

# Standards for agencies employing financial counsellors

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financial  
counselling  
australia



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## About Financial Counselling

Financial counsellors assist consumers in financial difficulty. They provide information, support and advocacy to help consumers deal with their immediate financial situation and minimise the risk of future financial problems. The majority of financial counsellors work in community organisations, although some are employed by government. Their services are free, confidential and impartial.

Financial counsellors have extensive knowledge in a range of areas including consumer credit law, debt enforcement practices, the bankruptcy regime, industry hardship policies and government concession frameworks. Financial counsellors also have training in counselling skills.

## How Does a Financial Counsellor Assist a Client?

Financial counsellors assist their clients to get a clear picture of their overall financial situation. They will listen to their client's story, providing support as necessary and explain the various options open to the client. For example, this could include:

- assessing whether any debts are legally owed, if the amount said to be owing is correct or whether the contract was fair
- explaining what options clients may have in relation to their debts, weighing up the pros and cons of each option
- providing assistance in completing documentation, for example, in lodging a dispute with an external dispute resolution scheme
- empowering the client to negotiate or advocate with creditors and others on their own behalf, or negotiating and/or advocating on behalf of the client
- developing a budget
- providing ongoing support and referral to other services, for example legal services, No Interest Loan Scheme providers, health or housing services, that may also assist.

Financial counsellors aim to empower their clients so that they make their own informed choices. Their services are free, independent, confidential and non-judgmental.

Financial counsellors also work to prevent financial difficulty through community education and by providing input to government and industry policy development processes.

## About State and Territory Financial Counselling Associations

There is a financial counselling association in each State and Territory in Australia. Amongst other things, a core role of these associations is to set standards for membership, including professional development and supervision requirements.

## About Financial Counselling Agencies

Many different agencies employ financial counsellors, ranging from large charities, to community legal centres to neighbourhood centres. The work of financial counsellors sometimes involves providing financial advice and engaging in credit activities,<sup>1</sup> both of which would normally require specific licences. Agencies employing financial counsellors are exempt from requirements to hold an Australian Financial Services Licence and an Australian Credit Licence, as long as the agency meets certain conditions.

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<sup>1</sup> See ASIC Regulatory Guide 203 'Do I need a credit licence' for examples of credit activities.

# INTRODUCTION

## Purpose

The purpose of these standards is to assist agencies offering financial counselling services to provide a high quality service.

The standards set out the essential requirements an agency should meet if it wishes to offer financial counselling services.

## Application

In this document “financial counselling services” means counselling and advocacy services provided predominantly for the purpose of assisting individuals who are in financial difficulty to address their current situation.

These guidelines apply to all agencies that provide free financial counselling services. A “free” financial counselling service is one where the client is not charged a fee to use the service.

In particular, the standards apply:

- To agencies offering generalist or specialist financial counselling services, such as gambling financial counselling
- Whether financial counselling is the only service provided by that agency or as part of a broader suite of services
- Whether the agency provides financial counselling through the use of paid staff, contractors or volunteers
- Whether the agency is a community based or a government service
- Whether the service is provided face-to-face, by telephone, by email or other electronic means, or by any other means.

## Why have these standards been developed?

The standards were produced based on feedback from the financial counselling sector about the need for workplace guidance to support financial counsellors in their roles.

## Benefits for Agencies

By adopting the standards, agencies employing financial counsellors will be demonstrating a commitment to high quality and consistent service delivery. The standards will also assist agencies in managing risk.

Funding for financial counselling services is not always adequate and varies between funding bodies. Separately, it is important to continue discussions with funders about funding levels overall so that adequate resourcing is provided to enable agencies to meet these standards.

## Status of the standards

Adoption of these standards by agencies is on a voluntary basis and we strongly encourage all agencies to adopt them as part of their normal quality frameworks.

The standards supplement any legal or regulatory obligations that an agency may have. However, we note that some funding bodies may require agencies to adopt these standards as a requirement in funding agreements.

