

Appendix G

Hardship Policy

WESTERN WATER

HARDSHIP POLICY

April 2007

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1. FORWARD

Western Water adopted a comprehensive Collection Policy in August 2000 which included a section on Hardship. The adoption of this policy has assisted Western Water work towards its corporate goal of reducing aged debt as well as its Vision “to be a leading service provider, working with our community towards a sustainable future”.

In its March 2007 Guidance Paper for the 2008 Water Price Review, the Essential Services Commission (ESC) expressed concern about the variation in the use of restrictions, legal action and Hardship grants across the State. The ESC’s expectation is that Water Businesses will continue to improve their management of customers facing Hardship and be required to continue reporting on restrictions, legal action and Hardship grants through the established performance reporting framework. Additionally, businesses will be expected to explain in their Water Plan how they propose to deal with customers experiencing Hardship. The ESC expects that Hardship policies will be cost neutral to businesses.

Western Water recognises that customers on low and fixed incomes, such as pensioners, may be vulnerable to increasing costs for essential services, including water and sewerage services. However, Western Water also appreciates that the dynamics of Hardship are complex and therefore care will be taken not to generalise and categorise customers into groups based on a single characteristic.

This policy is based on the following principles:

- Western Water is a State Government owned Authority providing essential services that are not free.
- Western Water commits to this Hardship policy voluntarily and in a spirit of collaboration with the regulator, in pursuit of its own corporate Vision and Values.
- This policy endeavours to capture an ethos of Social Justice and the Australian tradition of giving battlers a fair go as well as providing reward for effort.
- Western Water’s Hardship Policy targets all its residential customers whose circumstances unfortunately render them eligible to participate but only in respect of their sole and principal place of residence to the exclusion of vacant land, investment properties and commercial premises.
- In line with the established ESC and Financial Counsellors benchmark, customer debts less than \$120 will be excluded from the Hardship program.
- Western Water is accountable to all its stakeholders and will transparently provide details of all waivers according to annual reporting and statutory requirements, including Privacy.

As an Authority established under the *Water Act 1989*, Western Water is bound by the *Information Privacy Act 2000* and its associated principles. Western Water has developed a Personal Privacy Charter in compliance with the Information Privacy Principles to help customers better understand their rights under the Privacy Act.

Western Water will actively review this Hardship Policy and associated procedures on a bi-annual basis, to gain both expert opinion and constructive feedback to identify process improvements. Thus ensuring the policy is adequate to meet customer needs.

2. DEFINING HARDSHIP

Western Water has adopted the following ESC definition of hardship:

“A customer in hardship is someone who is identified either by themselves, Western Water, or an independent accredited financial counsellor as having the intention but not the financial capacity to make the required payments within the timeframe set out in the business’s payment terms”

Western Water appreciates that from time to time any of its residential customers may experience financial hardship and that these circumstances may be either long or short term. This policy is designed specifically to help those people, taking into consideration both Social and Economic factors according to the customers’ differing circumstances.

Customers experiencing a temporary, single event or short term resources shortfall from which they believe they can recover within 12 months, will be classified as Crisis Hardship customers.

Crisis Hardship customers are generally those who have experienced a sudden unforeseen change in circumstances. These customers generally require flexibility in payment terms to manage their temporary financial setback.

Customers experiencing an extended compound situation or long term resources shortfall, which in the assessment of their circumstances will take in excess of 12 months recovery, will be classified as Chronic Hardship customers.

Chronic Hardship customers are generally those who are on a low or fixed income and have difficulty meeting the cost of their essential services on an ongoing basis.

Both Crisis and Chronic Hardship customers often experience multiple social and economic circumstances simultaneously as shown in the following table.

Hardship	Social Factors	Economic Factors
Crisis <12 months	Sudden illness Death in the Family Accident or injury Marriage breakdown Imprisonment Natural Disaster Tenant Concession Card holder	Civic compliance fines Fails to pay 2 consecutive bills Corporate collapse High Usage Reduced Income Unemployment Multiple bills at once Unexpected expense Inefficient appliances
Chronic >12 months	Family size Single parent household Concession Card Holder Disability Ill Health <ul style="list-style-type: none"> • Medical condition • Depression • Mental illness • Suicidal Addiction <ul style="list-style-type: none"> • Gambling • Alcohol • Drugs Domestic Violence Imprisonment	30% of income spent on accommodation and 10% on Utilities Owner Occupier - mortgagor Low Income Bankruptcy Multiple failed plans Previous URGS/Waiver Previous legal action Over committed financially Seeking Financial counselling

Western Water acknowledges the Poverty Line, established by Professor R.F Henderson in the 1970's, which calculates the amount of money people need to cover their basic living costs and maintain a minimum standard of living. Due to the variance between the Henderson Poverty Line and Centrelink benefits, Western Water will use both as a guideline in assessing a customer's Hardship circumstances.

