



**Royal Commission**  
into Family Violence

**WITNESS STATEMENT OF PETER JOHN GARTLAN**

I, Peter John Gartlan, Executive Director, of Level 1 Ross House, 247 – 251 Flinders Lane, Melbourne in the State of Victoria, say as follows:

- 1 I am currently employed as Executive Director of the Financial and Consumer Rights Council. I am authorised by the Financial and Consumer Rights Council to make this statement on its behalf.
- 2 I make this statement on the basis of my own knowledge, save where otherwise stated. Where I make statements based on information provided by others, I believe such information to be true.
- 3 The Financial and Consumer Rights Council made a submission in its capacity as member of the joint working group, Infringements Working Group (**IWG**), in relation to Victoria's infringements system. IWG is a working group of the Federation of Community Legal Centres (Victoria) and the Financial and Consumer Rights Council, supported by lawyers from Victoria Legal Aid. Attached to this statement and marked **PG-1** is a copy of the submission made by the IWG on 29 May 2015.
- 4 Throughout my statement I make a number of references to the report published by Wyndham Legal Service and Good Shepherd Australia New Zealand (co-authored by Owen Camilleri, Tanya Corrie and Shorna Moore), titled 'Restoring Financial Safety: Legal Responses to Economic Abuse.' Attached and marked **PG-2** is a copy of the report. I refer to the report throughout my statement as Camilleri et al (2015).

**Background and qualifications**

- 5 My background is in the community services sector. I have had approximately 30 years' experience in the community services sector, including youth work, consumer protection initiatives and financial counselling.
- 6 In 1987 I was one of the first No Interest Loans workers employed at Good Shepherd Youth and Family Service and through this work commenced financial counselling to low income consumers in Collingwood.

- 7 In 1990 I initiated the expansion of the Good Shepherd agency to the Mornington Peninsula and was responsible for starting the agency and commencing a number of services in Hastings.
- 8 In 1993, I then moved into the role of Youth Work Coordinator at YCW.
- 9 Between 1995 and 2010 (with the exception of two years teaching overseas) I worked in the area of financial counselling and financial literacy initiatives at Coburg Brunswick Community Legal Service, Banyule Community Health Service, EACH Social and Community Health (Yarra Ranges) and Incolink.
- 10 Since 2010, I have been Executive Officer at Financial and Consumer Rights Council, the peak body for financial counsellors in Victoria.
- 11 I am a current board member of Consumer Action Law Centre and the Energy and Water Ombudsman of Victoria. I am involved in numerous reference groups, including Women's Legal Service Stepping Stones project (currently piloting a financial counsellor and lawyer providing a joint casework service) and Consumer Utilities Advocacy Centre.
- 12 Formerly, I was the consumer representative of the General Insurance Code Compliance Committee, consumer director of Insurance Brokers Disputes and past board member of Consumers Federation Australia.
- 13 I have qualifications in financial counselling and training and assessment.

#### **Financial and Consumer Rights Council**

- 14 The Financial and Consumer Rights Council (**FCRC**) is the peak body and professional association for financial counsellors in Victoria and indirectly represents the interests of vulnerable consumers across the state.
- 15 It is a non-profit organisation whose purpose is to:
- 15.1. support the financial counselling sector through its casework, advocacy and law reform;
  - 15.2. advocate for vulnerable Victorian consumers who are experiencing financial difficulty; and
  - 15.3. adopt and maintain best industry practice.
- 16 FCRC provides professional association services to approximately 200 member financial counsellors, primarily through ongoing training, education, professional development seminars and accreditation processes. Additionally, FCRC is active in promoting the rights of consumers through effective policy advocacy, support and casework.

