



Good Shepherd Australia New Zealand's

Submission to:

The Department of Social Services Discussion Paper:

Financial wellbeing and capability activity

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About our organisation

This submission has been prepared by Good Shepherd Australia New Zealand (GSANZ), a community services organisation that has been delivering on its mission to disrupt the intergenerational cycle of disadvantage and enable the fullness of life, with a focus on women and girls, since 1863 in Australia and 1886 in New Zealand. We achieve this by challenging disadvantage and gender inequality through services, research, advocacy and social policy development.

Our specific expertise is in:

- **Safety and resilience** - supporting women to be resilient provides a buffer between an individual and adversity, allowing them to achieve improved outcomes in spite of difficulties.
- **Financial security** - supporting women to ensure they have access to sufficient economic resources to meet their material needs so that they can live with dignity.
- **Educational pathways** - assisting women and girls to overcome the obstacles in their life that hinder them from achieving their educational/vocational capacity.
- **Outcomes and evaluations** - developing evidence-based program designs across all Good Shepherd Australia New Zealand programs and services.
- **Research, social policy and advocacy** - needs research into emerging issues, identifying effective change interventions for program design, policy analysis and advocacy.

GSANZ is part of a global network of services and advocates established by the Congregation of the Good Shepherd, with representation at the United Nations as a Non-Government Organisation with special consultative status on women and girls.

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Introduction

GSANZ welcomes the opportunity to submit to the Discussion Paper: Financial wellbeing and capability activity ('Discussion Paper').

GSANZ has been delivering financial wellbeing programs for over 30 years. We operate financial literacy, capability building and microfinance programs including No Interest Loans (NILS) and matched savings scheme (AddsUP) in Victoria and NSW, in partnership with Good Shepherd Microfinance (GSM). GSANZ has also delivered financial counselling for over fifteen years. For the past three years GSANZ has been the lead agency in Consumer Affairs Victoria funded financial counselling programs in Brimbank-Melton and Bayside Peninsula catchments in Victoria, working with three service delivery partners. GSANZ also works as a partner organisation through state funded service delivery in Marrickville, NSW.

As well as significant practice experience, GSANZ has extensive research and policy expertise. GSANZ's Women's Research Advocacy and Policy (WRAP) Centre supports our service delivery and strives to influence the policy environment by undertaking and collating relevant research, policy analysis, advocacy and outcomes measurement. Research reports include:

- [Economic Security for Survivors of Domestic and Family Violence: Understanding and measuring the impact](#)
- [Restoring Financial Safety: Legal responses to economic abuse](#)
- [Economic Abuse: Searching for Solutions](#)
- [Collaborating for Outcomes: Networks in the financial support service system](#)
- [Microfinance and the Household Economy: Financial inclusion, economic and social participation and material wellbeing](#)
- [Smiling for the First Time: Bankruptcy for people with a mental illness](#)
- [Under Pressure: Costs of living, financial hardship and emergency relief in Victoria](#)

It is from both a practice and research perspective that we provide our feedback to the Discussion Paper.

Recommendations

- Recommendation 1: If experiences of family violence are going to become a basis for support in FWC programs, DSS consult with the Family Violence sector in the implementation of these reforms.
- Recommendation 2: DSS does not restrict access to FWC services based on the criteria outlined in the discussion paper.
- Recommendation 3: DSS enables community organisations to have the flexibility needed to address local needs.
- Recommendation 4: DSS support community sector collaboration (in its many forms) to promote community financial wellbeing, but not be prescriptive about the forms of cooperation.
- Recommendation 5: DSS supports and resources the development of service networks.
- Recommendation 6: DSS review the recommendations as outlined in ‘Collaborating for Outcomes’ as a means to develop greater service integration.
- Recommendation 7: DSS reconsider including employment conversations in FWC program,s where the client has not raised this as an area in which they need support.
- Recommendation 8: DSS, State and Local government invest in Firmer Foundations as an early intervention and post-crisis program.