A customer's participation in the Hardship program will cease in one of the following ways:

- The customer advises Western Water of their improved circumstances.
- The customer's account is paid in full, within terms, for two consecutive billing cycles.
- Twelve months of Crisis status has elapsed.
- If Hardship persists the customer will be reassessed and moved to Chronic if appropriate and advised accordingly.
- Western Water receives advice from Centrelink that the customer is no longer eligible to their particular benefit.

In the case where a Hardship customer fails to maintain a mutually agreed plan and telephone contact is not possible, a home visit will be considered as soon as practicable after the plan fails.

Western Water will work with its customers to find solutions that are fair, effective and sustainable offering instalment plans that are flexible and consistent with the customers' capacity to pay, regardless of their current balance.

All customers will be treated with dignity, sensitivity and respect without Western Water staff making or expressing value judgements.

Rights of Hardship Customers

- Be treated respectfully, sensitively, and non judgementally.
- Have their cases individually considered and their circumstances kept confidential.
- Receive prompt information on alternative payment arrangements, Western Water's Hardship Policy and Government Assistance Schemes.
- Nominate the amount they can afford and the frequency of instalments of their preferred payment plan.
- Choose from various payment methods available and receive written confirmation of the agreed payment plan within 10 working days.
- Re-negotiate the amount of their instalment if there is change in their circumstances.
- Receive information about free independent and accredited financial counselling services.
- Receive a language interpreter service free.
- Avoid water supply restriction as long as they establish and maintain an agreed payment arrangement.
- Speak with a person at Western Water who is familiar with their situation in order to re-negotiate their payment arrangement if a payment has been missed or is likely to be missed.

- Be advised about how to reduce consumption to assist in reducing future water use.
- Be advised about their right to lodge a complaint with the independent dispute resolution scheme (Energy and Water Ombudsman of Victoria) if their affordability issue is not resolved with Western Water.

Responsibilities of Hardship Customers

- Advise Western Water of their financial hardship as soon as practicable.
- Be reasonable in their negotiations with Western Water staff in pursuit of a mutually acceptable outcome.
- Be honest and realistic in their assessment of their capacity to pay.
- Seek independent financial advice or representation where appropriate.
- Maintain any arranged payment plan and advise Western Water if they are unable to meet a scheduled payment.

3. COMMUNICATION

Two extracts from the Western Water Collection Policy are:

“To create an environment where effective communication is established and nurtured between Western Water staff and customers, whilst maintaining ... collection best practice and Western Water’s values”.

and

“Customers will always be strongly encouraged to communicate with Western Water staff if unable to meet commitments”.

Western Water’s collection process reflects this philosophy by providing the customer five opportunities to communicate their intentions before recovery action is taken and additionally customers are contacted immediately after their existing plans fail.

In order to maximise the level of personal contact with customers, Western Water places great emphasis on the capture and recording of customers’ telephone numbers.

Involvement of Financial Counsellors

Western Water is committed to open and meaningful dialogue with the region’s accredited financial counsellors and meets with them on a half yearly basis. These meetings provide a forum to discuss Western Water’s Collection and Hardship Policies and any other issues relevant to our mutual customers. This feedback and interaction is valuable to Western Water and helps ensure its policies address customers’ needs.

Access to Financial Hardship Policy

Western Water’s Hardship Policy will be made available on its website and by request, in languages other than English according to the demographics of Western Water’s customer base.

Interpreter Service

A no charge interpreter service is available to customers from non English speaking backgrounds. This service is displayed on all Western Water service accounts.

Partnership with Community

Western Water has developed a network of community groups in each of the townships it services, known as CRG (Community Reference Groups) and an overall group with representatives from each CRG known as CAG - the Customer Advisory Group.

