Submission to the:
Queensland Productivity Commission
Consultation Paper
Service delivery in remote and discrete Aboriginal
And Torres Strait Islander communities

Prepared by:
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1. About the Indigenous Consumer Assistance Network (ICAN)

The Indigenous Consumer Assistance Network (ICAN) is a not for profit organisation servicing Aboriginal and Torres Strait Islander peoples living in North Queensland and the Torres Strait. With the vision of “Empowering Indigenous Consumers”, the organisation provides financial counselling assistance to alleviate consumer detriment, education and training to make informed consumer choices and advocacy services to highlight and tackle Indigenous consumer disadvantage.

ICAN has extensive experience and a long history of providing financial counselling, capability, resilience and consumer advocacy support to Indigenous peoples in remote and discrete Aboriginal and Torres Strait Islander communities in Queensland since 2003 as a special project under the Aboriginal Co-ordinating Council (ACC) and the Kowanyama Aboriginal Shire Council, and as a company limited by guarantee, since 2007. ICAN has been working in partnership with the Queensland Office of Fair Trading, the Department of Communities, Child Safety and Disability Services and other state and federal consumer regulatory agencies, to provide: early intervention support through our Yarnin’ Money financial capability education program, crisis response financial counselling to natural disaster affected areas in Far North Queensland (2011-2013), and building local community capabilities across a number of financial inclusion and consumer assistance domains since 2003 (see Appendix A).

ICAN provides a number of services, funded through state, federal and industry funding:

- **Financial counselling**: Nine qualified financial counsellors, accredited with the Financial Counsellors’ Association of Queensland (FCAQ), servicing: Cairns Region, Townsville Region, Tablelands, Cape York and the Torres Strait;

- **Financial capability education and support services**: Yarnin’ Money – ICAN’s financial capability training program, delivered through a culture-centred training model, which recognises existing cultural worldviews and knowledge as the foundation to build new financial capability skills;

- **Indigenous Financial Counselling Mentorship Program (Diploma of Financial Counselling Training)**: to address the under-representation of Aboriginal and Torres Strait Islander peoples in the financial counselling & capability sector & raise the number of qualified and accredited Indigenous financial counsellors in Queensland and nationally. The program, having graduated 34 students from 2012-2016, commences its fourth national roll out in September 2017;

- **Coordinated Indigenous consumer support**: ICAN’s North Queensland Indigenous Consumer Taskforce, a collective impact approach to identify and address systemic consumer issues affecting Indigenous peoples in remote and discrete Aboriginal and Torres Strait Islander communities. In 2016 & 2017, the Taskforce worked with the Wujal Wujal and Yarrabah Aboriginal Shire communities to establish their “Do Not Knock-Informed” campaigns, with Wujal Wujal becoming Australia’s first ‘Do Not Knock’ town. Taskforce members include: ICAN, Queensland Office of Fair Trading, Australian Competition and Consumer Commission (ACCC), Australian Securities and Investments Commission (ASIC), Shelter Housing Action Cairns, Cairns Community Legal Centre and the Energy & Water Ombudsman Queensland (EWOQ).

We note the purpose of the QLD Productivity Commission’s Consultation paper is to seek information about a broad spectrum of investments into programs and services in remote and discrete Aboriginal and Torres Strait Islander communities. However, as an Indigenous consumer organisation specific to financial counselling, capability and training services (related to financial counselling and financial literacy education), ICAN has narrowed the scope of our responses to the sector / service provision in which we operate.
2. Submission – Service delivery to remote and discrete Aboriginal and Torres Strait Islander communities

(4) Service delivery to remote and discrete Aboriginal and Torres Strait Islander communities (Equity, Access to services)

Is it clear what outcome/objectives the service is trying to achieve?
Does the service use good practice? If so, how?
Is the service delivered to the right level and quality? How should that be determined?