Response to Discussion Paper questions

1. Targeting of services

1.1 What impacts do you expect restricting eligibility criteria in the manner proposed above will have on your service?

GSANZ holds significant concerns with the further targeting of services. We are most concerned about what this means for people who need support. We believe it will create greater hardship for people and increased pressure on existing services.

The proposed restrictions do not reflect the evidence about how people who are facing a financial shortfall prioritise their spending and the ways in which scarcity impacts on long term planning. The restrictions also do not reflect the reality of living on low income, whether that be through increasingly casualised and precarious work or via receipt of Income Support.

People who present to Emergency Relief services often do so because they have prioritised their rent, utilities and other bills over food. This is very often how people with scarce resources tend to prioritise their money.¹ Not being able to pay bills is therefore not an adequate measure of need.

Making access to support contingent on an inability to pay bills has the potential to lead to an escalation in people's vulnerability to hardship. This has implications for their mental and physical health and that of their children and potentially force more people into debt, creating more demand for services, not less.

Restricting emergency relief access will create an increase in demand for already stretched financial counselling providers. As a Victorian and New South Wales state-funded financial counselling provider, GSANZ already faces significant overflow from underfunded programs.

Further, this will potentially place pressure on essential services and credit providers in terms of hardship support provisions; through ombudsmen schemes via a potential increase in lodgements and claims; community legal centres who are already facing significant funding cuts; and mental health services given people's increasing stress and mental health issues related to escalating financial hardship.²

Gender

As an organisation whose focus is on disrupting intergenerational disadvantage for women and girls, we are also concerned about the potential gender impacts. Findings from previous surveys of emergency relief services in Australia paint a consistent picture of the demographic characteristics of people who access these services. Over 60 per cent of Emergency Relief clients are women from mostly single-income households: either lone parents or people living alone.³

Restricting access for these women will have flow-on impacts for their children. While many may be in receipt of Income Support payments, and thus may still qualify for support, many are also in precarious employment.⁴ If employed, they are likely to be working less than full-time in casual positions. For example, Engels (2006) found that 11 per cent of emergency relief clients surveyed were working, and of these 46 per cent were in irregular casual work and 15 per cent in part-time work.⁵

The gender employment gap is well documented, particularly the over-representation of women in part-time and precarious work.⁶ To maintain this work and avoid poverty, many women in this situation need access to Emergency Relief Services. Being employed is therefore not an appropriate way to gauge disadvantage.

1.2 What strategies can be employed to ensure that services are accessible for those who need them the most?

Community organisations are best placed to ensure that services are directed toward those that need them most. All organisations GSA NZ has consulted with that provide financial counselling and emergency relief services already have systems in place to ensure they can make best use of resources, given they have so few. Formalising these criteria does not allow for flexibility for organisations to respond to community needs and will lead to deepening disadvantage.

However, we are pleased that women experiencing family violence will remain eligible for service. The main issue in this regard is the ‘evidence’ required to enable access. It can be difficult for many people to disclose family violence because of fear, stigma or shame. Looking at experiences of family violence as a basis for FWC support can potentially be problematic in its implementation without careful consideration of these factors.

Recommendation 1: If experiences of family violence are going to become a basis for support in FWC programs, DSS consult with the Family Violence sector in the implementation of these reforms.

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These restrictions will affect access to FWC programs for many cohorts, including:

- Farmers in rural areas in short term hardship, facing drought or other natural disasters
- Homeless people or people at risk of homelessness, given the increase in housing stress, lack of affordable alternatives and hence lower disposable income to buy food
- People with disability; who may be in low-paid or precarious work and hence not qualify for support
- The casual workforce generally
- Single parents who are in part-time work, or who receive Family Tax Benefit and receive no support from the non-custodial parent

Community organisations need to be flexible to accommodate the varying and complex causes of financial hardship, and are best placed to make those decisions.

Recommendation 2: DSS does not restrict access to FWC services based on the criteria outlined in the discussion paper.

Recommendation 3: DSS enables community organisations to have the flexibility needed to address local needs.

2. Strategies to increase service integration

GSANZ can respond to these questions as a provider of Financial Counselling services.

