



# Financial Rights

LEGAL CENTRE

# Annual Report 2022



# About us

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The Financial Rights Legal Centre is a community legal centre which specialises in helping people understand and enforce their financial rights in relation to consumer credit, banking, insurance and debt recovery.

We focus particularly on assisting low-income, disadvantaged or vulnerable consumers who need help to solve complex problems and gain greater financial freedom. We also use our experience helping individuals to argue for improved consumer protection laws and a fairer marketplace.

## Our purpose

- To provide advice and advocacy for people in financial stress
- Provide high quality legal advice, financial counselling and information
- Promote access to justice
- Advocate for a fair and equitable financial services sector and improved financial wellbeing
- Support our people and our planet

## Our values

- Respect and integrity in all our dealings with clients, stakeholders and colleagues
- Quality in all our services and activities
- Independence from conflicts of interest
- Empathy and compassion for the circumstances in which people find themselves
- Empower people to take control of their financial situation, exercise their legal rights and expect fair treatment
- Inclusion in access to our services, consultation in planning our services, and promoting access to a fair and equitable marketplace and improved financial wellbeing for all
- Courage to be fearless advocates for people facing exclusion, exploitation or unfair conduct



Financial Rights Legal Centre acknowledges all Traditional Owners of Country across Australia and particularly the Gadigal people of the Eora nation, on whose Land the Financial Rights Legal Centre's office is located. We pay our respects to cultures, and to Elders past, present and emerging and recognise the continuing connection to lands, waters and communities.

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## At a glance



Total contacts for free legal advice or financial counselling

12,483

Total contacts for free legal advice or financial counselling

13,062

Total number of services provided

9,406

Contacts about credit and debt (phone & email)

3,142

Contacts about insurance (phone & email)

2,851

Contacts answered through Mob Strong Debt Help

881

Contacts answered through disaster priority line

1,696

Referrals to face-to-face financial counsellors

1,685

Services initiated by live chat

325

Legal tasks (229 credit & debt, 96 insurance)

370

Services to people impacted by family violence

176

Cases opened

254

Cases closed

81

Complaints to regulators and authorities

47

Policy submissions

192

Media mentions

56

Community legal education



# Chair / CEO report

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This year the Financial Rights team was focused on our goal: to provide advice and advocacy for people in financial stress.

Our strategy to focus on quality rather than quantity paid off again this year. We had less staff and provided less services overall, but achieved a record amount in monetary outcomes for clients of over five millions dollars. Of course it is not always the monetary value that is attached to the outcome that is the most important. Our clients report life-changing impacts like finally sleeping at night, improvements in their health and relationships, keeping a roof over their head, being able to save for the future, being able to care for their children more effectively, or having the mental space to look for work or engage in education. For some the assistance is life-saving.

Mob Strong Debt Help, our First Nations team dedicated to working on money matters with Aboriginal and Torres Strait Islander peoples from anywhere in Australia have put in a huge and highly effective effort this year. After the collapse of the ACBF-Youpla funeral funds in March 2022, the Mob Strong team has been working side by side with communities to get a fair outcome. Across Financial Rights we delivered over a 1,000 ACBF related services to clients in the financial year. Our team is now playing a leading role in the Save Sorry Business campaign and has been a powerful voice in Canberra, making sure that First Nations people are heard in discussions about how to fix the mess that decades of misconduct has left behind.

Financial Rights played a crucial role in the Save Safe Lending campaign, working with other consumer groups to make sure that responsible lending laws kept essential consumer protections. We also saw the implementation of some of the final recommendations from the Banking Royal Commission, a culmination of a large amount of work from Financial Rights and others in the consumer movement. We also issued a number of forward looking reports in relation to insurance, with the intent of shaping developments in the fast changing world of data and insurance through a consumer benefit lens.

We dedicated a lot of resources this year to preparing for the introduction of financial hardship information on credit reports. We had fought the introduction of this new class of information because we were concerned it would deter people from seeking hardship assistance from their lenders. We worked hard to get consumer friendly amendments into the legislation in previous years and in this year we continued that work in influencing related amendments to the Credit Reporting Code and developing resources to explain the changes.

Our engagement efforts literally doubled this year. In 2021-22 Financial Rights trained over 3,200 financial counsellors, solicitors and community workers through online and in-person training, double the amount we reached in the previous year. Our legal and financial counselling experts use these training sessions to help others help their clients more effectively, such as explaining the credit reporting changes referred to above, growing our reach well beyond our direct client service provision.

I'd like to thank the members of the Financial Rights board for their work this year. We've continued to work together to strengthen our approach to governance, setting our organisation up for ongoing success. As a board, we will continue to focus on the best way to support our organisation as it assists and champions the interest of consumers.

I also thank our current funders whose ongoing support allows us to help consumers. The previous and current Federal Governments both committed to several years of substantial funding for our Insurance Law Service, an essential help for people experiencing the effects of natural disasters. There's never been a more important time to fund independent insurance law help and I thank governments for recognising this need.

Finally, and most importantly, thank you to the staff at the Financial Rights Legal Centre. Thank you for your dedication to helping people when they most need you and your focus on fairness.

**Erin Turner**  
CHAIR

**Karen Cox**  
CEO

# Activities



## Advice, information and referral

A large part of the work of Financial Rights is to provide information and advice to the public, financial counsellors and other caseworkers in our areas of expertise.

We provide advice, information and referral through five advice lines. This allows us to give people vital information when they need it to solve their money related problems, to gather intelligence about the consumer experience with money related products and services, and to identify those people most in need of further assistance.

### Total information services:

6,169

### Total advice services:

6,314

## Top languages spoken at home other than English:

Mandarin

Arabic

Vietnamese

Hindi

Cantonese

## Demographics for advice

46%

Male



54%

Female



1%

Other



## Young people (under 24)

4%

## Older people

20%

## Impacted by family violence

5%

## Mental illness or disability

12%

## Regional or remote

10%

## Aboriginal or Torres Strait Islander

15%



## Main language other than English

5%

## Demographics for casework

37%

Male



63%

Female



### Young people (under 24)

10%

### Older people

31%

### Impacted by family violence

22%

### Mental illness or disability

51%

### Regional or remote

17%

### Aboriginal or Torres Strait Islander

35%



### Main language other than English

11%

## Task and casework

From our extensive consumer contacts we identify the people who most need further assistance. In many cases this will mean providing task assistance where we lodge a complaint, or draft submissions for the client to send or contact a creditor or the court to get further information. In a smaller number of cases we provide representation by a solicitor, financial counsellor or both. We also identify cases to pursue in the public interest.

### Task:

325

(203 Credit & Debt, 122 Insurance)

### Legal casework opened:

122

(67 Credit & Debt, 55 Insurance)

### Legal casework closed:

185

(122 Credit & Debt, 63 Insurance)

### FC casework opened:

54

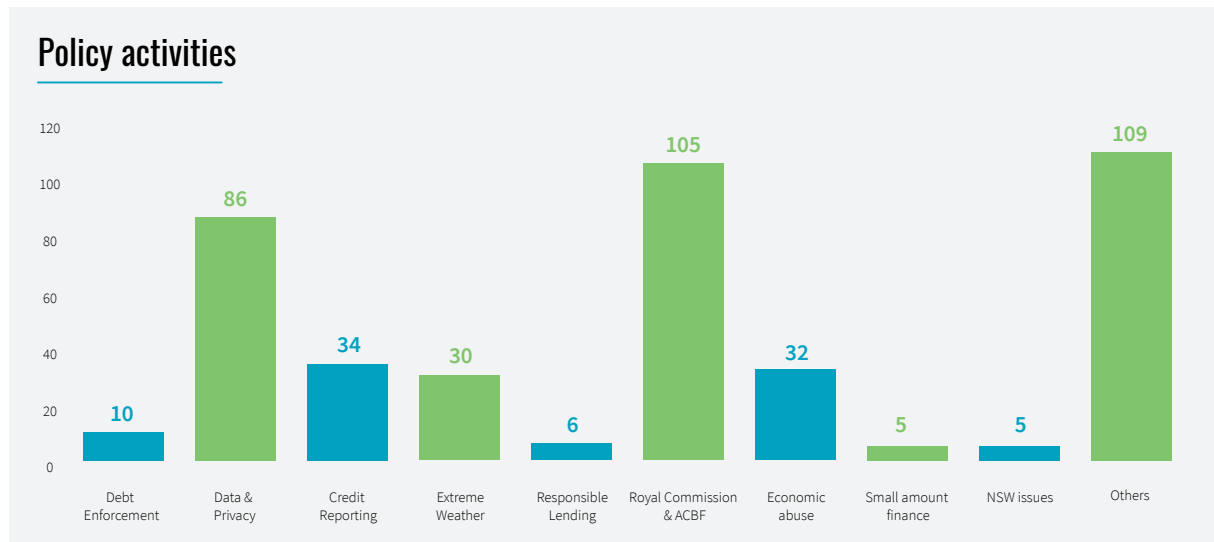
### FC casework closed:

69

## Policy

Our policy and campaign work integrates with our hotline advice and casework, both from our financial counsellors and our solicitors.

