



# **Integrated Practice**

## **2019 Mid Year Report**

# INTEGRATED PRACTICE

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Consumer Action is located on the land of the Kulin Nations. We acknowledge all Traditional Owners of Country throughout Australia and recognise the continuing connection to lands, waters and communities. We pay our respect to cultures; and to Elders past, present and emerging.

**Warning:** Aboriginal and Torres Strait Islander people are advised that this document may contain the names or images of people who have since passed away.

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### Our Artwork

Creator: **Dixon Patten**

Dixon is a proud Yorta Yorta and Gunnai man and has family bloodlines from Gunditjmarra, Dhudhuroa, Wiradjuri, Yuin, Wemba Wemba, Barapa Barapa and Monaro.

# 01

## ABOUT US



Consumer Action Law Centre (**Consumer Action**) is an independent, not-for-profit consumer, credit and debt advocacy organisation located in Melbourne, Australia. Our purpose is to make life easier for people experiencing vulnerability and disadvantage in Australia. We do this through:

- financial counselling services;
- the provision of legal advice and legal representation to Victorians; and
- through training of, and engagement with, other services and with community groups.

Our front-line service delivery work is integrated with our research, campaigning and policy work. Through this work, we identify and seek to address systemic issues to make the system fairer for all Victorians.



**Victorian Aboriginal  
Legal Service**

The Victorian Aboriginal Legal Service Co-operative Limited (**VALS**) was established as a community controlled Co-operative Society in 1973. VALS plays an important role in providing referrals, advice, information, duty work or case work assistance to Aboriginal and Torres Strait Islander peoples in Victoria.

Solicitors at VALS specialise in one of three areas of law, being Criminal Law, Family Law and Civil Law. VALS maintains a strong client service focus which is achieved through the role of Client Service Officers (**CSOs**) who act as a bridge between the legal system and the Aboriginal and Torres Strait Islander community.

# 02

## INTRODUCTION: Integrated Service Funding Grant

Around September 2018, Consumer Action was successful in its application for funding under the Integrated Service Fund, administered by the Federation of Community Legal Centres (Victoria). This meant that Consumer Action was granted funding for one year in order to address some of the unmet consumer, credit and debt legal needs in Victorian Aboriginal communities in an integrated practice with VALS.

Consumer Action and VALS commenced the Integrated Practice Project (**the IP Project or the Project**) in March 2019.

This report has been prepared by Consumer Action to provide an overview of the IP Project.

### How was funding used?

The funding was specifically used to create two new positions: a VALS lawyer and a Consumer Action policy officer. Both roles were dedicated to responding exclusively to the consumer, credit and debt legal needs of Victorian Aboriginal Communities.

Using the funding in this way has increased the capacity of each organisation to try to address some of the unmet consumer, credit and debt needs within Victorian Aboriginal communities and has led to significant improvements in service delivery.

However, funding for this project was available for one year only.



Community engagement session at Rumbalara Football and Netball Club in Shepparton, Victoria. Pictured: CALC, VALS, and Victoria Legal Aid.

Consumer Action data indicates a

**25%**  
**increase**

in number of Aboriginal and/or Torres Strait Islander people receiving consumer, credit and debt assistance across Consumer Action's legal and financial counselling services compared to the same period last year



VALS data indicates a

**75%**  
**increase**

in number of Aboriginal and/or Torres Strait Islander people receiving consumer, credit and debt assistance through VALS compared to the same period last year



**Victorian Aboriginal  
Legal Service**

# 03

## BACKGROUND TO THE IP PROJECT

The genesis of the IP Project can be traced back to the 2013 Civil and Family Needs of Indigenous people in Victoria Report published by James Cook University's Indigenous Legal Needs Project (*the 2013 Report or the Report*).<sup>1</sup>

This 2013 Report identified two broad priority areas:

- The civil law needs of Indigenous<sup>2</sup> peoples of Victoria; and
- Eight priority areas to improve service delivery to Indigenous Victorians.

In terms of the civil law needs, the 2013 Report identified the most common types and the most important civil law issues impacting on Aboriginal communities in Victoria. Amongst the most common areas of civil need identified by the 2013 Report were those within Consumer Action's area of practice. That is, consumer, credit and debt issues.