Door-to-door trading and direct marketing has a long and pervasive history of detriment in remote Indigenous communities. Research has noted a history of deliberate and targeted methods by travelling door-to-door traders to prey on Indigenous peoples living remotely, where high pressure techniques have been used to sell goods and services\(^1\). While remote and discrete Aboriginal and Torres Strait Islander communities are small in population size, the impact of consumer and financial detriment on communities, has been profound. Below is an estimate of the value of identified consumer detriment specific to remote and discrete Aboriginal and Torres Strait Islander communities in the period 2006-2017 (specific to matters ICAN has identified and/or assisted with, via working with communities):

<table>
<thead>
<tr>
<th>Year</th>
<th>Trader (door-to-door, telemarketing or Cairns-based w/ impact in remote &amp; discrete Aboriginal and Torres Strait Islander communities)</th>
<th># of people affected</th>
<th>$ value of contract(s) of goods / services per unit</th>
<th>Estimated consumer and financial detriment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>Channic Pty Ltd(^2)</td>
<td>10 Indigenous witnesses in ASIC v Channic Pty Ltd</td>
<td>$13,000</td>
<td>$130,000</td>
</tr>
<tr>
<td>2016</td>
<td>Careers Australia(^3) (Diploma courses sold via door-to-door trading)</td>
<td>80 (identified by ICAN in the Yarrabah Aboriginal Community)</td>
<td>$8,000-10,000</td>
<td>$720,000</td>
</tr>
<tr>
<td>2016</td>
<td>Chrisco Hampers(^4)</td>
<td>Representative sample was consulted.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Matter arose from complaints by Palm Island residents. Palm Island residents (many whom were in receipt of a Centrelink benefit) complained to ICAN that they were experiencing ongoing financial hardship when Chrisco continued to take fortnightly payments, after they had paid in full for their goods. This system, titled “Head Start” required customers contact the company to opt-out of this arrangement, “in order to avoid having further payments automatically deducted by Chrisco after their lay-by had been paid for”(^5).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>Expression Sessions(^6)</td>
<td>Representative sample was consulted.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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2 Indigenous Consumer Assistance Network Submission to QPC Consultation Paper Service delivery in remote and discrete Aboriginal and Torres Strait Islander communities.
2015  John Hawash Motor Dealer

Representative sample was used. ICAN received complaints from: Yarrabah, Kowanyama, Pormpuraaw & NPA.

$5,000-$20,000

Large impact on most Cape York communities

2014  Titan Marketing

(First aid kits and other goods)

7,900

$400

$3.16M

2013  Excite Mobile

Debt collection letters sent to customers nationally incl. 'several North QLD communities targeted including Yarrabah & Kowanyama.

$2,500

$2.7M

2013  Rent The Roo Pty Ltd

Large impact in Yarrabah & Wujal Wujal Aboriginal communities

$3,000

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2012  Vacuum sales

(via door-to-door trading in the Yarrabah Aboriginal community)

36

(Matter identified from complaints via the Yarrabah Aboriginal Community)

$2,000

$72,000

2010  Fair Dinkum Rentals

(White goods rental sales via door-to-door trading)

800

$3,000

$2.4M

2009  Love Springs

(Door-to-door water cooler sales; enforcement action)

Representative sample was used. (Matter identified from complaints via the)

$1,100

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7 Chief Executive, Department of Justice and Attorney General v Hawash [2015] QCAT 111 (13 April 2015).
10 Australian Competition and Consumer Commission v Excite Mobile Pty Ltd (No 2) (includes Corrigendum dated 23 December 2013) [2013] FCA 1267 (23 December 2013).

3 Indigenous Consumer Assistance Network
Submission to QPC Consultation Paper
Service delivery in remote and discrete Aboriginal and Torres Strait Islander communities
In response to the complex financial and consumer issues being experienced in North Queensland, ICAN has been delivering financial counselling and capability services to remote and discrete Aboriginal and Torres Strait Islander communities for fourteen years. Generally, there are no financial counselling positions funded for service delivery at a local level, in remote and discrete Aboriginal and Torres Strait Islander communities. ICAN operates in this service gap, providing necessary financial counselling and capability support via face-to-face, regular outreach and telephone counselling services. Queensland government funding for financial counselling and consumer services has been sporadic, with funding historically directed towards financial counselling as a crisis response measure to natural disasters. Despite historically limited funding for financial counselling more broadly, ICAN achieves its objectives and outcomes of: “Empowering Indigenous Consumers by providing financial counselling assistance to alleviate consumer detriment, education to make informed consumer choices and research/advocacy to highlight consumer disadvantage”\textsuperscript{23}, by working closely with remote and discrete Aboriginal and Torres Strait Islander communities in the following areas;