We aim to identify systemic issues that contribute to financial hardship and consumer detriment, and then develop law reform, advocacy and educational responses.



Our solicitors and financial counsellors made 81 complaints to regulators or code compliance committees.

## Media & communications

Media releases:

**20** **192**

Media mentions

Media Mentions for Financial Rights have increased substantially in the past 7 years.





## Websites

Financial Rights has 3 websites, containing over 100 legal information fact sheets, sample letters and checklists:

[financialrights.org.au](http://financialrights.org.au)

[insurancelaw.org.au](http://insurancelaw.org.au)

[mva.financialrights.org.au](http://mva.financialrights.org.au)

Total unique visitors to all three websites:

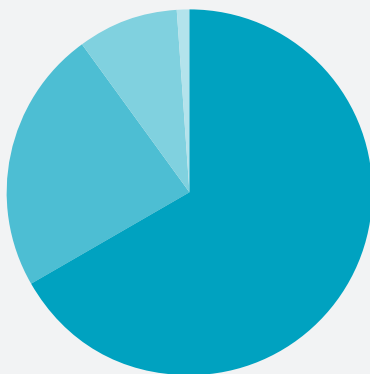
# 379,781

31% increase from last year

## Community legal education

This financial year we completed 56 external CLE presentations including 6 recorded CLE webinars. Total 50+ hours

### CLE audience breakdown



- Financial counsellors **2161**
- Other caseworkers **748**
- Solicitors **293**
- General public **30**

Grand total  
**3232**  
attendees



## Media topics



### Credit & debt

10

### Insurance

14

### Financial stress

19

### Economic abuse

5

### Unregulated credit

23

### ACBF/Youpla

34

### Extreme weather

15

### Insurance reports

27

### Consumer data rights

13

### Royal commission

12

### Codes


9


## Top 5 financial product types people sought credit and debt advice about

15%   
Home loan/mortgage


12%   
Credit card facility


11%   
Personal loan


6%   
Motor vehicle loan


3%   
Energy


## Top 5 financial product types people sought insurance advice about

23%   
Funeral

21%   
Home building insurance

20%   
Motor vehicle comprehensive

6%   
Debt to insurer

3%   
Home contents insurance





# Outcomes



## Information & advice

It is not always easy to track the outcomes of our lighter touch services like information and advice but they make up a large part of what we do.

These services play a very important role in amplifying the impact of our casework by sharing the expertise we have gained with a larger number of Australians, who can use that information to solve their own problems.



## Advice survey responses

94%

found our advice 'helpful' or 'very helpful'

54%

said they have already taken action based on our advice, and another 38% say they haven't taken action yet but intend to

97%

said our advice is practical and they think they will be able to act on it.



*"So fast, and accurate advice, and totally not judgemental of the situation, and gave me credit for my efforts to date, I slept more than 4hrs for the first time in years."*

*"Needed to know rights and my position prior to discussions with insurance org re: claim disagreement. Louise was very helpful. Fantastic service that I didn't know existed! ....Really happy with talk."*

*"I would've immediately consolidated my debts, if not, lodged for bankruptcy. Peter's advice pointed me in the right direction, which was something I needed. No judgement, just help. It was nice and I'm very grateful. Great service, I wish I had known about this before. It would've saved me heartache and loads in admin fees with other commercial companies. Keep it up. People like us appreciate it."*





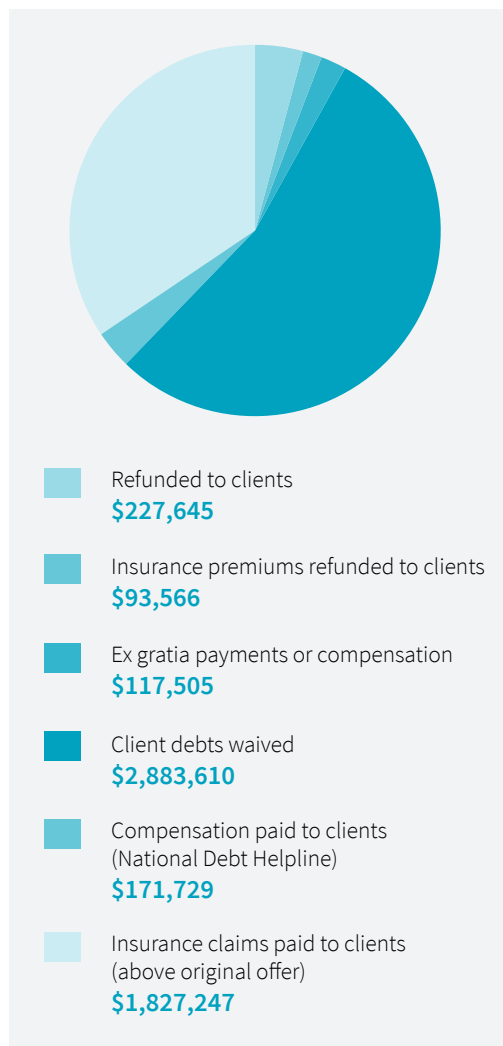
## Key casework outcomes

An important part of our work is providing casework representation for vulnerable clients, or matters where we are on the record representing a client on an ongoing basis as their legal practitioner or financial counsellor.

While we only have capacity to take on a small number of callers as casework clients, what we learn from our casework we use to advise thousands more people over the hotlines and do systemic law reform work.

## Total amount saved or recouped for clients

# \$5,321,302



## CASE STUDY

### Wendy and Geoff: Unjust Contract & Unconscionable Conduct

Our clients, an Aboriginal couple in their 60s, had refinanced their home loan in regional NSW with a high-interest non-bank lender prior to the commencement of the current responsible lending regime. The couple had refinanced numerous times before, and were in default on their current home loan and a number of other consumer debts. The lender relied on a bare-bones statement of financial position, credit reports, and a few of Geoff's payslips to determine they could amply afford the refinance (despite it putting them in no better position than the current loan, according to the lender's own internal notes at the time). No bank statements or verification of Wendy and Geoff's expenses was undertaken; no discussion was had as to whether, or how, they would suddenly be able to manage their finances so as to afford the new loan.

Unsurprisingly, Wendy and Geoff quickly fell into default. What followed was years of debt collection, court proceedings, and the gradual withdrawal of almost every cent in their superannuation accounts to stall repossession. Over the life of the loan the couple paid the lender almost double the amount of money borrowed. Once the super was gone, the lender moved to repossess their home.

At that stage, Financial Rights became involved. A team of solicitors and a financial counsellor represented Wendy and Geoff in the Australian Financial Complaints Authority ("AFCA"), and were able to put forward evidence and arguments establishing the lender's failures to meet its legal obligations both at the time of lending, and throughout the life of the loan. The effect of AFCA's decision was that their house was saved, the mortgage discharged, and the lender required to refund a significant portion of the amounts paid over the principal by the couple, plus compensate them for its failures to properly deal with their financial hardship. This money has been used to replenish Wendy and Geoff's superannuation accounts, so that they can look forward to a more comfortable retirement.