- 17 FCRC works with financial counsellors in a number of ways, including:
- 17.1. partnering with RMIT University to deliver the Diploma of Community Services (Financial Counselling);
  - 17.2. providing 25 professional development sessions to financial counsellors annually;
  - 17.3. developing and supporting working groups and regional networks;
  - 17.4. co-ordinating and delivering of an annual state-wide conference focusing on issues relevant to financial counsellors and their clients;
  - 17.5. representing the sector to industry and government; and
  - 17.6. assisting financial counsellors to meet the ongoing requirements which allow agencies who employ them to hold an ASIC Exemption (discussed below).
- 18 The FCRC also works with government (both state and federal) and the banking, utilities, debt collection and a number of other industries in the area of financial hardship; this includes communication of issues of concern for financial counsellors and their clients and working towards reaching consensus on best practice hardship provisions.
- 19 FCRC receives daily feedback from financial counsellors across Victoria on how the policies and practices of industries and institutions impact on the lives of their clients. We are perfectly placed to act as barometers to assess the efficacy or otherwise of industry hardship policy and practices. Recent FCRC surveys such as 'Rank the Bank' and 'Rank the Energy Retailer' have led to improvements in how banks and energy companies respond to vulnerable and disadvantaged consumers.
- 20 The systemic advocacy, policy and project work of the FCRC has also contributed to an increase in the number of financial counsellors in Victoria. It has also resulted in the development of numerous publications to assist consumers and caseworkers to deal with financial hardship, and to advocate strongly for those who need it most.
- 21 The financial counselling sector is mostly state and federal government funded. Consumer Affairs Victoria provides \$7.445 million for 2015/6 for financial counselling, which represents approximately 60% of the funding received in Victoria. The Federal Department of Social Services provides approximately \$3 million in funding to Victorian financial counselling agencies. Some agencies receive funding from philanthropic organisations for particular initiatives.

- 22 FCRC receives \$250 000 from Consumer Affairs Victoria, as part of its financial counselling allocation, to provide professional development training, maintain the website, produce sector wide publications and support of sector working groups.
- 23 FCRC looks for project funding to continue hardship related policy and advocacy; support the sector to expand access to financial counselling in new areas; and self- funds its partnership with RMIT.

### **Financial counsellors**

- 24 Financial counsellors in Victoria are highly skilled paralegal professionals who provide assistance, advocacy, and information to those who are experiencing financial difficulty to enable their clients to gain control of their financial situation. Financial counsellors offer their services free of charge to their clients and provide impartial advocacy.
- 25 There are 200 financial counsellors in Victoria employed by 60 community/welfare not for profit agencies, including but not limited to organisations such as Good Shepherd, Springvale Community Aid and Advice Bureau, Bass Coast Regional Health, Salvation Army and Anglicare.
- 26 60 percent of financial counsellors are employed in metropolitan Melbourne, while forty percent are employed in rural and regional Victoria. Approximately a third of financial counsellors have well over 10 years' experience, a third have between three and ten years' experience and a third have less than three years' experience.
- 27 Agencies that employ financial counsellors receive an exemption from the Australian Security and Investment Commission (**ASIC**) from the requirement to hold an Australian Credit License. Conditions are placed on agencies that employ financial counsellors to meet exemption requirements, including that financial counsellors need to be adequately trained, offer a free and independent service and be members of the state based peak body (in Victoria, the FCRC).
- 28 In order to become an accredited financial counsellor, individuals must complete a Diploma of Community Services (Financial Counselling). As stated above (at paragraph 27), they must also become a member of FCRC. Further, in order to retain membership with FCRC, financial counsellors also need to achieve ten professional development points and have a minimum of ten hours' professional supervision per annum (the latter on a pro rata basis for part time employees).
- 29 Financial counsellors work with a vast array of consumer credit, bankruptcy, debt collection and social security law as well as codes of practice in the banking, insurance and energy sectors.

30 In terms of an initial consultation with a client, broadly speaking, a financial counsellor will usually work through the following process:

- 30.1. ascertain the key issues the client is seeking to discuss or resolve during the consultation;
- 30.2. obtain information from the client regarding their complete financial history;
- 30.3. make an assessment of the client's financial circumstances; and
- 30.4. provide relevant financial options and advice and a range of client advocacy.