The extent to which a financial counselling organisation can deliver effective services depends on a number of factors including its reach and relationship with the community it serves, and the professional quality of its practice. ICAN enjoys a fourteen-year relationship with remote and discrete Aboriginal and Torres Strait Islander communities, having provided financial counselling to

<table>
<thead>
<tr>
<th>Year</th>
<th>Organisation</th>
<th>Outcome Description</th>
<th>Financial Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>VIPTel / EDirect Pty Ltd\textsuperscript{18,19}</td>
<td>58 ‘No coverage’ customers in remote &amp; discrete QLD communities\textsuperscript{20}. Matter arose via community complaints to ICAN, provided to the ACCC.</td>
<td>$1,000 $58,000</td>
</tr>
<tr>
<td>2002-2006</td>
<td>Townsville 4-Wheel Drive, United Financial Services\textsuperscript{21,22}</td>
<td>National impact, matter arose from initial complaints via Wujal Wujal, Pormpuraaw and Northern Peninsula Area (NPA).</td>
<td>$10,000-20,000 $2.7M (QLD Indigenous communities) $5.2M (National impact)</td>
</tr>
</tbody>
</table>

TOTAL: $11.94 M (Known impact of consumer detriment)

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Indigenous Consumer Assistance Network Submission to QPC Consultation Paper Service delivery in remote and discrete Aboriginal and Torres Strait Islander communities
the communities since 2003 under the ‘Consumer Affairs Unit’ under the Aboriginal Co-ordinating Council, and as a special project under the Kowanyama Aboriginal Shire Council before becoming a not-for-profit company limited by guarantee.

ICAN’s financial counselling & capability services:

- Delivers services to North Queensland, Far North Queensland including Cape York and the Torres Strait;
- Identify individual and systemic consumer issues affecting remote and discrete Aboriginal and Torres Strait Islander communities;
- Yarnin’ Money\textsuperscript{24,25}, a financial literacy/capability training program developed and delivered by ICAN to remote and discrete Aboriginal and Torres Strait Islander communities in Queensland;
- ICAN services align closely with, and serves as a liaison point to related government services such as the Queensland Office of Fair Trading, where services may be difficult to access at a local level.

The organisation works with local people and communities, and the broader financial and consumer regulatory system to achieve individual and community level outcomes. ICAN financial counsellors identify systemic consumer issues affecting individuals and communities and brings these matters to the appropriate state and federal consumer regulatory bodies, such as the Queensland Office of Fair Trading (OFT), the Australian Competition and Consumer Commission (ACCC) and the Australian Securities and investments Commission (ASIC). Over ICAN’s fourteen years of service delivery, enforcement action has been taken against a number of traders, where ICAN and local remote and discrete Aboriginal and Torres Strait Islander communities have worked together to identify the systemic consumer issues, gathered evidence required and worked with the appropriate regulators to bring the enforcement action. Between the period of 2013-2017, six significant matters have been identified and resulted in enforcement action against traders, resulting in financial savings or benefit to remote and discrete Aboriginal and Torres Strait Islander communities (See p. 10 for list).

In line with ‘Good practice service delivery’ items identified in the consultation paper (p. 10), ICAN utilises a community development approach when working with remote and discrete Aboriginal and Torres Strait Islander communities, to develop local capacities and capabilities. It does so via two avenues:

1) A focus on local employment. \textit{Where funding permitted}, ICAN delivered placed-based services in: Yarrabah, Palm Island & Thursday Island:

- From 2008-2014, ICAN delivered a place-based Money Management Program (MMP) in the Yarrabah and Palm Island Aboriginal communities. ICAN employed local community residents to deliver a suite of services under the MMP, including: financial counselling, consumer advocacy, Tax-Help, financial literacy workshops and the “No Interest Loans Scheme” (NILS).

- From 2010-2012, ICAN delivered a placed-based financial counselling and No Interest Loans (NILS) program on Thursday Island. In partnership with the Mura Kosker Women’s Sorority, ICAN employed two local staff to deliver services to Thursday Island, the Northern Peninsula Area and the outer Torres Strait Islands.


2) Developing local capacities and capabilities via a community development model to service delivery; Diploma level training (through the Diploma of Financial Counselling) for Aboriginal and Torres Strait Islander peoples working in the financial counselling/capability sector, seeking to become qualified and accredited financial counsellors.