\$243513



Other Case Outcomes	
Repayment plan/variation garnishee reduced/removed:	31
Extension of time to pay (or sell home/asset):	12
Debt/contract release - compassionate:	48
Debt/contract release - dispute settlement:	44
Arrears capitalised:	4
Interest reduced/removed:	33
Credit report listing amended/removed:	20
Money refunded:	26



Retained home or  
other asset: 31



Court and tribunal work:  
11 matters 24 appearances



*“The AFCA decision Financial Rights was able to achieve was completely in my favour”*

*“Naomi saved our home”*

*“Everything is back on track, finally have my car with insurance due to debts being no more, being able to look after my family and self properly, finally I believe I should be fine with future finances but I always know who to call if I ever run into trouble”*

*“I am able to focus more on my children and invest towards our future”*



## CASE STUDY

### Sam's Story – Travel Insurance – AFCA Determination

Sam was 27 years old and an avid traveller. Before a trip to Europe he took out comprehensive travel insurance to cover everything, including up to \$10,000,000 for his legal liability.

While overseas, he was at fault in an accident. He misjudged overtaking a bus and collided with a motorcyclist. Both Sam and the motorcyclist sustained serious injuries and damages, including hospital and travel expenses. He contacted his insurer, who had accepted the claim with the right to review and paid over \$200,000 to repatriate Sam to Australia, plus medical expenses of \$120,000 and some disability entitlements under the policy.

In the following years, the motorcyclist gave notice he intended to recover further medical expenses. As Sam was in Europe when the accident took place, the local law meant it was usual for the public prosecutor to take steps to prosecute him for a breach of the local Criminal Code as well.

On notifying the insurer of the criminal proceedings, they indicated they were now refusing his claim and would seek to recover the money already paid. They cited reasons including admitting fault and accepting liability without their consent; the general exclusion he did not act in a responsible way to protect himself; and an exclusion relating to acting illegally or breaking any government prohibition, laws or regulations.

If the insurer recovered the amounts already paid, Sam was facing bankruptcy and the loss of his home. He was already in hardship as his injuries meant he was suffering from disabilities meaning he could not work in his pre-accident career.

Unable to resolve the issue with the insurance company, we raised a complaint in the Australian Financial Complaints Authority (AFCA). AFCA determined the insurer could not decline our client's claim. They found that the exclusion should be interpreted narrowly and that, upon reading of the policy as a whole, a reasonable policy holder would understand that they would be covered for their liability arising from carelessness or negligence. AFCA awarded our client \$3,000 in non-financial loss in line with the AFCA rules as the insurer's management of the claim, as well as the decision to decline caused Sam an unusual degree of stress, anxiety and physical inconvenience.

C176630

# Community legal education



This year marked a continuing growth in our CLE programme both in number and reach of our training sessions.

This year we delivered training at 56 events, an increase of over 20% on the previous financial year. With increased participation at conferences and an overall increase in audience size per session, our total audience grew by over 100% from 1,540 to 3,232 participants.

In addition to conferences and live online presentations, 6 sessions were recorded webinars for, amongst others, the Women's Legal Service, Legal Aid NSW, CLC Queensland and FCAWA. Over 319 people were able to watch the webinar at a later date – again increasing our reach.

What remained a constant over the last two years has been the recognition that different topics benefit from different audience sizes. Sessions every year range from a handful to over 100. This year we spoke to multiple groups of under 10 participants about how to communicate in a culturally appropriate way with First Nations clients, and delivered information about the evolving collapse of the Aboriginal Community Benefit Fund. This maximised interaction, sharing of information and open discussion.

Again, technology has been an enabler for our training – allowing us to reach audiences across regional and rural NSW and further develop our relationships with interstate colleagues in Queensland, WA, SA and the NT. A particularly important factor for reaching those advising First Nations consumers about the collapse of ACBF.



# Policy and law reform

Financial Rights achieved some great outcomes in our policy priority areas this year. The subject areas of Save Sorry Business, The Future of Insurance, and Credit Reporting are discussed later in this report. In addition we achieved a few other policy wins this year:



## Responsible Lending

The Save Safe Lending Campaign - to which Financial Rights was a major contributor - was successful in repelling a push to remove responsible lending laws. These are critical consumer safeguards that protect people from exploitative lending by banks and other lenders.



## Debt Management Firms

From 1 July 2021, debt management firms are required to hold an Australian credit licence with an authorisation that covers debt management services meaning that for the first time DMFs will be required to act 'efficiently, honestly, and fairly', provide internal dispute resolution services and maintain membership of the Australian Financial Complaints Authority. This was the result of years of work from Financial Rights and others in the consumer movement highlighting the risks and harms of these services.



## Implementation of the royal commission recommendations

A further set of key Royal Commission reforms commenced in October 2021, including new anti-hawking laws, design and distribution obligations. A deferred sales model for add-on insurance products, and improvements to the Internal Dispute Resolution (IDR) regime. Licensing requirements for claims handling and settling services and ASIC oversight began in January 2022. This is a culmination of a large amount of work from Financial Rights and others in the consumer movement.



*Mob Strong's Voice is heard.*

*In late 2021 Mob Strong put in a powerful submission to a Parliamentary Inquiry into how the corporate sector in Australia treats First Nations consumers. Bettina Cooper appeared before the Committee and was praised for the evidence and the insights she brought to the inquiry.*

*Following the hearings the Chair of the House Indigenous Affairs Committee, Mr Julian Leeser MP came to Financial Rights as part of FCA's A Day in the Life program specifically to listen in to Mob Strong calls and speak to the Mob Strong team about the experiences of First Nations people.*



# Financial counselling in focus

Our financial counselling team not only achieves amazing results for their clients, they provide vital assistance on legal casework files working in collaboration with our legal team.



*Marie was very compassionate and understanding, she was very clear with her instructions and extremely helpful and kind whilst still being professional. With her help I was able to get the debt waived which has taken a lot of weight off my mind...A wonderful service, helpful and reassuring providing advice I would never have thought of myself.*



This year our financial counsellors, working alone or in co-operation with solicitors, achieved financial outcomes in excess of \$1.3million.

The outcomes they have achieved for their very vulnerable clients have been nothing short of life changing.





CASE STUDY

## Mandy's Story – Mortgage Hardship

Mandy had been suffering financial hardship for a number of years. Her only source of income was the Disability Support Pension and she lived in her house with her ex-husband, who also received Centrelink income support.

They both shared the mortgage, but unfortunately, due to the early stages of dementia her ex-husband had stopped paying his share. They fell into arrears, and went into some on/off repayment arrangements, all of which failed. Mandy rang the National Debt Helpline in tears. The arrears were accruing and the mortgagee was threatening to send a default notice. Due to Mandy's disability, the home had wheelchair accommodations, which was part of the reason losing her home would be a huge problem.

Our financial counsellor worked with Mandy on her Statement of Financial Position, which showed that she could maintain fortnightly repayments of \$500, which would decrease the arrears, as long as her daughter paid board, and she monitored her spending. The mortgagee wanted Mandy to commit to paying \$800 per fortnight which was unrealistic given her only source of income was Centrelink. Eventually they agreed to \$600 per fortnight, which would clear the arrears in six months.


Mandy commenced her repayment plan. She managed to stick to the entire arrangement and did not miss one payment. She said it was a difficult six months and she had to be extremely careful with her budget, but the arrears are now cleared and she is back to normal mortgage repayments.

S261211


## Top 5 Financial product types in financial counselling casework

28% 

Personal Loans  
(including payday loans)

24% 

Credit cards

12% 

Home loans

6% 

Motor vehicle loan

4% 

Buy Now Pay Later  
and Energy

# National debt helpline live chat



**NATIONAL  
DEBT  
HELPLINE**  
1800 007 007  
ndh.org.au

get back on track with **free** financial counselling

Live chat with the National Debt Helpline was piloted in some States in 2020 and Financial Rights got involved from 1 July 2021.

It was a toe in the water at first, starting with 3 days per week and adding one evening from March 2022.

In May 2022 we successfully applied, in partnership with Care ACT, to operate chat 5 days per week, from 9am until 8pm, for residents of NSW, ACT and Tasmania from 1 July 2022.