4. PROCEDURES

Payment Arrangements

Western Water staff will negotiate tailored instalment plans and arrangements with individual customers to meet their needs and ability to pay. Customers will be asked “what payment can you afford?” Western Water encourages regular payments where possible, even when the amount is insufficient to pay new charges as well as arrears. The account will continue to be monitored by the Hardship team in an endeavour to avoid further indebtedness.

Western Water will promote its partnership with the regional Financial Counsellors by providing all hardship customers with a list of their contact details.

Western Water promotes variety and flexibility with its payment plans as demonstrated in the attached table:

Agreements/Payment Plans		
Flexibility	Amount	<ul style="list-style-type: none"> • According to the account balance • According to future projected bills/usage • According to the customer's capacity to pay
	Frequency	<ul style="list-style-type: none"> • Weekly • Fortnightly • Monthly • Extensions • Full amount according to terms
	Options	<ul style="list-style-type: none"> • WW Easy Pay at any AustPost outlet • AustPost Billpay by phone, internet or in person • Direct Debit from a designated Bank Account • Centrepay from any Centrelink benefit • Bpay by credit card or internet • Bill Express by phone or internet • Mail – cheques and Money Orders (No Cash)
	Access	<ul style="list-style-type: none"> • Personally over the counter • By phone to 1300 650 422 Mon to Fri 7 to 7

Western Water's Incentive Plans

These incentive plans are provided to encourage customers to:

- Establish regular payment patterns
- Reduce their arrears

- Prevent future indebtedness
- Build and foster relationships of trust with the business.
- Raise the priority of water as an essential service when paying domestic household accounts.

Customers will only be entitled to receive one incentive bonus at a time, that is, the one most advantageous to them.

Incentive bonuses will be applied in week 16 of the billing cycle. Any customer who has failed to maintain their agreed incentive plan and fails to make good any shortfall before the end of week 16, shall forfeit their bonus.

Bonuses will not be applied retrospectively. Each billing cycle stands alone.

1. **Reward for Effort** - Customers can apply for a customer Pay & Save Plan, which will provide assistance to those who are experiencing financial difficulties. Under a Pay & Save Plan, if a customer makes four payments as agreed and on time, Western Water will match the first payment of the next billing cycle. This is based on a regular monthly arrangement. Similarly, if the customer is on a fortnightly plan then eight payments are required or sixteen payments in the case of weekly plans. Maximum \$50 per billing cycle.
2. **Audit Bonus** - Assessed on a case by case basis Western Water will commit to a predetermined reduction of a customers water usage charge, if that customer agrees to and undergoes either the Smart Homes Program or a Free Western Water Home Audit. 50% of current usage to a maximum of \$75.
3. **Utility Relief Grant Scheme (URGS) Supplementary Bonus** - In cases where URGS have been granted in the last 12 months and a customer still has a balance of over \$500, Western Water will offer to supplement the grant by providing an additional 10% of the grant amount in return for a commitment by the customer to a sustainable payment plan.
4. **URGS Financial Counsellor Bonus** - Where a customer seeks advice from a Financial Counsellor and submits an URGS application, Western Water will rebate \$20 off their account.
5. **Family Size** - Is recognised as a contributing factor in assessing Hardship and Western Water undertakes to assist those families in its database, subject to the following conditions:
 - Household equal to or greater than seven people.
 - Household dependent on a Single Low Income.
 - Status of Hardship due to Family Size granted for a maximum of five years subject to annual review by the Hardship Team.
 - Detection of fraud may result in the loss of Status and reinstatement of the dollar value of any assistance provided.
 - Assistance will be a Flat Usage charge exclusive of RBT at the same rate applicable to Commercial customers.

However, none of the above Western Water incentives will continue after arrears are cleared, resulting in an account balance going into credit.

To be eligible for inclusion in a Western Water incentive plan a customer must have been assessed as experiencing either Crisis or Chronic Hardship.

Once participating in the Hardship program, Western Water will:

- Offer the customer a choice of various payment methods within their capacity to pay and confirm the details of any payment arrangement, in writing within 10 working days.
- Allow a customer to renegotiate their payment plan should their circumstances change.
- Omit Hardship accounts being managed on payment plans and meeting the agreed payment schedule, from normal recovery processes.