The eight priority areas relating to service delivery identified by the 2013 Report were:<sup>3</sup>

1. Giving non-criminal law needs greater attention;
2. Increasing knowledge about rights, supported by ongoing advocacy work;
3. Recognising and responding to the complexity of legal needs;
4. Providing more holistic service delivery;
5. Reducing service segregation;
6. Effective community engagement;
7. Improving the quality of legal service delivery; and
8. Increasing funding to respond to non-criminal legal needs.

Notably, each of these service-delivery priorities are being addressed through the IP Project. These priority areas therefore act as a useful measure of the effectiveness of the Project and will be addressed in part 6 of this mid-year report.

<sup>1</sup> Schwartz, M., Allison, F. and Cunneen, C. (2013). *The Civil and Family Law Needs of Indigenous People in Victoria*. Cairns: James Cook University (hereafter, The 2013 Report).

<sup>2</sup> The 2013 Report used the term Indigenous, however, this paper uses the word Aboriginal. In doing so, we include all Aboriginal and/or Torres Strait Islander peoples living in Victoria.

<sup>3</sup> The 2013 Report, pp. 15- 16 and 58 – 64.

In early 2018, Consumer Action's Koori Engagement Manager (or **KEM**) established an action group to ensure a coordinated approach to addressing the civil needs of Victorian Aboriginal communities. The action group members include: Victoria Legal Aid; the Australian Securities and Investments Commission (**ASIC**); VALS; the Telecommunication Industry Ombudsman (**TIO**); the Energy and Water Ombudsman (Victoria) (**EWOV**); the Department of Environment, Land, Water and Planning (**DELWP**); Djirra (the Aboriginal women's family violence legal service); Aboriginal Housing Victoria; Financial Counselling Australia; the Thriving Communities Partnership; Yarra Valley Water; Consumer Affairs Victoria (**CAV**); the Victorian Civil and Administrative Tribunal (**VCAT**); the Australian Financial Complaints Authority (**AFCA**); the Australian Competition and Consumer Commission (**ACCC**) and the National Aboriginal and Torres Strait Islander Women's Alliance (hereafter, **the Action Group**).

The KEM worked with the Action Group members, as well as analysed Consumer Action's own data, to identify that the priority issues in the 2013 Report were still current across the sector.

Recognising the importance of addressing unmet legal need and improving service delivery in the ways identified by the 2013 Report, it was then that Consumer Action made a successful application for a grant of funding under the Federation of Legal Centres Integrated Services Fund 2018-2019.



The Action Group Strategic Planning Session. Pictured: FCA, DELWP, EWOV, Thriving Communities, CAV, VLA, Yarra Valley Water, VALS, ASIC, NATSIWA, and Yarra Valley Water

# 04

## IP PROJECT DESIGN

### Overview

The IP Project was designed in a way to allow Consumer Action and VALS to partner to deliver integrated consumer, credit and debt legal related services with Aboriginal communities in Victoria.

The work being done under the IP Project takes various forms, but a significant proportion of the work relates to regular community engagement sessions. These sessions are usually attended by an integrated team made up of:

- the Consumer Action Koori Engagement Manager (**KEM**);
- a VALS civil lawyer;
- a Consumer Action lawyer;
- the VALS Community Legal Education Officer; and
- the Consumer Action policy officer.

The team is supported by other roles within each organisation including the organisations' management team and VALS' Client Service Officers (**CSOs**).

In recognition of the critical importance of engaging local Aboriginal Community Controlled Organisations (**ACCOs**) when working with Aboriginal communities, the KEM ensures ACCOs are involved in the community engagement sessions. This provides an opportunity for staff within each ACCO to understand consumer, credit and debt issues so that they too can identify these issues within the community and know where to refer people.

The legal support and policy work under the Project are delivered in a client centric way, while incorporating a holistic approach. This is achieved by working with other key organisations that can offer support to communities and, where appropriate, by including these organisations in events where their presence will meet community needs. For example, representatives from Ombudsman schemes, such as EWOV, are invited to community engagement sessions to facilitate faster resolution of issues and ensure there is greater community awareness of the existence of these services. ASIC have recently been invited to events to hear first-hand about the impacts of the systemic consumer credit and debt issues occurring within Victorian Aboriginal communities. Where possible, a representative from the local financial counsellor service and from the local generalist community legal centre also attend.