2.1 What would help you to strengthen cooperation with other services (e.g. family support services and job network providers) in your community? What additional support would you need to achieve this?

Developing and maintaining service networks and cooperation requires resources and relationships. GSANZ has strong referral networks and works collaboratively with other service providers, depending on the needs identified by the client. When they are experiencing high levels of financial stress, these needs rarely include employment at that point. If it is, our clients have already been assessed as to their job readiness and thus are connected to the job network. This makes any formal partnerships with Job Network providers a duplication of effort and may also dissuade people from accessing the service.

As previously mentioned, Financial Counselling programs are not designed for job readiness, they are designed to get people out of financial stress and to support them build their capabilities. When necessary and when identified, referrals are already made to job network providers.

Recommendation 4: DSS support community sector collaboration (in its many forms) to promote community financial wellbeing, but not be prescriptive about the forms of cooperation.

Recommendation 3: FWC providers not be required to prove employment outcomes given the scope of the service and current resourcing levels.

2.2 What effect will the requirement to formalise relationships with other organisations have on your service? How do you see these relationships working to maximise their effectiveness?

Collaboration with services is facilitated in a number of ways, of which co-location and formal partnerships with other services are just two. The requirement that there be formal relationships with other organisations will reduce our flexibility to provide an individualised service; will create an administrative burden that we are not resourced to manage; and will not necessarily improve outcomes for our service users.

Where necessary, formal partnerships are developed for service delivery, though initiatives such as ChildFIRST, Integrated Family Violence Services, centralised intake and collaborative service delivery models. Organisations do this depending on their community needs and funding models. This reaffirms recommendation 2.

2.3 Where is integration / collaboration of FWC microfinance services with other FWC services occurring across the country? Is there a way these relationships could be better supported?

In 2014, GSANSZ conducted research ‘Collaborating for Outcomes’⁷ into the ways in which community financial support services could be best integrated. These services included emergency relief, financial counselling, microfinance and Centrelink’s Financial Information Service. The areas covered including Yarra, in inner Melbourne; Blacktown in Sydney’s outer-west; Cairns in North Queensland; and Thursday Island in the Torres Strait.

The research made clear that networks, more closely aligned to co-operation on the continuum of integration,⁸ are critical to support service delivery. While formal partnerships (Collaboration and Integration on the continuum) have their place, they are not necessarily the best way to enable the delivery of wrap-around services.

The research concluded that resourcing networks and not prescribing partnerships is the most appropriate, effective and cost-efficient way to enable joined up services.⁹ Below is an excerpt from the executive summary of *Collaborating for Outcomes*, which outlines the strengths of networks for joined up service delivery, and the different ways in which this can be facilitated.¹⁰

Collaborating for Outcomes: Key findings

The research identified the following characteristics associated with greater networking activity and informal service networks:

- Staffing models that utilised paid, or both paid and volunteer positions, were associated with more network links.
- Co-location is neither a necessary nor sufficient condition for effective service integration. Services that are co-located do not necessarily have more links with other services, although purposeful use of colocation does increase links.
- The number of links is affected by both structural factors such as partnerships and staffing resources, and more local determinants such as distance and worker longevity.

Formal service networks

Formal networks were also investigated. Formal networks include local or regional networks for specific sectors (emergency relief (ER), financial counselling or microfinance), local inter-agency networks linking services from multiple sectors in an area (often convened by local government), central networks (such as the NILS network or financial counselling peak bodies) and the internal networks of large multisite (usually faith-based) organisations. These networks not only increase opportunities for information flow about day-to-day practice, but also value-add to informal links through the organisational relationships that go beyond worker-to-worker relationships and enable collaborative planning to develop innovative services, gain funding and increase service quality. The research found that most financial support services still do not include local formal networks within the program design and funding arrangements, and this has resulted in patchy coverage and a plethora of ad hoc local arrangements.

Key findings related to existing formal service networks include:

- Larger organisations play a critical supporting role for local service networks. They provide resources as specialised knowledge to the network, which can be accessed by smaller organisations.
- Larger organisations are able to build networks across a diversity of areas, in line with their range of programs. This means they are well placed to act as a bridge between small specialised services and larger generalised services.
- Larger organisations are able to contribute the most to the network when they are decentralised, providing staff with the autonomy to build local connections.