## Accompanying Checklist

The standards are accompanied by a separate checklist. This has been prepared to assist agencies in assessing their compliance with the Standards. This checklist should be used each year to check for compliance with the Standards.

## Review Date

These standards will be reviewed three years after implementation. The review will be undertaken by FCA, in consultation with financial counsellors, financial counselling agencies, funders and regulators.

# STANDARD 1 KEY SERVICE FEATURES

## 1.1. Service is free to clients

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*The agency does not impose any fees or charges upon clients in relation to any aspect of the financial counselling service.*

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This will be achieved by:

- 1.1.1. Ensuring that the agency, and each person acting on its behalf, does not request or accept payment of any fees or charges by clients.

## 1.2. Service is free of conflict of interest

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*The agency ensures that financial counselling services are provided free of any conflict of interest.*

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This will be achieved by ensuring that:

- 1.2.1. The agency does not place itself in a position where a relationship with a third party could be seen to conflict with its obligation to provide independent financial counselling services to its clients.
- 1.2.2. The agency does not accept a client where the relationship between an individual staff member and a third party could be seen to conflict with the agency's obligation to provide independent financial counselling services to that client. Staff in the agency have a duty to disclose such conflicts.
- 1.2.3. The agency does not accept a client where the interests of an individual staff member could be seen to conflict with the agency's obligation to provide independent financial counselling services to that client.
- 1.2.4. The agency does not accept a new client where providing services to that client could conflict with its obligations to a previous or existing client.

### 1.3. Service is confidential

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*The agency ensures that it provides a confidential service and that it collects and stores client information in a manner that respects the client's privacy and maintains the client's confidentiality, subject to the agency's legal obligations (including under the Privacy Act 1988).*

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This will be achieved by:

- 1.3.1. Ensuring that clients waiting in reception areas cannot inadvertently access or see the personal information of other clients that may be collected at that point or is visible on computer screens.
- 1.3.2. Ensuring client interviews are able to be conducted without being overheard by other clients, staff or members of the public.
- 1.3.3. Ensuring client registers and client files are kept securely and are only accessed by staff members who have been authorised to do so.
- 1.3.4. Ensuring staff do not communicate about the client with a third party unless:
  - The client has authorised that communication, or
  - The appropriate supervisor in the service has authorised the communication due to the need to protect the client, a staff member or another person, from imminent risk of serious harm.
- 1.3.5. Informing the client why the collection of information is necessary, how that information is stored and for how long, and how the client can access the information if they wish.
- 1.3.6. Collecting only such personal information from clients as is necessary to assess the client's needs, provide financial counselling services and meet reporting requirements to funding bodies.
- 1.3.7. Ensuring that hard copy and electronic information is stored securely.



## 1.4. Service is accessible

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*The agency ensures that its services are accessible and welcoming to all clients, including people from culturally and linguistically diverse backgrounds, people with disabilities and other people with special needs.*

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This will be achieved by:

- 1.4.1. Providing a range of access options including telephone, office visit and, in appropriate circumstances or where required by funding agreements, broader access options including outreach services, video conferencing, Skype or web chat.
- 1.4.2. Ensuring interpreters are used where they are required.
- 1.4.3. Facilitating reasonable adjustments so that people with disabilities can access the service, for example by making appropriate changes to building access.
- 1.4.4. Ensuring reception areas provide a welcoming and comfortable environment.
- 1.4.5. Greeting clients in a courteous helpful manner that conveys respect.
- 1.4.6. Agreeing to clients' requests to have a support person present unless it is inappropriate, for example, where there may be a conflict of interest.

## 1.5. Service is equitable

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*The agency ensures that clients are treated in a fair and non-discriminatory manner.*

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This will be achieved by:

- 1.5.1. Ensuring all clients are treated with respect.
- 1.5.2. Ensuring staff are able to provide culturally appropriate services to Aboriginal and Torres Strait Islander clients and to clients from culturally and linguistically diverse backgrounds.
- 1.5.3. Ensuring staff have an understanding of how to work with clients with special needs, for example people affected by domestic violence, homelessness, mental health issues, or addiction.
- 1.5.4. Making reasonable adjustments to meet the special needs of clients.