The community engagement sessions act as a platform for legal advice and representation, financial counselling advice, policy work and legal education. They also act as a forum for sector integration and cross-promotion of services that can support the consumer, credit and debt needs of Victorian Aboriginal communities.

## The significance of the Koori Engagement Manager role

Consumer Action's Koori Engagement Manager (**KEM**) is the IP Project lead. As the Project lead, the KEM plays a critical role across legal, community engagement and policy work, a role that should be replicated across other community legal centres. The KEM has extensive project management expertise, community knowledge and connections to both the ACCO sector and the Victorian Aboriginal communities. As the project lead, the KEM creates effective working partnerships with local providers and ensures that all community engagement is culturally appropriate and relevant. Working together under the leadership of the KEM ensures that the focus is always on the needs of Victorian Aboriginal communities. Responding to these needs is central to the work undertaken through the IP Project.

## Policy work

A unique offering of the IP Project is its integration with Consumer Action's policy team. Policy officers have attended community engagement sessions to:

- provide information to communities across a range of issues, in particular, energy;
- identify the breadth and depth of consumer credit and debt issues in community and feed this back to the organisation and to decision makers; and
- identify case studies that can be utilised for policy work.

## Legal service and outreach

One way that service delivery is integrated through the IP Project is via the working relationship between Consumer Action lawyers and the dedicated consumer, credit and debt VALS lawyer. Under the Project design, the VALS lawyer is mentored by an experienced senior lawyer from Consumer Action and is embedded within Consumer Action office once a week. As a result, the VALS lawyer has access to many of Consumer Action's resources, specialised legal knowledge and key contacts within industry, the consumer advocacy sector and within regulating bodies.

Representation at community engagement sessions from both Consumer Action and VALS provides the Victorian Aboriginal community with the option of either a mainstream service or an Aboriginal community-controlled service. This also means lawyers could utilise established relationships with local non-legal services providers to ensure both legal and non-legal support is provided.

Collaboration within the team occurs so that the lawyers' casework is being captured by the work of the Consumer Action policy officer and so, with the support of the KEM, casework is addressing both the legal and cultural needs of the client.

# 05

## WHAT HAVE WE LEARNED?

The IP Project has brought to the fore the powerful benefits of integration between and within community legal centres. The IP Project has also allowed both organisations to collect data to identify issues impacting communities which has a critical importance in informing future work and priorities that will help us further address the civil law needs of Victorian Aboriginal communities.

Preliminary analysis of the data captured thus far indicates that the three most common issues impacting Aboriginal communities are:

- unsuitable funeral products including insurance;
- irresponsible lending; and
- add-on insurance.

Other issues identified include: utilities debt; consumer leases for cars and household goods; unsolicited and high-pressure selling activity such as door knocking; wrongful electricity disconnections; and concerning water restrictions.

The Action Group members stated in 2018 that there has been minimal change to civil law needs of their clients since the 2013 Report. The systemic issues emerging from the IP Project provides further evidence to the Action Group members' conclusion that the priority issues affecting community remains the same and that there continues to be a significant service gap in addressing civil law needs within Victorian Aboriginal communities.

# 06

## PROJECT ACHIEVEMENTS

While the Project is ongoing, much has already been achieved. Those achievements broadly fall within two categories:

- A.** an increased capacity of each organisation to respond to some of the unmet consumer, credit and debt needs;
- B.** an improvement in service delivery and access to justice through integration, including sector engagement and coordination between a number of critical services.

### **A. Increased capacity to respond to some of the unmet legal needs**

#### **VALS**

The relatively small VALS civil team works across a broad range of important civil practice areas. Prior to receiving funding, VALS did not have the capacity or expertise to take on many consumer, credit or debt cases. These cases were commonly referred to other specialised organisations such as Consumer Action. The Integrated Services Fund grant made it possible for the employment of an additional VALS civil lawyer dedicated to responding exclusively to the consumer, credit and debt legal needs of Aboriginal Victorians. However, the additional lawyer position is also only for 12-months.