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- Local government, community hubs or ‘one-stop shops’, and Centrelink can all play a role in facilitating local networks in financial support services, although they do not necessarily do so in all localities.
- Networks are relational. This means that retaining staff within organisations, or the network more broadly, is critical to the successful functioning of the network. High staff turnover is likely to be barrier to establishing robust local networks and service integration.
- Networking is at the low intensity end of the service collaboration continuum; it requires fewer resources than fully ‘joined-up’ services, is more organic and flexible, and can operate without system-wide coordination. This type of worker-level horizontal networking is also essential to the success of any more formal, vertical service integration.

Conclusion

Delivering more effective and collaborative services requires good working relationships and adequate knowledge of other services. Clients’ multiple and complex needs often go beyond the ambit of a single agency. This is why abundant and dynamic links between services are needed: to provide options in assisting clients, to respond to changing patterns of need in the community and to support and learn from other services in meeting these challenges.

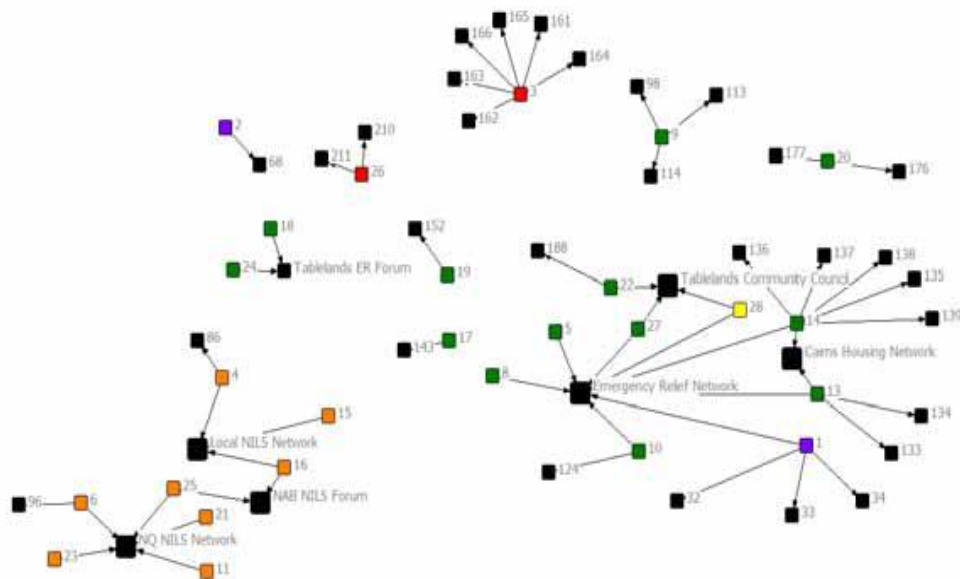
While this research supports the needs for greater service integration, it is clear that this is not always best facilitated through formal partnerships, and if these partnerships are developed they must be purposeful and bespoke for local community needs. The research also highlights that in a largely voluntary sector, such as the emergency relief sector, the resources required to enable these networks are currently insufficient for formal partnerships.

Recommendation 5: DSS supports and resources the development of service networks.

2.4 What elements would need to be present to ensure a hub model is successful in your community? What additional support would you need to establish a hub in your community?

As discussed previously, ‘hub’ models can be an effective way to better integrate services; however at the core of service integration is relationships. Co-located services that do not have a clear and demonstrated need to work together are merely sharing space. For a hub model to work, community engagement approaches must be embedded, and support must be supplied to enable this. Sufficient support is also required for volunteers,¹¹ both to enable the development and maintenance of networks and to prevent unfair expectations on volunteers to provide a level of service expected from paid staff.

Map 2: Cairns formal networks



2.6 How could Australian Government funding be used differently to better support integration of FWC services?

This has been discussed previously. While “around 70 per cent of FWC services currently offer only a single FWC service to their clients”¹³ this does not mean they are not integrated with other services.