- ICAN’s ‘Indigenous Financial Counselling Mentorship Program’ has become a best practice model for training Aboriginal and Torres Strait Islander peoples seeking to become qualified and accredited financial counsellors in line with the national standards for practice, by embedding Indigenous perspectives into a mainstream training framework while simultaneously providing a unique model of personal and academic mentorship.

![Figure 1: Mentorship Program theory of change, based on a community development approach](image)

In seeking to build local capabilities in remote and discrete Aboriginal and Torres Strait Islander communities, all persons employed by ICAN in Yarrabah, Palm Island and Thursday Island undertook their Diploma of Financial Counselling via ICAN’s “Indigenous Financial Counselling Mentorship Program.” In a blended learning model which provides face-to-face and online learning opportunities, locally employed staff are able to travel to Cairns for 6 x week-long face-to-face block training sessions, with the aid of fully funded scholarships provided by the Commonwealth Bank and travel assistance via AbStudy.

To date, ICAN has delivered three Mentorship Programs, graduating 34 Aboriginal and Torres Strait Islander peoples with their Diploma of Financial Counselling, contributing to a significant increase in the number of qualified, practicing Indigenous financial counsellors in Queensland and nationally. The first training delivery was held in 2011-2012 and was dedicated to the professional development of ICAN’s internal staff across four locations: Cairns, Thursday Island (in the Torres Strait) and the Yarrabah and Palm Island Aboriginal communities in North Queensland (See Appendix A – Building financial inclusion in Queensland).
<table>
<thead>
<tr>
<th>Year</th>
<th># of Graduates</th>
<th>Location of student graduate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012</td>
<td>9</td>
<td>Yarrabah (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Palm Island (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Thursday Island (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cairns (QLD)</td>
</tr>
<tr>
<td>2014</td>
<td>10</td>
<td>Cairns (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Yarrabah (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Port Augusta (SA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Derby (WA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Penrith, Western Sydney</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Alice Springs (NT)</td>
</tr>
<tr>
<td>2016</td>
<td>15</td>
<td>Mornington Island (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Cairns (QLD)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Kempsey (NSW)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Melbourne (VIC)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Darwin (NT)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Alice Springs (NT)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Port Augusta (SA)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ceduna (SA)</td>
</tr>
</tbody>
</table>

*Figure 2: Mentorship Program Indigenous graduates, by geographic location*

**Is the service delivered to the right level and quality? How should that be determined?**

The level of service delivery to remote and discrete Aboriginal and Torres Strait Islander communities will largely be determined by the amount of funding provided to deliver that service. Funding can hamper whether or not a service is able to employ locally, where local capabilities can be developed to deliver place-based financial counselling.

Financial counselling and capability services have a unique opportunity to prosper and be embedded into remote and discrete Aboriginal and Torres Strait Islander communities, because consumer and financial issues affect all communities. Regular financial counselling outreach can be effective if ongoing travel funding is adequate to meet the needs of communities. However, financial counselling and capability services compete against larger community priorities such as housing, and other infrastructure or development issues.
Coordinating service delivery

| Are there examples of... service gaps in remote and discrete communities? |
| What could be done to improve coordination? |
| Are there examples where coordination is done well? If so, how? |
| Is there anything else you would like to tell us that you think is important about service delivery coordination? Please expand. |

Generally, there are no financial counselling positions funded for service delivery at a local level, in remote and discrete Aboriginal and Torres Strait Islander communities. This translates to local communities not being equipped to meet their own issues in the consumer and financial space, as they occur.

With the exception of rural financial counselling (specific to the needs of the rural farming community), Queensland government funding for financial counselling and consumer services has been sporadic, with funding historically directed towards financial counselling as a crisis response measure to natural disasters. ICAN is not aware of disaster relief financial counselling assistance funding being diverted towards local, place-based financial counselling delivery within remote and discrete Aboriginal and Torres Strait Islander communities. ICAN operates in this service gap, providing necessary financial counselling and capability support via face-to-face, regular outreach and telephone counselling services.