VALS data indicates a 75% increase in the number of Aboriginal people receiving consumer, credit and debt assistance through VALS compared to the same period last year.

Not only has VALS been able to take on more of these kinds of cases but they have done so in a timely and competent manner, already obtaining successful outcomes in four of their new cases and three of their pre-existing ones. This is impressive given the nature of civil cases and the short period of time since the Project commenced. VALS consumer or credit cases existing prior to the Project were completed in a more timely way and achieved far greater outcomes because of an increase in lawyer capacity and the integration with Consumer Action. Case Study 1 is an example of the types of outcomes achieved by VALS with the support of Consumer Action.

## CASE STUDY 1



Allan, a single father of two, sought assistance from VALS after struggling for around six years to repay a car loan. Allan had purchased a car from a car yard in 2012 using linked credit of over \$36,000. From enquiries that VALS assisted Allan to make, it appears that the finance provider failed to conduct an accurate and robust financial suitability assessment before giving the loan to Allan. Furthermore, it appeared that two types of unnecessary car insurance had been sold to Allan (thereby increasing the loan amount) without his knowledge or understanding and in arguable breach of the insurance laws.

The financial strain placed on Allan became far greater when he lost his job about a year after obtaining the loan. Allan would sometimes go without food just so he could meet the car repayments. The car was finally voluntarily repossessed in 2018. Because the sale of the car was not enough to cover the outstanding loan repayments, Allan remained in debt to the bank and he continued to struggle under the weight of the alleged debt until VALS was able to provide some relief in the form of legal advice and representation. With the assistance of Consumer Action, VALS helped Allan obtain the documents he needed to understand what happened,

negotiated on Allan's behalf before making a complaint to the Australian Financial Complaints Authority (AFCA) on the grounds of irresponsible lending and other legal breaches. The complaint settled when the bank offered to waive Allan's alleged debt and pay Allan compensation for the fees and charges he had paid. The insurance company also agreed to refund the premiums paid along with penalty interest. In total, Allan was repaid approximately \$27,000. This outcome has allowed Allan to support his family financially and has improved Allan's feelings of financial security as he had previously been struggling on Centrelink payments.

The impact of successful legal outcomes, like those in case study 1, has a widespread effect in communities. The impact is illustrated by one of our clients, 'Joe,' who reflected that, 'I can't believe it, we are getting the banks. I didn't know this could happen - blackfella's winning!' Joe made this comment after VALS assisted Joe to get a refund on all the fees, charges and undisclosed commissions he was charged in arguable breach of the responsible lending and disclosure laws. Joe's debt to the bank was reduced by around \$3,000 and he was credited with the insurance premiums he had been sold without his knowledge.

**“I can’t believe it, we are getting the banks. I didn’t know this could happen - blackfella’s winning!”**

- Joe, one of our clients

## **Increase in Consumer Action’s legal service delivery**

Consumer Action has seen a significant increase in the number of consumer credit and debt issues from Victorian Aboriginal communities. Our data indicates that there has been a 25% increase in the number of Aboriginal and/or Torres Strait Islander people receiving consumer, credit and debt assistance across Consumer Action’s legal and financial counselling services compared to the same period last year.

## **Policy work**

The employment of a dedicated Consumer Action policy officer has led to greater attention being given to issues facing Victorian Aboriginal communities.

The role has shifted the way that traditional policy work has been done within Consumer Action. By attending community engagement sessions, the policy officer can capture information about systemic issues that would ordinarily be lost through the reliance on Consumer Action’s casework data alone. For example, talking to community members in Robinvale enabled the policy officer to observe the degree to which unwelcome door knocking was prevalent in that community.

The policy team have taken the issues identified through community engagement sessions and legal casework to:

- engage with decision makers to underscore the wide number of consumer credit and debt issues identified in community and advocate for systemic change; and
- ensure the impact of systemic issues on Victorian Aboriginal communities are heard by incorporating client stories in submissions, reports, briefs and other policy documents already being undertaken by policy and campaigns staff.

This work will continue in the second half of the Project and, in addition, there will be a move toward:

- facilitating the involvement of Aboriginal clients in decision maker briefings; and
- profiling the stories of community in public facing campaign work including media and social media.