Recommendation 6: DSS review the recommendations as outlined in ‘Collaborating for Outcomes’ as a means to develop greater service integration. This includes:

- Providing resources explicitly for networking. This can be done at the government level (federal, state or local), or the organisational level.
- Ensuring a locality has a mixture of small and large service providers, who will build and contribute to the network in different ways.
- Up-skilling Centrelink and local government workers to play a role in connecting local service networks.
- Creating working conditions that will support workers to stay in their jobs and/or the sector. This can be done at the organisational level, but is likely to require additional resources from governments
- Co-location will not automatically produce links within networks, and can be expensive.¹⁴

3. Strategies to support client outcomes

3.1 What strategies can you utilise to support a client to improve their financial and/or employment outcomes?

The reality is that for people on low-income or who are reliant on Centrelink payments, access to Emergency Relief becomes a critical part of their capacity to make ends meet.

Until Income Support payments are at a level sufficient for people to live a life with dignity, there will always be demand for services. There are times when there is simply not enough money to make ends meet and to stabilise a crisis situation in order to rebuild.

However, building people's financial capability is an important way to protect them against financial shocks, and to ensure that people with fewer resources can make the best use of them. Integrated, community-based and community-led financial capability programs that provide contextualized, relevant and practical financial information and support work well in doing this. These programs need to be well supported, however, by access to fair financial services such as microfinance and need to be resourced appropriately.

3.2 How does your service currently deal with clients who present to your service on multiple occasions? At what point should additional support and requirements apply to repeat ER clients? What form should this take? What barriers do you see in implementing these requirements with your clients? What support would you need to implement such a proposal?

Program staff do their best, in a very limited space of time and in the context of increasing demand, to provide clients with the tools necessary to avoid financial issues from reoccurring. While realistically there will always be a small cohort of people who experience multiple and complex challenges that will continue to access the service, the ultimate outcome after support would be people have the capacity to manage similar challenges into the future.

From an ER perspective, as aforementioned volunteers cannot be expected to deal with all of the multiple and complex issues that relate to barriers to employment; however they are well placed, and do, provide information about budgeting and financial literacy. Higher levels of funding are the only realistic way to deliver on all of these outcomes.

Recommendation 7: DSS reconsider including employment conversations in FWC program,s where the client has not raised this as an area in which they need support.

3.3 How can DSS better support early intervention and prevention opportunities?

The restrictions to service directly counter efforts to provide early intervention and prevention opportunities. This is consistent to an extent with changes in Victorian state funding of financial counselling services, in which the Community Development aspects of the roles was removed.

It is understandable in times of excess demand to ensure those most at need receive the service required, and as such we do not object *per se*, to specific services being targeted. However this has led to a large gap in early intervention and prevention. We would recommend that specific early intervention services, such as Firmer Foundations, be funded as outlined below. These services are also extremely useful as a value add to ‘crisis’ services such as financial counselling and emergency relief. Programs such as these result in fewer people needing ongoing support and help break the cycle of repeat usage. While not it’s primary focus, these programs are also effective at supporting people into paid employment.

Prevention and early intervention - Firmer Foundations

Since 2013, Good Shepherd Australia New Zealand’s Firmer Foundations has successfully supported more than 300 women and over 250 children in Victoria to improve their financial independence through a range of comprehensive and holistic program components. These components adopt an ‘ecological’ view of financial wellbeing which recognises the multi-faceted nature of the challenges and responses; building women’s financial literacy, financial capability, and financial confidence to improve women’s financial wellbeing. It adopts the latest practice frameworks including GSA NZ’s unique Family Violence Informed practice and Financial Capability Coaching.

The program components are:

- **Group-work** - Financial capability coaching in a group setting, utilises peer support and shared experience, and focusses on money and finance as part of a whole of life approach.
- **Social capital development** - The creation of peer networks and bridging social capital builds positive social capital, which is essential to long-term financial resilience.*
- **Individual financial capability coaching** - Initial assessment and individual financial capability coaching is offered to help women set and achieve their own financial goals.
- **Workshops** - Particular financial challenges for participants are addressed with through specifically tailored workshops.