## 1.6. Service complies with licensing relief

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*The agency ensures that it complies with the licensing relief for the agency, under both the Corporations Act 2001 (ASIC Class Order CO3/1063) and the National Consumer Credit Protection Regulations 2010 (Regulation 20).*

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This will be achieved by ensuring that the agency:<sup>1</sup>

- 1.6.1.** Does not charge any fees or receive any remuneration arising from the financial counselling service.
- 1.6.2.** Does not run, and is not associated with, a financial services business.
- 1.6.3.** Ensures its financial counselling staff do not provide any financial product advice or credit activity advice outside the terms of the appropriate licensing exemptions.
- 1.6.4.** Ensures its financial counsellors are members of, or eligible for membership of, the relevant State or Territory financial counselling association.
- 1.6.5.** Ensures its financial counsellors have adequate skills and knowledge to deliver the financial counselling service.

## 1.7. Service complies with Code of Ethical Practice

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*The agency ensures that the financial counsellors employed comply with the Australian Financial Counselling Code of Ethical Practice.*

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This will be achieved by ensuring that:

- 1.7.1.** The financial counsellor has a hard copy of the Code or the agency makes an electronic copy of the Code available.<sup>2</sup>
- 1.7.2.** The financial counsellor has access to appropriate training about the Code.<sup>3</sup>
- 1.7.3.** If ethical dilemmas arise, that the Code is one mechanism used to help resolve them.

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1 This section essentially reflects the wording in the licensing relief for agencies offering financial counselling services: ASIC Class Order CO3/1063 re an Australian Financial Services Licence and s 20(5) of the National Consumer Credit Protection Regulations 2010 re a Credit Licence.

2 The Code is also available for download from the website of Financial Counselling Australia.

3 This could for example be provided in-house. FCA is also planning to develop online training modules based on the Code of Ethical Practice in the future.

## **1.8. Service integrates casework with policy and systemic advocacy**

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*The agency ensures that casework experience is used to inform its policy and advocacy activities and that of other advocacy bodies.*

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This will be achieved by:

- 1.8.1.** Encouraging and supporting financial counsellors to identify policy issues and advocacy opportunities arising from their casework.
- 1.8.2.** Encouraging and supporting financial counsellors, in ways consistent with the agencies own policies and practices, to contribute to policy development and advocacy opportunities with other organisations.

## STANDARD 2 CLIENTS: INTAKE, CASEWORK, REFERRAL AND COMPLAINT HANDLING

### 2.1. Use appropriate intake procedures

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*The agency uses a systematic and comprehensive intake procedure for all financial counselling clients that assesses the client's broader needs and ensures that financial counselling is offered only when it is the best option for the client.*

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This will be achieved by:

- 2.1.1. Having a documented process that describes how
  - clients' needs are assessed
  - clients' cases are prioritised, including identifying urgent matters and how they will be dealt with
  - services are matched to clients' needs
- 2.1.2. Ensuring staff inform the client about the services the agency is able to offer and support the client to make an informed choice about whether to participate in the service.
- 2.1.3. Ensuring staff refer the client for other services as appropriate to address broader needs.

### 2.2. Provide casework in a way that builds client capacity

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*The agency delivers a service that builds the capacity and self-sufficiency of the client in managing their current and future financial issues.*

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This will be achieved by ensuring:

- 2.2.1. The service maximises the client's participation in planning, decision-making and the resolution of issues, so that the client determines the course of action.
- 2.2.2. That staff assist the client to further understand the cause of their financial problems, identify changes to minimise further financial problems and build financial capability

## 2.3. Conduct casework according to good financial counselling practice

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*The agency ensures that the casework it conducts reflects good financial counselling practice.*

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This will be achieved by ensuring that:

- 2.3.1. The agency provides a range of resources and tools to assist staff to provide a service that reflects good financial counselling practice including triage tools<sup>4</sup> and checklists.
- 2.3.2. In each case, consideration is given as to whether the client is liable for the debts that are alleged to be owing, and if owing, whether the amount is correctly calculated.
- 2.3.3. The agency supports the financial counsellor to act as an advocate when negotiating with third parties.
- 2.3.4. Where appropriate, the agency works collaboratively with other support workers who are assisting the client.
- 2.3.5. The agency has procedures in place to deal with the situation where the client's ability to provide instructions is uncertain.
- 2.3.6. The service provided is within the confines of a financial counselling service and does not exceed it.
- 2.3.7. The agency has appropriate procedures in place to review the file work conducted by financial counsellors.

## 2.4. Provide appropriate referrals

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*The agency provides an effective referral service for clients who need other services in addition to financial counselling or where financial counselling is not the most appropriate service.*

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This will be achieved by:

- 2.4.1. Maintaining up to date information about legal, health, social and support services that are able to accept referrals.
- 2.4.2. Liaising with legal, health, social and support services to develop referral pathways to assist clients to access those services.
- 2.4.3. Using warm referrals to assist clients to contact other services in cases where that is necessary.<sup>5</sup>

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4 Triage refers to the process of obtaining information from the client in order to assess eligibility for the service, as well as the urgency of the matter.

5 A 'warm referral' occurs when the financial counselling service contacts the other service, for example to make an appointment. The service, with the client's consent, may also pass on any relevant information

## 2.5. Provide a complaint handling mechanism

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*The agency has an effective system for handling client complaints.*

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This will be achieved by:

- 2.5.1. Having a documented complaint handling process that is fair, accessible, responsive and efficient.<sup>6</sup>
- 2.5.2. Ensuring that clients are aware of their right to make a complaint and how to go about it.

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<sup>6</sup> See Commonwealth Ombudsman, 'Better Practice Guide to Complaint Handling' 2009 for a guide. Available at <http://www.ombudsman.gov.au/docs/better-practice-guides/onlineBetterPracticeGuide.pdf>

## STANDARD 3 HUMAN AND PHYSICAL RESOURCES

### 3.1. Engage qualified financial counsellors

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*The agency engages qualified financial counsellors who have appropriate training and experience or who, once employed, obtain the relevant qualification.*

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This will be achieved by ensuring that each staff member who provides financial counselling services for an agency:

- 3.1.1. Has undergone induction training with the agency.
- 3.1.2. Is a member of, or is eligible to be a member of, the financial counselling association in the state or territory in which the financial counsellor works.<sup>7</sup>
- 3.1.3. Holds a Diploma of Community Services (Financial Counselling) or is actively studying for this qualification.
- 3.1.4. Has the level of skills and knowledge sufficient to provide good quality financial counselling services having regard to the type of service that person provides and having regard to the level of financial counselling expertise and the level of professional supervision available to that person.
- 3.1.5. Is committed to offering services that are non-judgmental and in the best interests of the client and adequately understands both the personal and systemic causes of financial hardship and the impact financial difficulty can have on an individual's life.

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<sup>7</sup> The associations are: Financial Counselling Tasmania, Financial and Consumer Rights Council (the Victorian body), Financial Counsellors ACT, Financial Counsellors Association of NSW, Financial Counsellors Association of Queensland, Money Workers Association of the NT, Financial Counsellors Association of WA, South Australian Financial Counsellors Association.

### 3.2. Support professional development

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*The agency supports the professional development of financial counsellors who deliver services on its behalf. In particular the agency ensures that financial counsellors are provided with opportunities for ongoing professional development and professional networking.*

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This will be achieved by:

- 3.2.1.** Providing access to the necessary information resources so that financial counsellors can maintain and improve their skills and knowledge.
- 3.2.2.** Supporting financial counsellors to continue their professional development by encouraging their attendance at professional development seminars, courses, conferences and other events that meet the requirements for membership set by state and territory financial counselling bodies. This support should include release from usual duties to attend such events during ordinary working hours and payment of reasonable costs for such events.
- 3.2.3.** Supporting financial counsellors to participate in state and territory financial counselling bodies. This support should include supporting staff to attend professional development opportunities, professional networks or conferences organised by these bodies and, where appropriate, supporting staff to take up positions of responsibility within professional associations.
- 3.2.4.** Supporting financial counsellors to participate in reflective practice, including facilitating access to programs outside the agency.