Waivers

Western Water uses waivers as good business practice to make allowances for circumstances that arise from time to time. Amounts waived or written off by Western Water are classified into four categories:

Category	Definition
Abandonments	Legitimate charges written off after due consideration according to delegated levels in the Instrument of Delegation
Owner Onus Leaks	25% forgiven off usage over and above normal consumption.
Vacated Tenants	Tenants who skip without leaving a forwarding address and can not be traced to another property in the district.
Compassionate Waivers	Once off waiver applications on the grounds of disadvantage.

The following waiver levels are currently in place at Western Water:

1. On the merits of each case, in certain circumstances and upon application, Western Water will consider matching an URGS grant dollar for dollar dependent on the account balance at the time.
2. Western Water will also consider arrangements with some customers and may agree to waiver, dollar for dollar any amount the customer pays within an agreed period, over and above their current charges for that period.
3. Customer Service Advisors have a nominal level to grant an immediate, once off waiver of up to \$180. This is the established annual benchmark for combined pension concessions applying to both water and sewerage tariffs and is indexed annually.
4. Circumstances that warrant more substantial consideration for amounts up to \$1,000 are referred to a Manager with a higher delegated authority.
5. Any application greater than \$1,000 needs to be referred to the General Manager Customer and Community Relations.

All waivers granted will be confidential and conditional upon the customer agreeing to an instalment plan that prevents future indebtedness.

All amounts written off are reported to Management on a monthly basis.

Suspension of Recovery Action

Each customer will be dealt with on a case by case basis and:

1. Where a customer has made an appointment to see a Financial Counsellor, a hold will be placed on recovery action, generally for a period of 3 weeks.
2. A hold will be placed on debt recovery upon the establishment of an agreed payment arrangement.
3. Customers will be shielded from legal action and additional recovery costs whilst they continue to make payments according to an agreed schedule.
4. Once a customer has been identified as a Hardship customer and has agreed to a payment arrangement, they will avoid restriction whilst communication and payments as agreed are maintained.
5. Western Water's mercantile agent will be required to identify Hardship customers and refer them back to the Hardship team at Western Water.

If a customer fails to meet an agreed payment arrangement and does not actively work with Western Water to address the situation, the customer will be advised in writing that standard debt recovery processes will resume.

Home and Field Visits

Western Water is committed to being pro-active in providing potential Hardship customers with information regarding payment assistance. This may involve home/field visits to customers to initiate communication and discuss concession entitlements, Government schemes and alternative payment arrangements. Once an arrangement has been secured the customer will receive written confirmation within 10 working days.

Government Assistance Schemes

When customers are identified as experiencing Hardship, Western Water will offer these customers information regarding any current Authority or Government funded assistance program. This includes all of the following:

Concessions – these are available to holders of Pensioner Concession Cards, Health Care Cards or DVA Gold Cards.

Utility Relief Grant Scheme – assistance provided to low-income households suffering a short-term (within last 12 months), financial crisis who are unable to pay for a current utility account. Applicants must demonstrate one of the following three criteria:

- a substantial increase in usage that has resulted in a high water bill
- an unexpected expense on an essential item or
- a decrease in household income.

Western Water will regularly review its procedures to promote URGS as a more attractive remedy for Hardship customers.

Capital Grants Scheme – provides assistance to people in an emergency situation by repairing or replacing essential water appliances for households who otherwise could not afford to do so. In addition to the URGS criteria, the applicant must show that faulty or defective appliances have caused very high bills and/or that an emergency situation exists.

Water Smart Gardens & Homes Rebate Scheme (DSE) – opportunity for customers to claim rebates on water saving products for the garden and home.

Smart Homes (DHS) – provides financial assistance to low income concession card households, with the replacement costs of inefficient or defective fixtures that are causing high water bills.

Hardship Relief Grants for Sewerage Connection – provides financial assistance to customers with a once-off grant toward the plumbing cost of connecting to a compulsory water and sewerage connection scheme.

Carted and Non-Mains Water Rebate – provides a flat annual rebate for those who spend at least \$120 each financial year on buying non-mains water, tank water and cartage costs.

The above schemes will be proactively promoted and applied to accounts of those customers who have been assessed as experiencing Hardship. Western Water appreciates that the Water Industry is dynamic and new grants, concessions and allowances will evolve from time to time. Western Water is prepared to embrace these developments and pass them on to its customers as appropriate when they occur.