### **Economic abuse as a form of family violence**

31 As set out in Camilleri et al (2015), economic abuse is not typically identified by victims, or the community, as family violence. Estimates of family violence cases involving incidents of economic abuse vary from 30 to 90 per cent (Macdonald, 2012). A conservative estimate suggests that economic abuse occurs in approximately 50 per cent of family violence cases (Sharp, 2008). Considering these figures, an estimated 1.86 million women in Australia may have experienced economic abuse (Corrie & McGuire, 2013).

32 Financial impacts of family violence can be long-lasting and detrimental to the woman (and her children) over the long-term. Family violence and financial problems interconnect in a number of ways, including the following.

- 32.1. Women are likely to experience significant financial detriment as a direct result of family violence (for example, as a result of leaving the relationship with few resources or difficulties experienced maintaining employment).
- 32.2. Economic factors can profoundly impact a woman's ability to leave (or not return to) an abusive relationship.
- 32.3. Many women who are subject to physical/emotional violence are subject to economic abuse from their partners (including restricted access to joint finances and coercion to sign for loans for the partner's benefit).
- 32.4. Some women who have not been subject to economic abuse may experience this once they leave the relationship (for example, where joint bills and debts are not paid and the woman is pursued for payment).

33 The particular impacts of economic abuse during the period the woman remains in the relationship often include:

- 33.1. lack of access to funds for her own, and children's needs;
- 33.2. inability to obtain or maintain employment;
- 33.3. inability to access study or training pathways
- 33.4. lack of access to communications such as email or phone;
- 33.5. increased stress as a result of contact from debt collectors about bills and debts that may be in her name alone; and
- 33.6. lack of control over her day-to-day life.

34 Once the woman has left the relationship, the negative impacts can include:

- 34.1. little, or no, access to money/bank accounts;
- 34.2. a decrease in income;
- 34.3. threats to vital assets (for example, her car);
- 34.4. stress as a result of an unfair allocation of liabilities (for example, debts incurred for the partner's benefit or being left to pay joint debts alone, or cases where the abused person is sole director of a company business in which the abuser is the trader);
- 34.5. a poor credit history (which impacts on the individual's ability to borrow in the future at reasonable rates);
- 34.6. problems acquiring vital utilities such as electricity or phone as a result of unpaid accounts in her name;
- 34.7. a lack of confidence/knowledge to deal with day-to-day financial matters;
- 34.8. ongoing increasing debt liabilities due to the ex-partner continuing to incur credit (for example, on a credit card or mobile phone) for which the woman is responsible; and
- 34.9. being deemed ineligible for Centrelink Family Tax Benefit (B) as a result of the ex -partner not lodging tax returns or under-declaring income.

#### **The role of debt in economic abuse**

35 Debt can be used as a way of maintaining control when a person tries to leave the relationship.

36 In their report, Camilleri et al (2015) found that debt was a common way of abusers being able to control their partners. In particular, women were protective of their credit records and often continued to pay the full amount of a joint debt when the man threatens to default. The report states that:

*“The use of debt was a common and pervasive form of economic violence. Perpetrators would often force women to take out debts in her name, and retain the asset during the relationship and post-separation. This was particularly true for cars, which were regularly withheld from women to control and limit their economic and social participation.”*

37 This finding corresponds with my experiences over the period I have worked in the financial counselling sector. For example, I am aware of issues such as:

- 37.1. whilst bankruptcy is a legal solution to debt and can provide women with a ‘fresh start’, careful consideration needs to be given to future impact on a woman’s credit file, lack of access to mainstream finance, and how bankruptcy is perceived by survivors of family violence;
- 37.2. electricity and phone debts that are in the name of the perpetrator for services that continue to be used by the woman and her family;
- 37.3. debts that are in the name of the woman that she was unaware of (infringements incurred by the abuser, or where the abuser nominates his former partner as the infringer);
- 37.4. joint credit cards and co-borrower car loans solely used by the perpetrator, where the woman receives little or no benefit of the goods or asset purchased;
- 37.5. instances where the perpetrator elects to go bankrupt, causing the woman to be left liable for those outstanding debts that were in joint names; and
- 37.6. instances where the perpetrator fails to lodge taxation returns which later causes a Family Tax Benefit debt to be raised, now owing by the woman.