**NQ Indigenous Consumer Taskforce (Example of coordination done well)**

In order to effectively address systemic consumer detriment arising from remote and discrete Aboriginal Aboriginal and Torres Strait Islander communities, ICAN has developed a coordinated service delivery approach with consumer regulatory bodies operating at state and federal levels. The NQ Indigenous Consumer Taskforce is a community driven partnership between government consumer regulatory bodies, external dispute resolution schemes and financial counselling and community legal services throughout North Queensland. The concept for the Taskforce was developed and is administered by the Indigenous Consumer Assistance Network (ICAN) with the vision of improving inter-agency communication and increasing collective action to reduce consumer exploitation; empowering Indigenous consumers from Townsville to the Torres Strait Islands.

A collective impact approach can be an effective way to coordinate service delivery, in order to identify and address systemic issues being experienced by remote and discrete Aboriginal and Torres Strait Islander communities. In response to the complex financial and consumer issues being experienced in North Queensland, ICAN, state and national consumer regulatory bodies ACCC, Australian Securities and Investments Commission (ASIC), the Queensland Office of Fair Trading and the Energy & Water Ombudsman Queensland (EWOQ), formed the North Queensland Indigenous Consumer Taskforce in 2014. The Taskforce utilises a collaborative framework, involving Indigenous communities, community services organisations, and government regulatory bodies, to address systemic civil law issues at a regional level in innovative ways with Indigenous input at grassroots (community) and organisational and regulator levels.

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8 Indigenous Consumer Assistance Network Submission to QPC Consultation Paper Service delivery in remote and discrete Aboriginal and Torres Strait Islander communities
On April 22, 2016, Wujal Wujal and the Taskforce launched Australia’s first “Do Not Knock-Informed” initiative to assist local community people to combat consumer exploitation occurring via Door-to-Door trading.\(^{27,28}\)

On May 9, 2017, the Taskforce worked with the Yarrabah Aboriginal community to launch their “Do Not Knock-Informed” campaign, placing signage at the entrance of the community. The Yarrabah Do Not Knock initiative marks the second campaign in Australia.

Under the “Do Not Knock Town” initiatives in Wujal Wujal and Yarrabah, signage was placed at the entrances into the discrete Aboriginal communities, reminding door-to-door traders they have legal obligations to consumers and cannot approach houses displaying do-not-knock notices. It is also hoped that the signage helps to empower Wujal Wujal and Yarrabah residents to understand and assert their rights under Australian Consumer Law.

The Taskforce allows ICAN and consumer regulators to review and respond to systemic consumer issues affecting Indigenous peoples, pool resources across agencies to achieve better outcomes for Indigenous consumers, and importantly, presents a unique opportunity for a multi-jurisdictional approach to resolving consumer matters (often unique to Indigenous communities).

Importantly, it facilitates opportunities in the following areas, which go beyond identifying and addressing systemic consumer issues affecting remote and discrete Aboriginal and Torres Strait Islander communities alone, to be the platform for:

- Knowledge exchange and transfer in two-way process, between communities and regulators, and equally between regulators and communities;
- Regulators meet and discuss how best to collaboratively tackle systemic consumer issues, and how each jurisdiction can/may best assist;
- Increases regulator presence in remote Aboriginal and Torres Strait Islander communities, where none may have previously existed;
- Provides alternate ‘access to justice’ pathways for Indigenous consumers to access appropriate and quality support;
- Consumer cases (systemic or individual) are handled by regulators in a timely manner, where case progress is regularly reported back to the Taskforce;
- Financial counsellors (ICAN and other participating community services organisations) are able to seek direct advice from decision-makers within consumer regulatory bodies on how best to handle cases, or where cases will then be managed by one or several regulators, with additional support by financial counsellors for ongoing client data collection/management;

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• Direct partnerships between regulators and remote Aboriginal and Torres Strait Islander communities (See: Wujal Wujal Do Not Knock Town initiative).