Natural/Corporate Disasters

Customers who become the victims of either a natural disaster or corporate collapse, will automatically be granted an additional thirty (30) days to finalise or arrange payment of their account, including a tailored payment plan or access to Government Assistance Schemes, as appropriate.

Private Scheme Accounts

Where a customer has multiple accounts with Western Water, that is both a water and sewerage account and a private scheme account, Hardship will only be assessed on the water and sewerage account. Given that the four monthly instalment amounts on a private scheme account is \$26.66, private scheme accounts will be excluded from Hardship assessment.

Hardship Assessment

Western Water has developed a hardship assessment tool (Appendix 1) to assist both Customer Service advisors and the Hardship team assess customer hardship. Such an approach will enhance consistency across the organisation and any community groups that may become involved.

Application of Interest to Overdue Accounts

Western Water elects not to charge interest on overdue accounts for water and sewerage services, usage charges and private schemes. The Board reviews this decision annually.

5 COMPREHENSIVE STAFF TRAINING

Western Water will ensure that the Customer Service team and Mercantile Agency staff are adequately trained to deal compassionately and sensitively with Hardship customers. Staff will be well informed about:

- Government Funded Schemes
- Western Water Hardship Policy and Procedures
- Customers legal rights and responsibilities eg: EWOV
- Industry's Code of Practice for Hardship Customers.

Ongoing training will be made available from internal and external sources, on a range of topics, to assist the Customer Service team understand the issues confronting Western Water's hardship customers and to ensure these customers are treated respectfully, non judgementally and confidentially.

This training will be provided by Independent Financial Counsellors and augmented by specialists from such areas as Gamblers Help, Odyssey House and Family Counselling.

Training will be provided on three levels:

- Awareness through the business Induction Program provided internally by the Credit Management Team.
- Comprehensive training for the Customer Service Team provided by external and independent accredited Financial Counsellors
- Specialist training for the Hardship Team provided by external specialist trainers from a range of hardship related service providers.

6 EFFICIENCY FOCUS

An important element of Western Water's response to customers suffering financial hardship is to help them manage their water consumption. This will help customers control their water costs.

Western Water's Customer Service team will offer advice about water saving in and around the house and garden and send fact sheets "Saving Water in the Home and Garden" to help customers manage their water usage. Where a customer is eligible for the Smart Homes program, it will be offered.

If a property is recognised as recording abnormally high consumption for a particular billing period, the customer will be issued with a “High for History” letter. This letter advises the customer prior to their account being sent of the high consumption and expresses Western Water’s concerns about a possible leak at the property. The letter also explains what action the customer needs to take to determine the extent of the leak.

Free Water Audits

As a part of Western Water’s commitment to helping its customers conserve water, a free water efficiency audit will be offered to any eligible customer. An experienced Western Water staff member will visit the property to assess the way water is used in and around the home and suggest measures to help lower or better manage water usage.

Smart Homes Rebate Scheme

Is available to concession cardholders and entitles them to receive a free Water Audit. The Department of Human Services provides a rebate for the replacement of inefficient or defective fixtures that might contribute to high water bills.

Water Smart Gardens and Homes Rebate Scheme

Is an opportunity for customers to claim rebates on water saving products for the home and garden.

Hardship Kits

Western Water has developed three Hardship Kits, available to customers according to their level of hardship. The kits include the following:

Kit 1 Water Saving Letter from General Manager Customer & Community Relations

Western Water contact phone numbers – Fridge magnet
“Don’t let your money go down the drain” – Western Water flyer
“Direct debit full payment” – Western Water flyer
“Claim concessions on your water bills” - DHS flyer
“Water Smart gardens & homes rebate scheme” - DHS flyer
Direct debit application forms – Western Water proforma
“Saving water in the home” – Western Water Fact Sheet
“Saving water in the garden” – Western Water Fact Sheet

Kit 2 Kit 1 as well as:

Centre Pay brochure - Centrelink flyer
Centre Pay application form – Centrelink proforma
“Are you having trouble paying your water account?” – Western Water flyer
Utility Relief Grant Scheme – DHS flyer
Pack of tap washers – complimentary offer

- Kit 3** Kit 2 as well as:
Free water audit of your home – Western Water flyer
Shower flow control Kit – complimentary offer
Water saving shower head – complimentary offer

Should the customer request assistance with the fitting of any complimentary products, Western Water will arrange for a licensed plumber to affect the changes at its cost, free to the customer.