Providing financial counselling over chat has proven both rewarding and unexpectedly challenging. People who may never pick up the phone are sometimes willing to initiate a chat conversation, providing them with an important opportunity to connect with the service. In some cases they disclose very personal and distressing experiences. Responding appropriately, with adequate warmth, and providing useful information without appearing to interrogate the chatter is a very different skill to doing this in person or over the phone. We are learning all the time.

In some cases chat is just a way to engage and reassure a client and introduce them to financial counselling in a non-threatening way before connecting them up with phone or face-to-face assistance. In other cases we can provide the client with everything they need to know via chat.

“

*"You have been a great help. You have given me an actionable plan to start today."*

”



# Federal court bankruptcy list

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From March 2022 we have had a financial counsellor sitting in on the bankruptcy list in the Federal Circuit Court on Tuesdays and Thursdays.

Being made bankrupt is extremely distressing. In some cases, bankruptcy will not make a big practical difference in a person's life and the financial counsellor can explain what will happen and reduce some of the person's anxiety.

In other cases, particularly where someone owns their own home or other significant assets, bankruptcy can be devastating. It will cost them far more than paying the debt plus interest, as fees, legal costs and trustee's fees will be added to the tune of tens of thousands of dollars. Bankruptcy may also impact on options for employment or the ability to travel. With the financial counsellor's help, the debtor may be able to devise a strategy to pay the debt, challenge it or negotiate a compromise. The financial counsellor will then appear in court and seek an adjournment to put the strategy into action.

While sitting in the courtroom our financial counsellors have observed that cases involving people being pursued by their owner's corporation for outstanding strata levy debts are extremely prevalent.

In many cases bankruptcy appears to be being pursued as a first resort, for amounts barely above the bankruptcy threshold. We are now working with Financial Counselling Australia to examine this issue nationally, and to advocate for improvements in the system to address the issue.



# Demand for Mob Strong explodes



It takes time and patience to build a trusted and reliable Aboriginal and Torres Strait Islander service.

Since inception in 2016 tasks and casework at Financial Rights for First Nations clients has been growing steadily and organically as information about this service has spread through community. This year, after the collapse of funeral insurer ACBF/Youpla demand for Mob Strong exploded. Mob Strong went from receiving 50 calls a month to hundreds of calls a day.

Prior to establishing Mob Strong, Financial Rights had an average of 1% of advice callers self-identifying as Aboriginal or Torres Strait Islander and roughly 10% of casework clients. The percentage of First Nations clients this year was over 15% of advice callers and over 35% of casework clients.

Our Mob Strong Debt Help service was created to provide culturally appropriate access to Aboriginal and Torres Strait Islanders in financial stress and while we faced challenges meeting this surge in demand we believe we are achieving that goal. Callers to the service are located all over Australia, including some regional and remote locations.

Our staff have been able to bridge the gap in communication when complex messaging has come out from both the government and liquidators after the collapse of ACBF/Youpla. Our staff have provided communications in a method and manner which has allowed the community to understand, participate and be empowered in their financial decisions.

## Monthly Mob Strong calls for 21-22



*“On advice from Mob strong, I asked the place I was in debt with if I could have a reduced payment if I paid today which they were more than happy to do at an almost 50% of the initial debt.*

*Very helpful, and the process was really quick with 48 hours I had a much clearer understanding on how to approach the debts. The team from the moment I first called were friendly, respectful and more than willing to assist.”*





## CASE STUDY

### Stella's story

Stella is a member of the Stolen Generations. She has limited literacy and no experience with financial products, never having a loan, credit card, insurance or phone contract.

Stella was at home in the late 1990s when an ACBF's saleswoman knocked on her door, completely unsolicited. Stella recalled signing the ACBF forms because she wanted the saleswoman to leave. After that, ACBF agents regularly attended Stella's home under the guise of confirming her contact details had not changed. In those visits, she was given forms to sign for transferring memberships from Fund 1 to Fund 2 or the Plan and/or additional amounts and increased payments. Stella remembers ACBF's salespeople telling her that if she died, the money would pay for her funeral and the rest would go to her children. She understood that once she paid the \$10,000, like a savings plan, she wouldn't be asked for any more premiums and she wouldn't ever lose the funds she had paid. Most of the payments were through Centrepay.

For 20 years, Stella paid over \$21,000 to ACBF to cover funerals for herself and her 5 children. Her sole source of income was Centrelink (parenting payment and carer's payment). One of Stella's youngest children is disabled and payment for his fund came from his Disability Support Pension once he turned 18. Stella's youngest child was 3 months old when funeral cover was sold to Stella to cover that child's funeral. Stella had 14 contracts in all. In mid-2018, Stella stopped paying into the fund and the memberships were cancelled. She says she "felt like she had paid them enough" and she had heard bad things about them. In June 2019, Stella complained to AFCA. In September 2021 AFCA made a determination that ACBF was required to refund her payments to her and also refund the payments her disabled son had made. ACBF delayed payment and then went into liquidation without refunding the money to Stella or her disabled son.

#### **In AFCA's determination, the Ombudsman stated:**

*In Fund 1 and Fund 2, the words 'Aboriginal Community Benefit Fund' are expressly used. In the Plan, the 'ACBF' acronym is for Aboriginal Community Benefit Fund, and the product is called 'Aboriginal Community Funeral Plan'. The words themselves evoke an Aboriginal community, a benefit for that community and the benefit is supported by a fund. The ordinary meaning of 'fund' is a sum of money saved or made available for a particular purpose. In the context of financial services, it is often associated with a legal trust.*

*The term 'plan' has the ordinary meaning of a scheme for the regular payment of contributions. Its use to describe the ACBF business supports these meanings. However, the premiums were not paid savings nor was the Plan an investment product. The payments were not for a purpose. The payments were directly to ACBF as a corporation. There was no fund, no trust fund and no trust in the Plan.*

#### **In finding that ACBF's conduct to Stella was misleading, deceptive and unconscionable, the Ombudsman stated:**

*The representations made by ACBF were not accurate. Fund 1, Fund 2 and the Plan were not a fund set up for a community or for the benefit of a community. ACBF is a corporation whose legal purpose is the benefit of its shareholders. It has none of the characteristics evoked by its name.*

C176807



**#SAVE SORRY  
BUSINESS**



# Save Sorry Business

## About Youpla/ACBF and the Save Sorry Business Coalition

For almost 30 years, the Aboriginal Community Benefit Fund (ACBF), trading as Youpla, aggressively sold poor-value funeral plans to First Nations people across Australia.



Financial Rights has been warning consumers about the poor value and unsuitability of funeral insurance products for years. We have run many cases through FOS and now AFCA to help consumers get their payments reduced or their premiums refunded when this poor value product does not meet their needs.

Youpla actively preyed on the culturally significant practice of Sorry Business with many people paying tens of thousands of dollars to the company to ensure their families could afford a dignified and culturally appropriate Sorry Business.

This year First Nations policyholders and their families were left unable to pay for their funerals and sorry business after Youpla went into liquidation in March 2022.

In the wake of Youpla's collapse, Mob Strong Debt Help began getting hundreds of calls from distressed First Nations consumers.

Mob Strong joined several other organisations and created the 'Save Sorry Business' Coalition. This is a First Nations-led campaign supported by 130 organisations and over 20,000 Australians seeking a fair and enduring resolution for the 30,000 First Nations people harmed by the misleading and deceptive conduct of Youpla and the massive and prolonged failure of governments and regulators over two decades.

## Getting the word out

Not only was Mob Strong doing the lion's share of advice and assistance for First Nations people harmed by the collapse of Youpla, they also took the lead on raising awareness of this disaster with Government, the media and the wider public.

## Media Stories

22



Online articles

9



TV appearances

3



Radio interviews



## Online

This year our Mob Strong Facebook page had over 6000 new visits and over 600 new likes. Most of this activity happened after the collapse of Youpla.



Our top Facebook post about the collapse of Youpla reached over 60,000 people, had over 1000 reaction and shares, including nearly 400 comments.

**We are in shock!**  
We just found out that ALL ACBF/ Youpla funds have gone broke.  
We are working our next steps on how to help you.  
Contact your bank and **STOP** your payments now.