The Project is also establishing practices that can be used in the future to include community members in setting Consumer Action’s policy priorities and in developing policy solutions.

## Community engagement

The integrated team have attended 8 community engagement sessions within the first 5 months of the Project commencing. This surpasses the number of community engagement sessions planned. To date, the integrated team has attended community events in: Echuca; Shepparton; Wodonga/Albury; Laverton; Hoppers Crossing; Mildura and Robinvale. These events have involved various other key support services such as ACCOs; financial counsellors; and community legal services; Ombudsman schemes and regulators.

The IP Project team has met with VALS CSOs who have enthusiastically promoted the Project within their communities. Not only is this evidence of true integration, but this work has increased attendance at community engagement sessions and therefore the impact of those sessions. Furthermore, news of successful outcomes achieved through the IP Project passes organically through CSOs to their communities in a process akin to a CLE 'Koori Grapevine.'

## Professional development and information sharing

The IP Project is powerful because it enables each organisation to leverage each other's strengths. VALS has built an invaluable breadth of knowledge across its broader areas of legal practice. Consumer Action on the other hand, has developed expertise in consumer, credit and debt laws. This expertise is being shared with VALS through mentorship of the VALS lawyer dedicated to consumer credit and debt cases and through the provision of training to the broader VALS team. VALS has been able to build up a body of resources and templates for their legal practice. These professional development activities enhance capacity across both organisations and foster more powerful outcomes for clients and communities.

Not only has each organisation increased its body of knowledge, but each have improved their practices and processes. For example, Consumer Action have improved their internal processes to ensure that community engagement is efficient and streamlined for clients.

“You guys aren't so scary after all.”  
- a community member



Sistas Day Out Robinvale, Victoria.  
Pictured: Djirra, VLA, VALS, Mallee Family Care and Consumer Action

## B. Measuring improvements in service delivery through integration

The benefits of integration can be seen by using the eight service-delivery priority areas identified by the 2013 Report as measurement of the IP Project's achievements.

**1. Increasing attention to non-criminal areas of legal need in all legal related activities including case work, advice, law reform and legal education.**<sup>4</sup>

**2. Increasing community legal education as an important first step to accessing justice.**<sup>5</sup> Increasing the Victorian Aboriginal communities' awareness of consumer rights; how to spot legal problems; and where to get legal support and advice is a key aspect of the community engagement sessions. Community education is an integral part of the Project that happens at every level. However, it is not the only part of the Project. Community education is supported and complemented by advocacy work and service provision.

Through the work of the IP Project, it has become clear that while people within Aboriginal Communities may have some knowledge about family and criminal law, many are not aware that they have legal rights around the consumer, credit and debt issues. The IP Project is addressing this gap.

**3. Responding to the complexity of legal need.** The IP Project is responding to complex needs in ways advocated by the 2013 Report by:

- improving our understanding of the complexity of legal need faced by the Victorian Aboriginal communities;<sup>6</sup>
- working with the Victorian Aboriginal communities and local services to promote awareness and engagement with legal issues at an earlier stage;<sup>7</sup> and
- working towards a more holistic and client centred approach highlighted by case study 2.<sup>8</sup>

**4. Working towards more holistic service delivery.**<sup>9</sup> The IP Project is working toward this ideal through partnerships with mainstream and Aboriginal controlled organisations. This breaks down compartmentalised service delivery by linking people up with all the different agencies that can address their civil needs.

### CASE STUDY 2

Marcia was a long-term client of VALS. Marcia had been a client of VALS criminal service and then accessed the assistance of VALS civil lawyers to obtain a Will. The client has a complex personal history and finds reading and writing challenging. The client also recently accessed assistance of VALS' civil team in relation to a funeral insurance policy she obtained because she was worried about her family's ability to cover the cost of her funeral. The sales tactics used by the company were arguably predatory and manipulative. After VALS made a complaint to AFCA on Marcia's behalf, the insurer agreed to refund the premiums she paid on the policy which amounted to around \$10,000. Because of the IP Project and in a short period of time, VALS was able to assist this long-term client to achieve a fantastic result for her funeral insurance case rather than referring her to a different agency, such as Consumer Action.