The Hardship Kits have been distributed as follows:

- Kit 1 In response to customer calls to the Call Centre
- Kits 2 & 3 On assessment when property visits are made.

6. Monitoring and Reporting

A performance monitoring tool will be developed by the 1st July 2007 to report progress of the implementation of this policy. This tool will be a “BSC dashboard” identifying and quantifying key performance targets.

Appendix 1

Hardship Assessment Tool

WESTERN WATER HARDSHIP ASSESSMENT



SOCIAL PROFILE	NAME		ACCOUNT #		
	SERVICE ADDRESS				
	POSTAL ADDRESS				
	TELEPHONE HOME	MOBILE	WORK		
	HOUSEHOLD	MARRIED / COUPLE / SINGLE / SINGLE PARENT			
	NUMBER OF CHILDREN	AGES			
	PRIMARY PLACE OF RESIDENCE	OWNER	MORTGAGE		
		TENANT	PRIVATE / DHS RENTAL		
		CRN	START	EXPIRY	
	CENTRELINK ENTITLEMENT	HCC			
		PENSION			
		DVA			
	HEALTH	MEDICAL CONDITION		DETAILS:	
		DISABILITY			
		MENTAL ILLNESS			
DEPRESSION					
ACCIDENT OR INJURY					
OTHER CIRCUMSTANCE	DOMESTIC VIOLENCE		DETAILS:		
	ADDICTION	GAMBLING			
		ALCOHOL			
		DRUGS			
	IMPRISONMENT				
	DEATH IN FAMILY				
	MARITAL BREAKDOWN				
	NATURAL DISASTER				

ECONOMIC PROFILE

CURRENT ACCOUNT BALANCE	\$	LAST PAID	AMOUNT PAID
PAYMENT PLAN CURRENT / ARRANGED	AMOUNT \$	WK / FN / MTH	
NUMBER OF PREVIOUS PLANS		DATE LAST FAILED	
HIGH USAGE FOR HOUSEHOLD (above 30kl per person per account)			YES / NO
PREVIOUS DHS URGs	\$	DATE	
PREVIOUS WW WAIVERS	\$	DATE	
PREVIOUS LEGAL ACTION	SR #	DATE	
PREVIOUS RESTRICTION	SR #	DATE	
REDUCED INCOME DUE TO DECREASE IN CASUAL WORKING HOURS		YES / NO	
UNEMPLOYED SINCE		RECEIVING NEW START YES/NO	\$ / FT
CORPORATE COLLAPSE - COMPANY NAME			
DATE INTO RECEIVERSHIP		ANY ENTITLEMENTS / WHEN	
MULTIPLE BILLS AT ONCE TOTAL AMOUNT		\$	DUE
UNEXPECTED EXPENSE - TYPE		\$	DUE
DECLARED BANKRUPTCY	DATE DECLARED		BANKRUPTCY NO
OTHER FINANCIAL CIRCUMSTANCES		CIVIC COMPLIANCE FINES	
		INEFFICIENT APPLIANCES	

ASSESSED

NAME		ACCOUNT #	
SERVICE ADDRESS			
POSTAL ADDRESS			
TELEPHONE HOME	MOBILE	WORK	
INCOME TOTAL	\$	WK / FT / MTH	CENTRELINK BENCH MARK \$
COST ACCOM RENT/MORTGAGE	\$	WK / FT / MTH	FAILED TO PAY MIN 2 CONSECUTIVE ACS
COST OF TOTAL UTILITIES	\$	WK / FT / MTH	
TOTAL EXPENSES	\$	WK / FT / MTH	
OVER COMMITTED FINANCIAL		YES / NO	1ST A/C DATE: \$ 2ND A/C DATE: \$ 3RD A/C DATE: \$
PHONE, ELECTRICITY, GAS, WATER BENCH MARK 30 % & 10 % RESPECTFULLY			
STATUS	DATE	ASSESSOR	
CRISIS			
CHRONIC			
RECOMMENDATIONS	WESTERN WATER ASSISTANCE		
	CONCESSION PENSION / HCC		
	OTHER GOV PROGRAMS		
SEEKING / REFERED TO FINANCIAL COUNSELLOR	WHO	APP DATE:	