New ACBF fact sheet (created in March 2022)

3827 page views in 4 months

**#SAVE SORRY BUSINESS**

## Getting legal support for Mob Strong

By May 2022 Mob Strong had over 700 First Nations consumers impacted by the ACBF/Youpla collapse on its call-back list.

Since conversations with people who may have lost 20 or more years of funeral savings were hard, these calls on average took 30 minutes. There was no way Mob Strong, even with other Financial Rights caseworkers could call all of these people back in a reasonable amount of time. Thankfully we were able to get 3 pro bono solicitors from HWL Ebsworth and K & L Gates to come to our offices and share the load.

Additional emergency funding from Ecstra Foundation also allowed us to boost staff numbers including a casual First Nations financial counsellor Jennifer Daley to provide culturally appropriate support to ACBF/Youpla affected clients.

With everyone's help we lodged over 434 AFCA complaints on behalf of First Nations callers.

Special shout out to Amy Colquhoun, one of our new full time solicitors who spent her first three months on the job talking to people harmed by ACBF/Youpla.



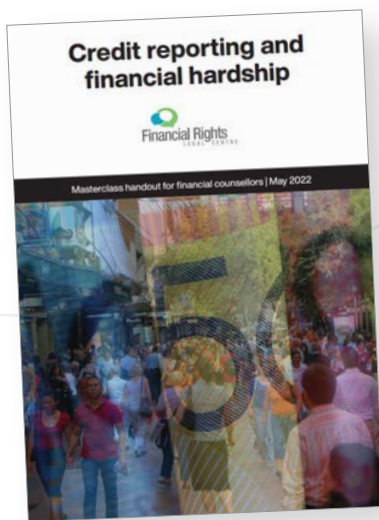
## About the #SaveSorryBusiness design

The Save Sorry Business design was developed by Dixon Patten at Bayila Creative. The logo represents a smoking – an important part of ceremony for Aboriginal & Torres Strait Islander peoples. Smoking ceremonies are used for burial, celebration, healing and cleansing, and are also a gesture of goodwill, bringing people together. Smoking ceremonies can also be a way of connecting with country by speaking to and acknowledging ancestors

# Credit reporting

This year credit reporting was a major policy and casework priority. This is primarily because new credit reporting rules were kicking in from 1 July 2022 that would affect people entering financial hardship arrangements.

Since helping people negotiate financial hardship arrangements with lenders is something our financial counsellors do almost every day, this is a big deal for our work at Financial Rights.



There have been some big changes to credit reporting in Australia over the years including the introduction of comprehensive credit reporting which allowed positive credit information to be included in credit reports.

The introduction of Financial Hardship Information is another seismic change for our advice work and we needed to do a ton of work to ensure the rules would be simple, easy to explain to people and fair.

Julia and Karen led the charge from the consumer sector when it came to consultations and negotiations with Government, regulators and industry over the new financial hardship reporting rules and revisions to the Credit Reporting Code.

## Policy Activities



12

Meetings with industry  
(ARCA & ABA)



7

Meetings with regula-  
tors (ASIC & OAIC)



10

Submissions and  
formal consultations

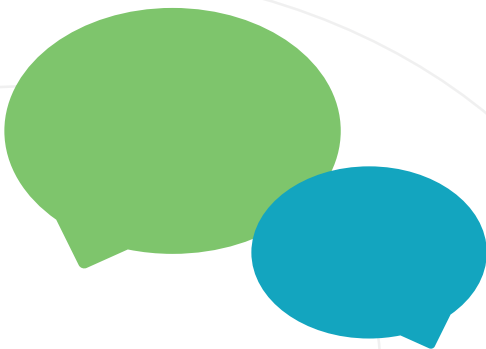
## Training and resourcing the community

Julia (with the help of Annabel, our CLE Coordinator) focused on making sure financial counsellors and community lawyers across Australia understood the new rules and were ready to assist people when the laws commenced on 1 July.

We launched a series of credit reporting trainings at the FCA Conference in Cairns where Julia presented to 680 financial counsellors across two days.

Julia recorded a webinar for FCA which was available nationally and had over 140 attendees. She did 7 more training sessions in almost every state and territory, some online and some in person for a total of 409 more solicitors, financial counsellors and community workers in to the beginning of the 22/23 financial year.

Finally we developed a Credit Reporting and Financial Hardship Masterclass factsheet and shared a Power Point with lots of examples and illustrations. We were also asked by the ABA and the OAIC to review their information resources which would be available to the public, and all of our suggested changes were accepted.

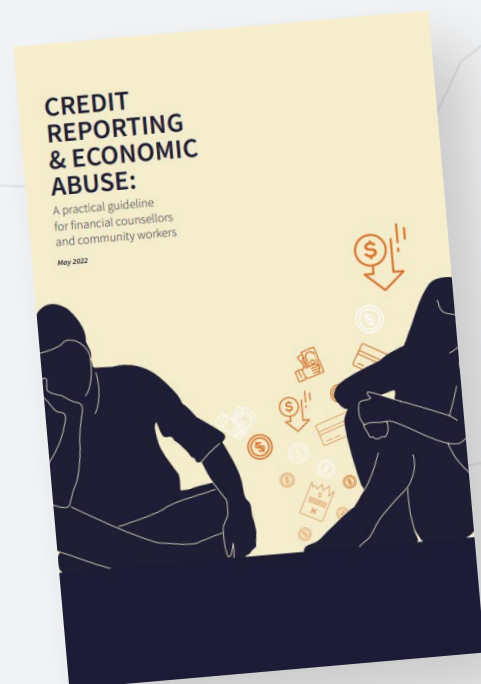


## Special focus on Economic Abuse and Credit Reporting

The law relating to credit reporting is complex and there is currently no specific regulation regarding credit reporting and domestic and family violence.

However, Financial Rights knows from its own casework and from hearing from caseworkers across the country that we regularly need to support victim survivors of financial abuse to repair their credit histories.

This year Financial Rights worked closely with the National Economic Abuse Reference Group to develop a Credit Reporting & Domestic Violence Guide for financial counsellors and community workers. The guide considers the law, various codes and external dispute resolution outcomes to determine what is most likely to be considered good industry practice and gives caseworkers arguments and precedent letters to use in these disputes.



The Guide was launched at the FCA Conference in May 2022.



# Future of insurance



This year Financial Rights released three ECSTRA-funded research reports into different aspects of the Future of Insurance.

These followed from our report Open Insurance: The Consumer Data Right and Insurance by Dr Richard Tooth of Sapere released in November 2020. Open Insurance examined the application of Consumer Data Right (CDR) to the insurance sector. We found insurers hold large amounts of data on consumers including about customer relationship, risk assessment, pricing; and claims data. We explored some of the use cases and risks identified in the report in our subsequent research.

## Automating general insurance disclosure



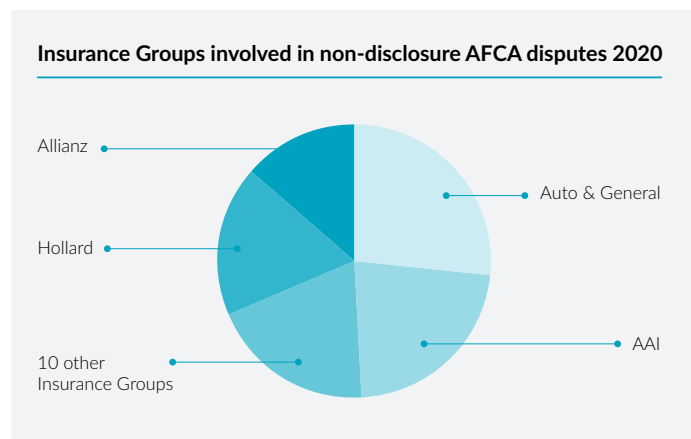
Automating General Insurance Disclosure reviewed the issue of illusory insurance – the phenomena of people believing that they are insured when in reality they are not. This occurs when consumers inadvertently – or in a small number of cases purposefully - do not provide their full driving or insurance history, or other relevant information to their insurer when they purchased their insurance.