#### **How financial counselling can assist**

38 The assistance financial counsellors can provide for all clients, including women experiencing family violence, includes the following:

- 38.1. Negotiating with creditors and debt collectors over outstanding debts.
- 38.2. Accessing formal ‘hardship’ schemes at organisations such as banks, finance companies and utility companies.

- 38.3. Protecting the client's financial interests (for example, by helping a woman to stop further credit being obtained from accounts for which she is liable).
- 38.4. Ascertaining which debts are legally owed; debts for which the client is liable and whether he or she could challenge liability.
- 38.5. Lodging disputes with ombudsman schemes (for example, if an unfair contract or obligation arises as a result of abuse or if the company does not respond appropriately to a 'hardship' request).
- 38.6. Explaining and assisting with debt options such as bankruptcy, with careful consideration to the emotional impact on women as well as future barriers to economic participation.
- 38.7. Helping the client to establish new financial arrangements and accounts and improving the client's understanding of financial matters leading to long term financial stability.
- 38.8. Ensuring referral to, and a clear working relationship with, a family law expert. The experience of the Stepping Stones project at Women's Legal Service demonstrates the importance that there is an understanding of both family law and credit laws areas to ensure that the best options for the individual situation are explored. There will be cases where it is beneficial to seek a property settlement from the perpetrator, or cases where it is beneficial to walk away and explore hardship options with a bank, or a combination of both.

### **Financial counselling as part of a family violence response**

- 39 Financial counsellors currently assist many clients who have experienced family violence. However, the extent to which this assistance is provided depends on a number of factors, including the level of demand from other clients and the relationship between the financial counsellor and those organisations assisting affected women. Financial counsellors have reported that this type of work is significantly more complex and time intensive than that required for the average financial counselling case.
- 40 Aside from a pilot project at the Women's Legal Service Victoria (which I discuss below), financial counsellors have not been specifically funded, or employed, to work with victims of family violence. Some financial counsellors do some work in this field due to referrals from family violence services in their local area. However, the cases involving family violence are likely to be more complex as stated above.



Financial counsellors often work with victims of family violence and economic abuse without this being identified as a specific problem.

- 41 FCRC provides some training to its financial counsellors, as part of their continuing professional development requirements, on the issue of family law and how it intersects with financial counselling. However, financial counsellors require specialist technical, counselling, and case work practice training in a post -diploma accredited framework that focuses on family violence and family counselling. See below.

### **Specialist family violence financial counsellors**

- 42 Camilleri et al (2015) state, and I agree, that:

*“While many services such as financial counselling services deal with financial issues, few have a specific focus on these issues in the context of family violence and often these generic services are not accessed by survivors of family violence. Similarly, family violence services do not have the funding or capacity to deal with economic abuse issues. Both sectors need greater resourcing to provide support for people who have experienced economic abuse.”*

- 43 To provide the best possible service, there is a need for financial counselling program to integrate at the point where women seek assistance. Further, financial counsellors need to undertake specialist training to better understand the context in which problems arise, the forms of economic abuse, and how the legal position might change the possible solutions offered by the financial counsellor. Specialist training would also explore the sensitivities of some ‘last resort’ debt solutions such as how bankruptcy may impact differently on a client who has experienced financial abuse.

- 44 One of the recommendations made in the report by Camilleri et al (2015) is that the Victorian Department of Justice funds the FCRC, in partnership with other relevant organisations to develop a specific qualification for family violence financial counsellors and, further, provides funding for this training to be rolled out.