The matters arising via and/or with Taskforce activity, which have brought financial savings and benefits to Indigenous communities include:

<table>
<thead>
<tr>
<th>Year</th>
<th>Consumer matter &amp; Enforcement action</th>
<th>Who involved?</th>
<th>Financial Savings or Benefit to community</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>Queensland car yard lender ordered to pay over $1.2 million after breaching consumer credit laws.²⁹</td>
<td>ICAN, ASIC &amp; the Yarrabah Aboriginal Community</td>
<td>Contracts cancelled</td>
</tr>
<tr>
<td>2016</td>
<td>Chrisco ordered to pay $200,000 penalty for making a false or misleading lay-by representation.³⁰</td>
<td>ICAN, ACCC &amp; the Palm Island Aboriginal Community</td>
<td>Contracts cancelled</td>
</tr>
<tr>
<td></td>
<td>Careers Australia undertakes to repay Commonwealth for VET FEE-HELP diploma courses.³¹</td>
<td>ICAN, ACCC &amp; the Yarrabah Aboriginal Community</td>
<td>Courses cancelled, ATO debt(s) waived</td>
</tr>
<tr>
<td></td>
<td>Motor dealer license revoked by Queensland Civil and Administrative Tribunal (QCAT) for failing to provide contracts and adhere to cooling off notices and statutory warranties.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td>Titan Marketing to pay $750,000 for unconscionable conduct and false and misleading representations.³³</td>
<td>ICAN, ACCC, Queensland Office of Fair Trading &amp; several Cape York Aboriginal communities</td>
<td>Contracts cancelled</td>
</tr>
<tr>
<td>2013</td>
<td>Court orders Excite Mobile to pay $455,000 for engaging in false, misleading and unconscionable conduct.³⁴</td>
<td>ICAN, ACCC, Kowanyama &amp; Yarrabah Aboriginal communities</td>
<td>Contracts cancelled</td>
</tr>
</tbody>
</table>


³² [7] Ibid.


10 Indigenous Consumer Assistance Network Submission to QPC Consultation Paper Service delivery in remote and discrete Aboriginal and Torres Strait Islander communities
What could be done to improve coordination?

The efforts and outcomes of the QN Indigenous Consumer Taskforce fill a service gap in remote and discrete Aboriginal and Torres Strait Islander communities, yet remains an unfunded initiative, relying on in-kind contributions of the consortium. The QN Indigenous Consumer Taskforce could increase its reach and impact in the following ways:

- Administrative funding for the QN Indigenous Consumer Taskforce can aid the consortium to: provide a communications strategy to highlight Taskforce activities; allow for local organisations operating in remote and discrete Aboriginal and Torres Strait Islander communities to join the Taskforce in order to further identify and address systemic consumer and financial detriment often specific to Indigenous communities;

- Evaluation (as a separate, funded activity) of Taskforce initiatives, to provide an evidence base for the North Queensland Indigenous Consumer Taskforce as best practice and assist in the development of Taskforce initiatives in new regions.

(6) Funding arrangements

For Indigenous organisations, is the current level of flexibility and control over spending appropriate? If not, why and what reforms should be considered?
Is there anything else you want to tell us that you think is important about the funding arrangements? Please expand.

- When funding is delivered to financial counselling to service a range of geographical areas, it may be limited by being delivered as a ‘one size fits all’ (ie. Funding amount to cover a large geographical area specific to remote and discrete Aboriginal and Torres Strait Islander communities, may be the same funding level as delivering the same service to a densely populated urban centre. The one size fits all funding model may not recognise the additional costs (ie. travel) of delivering quality services to remote and discrete Aboriginal and Torres Strait Islander communities;

- The above may limit a service’s ability to align with ‘Good practice service delivery – perspectives on what works’ outlined in the consultation paper36 such as utilising a community development approach to delivering services, which focuses on local employment and building local capabilities and capacities in remote and discrete Aboriginal and Torres Strait Islander communities (ie. where funding may not be provided to employ locally, build local capability to deliver the service);

- Reporting requirements have a focus on service delivery, including service delivery hours, where there is also contractual obligation for meeting compliance activities, that aren’t recognised as billable service delivery hours. This means a percentage of meeting these compliance requirements become funded by the service organisation itself, and is not covered under the funding agreement. This issue impacts upon smaller not-for-profit organisations more than their larger counterparts.

Developing an evaluation framework

Do the current reporting requirements associated with grant programs provide useful information to policy makers, service providers and communities? If no, why?
What could be done to improve the culture of evaluation and make it more useful for driving improvements to service delivery?
What indicators should be used to measure progress in remote and discrete Aboriginal and Torres Strait Islander communities?
Is there anything else you want to tell us that you think is important about evaluation? Please expand.