The report examined nearly 400 cases of Australians being denied insurance claims on this basis. Four insurers accounted for 80% of the non-disclosure AFCA disputes in 2020: Auto & General (26%), AAI (Suncorp Group) (22%), Hollard (17.9%) and Allianz (13.4%).

Auto & General’s brand Budget Direct was the most common brand named by our clients denied claims on non-disclosure grounds over the three year period (28%).

This report proposed automating the disclosure of driving histories and insurance claims information, with consent and where it is secure to do so, to resolve this issue.

NielsenIQ tested consumer comfort with sharing driving record and insurance claims histories automatically at time of quoting. For each respective category 71% and 73% of Australians were happy to share. The report took the view that automating other forms of disclosure including criminal history, medical or financial records may not be appropriate or acceptable.



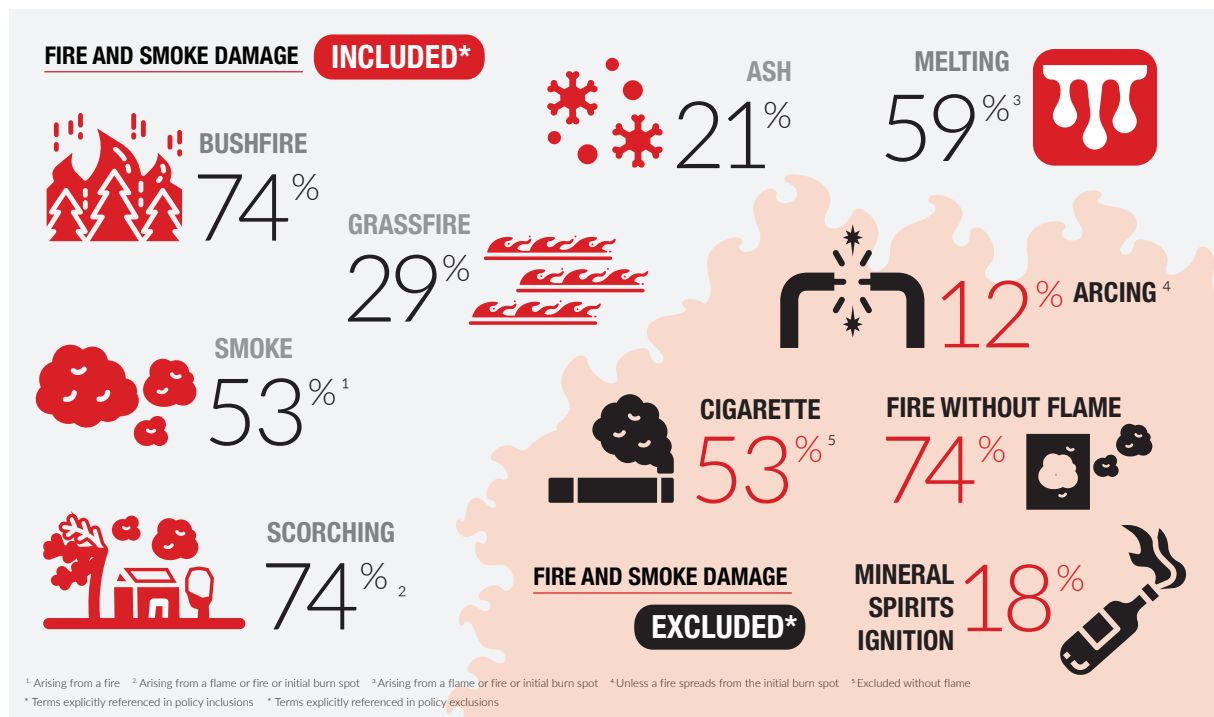


## Standardising General Insurance Definitions

Standardising General Insurance Definitions by Dr Diana Grace PhD and Professor Michael Platow PhD examined the lack of consistent definitions in general insurance and the impact of this on the implementation of the Australian Government’s CDR reforms to general insurance.

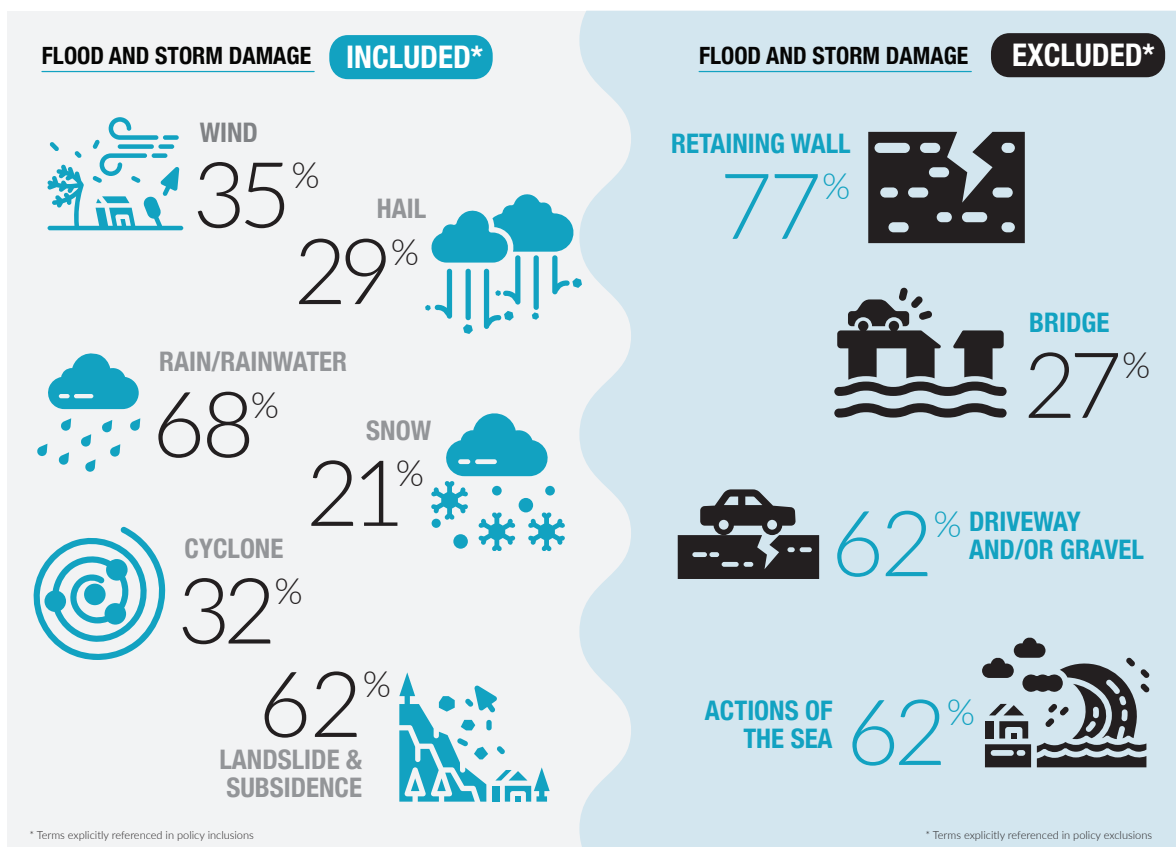
The report studied the definitions of fire, storm and flood, malicious damage, and wear and tear.

Product Disclosure Statements (PDSs) of home insurance policies from 34 insurers were examined and a series of focus groups explored consumers’ understandings of the terms and wording used, and related concerns.



It was found that, despite ‘flood’ being a standardised definition there were differences in what insurers effectively included in flood and storm damage. Similarly, fire and smoke damage varied, and certain aspects of water and fire damage were found to be excluded in some policies. With regard to malicious damage, there was variation concerning who caused the damage, and whether or not the damage must be reported to the police. ‘Wear and tear’ and ‘maintenance’ were largely undefined, although some policies gave examples of appropriate maintenance.

Focus groups found that people showed high levels of understanding of insurable events, such as fires, storms and floods, along with the damage associated with these events. What people did not necessarily know about – and where problems arose – were the exclusions and qualifications to these concepts included in the fine detail of PDSs. These exclusions and qualifications functionally alter the meaning of the key definitions. The report recommended an emphasis on standardising terms used to exclude and qualify, in an easily comparable form, to help resolve this problem.