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The outcome of actions taken is measured through quarterly online surveys and through ongoing programmatic data collection. This data is collected at the beginning and end of the support to track the impacts of the program including:

- increased personal wellbeing
- increased financial wellbeing
- improved respectful financial relationships
- increased income and savings
- greater ability to manage debt and credit
- increased money management skills and knowledge
- participants working and/or studying and/or volunteering.

Each of these elements has been trialled, independently evaluated by Lirata and Associates and refined over the past three years based on client, coach and external stakeholder feedback, and by assessing the women's outcomes. A snapshot of these outcomes is listed below.

As a result of participating in Firmer Foundations:

- 84% of clients knew where to go for money questions
- 90% of clients report gaining new skills
- 76 % of clients report increased confidence in managing money
- 80 % of clients report increased confidence to take action

For more information on the program and its outcomes please go to: [Quietly Changing Lives: Summary Report for the Firmer Foundations Evaluation.](#)

Recommendation 8: DSS, State and Local government invest in Firmer Foundations as an early intervention and post-crisis program.

4. Strategies to build a strong workforce

4.1 Do ER and CFC/FC workers need to build capacity? If so, how might this be done?

Membership requirements for financial counsellors are such that high levels of professional development and professional supervision are built into their roles. From that perspective, the sector is professionalised and very skilful.

While GSANZ does not have CFC workers, we offer a related program in *Firmer Foundations*, so will comment in that regards.

The evaluation of Firmer Foundations highlights the strengths in the innovative approaches used in working with people to build their financial capability and wellbeing. Resources could be directed to supporting the sector in these areas of emerging focus. In particular, family violence, coaching methods, strengths-based practice, and other innovative ways to support long term financial wellbeing.

Family violence informed practice

Family Violence Informed Practice means applying the principles of family violence practice in non-family violence programs. This helps support women and girls who may have experienced family violence to access a level of support when they do not feel they can disclose their experiences of family violence. It is also to ensure that the safety of women and girls is addressed throughout all of our programs, to act as a buffer in order to help prevent family violence, or lessen its impacts if it does occur.

Family violence informed practice is a critical way of:

- addressing the needs of women who are experiencing or have experienced family violence but do not identify or wish to identify family violence as the issue
- developing programs that support in the prevention of family violence by understanding the drivers of family violence and addressing these in other contexts
- understanding the multi-faceted nature of family violence.

Principals of Family Violence Informed Practice are that it is:

- **Flexible:** Understanding that there are different points at which women will seek to connect or reconnect to support that are outside of the control of the service. There are also a variety of ways in which women will wish to seek support, and hence the delivery options for these women must be flexible (i.e. making use of technology, phone-based, individual support and group support).
- **Empowering:** Using a strength-based approach that focuses on women's existing capacity to problem solve. Coaching techniques are employed (in non-crisis situations) to support women navigate their own paths. Understanding and re-enforcing current strategies being used by women are harnessed.
- **Ecological:** Family violence is multi-layered. There are individual, social, cultural and systemic elements which needs to be addressed.

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- **Cyclical:** Family violence is cyclical and occurs in stages. A family violence informed approach understands the cyclical nature of violence and that different types of support are needed at different points in the family violence cycle.
- **Woman Centred:** The woman seeking the service is at the centre, her needs are articulated and her outcomes are focused upon.¹⁵

Financial Capability Coaching

Financial Capability Coaching is: “a process by which people determine their financial goals and the pathways and tools they need to achieve these goals. Coaching recognises that people are experts on themselves, their lives and the outcomes they are seeking, with a coach there to facilitate this process. Through the coaching process, people maintain ownership of their goals to create sustainable change and greater self-determination”¹⁶ (Good Shepherd Australia New Zealand, 2016).