Reporting requirements which focus on output reporting, do not provide the information required to report on the outcomes or longer-term impact achieved by an organisation. Additionally, reporting requirements which focus on capturing the number of minutes spent with a client may account for ‘Service Hour’ reporting, but does not account for the quality and level of a service provided.

ICAN recognised the need to evaluate its place-based financial capability program in the Yarrabah and Palm Island communities\(^\text{37}\), focusing on four indicators of financial capability:

- Managing money (the ability to live within one’s means)
- Planning ahead (in order to deal with unexpected events and provide for the
- Making choices (being aware of available financial products and choose them appropriately)
- Getting help (individuals gathering information for themselves and also using third parties).

Measuring the progress of a financial counselling intervention can be determined by how well a financial counselling service has been able to effectively address issues which have placed a client into financial hardship or crisis, and how these services lead to outcomes and impact for individuals, families and communities.

The former Australian Social Inclusion Board\(^\text{38}\) look to the building blocks of financial capability:

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Indicators used to measure progress should incorporate the inputs / interventions of the services provided, the effectiveness of those services, as well as structural factors impacting upon the overall financial wellbeing\(^{39}\) of remote and discrete Aboriginal and Torres Strait Islander communities (ie. limited / low incomes; access to financial services, basic banking services, financial counselling & capability services, government services, and geographic and cultural barriers to access) to create a balanced understanding of how organisations and communities strive towards building financial capability within context and structural constraints\(^{40}\).

Government funding can be directed towards evaluative activities by recognising evaluation as a separate and additional funded activity. Agencies can work towards continuous quality improvement of services when evaluative requirements are built into funding agreements at the onset. If there is both investment and interest by government in reporting on outcomes and impact, agencies and government can work on these activities in partnership. Government can assist service providers to report on outcomes and impact by investing in developing a reporting framework captures relevant outcomes over outputs. This kind of reporting framework can assist government to justify further investment into financial counselling and capability services that are embedded into service delivery to remote and discrete Aboriginal and Torres Strait Islander communities.

\[\text{Above: Financial capability continuum, ASIB 2013}\]

ASIB\(^{41}\) provides a framework for understanding the continuum of financial capability, from ‘crisis’ to ‘thriving’ which can be incorporated into a reporting framework for financial counselling services. Additionally, a reporting framework which recognises the value of consumer activity measurement throughout the consumer lifecycle can provide a better measure of the effectiveness of early intervention and advocacy actions. Measures could incorporate:

- Capturing front end education actions that improve consumer knowledge and assist in empowering Indigenous peoples to understand and exercise their consumer rights;
- Capturing the process of how communities, organisations and regulators work together to mitigate unscrupulous trader activity and its impact on the overall financial wellbeing of remote and discrete Aboriginal and Torres Strait Islander communities.


Appendix A: ICAN – Financial inclusion service provision to remote and discrete Aboriginal and Torres Strait Islander communities in Queensland

ICAN - Building Queensland through financial inclusion initiatives

2003 - Present
- ICAN graduates local people through the Diploma of Financial Counselling
- Financial capability/literacy training delivered including Yarnin’ Money
- Financial counselling services provided across North QLD & Torres Strait
- Australia’s first “Do Not Knock” town, NQ Taskforce/ Wujal Wujal partnership
- ICAN receives QLD Dept of Communities Community Recovery Program funding to provide an immediate financial counselling response to Cyclone Yasi affected Cassowary Coast communities

ICAN No Interest Loans Program (NILS)
2009 - Present (Yarrabah & Palm Island)
2010 - 2012 (Torres Strait Islands & NPA - Cape York)
Member of the FNQ NILS Network

North Queensland Indigenous Consumer Taskforce
ICAN developed a collective impact approach to identify and address systemic consumer issues in QLD.
Members: ICAN, SHAC, CCIC, EWOO, QLD OFT, ACCC & ASIC
17 systemic matters/enforcement actions taken by regulators

ICAN’s network comprises local, state and national partnerships with: government, community services organisations, consumer regulatory bodies, financial services, financial counselling associations and ombudsman schemes in order to provide quality financial counselling, capability and resilience services.

2005 - QLD Fair Trading Consumer Protection Award
2007 - QLD Minister’s Award for Excellence & Consumer Advocacy
2009 - Finalist, QLD Reconciliation Business Awards (Partnership)
2012 - Highly Commended Award, Money Smart Week