## Privacy practices in the general insurance industry



Privacy Practices in General Insurance by Roger Clarke and Nigel Waters examined the data access and handling practices of general insurers, including the accuracy of claims data contained in My Insurance Claim Reports. These reports are held by the Insurance Reference Service (IRS) – the existing industry scheme for sharing personal data.

The report found that every My Insurance Claims Report obtained by consumers as part of the field study contained at least one material error such as additional or missing claims, misleading or inconsistent information, and incorrect personal details such as addresses.

There were also profound difficulties in accessing personal data. The IRS sells My Insurance Claims Report through its partner Illion. Consumers have to request an application form, which takes 4-6 days to arrive. The form is difficult to fill out with consumers needing to navigate 4-point fonts and windings.

The report also found that processes for obtaining personal data from insurers was unnecessarily difficult, despite it being a legal right under the Privacy Act.

The report argued that plans to extend CDR to the general insurance industry, provided a once-in-a-generation opportunity to improve data standards, privacy practices and outcomes for consumers and insurers. But consumer protection must be at the front and centre of the new CDR regime and privacy-by-design principles need to prioritise safety, security and consumer confidence.

# Economic abuse

## Helping clients recover from economic abuse

In early 2022 we learned that we had been successful in applying for funding for a four year period to assist women who were victim survivors of domestic and family violence and financial abuse.

We had always assisted people in these circumstances, but we provided advice to many more people than we could possibly assist with casework.

In addition we were facing staffing cuts due to diminished funding, so these funds were very welcome.



## Caseworks, financial counselling and legal advice services provided:

Legal casework	41
Legal advice	150
Task assistance	35
Financial counselling	144

### CASE STUDY

## Dung's Story – Guarantee

In 2017, Dung signed a guarantee secured over her home to help her partner with a business loan of \$40,000 she was led to believe to prevent his truck (for his food transportation business) being repossessed by the finance company. Unbeknownst to her, it was in fact an unlimited guarantee over her home. In 2018, when the relationship had broken down, her ex-partner went to the bank and fraudulently provided Dung's signature to increase the loan amount by \$100,000. He then moved money out of the business account, and disappeared with the money and his whereabouts have not been known since. The bank sought to enforce the guarantee by moving against Dung's home.

As Dung had access to the business account the bank continued to blame Dung, and said it would cancel all her banking products with them save her existing mortgage. We lodged a complaint at AFCA. Even after the bank knew we were acting for Dung, someone at the bank contacted Dung and tried to intimidate her, saying that interest was accruing on the total amount. The bank held Dung liable for \$200,000 plus interest, \$217,000.

We attended a conciliation with the bank. It was unsuccessful. We put forward further submissions enclosing evidence that Dung received no benefit, explaining that she had no role in the business, and also explaining the circumstances of financial abuse which was the context in which she had been pressured to enter the guarantee.

AFCA found in favour of Dung. It held the guarantee was not enforceable by the bank and should be set aside. AFCA also ordered the bank pay Dung \$1,000 in non-financial loss. Dung was in tears when she received confirmation of the outcome and said she couldn't stop crying.

S259711



# Extreme Weather events

## Supporting people through extreme weather events

### CASE STUDY 1

#### Storm/Flood, bridge exclusion leads to no access to home

Anna is a widow and owns her own property in regional NSW. Her income is from Centrelink. She has been insured with the same insurer for the last 39 years. She was impacted by the Mid North Coast flood event, she has flood cover and the only property damaged was her bridge (or causeway).

She made a claim and an assessor was appointed who came and viewed the property. She was rejected, as in 2009/10 her insurer had introduced an exclusion for “Bridges, pontoons and jetties” impacted by flood.

She was devastated, the cost to repair the 12 metre structure was estimated to be almost \$60,000. Unreachable for her on her low income.

The causeway was her only access to the property – she would have to leave her car on the other side of the creek and scramble down the embankment and up the other embankment. If she arrived home late, she would sleep in her car so as not to risk slipping in the dark.

Her property was effectively uninhabitable without road access.

An ILS solicitor raised a complaint about Anna not getting notification of the policy change and so standard cover applied.

The insurer rejected the claim again and provided her electronic renewal notices dated 2016, 17 and 2018 and an updated PDS in 2019 which all referred to the exclusion in later pages of the renewal notice (pages 7 or 8 of the renewal or page 24 of the PDS).

Her Key Fact Sheet did not mention the bridge exclusion, just retaining walls.

Anna’s case looked pretty slim and difficult. She agreed to be a case study in our Natural Disaster report, Exposed: Insurance problems after extreme weather events, and also to speak to the media. The ABC reporter contacted the insurer for comment. Shortly after (and before the story went to air on the news) they notified Anna that they had improperly classified her “causeway” as a “bridge” and they would accept the claim as a causeway which was not captured by the exclusion.

C216339

## CASE STUDY 2

### Storm/Flood, rainwater runoff excluded along with flood

Cynthia is a proud Aboriginal woman supporting her dependent children in NSW. Cynthia's home was severely damaged by rainwater runoff from overflowing drains during the storms and floods of March 2021.

In December 2020, Cynthia called the insurer to check whether her home building policy was still active. Cynthia disclosed that her family had experienced domestic violence and that she was making the call to check that her former partner had been paying the premiums as was required of him. Upon hearing that it was not, she asked to set up a new policy.

During this call Cynthia stated she was concerned about the predicted increase in storms and wished to be protected. The sales representative asked her whether she would like cover for "flood, rainwater runoff or storm surge". Cynthia explained that she didn't, because she understood that her neighbours had previously suffered water damage from overflowing council drainage but had not been affected by flood, so she didn't need flood cover. The representative did not explain the definition of rainwater runoff or storm surge as distinct from flood or that by opting not to be covered for 'flood, rainwater runoff and storm surge', she would not be covered if the council drains overflowed again. This is particularly relevant because Cynthia had previously held policies with the same insurer which excluded damage caused by flood but included cover for rainwater runoff up until 2018.

Cynthia later received her Certificate of Insurance which stated that "You are not covered for damage caused by flood, rainwater runoff and storm surge". However, on the same page it listed a Special Condition which stated that "You are not covered for loss or damage caused by rainwater runoff until 11.59pm on 20 December 2020". The sales representative had also mentioned during the inception call that the embargo would finish on 20 December 2020, which led Cynthia to believe that after that date she would be covered for rainwater runoff.

The insurer declined Cynthia's claim on the basis that the policy excluded damage from flood, rainwater runoff and storm surge and that this was stated in the Certificate of Insurance.

We assisted Cynthia to lodge a complaint in AFCA, arguing that the terms of the policy were ambiguous and that the Special Condition led her to understand that the exclusion for rainwater runoff and storm surge would be lifted once the embargo period ended and further, that the representative did not explain the extended exclusion for flood, rainwater runoff and storm surge, which had changed since she last held a policy.

AFCA issued a determination in favour of Cynthia, finding that the insurer did not comply with Section 35 of the Insurance Contracts Act which requires that, prior to entering into a contract for insurance an insurer must clearly inform the insured in writing of any relevant exclusions or conditions. AFCA found that the inception call showed that Cynthia did not understand that the policy terms had changed since she last held a policy and that it would no longer cover her for rainwater runoff escaping from drains. AFCA determined that the insurer should accept the claim and either arrange for the repair of the property or agree to cash settle the claim for the cost of repairs, as well as cover her temporary accommodation costs. AFCA also made an award for non-financial loss, in the amount of \$3,000, due to the stress and inconvenience she suffered following the decline of the claim.

While AFCA's decision relied on the facts of the case, this decision is important for the clear guidance that it gives on the requirement that insurer's should clearly and unambiguously disclose exclusions it intends to rely on, and that the pre-inception dealings between the insurer and the insured can influence whether the insurer has adequately done so.

C215781



# Operational achievements



## Our people

Our employees are individuals with a passion for social justice focused on helping alleviate poverty, disadvantage and financial exclusion through financial counselling, legal assistance and systemic advocacy.