### 3.3. Provide supervision

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*The agency provides adequate professional financial counselling supervision for financial counsellors and fosters a culture of reflective practice.*

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This will be achieved by:

- 3.3.1.** Providing professional supervision<sup>8</sup> which covers both technical (casework) and counselling skills to financial counsellors at the level required for membership of state and territory financial counselling bodies.
- 3.3.2.** Where such professional supervision is not available within the agency, covering the costs of establishing regular, ongoing, qualified external professional supervision relationships for financial counsellors working within the agency.<sup>9</sup>

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<sup>8</sup> Staff managing financial counsellors are sometimes described as providing 'supervision'. However this is a different use of the word and refers to the line management function.

<sup>9</sup> We note that some agencies have entered into arrangements with each other so that supervision is provided on a quid pro quo basis between them.



### **3.4. Provide adequate physical resources**

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*The agency ensures that financial counsellors have access to adequate physical resources in order to do their jobs.*

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This will be achieved by ensuring that each financial counsellor has adequate access to:

- 3.4.1.** A telephone
- 3.4.2.** A computer with access to the internet
- 3.4.3.** A scanner, photocopier and locked filing cabinet
- 3.4.4.** A space to interview clients that maintains privacy and confidentiality

## STANDARD 4 OCCUPATIONAL HEALTH AND SAFETY

### 4.1. Provide support to staff dealing with difficult clients

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*The agency provides professional and personal support to staff in dealing with difficult or aggressive clients.*

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This will be achieved by:

- 4.1.1. Ensuring there are policies, procedures and training in place to support staff in dealing with difficult client interactions
- 4.1.2. Providing regular opportunities for debriefing and, where necessary, critical incident debriefing

### 4.2. Provide a safe workplace<sup>10</sup>

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*The agency provides a physical environment that is healthy and safe and suitable for the requirements of financial counselling.*

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This will be achieved by:

- 4.2.1. Providing a safe physical environment. In particular, all areas used for contact with clients should be subject to a risk assessment, and appropriate steps taken to minimise or eliminate risks to safety, for example, due to aggressive behaviour by clients.
- 4.2.2. Each agency should ensure that they have policies and procedures that cover the safety and security of staff working outside of the office.

### 4.3. Ensure workloads are manageable and appropriate

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*The agency ensures that the workload of each staff member is manageable having regard to the level of skill, experience and any special employment arrangements for that staff member.*

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This will be achieved by:

- 4.3.1. Ensuring workloads generally, as well as caseloads specifically, are reasonable and established in consultation and negotiation with the financial counsellor.

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10 Agencies of course also have obligations under relevant workplace health and safety legislation.

## STANDARD 5 RECORD KEEPING

### 5.1. Maintain a client record system

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*The agency has in place a system for opening, maintaining and closing client files.*

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This will be achieved by agencies:

- 5.1.1. Opening a file for each client.
- 5.1.2. Maintaining a central record of each file opened that allocates a unique identifier such as a number, code or name to each file.
- 5.1.3. Maintaining an orderly system for the storage of files so that files can be easily located and retrieved.
- 5.1.4. Maintaining a diary or bring-up system to ensure that important dates and time limits are identified and that files receive regular attention.
- 5.1.5. Maintaining a system for the closure of files to ensure that files are reviewed prior to closure.
- 5.1.6. Notifying clients in writing that their file has been closed, explaining why the file has been closed, how the file will be stored and for how long, enclosing any relevant correspondence and confirming, where feasible, that creditors have been notified.
- 5.1.7. Where feasible, notifying creditors that the client's file has been closed, that the agency is no longer acting for the client and any third party authorities are revoked.
- 5.1.8. Maintaining an archiving system that allows closed files to be retrieved within a reasonable period of time.
- 5.1.9. Ensuring that records are kept for the period of time required by the legislation that applies to those records.