<sup>4</sup> The 2013 Report, p. 58.

<sup>5</sup> The 2013 Report, p. 59.

<sup>6</sup> The 2013 Report, p. 60.

<sup>7</sup> The 2013 Report, p. 61.

<sup>8</sup> The 2013 Report, p. 61.

<sup>9</sup> The 2013 Report, p. 61.

5. **Reducing service segregation** by working with all of the key civil justice stakeholders and bringing them out to communities where appropriate. This increases awareness about the various services available within communities and ensures they are more accessible to Victorian Aboriginal communities. People also have the option of receiving consumer legal services from a mainstream service or from an Aboriginal controlled organisation.
6. **Engaging effectively with Aboriginal communities.** The funding provided through the IP Project enhances and extends the crucial engagement work being done by Consumer Action's KEM and by VALS' CSOs in the regions. Early indicators suggest that the IP Project is engaging well with Aboriginal communities with one community member commenting, 'you guys aren't so scary after all.'
7. **Improving the quality of Legal service delivery.** Legal service delivery has been enhanced through the IP Project as both Consumer Action and VALS have had to adapt their services to better support the needs of Victorian Aboriginal communities as identified through the community engagement sessions. For example, by building rapport with local community workers and organisations; improving referral processes between partner organisations; cross promotion of other services; improving our internal processes; and ensuring retainers and other communications with clients are in plain English. Importantly, we have shifted our thinking from communities coming to us for help to us going out to communities. Alongside work in improving our services' cultural competency overall, these enhancements have ensured we are providing legal support to community in a culturally appropriate way and one that achieves outcomes for communities. We are in a better position

to continually enhance our service provision through acting on feedback we receive from communities about the support provided.

The KEM describes recent community engagement in Case Study 3.

8. **Funding.** According to the 2013 Report, addressing the underfunding of legal services is a fundamental first step to improving services and access to justice for Aboriginal peoples. It argues for sufficient funding without reducing presently committed resources. To continue the invaluable work being done under the Project, additional funding is needed.

### CASE STUDY 3

A team made up of a Consumer Action Policy Officer, VALS IP lawyer and Consumer Action's KEM went out to Mungabareena Aboriginal Co-op in Wodonga. We were also joined by Hume Riverina Community Legal Centre, a local financial counsellor, police liaison officer, Sheriff's Aboriginal Liaison Officer and the Dispute Settlement Centre Victoria. We had a yarn with over 20 Aboriginal community members about consumer credit and debt matters. There was a great level of involvement from the community asking questions and engaging with the session. Consumer Action and VALS staff did a great job explaining consumer credit and debt issues in plain language whilst using case study examples to make the matters easier to relate to. We also provided useful information on essential services. We managed to connect 10 people on the day with a lawyer to discuss their legal matters and received some very positive feedback from the community members who attended. Attendees said it was useful and very informative. We finished off our day at Albury Wodonga Aboriginal Health Service Koori Men's Shed sitting and learning about language and family history.

## 07


# ENSURING FUTURE IMPROVEMENTS

The IP Project is a ground-breaking project which has already had a positive impact for Victorian Aboriginal communities despite only having run half of its course. Integrating legal services with community outreach has fundamentally changed Consumer Action's legal service delivery to Victorian Aboriginal communities by making it more proactive, flexible and accessible. These kinds of services were previously outside of the norms of practice within both organisations. The Project has played an invaluable role in building stronger relationships between the organisations and Victorian Aboriginal communities. In doing all this, the IP Project is helping to break down the barriers to justice.