- 45 The report also recommends that government-funded financial counselling programs be extended to include a family-violence specific service through embedding financial counsellors in other settings such as community legal services.

### **Benefits of specialist financial counselling intervention for family violence clients**

- 46 Specialist financial counselling interventions for family violence clients would have the following impacts.

- 46.1. Given that economic abuse can lead some women to return to a violent partner, improving financial outcomes will prevent further abuse being experienced by some women.
- 46.2. Better timing of financial counselling intervention during a critical period of change when decisions are being made about housing, independently managing finances and personal safety, may have a greater impact in that it will allow clients to move from a situation in which they feel their finances are controlled by a third party to taking control of their own finances.
- 46.3. Improved health and wellbeing, improved housing outcomes and overall a more empowered financial situation for clients and their children.
- 46.4. Timely resolution of immediate issues impacting on the client's and their family's welfare. A financial counsellor can negotiate with banks, finance companies, debt collectors, utilities companies and other creditors; including seeking lower repayments, waivers of debts, transfers of utility accounts, or taking a matter of unfair conduct to an industry ombudsman (for example, if a lender should have been aware the woman was being coerced to sign a loan).
- 46.5. The power and control of the perpetrator may be reduced, albeit with unintended consequences. For example, in one example I heard from Women's Legal Service Victoria, a bank accepted a hardship application from the financial counsellor due to family violence. The result was the debt was waived, which was a positive outcome for the woman concerned. However, because the loan was co-borrowed, the perpetrator (who had threatened not to pay) was also released from liability.
- 46.6. Assistance for less financially significant, but urgent, problems can be resolved without waiting for property settlement.
- 46.7. Resolution of some issues earlier can leave a person in a better financial position in the future (for example, by preventing adverse credit reports or legal action for debts and fines), even if some property issues will be subject to a property settlement.
- 46.8. Having the conversations with service users to reflect on what their aspirations are for the future. From this perspective, we could discuss

whether they have plans that will mean moving out of poverty that could threaten to become intergenerational.

- 47 I do not suggest that financial counsellors become vocational training and employment experts. However, I believe that the proposed specialist training must equip financial counsellors with the tools to engage in these important conversations.

### **Women's Legal Service Victoria – Stepping Stones project**

- 48 In March 2014, the Women's Legal Service Victoria (**WLSV**) established a pilot project, funded by the Legal Services Board of Victoria, that integrates financial counselling and legal services. The project aims to promote the economic well-being of women experiencing family violence and relationship breakdown and addresses the systemic barriers faced by victims of family violence. The project has two main components:

- 48.1. to develop and implement an inter-disciplinary model to deliver financial counselling services and legal services to WLSV clients; and
- 48.2. to research and draft a report on the complex legal and financial issues that arise for women experiencing family violence and relationship breakdown.

- 49 I understand that, among other things, the WLSV has been able to assist women in relation to debt reduction, dealing with utility companies, and to have an integrated casework approach to address complex legal issues including property settlements. Women's Legal Service Victoria lawyers and the financial counsellor have worked together to improve short term financial issues such as dealing with utility companies, advocating with creditors and managing daily living expenses whilst legal recourse against the perpetrators was explored and implemented. Where legal recourse is unviable or where immediate assistance is required prior to any legal settlement, then hardship advocacy may be undertaken with positive results in areas such as reduced payments, debt reduction and waiver.

### **Gaps in current service delivery, training and industry hardship policies**

- 50 There is little doubt that outcomes could be improved for many women experiencing family violence if financial counselling assistance was available to them. There is very limited scope to do this within the current financial counselling program funded by state and federal governments.

