultation, and flexible program structures that provide for diversity in needs. Inclusive policy design also requires systems which address dominant norm bias.

Retailers and policy makers should embed systems to make inclusive policy design the norm. Such systems reduce the risk of the needs of culturally and linguistically diverse people in the ACT being discounted or underserved.

Embedding such systems reduce the risks associated with relying on individual staff members and their good will or capability to ensure good outcomes for culturally and linguistically diverse people. Risks include staff reverting to



dominant norm patterns under time pressure or incentive misalignment where staff are rewarded for delivery speed rather than inclusion quality.

(d) Ensure participation of culturally and linguistically diverse people and organisations in the development of energy policy and services

This can be promoted through improving diversity on retailer/government policy teams and actively creating safe spaces/ opportunities for feedback on such teams.

It can also be promoted through resourcing organisations with direct connections to culturally and linguistically diverse communities to provide feedback on policies. Resourcing may take the form of sustainably funding positions within community organisations to build relationships with culturally and linguistically diverse people or organisations and gather feedback essential to policy processes.

(e) Explore the use of digital technologies to improve the energy experience of culturally and linguistically diverse people

Smart use of technological innovations can improve the energy experience of culturally and linguistically diverse people at a relatively low cost. For instance, optimising websites so information such as energy saving tips or advertisements for electrification programs can be easily translated by third party translation services such as Google Translate can significantly improve the ability of people with limited English fluency to access more information. (Note critical information such as hardship policies should still be professionally translated)

(f) Improve utilisation of community networks and organisations

Community organizations, leaders, and places of gathering such as temples or community halls often have good connections with culturally and linguistically diverse people and serve as trusted sources of information for culturally and linguistically diverse people.

Recognising the utility of these information pathways and sustainably resourcing organisations with good connections to culturally and linguistically



diverse communities can lead to better energy outcomes through improved information access.

(g) Address digital exclusion

Digital exclusion affects multiple groups including culturally and linguistically diverse people. Digital exclusion may be addressed by making paper-based information on energy plans, concessions, hardship programs easier to access.

These sources of information could be delivered through community organisations in direct and regular contact with culturally and linguistically diverse people to ensure people are provided the necessary information before hardship due to energy use results.

(h) Introduce minimum energy efficiency standards for rental housing

Introducing minimum energy efficiency standards for rental housing can help reduce the risk of culturally and linguistically diverse people being locked into high energy bills and poor housing conditions. This because culturally and linguistically diverse people are overrepresented in the rental market, especially in the early years of their migration.



End Notes

¹ Australian Bureau of Statistics, *Standards for Statistics on Cultural and Language Diversity*. ABS. <https://www.abs.gov.au/statistics/standards/standards-statistics-cultural-and-language-diversity/latest-release>.

² Ibid.

³ An incomplete response provided by a tertiary education provider has been excluded from this analysis.

⁴ Independent Competition Regulatory Commission, *ACT Retail Electricity Market Monitoring 2024*, (Annual Report) 33.

Thank you

actcoss@actcoss.org.au

02 6202 7200

actcoss.org.au

ABN 81 818 839 988