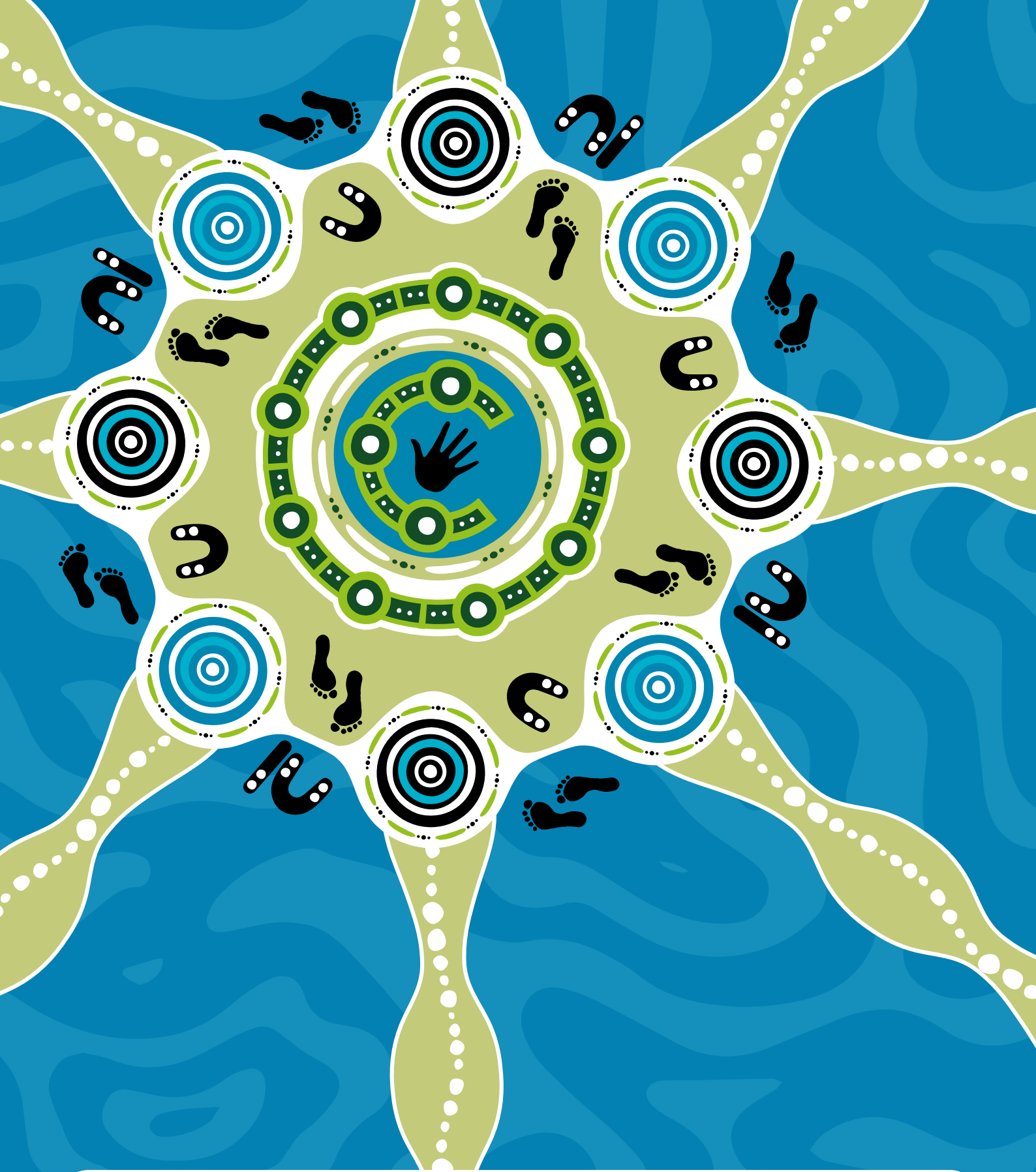
The IP Project is doing invaluable work, but it is only scratching the surface. Further time is required to understand the breadth and depth of the legal need

and to address that need. Further time is required to demonstrate our commitment to communities, thereby strengthening trust. Further time is required to empower more people with knowledge of their legal rights. Further time is required so this work can continue to inform the policy priorities of Consumer Action. And lastly, more time is required to build on the community relationships that have flourished under the Project.

Further funding is needed to improve practices and address unmet legal need in a smart way, a way that is evidence-based. The IP Project described in this report is one such way and, as explored in some length, has a strong evidence base grounded in the outcomes achieved under the Project thus far and in the research presented in the 2013 Report.



EWOV Round table and community session, Mildura, Victoria. Pictured: VLA, TIO, ASIC, VALS, Mallee Family Care, EWOV, AFCA, Murray Valley Community Legal Services and Anglicare



consumer  
action  
Koori Help



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