### **Service delivery gaps**

- 51 Financial counsellors need to be positioned where clients experiencing family violence seek assistance. This is critical and does not currently occur in a coordinated way.
- 52 This includes, among many others, family violence services, community legal centres and health services. Greater access and more timely referrals to a financial counsellor could reduce the impacts of economic abuse being suffered by the woman and her children.
- 53 Centrelink social workers in Victoria assess thousands of applications for crisis payments due to family violence each year. They currently do not enquire into the applicants overall financial situation and I believe there is an opportunity for financial counselling to be included in their assessment and referral processes.

### *Targeting vulnerable women who may not initially present with financial issues*

- 54 Women are unlikely to recognise economic abuse (or their need for financial counselling). Family violence workers, including lawyers, need to better identify economic abuse, and where a financial counsellor may be able to assist.
- 55 Some discussions I have had with the Wyndham Community Legal Centre suggest that even when help was offered for financial matters to women with intervention order hearings in court, women failed to identify economic abuse without detailed questioning. Yet, when explained, significant outcomes were achieved for clients.
- 56 Targeting victims of family violence with services that address economic abuse can enable financial counselling resources to be directed to this particularly vulnerable group. Since many clients fail to identify economic violence as a problem, the co-operation of other services that assist victims of family violence would ensure better outcomes.

### *Financial/assets issues before, or at time of, an intervention order application*

- 57 There would be benefits for some women if relevant financial and property issues were raised at the time of the intervention order application, to enable the intervention order to identify any economic abuse. This would have the result that continuing the abuse would be a breach of the intervention order.
- 58 Issues that might be best resolved at this stage include access to a vehicle, access to cash or a bank account, banking passwords, and even access to basics such as a cot or children's toys. If these are not resolved at the time of an intervention order they can only be resolved at a Family Court hearing, meaning

that in many cases, these issues won't be resolved at all. Very early resolution can increase the ability of the woman (and children, if applicable) to live independently.

*Integration of services*

- 59 Women experiencing family violence are likely to have a range of service needs (such as housing, health, counselling and legal service needs). There are significant benefits when services work closely together, providing a relatively seamless service, rather than requiring the client to separately engage with a number of services, opening the door to service fatigue and disengagement and as a result increasing risk for women and children.
- 60 This may be even more important for financial counselling, where the woman and support workers may not fully identify the level or impact of economic violence (and therefore not refer the individual to a financial counsellor) and where the work of the financial counsellor is likely to intersect closely with the work of other services, such as legal, health and family violence services. It is crucial for the financial counsellor and other services to understand the recommendations and interactions of other professionals with the client.
- 61 Integrating services and up-skilling staff would require time and effort through the implementation of a pilot program. One model will not suit all locations and the current service delivery model of Consumer Affairs Victoria will not work in a pilot program. A pilot within different settings would allow for a financial counsellor to be available where the family violence clients present. Some examples of relevant settings where financial counsellors could be positioned to enable better access to their services include:
- 61.1. a health centre in regional Victoria;
  - 61.2. an existing, integrated family violence service that does not currently include a financial counselling program;
  - 61.3. a Community Legal Centre that attends intervention order applications;
  - 61.4. an agency that takes family violence referrals from Centrelink Social Workers;
  - 61.5. as a secondary consult service to family violence agencies;
  - 61.6. multicultural and refugee organisations; and
  - 61.7. indigenous organisations.

### **The need for accredited training for financial counsellors**

- 62 Specialist training for financial counsellors is essential and can be delivered in a variety of formats. There is currently no additional specialist training provided to financial counsellors in respect of family violence aside from basic introductory case study and legal approaches in the Diploma of Community Service (Financial Counselling).
- 63 Further education would focus on post-diploma training and include the following key areas:
- 63.1. technical – more focus on technical issues with joint debts and unfair contracts, contextualisation and timing of interventions;
  - 63.2. counselling – strengthen skills with a focus on active listening, strengths based and social inclusion; and
  - 63.3. practice frameworks – implementation of skills to work in a best practice framework with women impacted by economic abuse, including education about a service model that highlights financial counselling as a pathway to future economic empowerment.
- 64 FCRC has significant experience in the development and delivery of accredited and non-accredited training and would propose that education initiatives be developed and delivered in partnership with RMIT University, Women’s Legal Service Victoria, Family Violence Educators, Good Shepherd research unit, VCOSS and Consumer Action Law Centre.
- 65 Family violence workers would also benefit from targeted training that explains the role and work of financial counsellors, how to identify debt related issues and provide appropriate referrals.