## 5.2. Keep complete and legible files

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*The agency keeps complete and legible records in relation to each matter where it provides financial counselling services.*

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This will be achieved by ensuring files contain:

- 5.2.1. All relevant information about the client, including their personal details and any special requirements.
- 5.2.2. All information relevant to the case, including information on the client's income, expenditure, assets, liabilities, numbers and ages of dependents and housing and any other data as required.
- 5.2.3. Copies only of all documents provided by the client, with the originals returned to the client.
- 5.2.4. Copies of authorities signed by the client to allow the agency to contact third parties on the client's behalf.
- 5.2.5. Copies of any signed instructions by the client in relation to the conduct of the matter, or notes of discussions with the client confirming their instructions.
- 5.2.6. Copies of all correspondence (including letters, emails, facsimiles) sent or received on behalf of the client.
- 5.2.7. Copies of all documents prepared for or on behalf of the client.
- 5.2.8. Notes made by the financial counsellor of all contacts with the client.
- 5.2.9. Notes made by the financial counsellor of all contacts made with third parties on behalf of the client.
- 5.2.10. Notes of any research conducted on behalf of the client.
- 5.2.11. Copies of any agency checklists or forms used on this file.

## STANDARD 6 ACCOUNTABILITY

### 6.1. Reporting to Funders

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*The agency fulfils the reporting requirements of its funders.*

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This will be achieved by ensuring that:

- 6.1.1. The agency submits reports to its funders in the required format and within the required time frames.
- 6.1.2. The agency advises funding bodies of any material changes to the organisation or service which may affect service delivery as soon as possible.<sup>11</sup>

### 6.2. Data collection and monitoring

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*The agency collects and monitors data so that it has an understanding of the effectiveness of its financial counselling services.*

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This will be achieved by ensuring that the agency collects and analyses information concerning:

- 6.2.1. The quality of the service delivered including, where appropriate, the results of file reviews.
- 6.2.2. The productivity of the service, including, where appropriate, the number of clients contacting the agency, the number of files opened, the number of files finalised, the time spent on each file.
- 6.2.3. Levels of unmet demand for the service.
- 6.2.4. Demographic information about the clients who use the service.
- 6.2.5. Feedback from clients about the service including, for example, follow-up client surveys after a file has been closed or client evaluation forms.
- 6.2.6. The outcome for the client as a result of service.
- 6.2.7. Systemic issues that are identified in the course of service delivery.

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<sup>11</sup> Examples of changes that may be material include: delivery locations, changes or loss of key personnel, changes to the organisation's constitution or governance impacting on the service.

### 6.3. Evaluation

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*The agency participates in evaluation concerning the effectiveness of its financial counselling services.*

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This will be achieved by:

- 6.3.1. Conducting evaluation on a regular basis concerning service design, delivery and outcomes, including consideration of effectiveness and efficiency.
- 6.3.2. Acting on relevant client feedback or other stakeholder feedback to change and improve service delivery.
- 6.3.3. Participating in external evaluations of the financial counselling sector more broadly, where appropriate.

## STANDARD 7 COMMUNITY DEVELOPMENT

### 7.1. Working with the community

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*The agency works with the community to actively represent the needs of people experiencing financial difficulties (where funding agreements permit this activity)*

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This will be achieved by ensuring that:

- 7.1.1. The service adopts a planned approach to working with the community based on the identified local, regional and state-wide community needs.
- 7.1.2. Strategies used in advocacy and community education about financial issues are appropriate for the purpose and the audience.

### 7.2. Building partnerships and networks to support service delivery

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*The agency builds strong partnerships and networks to support service delivery.*

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This will be achieved by ensuring that:

- 7.2.1. The agency participates in community networks and forums.
- 7.2.2. The agency targets its networking activities to those services that are relevant to supporting the delivery and accessibility of financial counselling services.