## Flexible working

We recognise that our people are our greatest asset and acknowledge the benefits that flexible work arrangements deliver to our staff and the organisation. In 2022 we continued to promote and encourage flexible working, with 100% of our staff working a hybrid work model and 59% of our staff working part-time.

## Employee engagement & staff retention

In April we launched our inaugural Happiness survey which is a 2 question anonymous survey that asks our staff to rate their happiness level on a scale of 1 to 10 with comment. The plan is to run this quarterly, tracking employee sentiment over time.

Feedback from our inaugural survey:

“

*“I love my job and the people I work with. Very rare to be able to have that in life.”*

*“Enjoy the quality of the work and the people I work with, and the opportunities to learn and develop.”*

*“Every day is different and my Team is amazing!”*

”

Staff attrition rate over the year was 12%, which we consider a solid result given the current war for talent.

# Technology

## Cybersecurity

Technology standardisation and strengthening our cyber security posture played a key role in supporting staff to work flexibly and safely.

Our technology is crucial in supporting our staff to continue to deliver services remotely and from the office. With the increasing reliance on technology comes the increasing threat of a cybersecurity compromise.

We delivered a number of cyber security initiatives over the year aimed at increasing staff awareness and enhancing technology protections. We delivered all staff training and cyber security training and resources now form part of our staff induction program, the primary goal being to reduce the risk of cyberattack caused by human error.

Additionally, we implemented Multi Factor Authentication across all our remote workspaces, core applications and data stores and we moved to Exchange online, leveraging the real time advanced threat protection features and conditional access policies offered by Microsoft 365. Improving our cybersecurity posture will continue to be a priority in the coming months and years.

## HR anywhere any time

We implemented a cloud based HR system that simplified and automated the pervious paper heavy processes for staff onboarding, leave management, payslip distribution and performance reviews.

Staff are now able to self-serve and access their leave balances, payslips, leave requests via a secure application on their smart phone or web browser, supporting our flexible workforce.



# Our staff

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## Almond Cafarella

Information and  
Communication  
Technology Lead

## Amanda Cameron

Aboriginal Service  
Coordinator

## Rebecca Campbell

Solicitor

## Ara Cho

Solicitor

## Amy Colquhoun

Solicitor

## Bettina Cooper

Mob Strong Financial  
Counsellor

## Karen Cox

Chief Operations Officer

## Jennifer Daley

Casual Financial Counsellor  
(ACBF)

## Julia Davis

Senior Policy &  
Communications Officer

## Naomi Delaney

Solicitor

## Marie Druon

Financial Counsellor

## Michael Dunkley

Financial Counsellor

## Jane Foley

Senior Solicitor & Acting  
Director of Casework

## Gerda Freimane

Administration Assistant

## Mark Holden

Solicitor

## Louise Jansson

Senior Solicitor

## Miriam Jay

Financial Counsellor

## Lynda Johns

Financial Counsellor

## Alexandra Kelly

Director of Casework

## Michael Kelly

Casual Research Officer

## Amy Knox

Senior Solicitor

## Jennifer Lewis

Senior Solicitor

## Alice Lin

Director of Advice

## Drew MacRae

Senior Policy &  
Advocacy Officer

## Annabel McConnachie

CLE Officer

## Peter Nicholson

Financial Counsellor

## Marianna Papadakis

Communications Officer

## Helen Rees

Financial Counsellor

## Greg Russell

Financial Counsellor

## David Ryan

Finance & Data Manager

## Claire Shidiak Khoury

Senior Solicitor

## Lara Song

Senior Solicitor

## Nicola Sutton

Office Manager

## Francesco Terranova

Solicitor

## Peter Thompson

Financial Counsellor

## Jane Wilburn

Senior Solicitor

## Rebekah Wong

Solicitor

## Marianna Zauanders

Solicitor

## Maria Zografos

Chief Operations Officer

# Acknowledgments and company details

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## Board

Erin Turner, Chair  
Dave McMillan, Deputy Chair  
Chris McKendrick, Treasurer  
Natalie Pozdeev, Secretary  
Francis Vierboom, Ordinary Member

## Aboriginal advisory committee

Nathan Boyle  
Robynne Quiggin  
Aunty Joy Reid

## Pro bono support

K & L Gates  
HWL Ebsworth  
Minter Ellison  
Glenn Fredericks  
Jim Johnson  
Sonia Tame  
Hall and Wilcox  
Australian Government Solicitor  
Justice Connect Pro Bono Portal

## Pro bono training providers

Knowmore  
Australian Financial Complaints Authority  
Small Business Debt Helpline  
General Insurance Code of Practice Committee  
Marrickville Legal Centre  
Seniors Rights  
Bush Money Mob  
Women's Legal Service  
Centre for Women's Economic Safety

## Contact details:

Financial Rights Legal Centre  
Level 1, 80 Cooper St. Surry Hills NSW  
PO Box 538 Surry Hills NSW

Administration: (02) 9212 4216 Fax: (02) 9212 4711  
ABN: 40 506 635 273  
Office Hours: 9:30am – 5:00pm weekdays  
Email: [info@financialrights.org.au](mailto:info@financialrights.org.au)

## Services:

National Debt Helpline:  
**1800 007 007** 9:30am – 4:30pm weekdays

Credit & Debt Legal Advice Line (NSW):  
**1800 844 949** 10am-1pm Weekdays

Insurance Law Service  
**1300 663 464** 10am-1pm Weekdays

Mob Strong Debt Help  
**1800 808 488** 9:30am – 4:30pm weekdays

Advice Hours: **(EST) 9:30am – 4:30pm weekdays**

Websites:  
**[financialrights.org.au](http://financialrights.org.au)**  
**[insurancelaw.org.au](http://insurancelaw.org.au)**  
**[mva.financialrights.org.au](http://mva.financialrights.org.au)**

## Funding acknowledgements

Financial Rights acknowledges the financial support for our core services provided by the Financial Counselling Services Program administered by the NSW Department of Finance and Services (Fair Trading) and the Community Legal Centres Program of the State Department of Justice and the Federal Attorney-General's Department, and the Community Legal Services Program operated by the Federal Attorney-General's Department. The QLD Department of Justice and Attorney General, also provided short-term funding.

We acknowledge funding from the Financial Counselling Foundation for Mob Strong Debt Help and our Federal Court financial counselling service. We acknowledge important project funding by Ecstra Foundation, for supporting some of our policy work and Mob Strong Debt Help.

We have also been fortunate enough to be the beneficiary of residual remediation funds passed on by industry participants. This only occurs where it is not practical to compensate affected customers directly, either because they cannot be located or because the amount per customer is negligible.

# Financials

Income	Actual
<b>Government Funding</b>	<b>\$2,225,460</b>
Attorney Generals - Commonwealth	840,049
Attorney General - State	202,957
Office Fair Trading	1,010,455
Legal Aid - QLD	52,000
Legal Aid - NSW	120,000
Qld Department of Justice & Attorney General	180,000
<b>Sector Grants</b>	<b>\$408,700</b>
Social Sector Transformation Fund	103,000
Financial Counselling Foundation	181,000
Ecstra	124,700
<b>Community Benefit and Other Income</b>	<b>\$965,154</b>
<b>Other Income*</b>	<b>\$965,154</b>
<b>Total Income*</b>	<b>\$3,599,314</b>

\* Other Income includes Residual Remediation funds where it is impractical to return funds to injured parties

Expense	Actual
<b>Service and Program Delivery</b>	<b>3,196,091</b>
Salaries, on costs Training	3,105,520
Travel	5,044
Program and Planning	85,527
<b>Administration and Infrastructure</b>	<b>\$332,237</b>
Premises Costs	212,332
Depreciation	46,645
Finance and Accountability	11,177
Insurances	14,192
Office Overheads	47,891
<b>Resources</b>	<b>\$140,627</b>
Library and Resources	31,784
Communications	108,843
<b>Total</b>	<b>\$3,668,955</b>







# Financial Rights

LEGAL CENTRE

## **Financial Rights Legal Centre**

Tel (02) 8204 1386

PO Box 538

Surry Hills NSW 2010

[www.financialrights.org.au](http://www.financialrights.org.au)