### ***Industry hardship policy and procedures***

- 66 Financial counsellors have a proven track record of working with industry to improve practices. This requires the ability to consult, but also to publicise poor practices. Recent examples of this are publication of “Rank the Bank” and “Rank the Energy Retailer” reports in which financial counsellors rank the ways in which businesses deal with customers in financial hardship.
- 67 Without this approach, industry reforms are likely to be short-lived. Financial counsellors are in an ideal position to have input to reviews of industry processes and to monitor processes in practice through their work with clients. This work must be recognised by any funding program given the work, and time, it will take to change and embed good industry responses to financial problems related to family violence.

- 68 The peak body to the banking sector, the Australian Bankers' Association (**ABA**), acknowledges that there is no specific policy or practice that relates to the way that banks apply hardship practices to a customer recovering from family violence. The financial counselling sector has proposed to the ABA to develop specific industry policy relating to how the banking sector responds to hardship requests due to family violence. Such a policy would provide a framework to banks to promote awareness and consistent arrangements to improve industry response for survivors of economic abuse and family violence. Through ongoing discussions with the ABA, I am confident they will agree to develop such a policy.
- 69 Hardship protocols are required to assist hardship teams from the banking, energy and telecommunication companies (among others), Civic Compliance Victoria (in respect of fines), local councils (in respect of rates) and VicRoads (in respect of car ownership issues) to instigate policies and procedures to better respond to the implications of economic abuse on debt. I agree with and support the recommendations for improving industry hardship practices made by the Camilleri et al (2015) report in recommendations 10 to 14 on page 77.
- 70 At this point I again refer to the joint submission by the Infringements Working Group, a joint working group of Federation of Community Legal Centres and FCRC. This submission makes two key recommendations aimed at reducing the impact of the fines and infringements system on victims of family violence. It is annexed to this report as "PG-1".

#### **FCRC proposal to Royal Commission**

- 71 In my view, the following programs would address the gaps and problems outlined above and provide significantly improved responses for many women. I would propose a modest investment of \$2 million over a two year period, including the following.
- 71.1. Development of a pilot program of six specialist family violence financial counsellors (at a cost of approximately \$1.4 million over two years) who would work closely across a range of legal, health and community services across Victoria. This should include continuing the funding of the successful Stepping Stones program being run by Women's Legal Service Victoria.
  - 71.2. Program coordination and evaluation of the six pilots (at a cost of approximately \$200,000 over 2 years). This evaluation would provide government with a best practice framework for the future.

- 71.3. Development and delivery of an accredited training qualification with RMIT to prepare experienced financial counsellors to specialise in family violence work (at a cost of approximately \$100,000 over two years).
- 71.4. Development and delivery of specific continuing professional development sessions for all financial counsellors to enable them to better identify and respond to family violence (and economic abuse) and make appropriate referrals (at a cost of approximately \$80,000 over two years).
- 71.5. Design, development and delivery of training materials (or other resources) in consultation with family violence services to assist those services to better understand the assistance financial counsellors can provide in response to family violence and economic abuse (at a cost of approximately \$100,000 over two years.)
- 71.6. Development of a series of protocols with hardship teams from the banking, energy, telecommunications companies, Civic Compliance Victoria, local councils and VicRoads to instigate policies and procedures to better respond to the implications of economic abuse on debt (at a cost of approximately \$100,000 over two years).
- 72 Together, these programs would come to a total of approximately \$2 million for the first two years.



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**Peter John Gartlan**

Dated: 8 July 2015