It is:

1. A collaborative, supportive, non-judgemental relationship, with opportunities for long-term contact.
2. Experiential, action-orientated process, with a focus on behaviour change
3. Client strengths and personal resources intentionally identified and consistently affirmed
4. Client is not currently experiencing ‘crisis’, and is willing to focus on longer-term financial goals
5. Client directs goals and action plans, with coach’s support
6. Coach provides context of supportive accountability

Figure One: Difference between Coaching and other Supports¹⁷

ROLE	FINANCIAL COACHING	FINANCIAL COUNSELLING	FINANCIAL EDUCATION	FINANCIAL PLANNING
STARTING POINT	Person feels ready to make longer term plans. There is a minimum level of crisis or stress*	Person has a high level of financial stress. And complex financial challenges that require specialised support.*	Person seeking specific financial information.	Person is looking for specific financial advice. E.G. investments.

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ROLE	FINANCIAL COACHING	FINANCIAL COUNSELLING	FINANCIAL EDUCATION	FINANCIAL PLANNING
OBJECTIVE OF SESSIONS	Defined and led by the person being coached; with options explored by the person being coached.	Defined by both the person being counselled and the counsellor, with options provided by the counsellor and explored in partnership.	Needs identified by the person seeking information, educator led.	Person defines goals with planner defined plan.
DIALOGUE	Active listening and carefully directed questions to guide self-reflection. More relational .	More issue led. Tends to be more transactional .	Tends to be more didactic, led by set of topics. More one-way .	Analytical and technical. More prescriptive .
MONITORING	Follow up and support, client led, discussed in coaching sessions.	Follow up at times by counsellor, depending on situation.	Client chooses what to do with financial information.	Task oriented.
REFERRALS AND ADVOCACY	Client responsible for own advocacy. Referrals common but passive.	Referrals common and active; counsellor may take on advocacy role and mediate on behalf of client.	Referrals provided for additional information for client to act upon.	Provides tools and information for clients to act upon.

4.2 What 'tools' do you see as integral to the further development of FWC services in Australia?

As previously mentioned, it is critical to embrace new practice skills and models when working with people to improve their financial wellbeing. As a sector we need to be supported and developed in these areas.

5. Strategies to strengthen evidence, improve practice and measure outcomes

5.1 What do you see as the key issues involved in evaluating the FWC activity?

The key issues are those of resourcing. While it is critical to ensure robust evaluation frameworks are in place (of which there are many to choose), these need to account for:

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- The large demand (and unmet demand) for services that limits the time of practitioners to collect outcomes data
- The complexity of the client group and hence the challenges in identifying key, shared outcomes across programs that can be measured
- The continuing innovation in service delivery that requires outcomes measurement frameworks to be adaptable, whilst still allowing for consistent, longitudinal data collection.

The best ways around this are generally to:

- Collectively (with programs) develop program logics that articulate key activities and expected outcomes.
- Develop outcomes measurement plans that map how these outcomes might be measured.
- Prioritise the key 3-4 outcomes that can be measured across programs
- Develop strategies for data collection that complement practice
- Develop systems that support this data collection and reporting

This requires a specific skill set in the development and reporting which would require investment.

5.2 What would you like to see as the main focus of the evaluation?

It stands to reason that different program will have different intended outcomes.

For financial counselling, GSANZ's program logic (appendix 1) highlights:

- Service outcomes:
 - Number of debt waivers, payment plans, hardship provisions and other case outcomes
- Client outcomes:
 - Improvement in financial self-advocacy skills
 - Improvement in money management
 - Reduction in levels of financial stress

For programs such as FWC, the Firmer Foundations program logic (appendix 2) highlights:

- Women apply relevant knowledge to make positive changes to their financial situation
- Women apply relevant skills to make positive changes to their financial situation
- Women are confident to make positive changes to their financial situation
- Women demonstrate behaviours to improve their financial situations

Being clear on expected outcomes would help guide what the evaluation needs to focus on.

Conclusion

We understand the importance of ensuring people at most need receive a service. However, over prescription and further targeting of programs will potentially lead to higher demand, and could result in more people experiencing hardship.

Community organisations are well equipped to ensure that they provide the best support possible in a way that is relevant to their local community and we would commend the further resourcing of organisations to enable them to innovate in this regard.

We are happy to elaborate further if needed.

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