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FWC Project Review Team Department of Social Services CANBERRA ACT 2600

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REVIEW OF THE FINANCIAL WELLBEING AND CAPABILITY ACTIVITY PROGRAMS

Thank you for providing the opportunity for the St Vincent de Paul National Council of Australia to provide a response to the review of the Financial Wellbeing and Capability (FWC) Activity Programs.

BACKGROUND

St Vincent de Paul Society National Council of Australia

The St Vincent de Paul Society National Council of Australia is instituted by the International Council General under the Society's governance mandates contained in *The Rule* (Part III, Art. 15) and follows the international and Australian statutes.

In Australia, the St Vincent de Paul Society is governed by *The Rule* which inter alia embraces the principle of subsidiarity such that decisions are made as close as possible to the level where activities can be competently performed and in a manner that ensures local circumstances are taken into consideration (Part I, Art 3.9).

The Society in Australia consists of the National Council and six State Councils and two Territory Councils that together assist the Society's members to conduct good works. Each of the nine councils has established a civil incorporated body to deliver charitable works within their jurisdiction. In the context of this review of the FWC Activity Program, it is the Society's members who deliver most of the relief to those in need. Members operate from Conferences established in local communities. There are 1,188 Conferences across Australia.

These Conferences provide the Commonwealth with on-the-ground support personnel across the SA4s in which the Society delivers FWC Activity programs.

Under *The Rule*, the National Council is the Society's superior council in Australia (Part II, Art. 1.6). National Council authorises the legal entities that operate in Australia in the name of the St Vincent de Paul Society. Each of the Society's nine councils in Australia is registered as a charity with the Australian Charities and Not-for-profit Commission.

National Council and the Financial Wellbeing and Capability Activity Programs

National Council does not receive FWC Activity programs grants funds to deliver emergency relief, food relief or financial counselling support and services. It has been in receipt of grants funds to operate the secretariate for the National Coordination Group.

National Council's Chief Executive Officer is a member of the National Coordination Group. Prior to the establishment of the National Coordination Group, National Council assisted the Commonwealth to respond to the last national drought, emergency relief during the COVID-19 pandemic, the Black Summer Bushfires and the 2020 floods. This involved advising the Department of Social Services on how financial assistance could be quickly dispersed to those in immediate need and the value of the financial assistance packages

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to be distributed through the Society's State and Territory Councils in the affected areas.

Each of the Society's six State Councils and two Territory Councils receive grant funds under the FWC Activity programs. The Society's State and Territory Councils are providing feedback to this review of the FWC Activity programs.

This submission is authored by the National Council, hereinafter referred to as 'National Council;' it draws on material provided by the State and Territory Councils and where this is the case, an attribution is made to a particular Council.

Where comments relate to the activities or the common views held by all the Society's nine Councils, the term 'the Society in Australia or 'the Society' is used.

SUBMISSION

Context

The St Vincent de Paul Society in Australia distributes approximately \$50 million per year in emergency relief. Approximately 35 per cent of these moneys come through FWC Activity programs grant funding, with the remainder from income generated by (i) the Society's retail network (Vinnies shops); (ii) fundraising activities conducted by each State and Territory Council; and (iii) annual, nationally facilitated fundraising campaigns.

Traditionally, the majority of those seeking assistance from the Society identify income support pensions and working age payments as their main source of income. However, people from backgrounds previously unknown to the Society, including full time employees and households with mortgages, are increasingly seeking assistance. High inflation, increased interest rates and cost of living pressures are weighing heavily on incomes and expenditure. Nationally, around one third of those seeking assistance from the Society in Australia live with a disability and 60 per cent are female. Depending on location, up to one in four of the people provided with assistance identify as First Nations People.

This submission reflects advice from those engaged at the grassroots in local communities who have long histories of helping people in times of crisis, including responding to national and state natural disasters. National Council has drawn on the insights of Society personnel involved in the delivery of support at the local level and those who administer and coordinate the delivery of FWC grant funds across SA4s to gain insights into what strategies and actions best respond to addressing immediate financial and material need, and how individual needs have changed over recent years and are continuing to change.

Finally, National Council acknowledges that 'emergency relief' services are also funded by State and Territory governments to varying degrees. 'Business-as-usual' coordination of these services across Commonwealth and State and Territory governments is disjointed. The recent establishment of the National Emergency Management Agency provides an inter-government mechanism and a real opportunity to bring greater coordination of emergency relief during and following times of national natural disasters. National Council engages in other fora around the alignment of the NGO sector in this space.



RECOMMENDATIONS BY FOCUS AREA

Focus Area 1: Current operating environments and systemic issues

- 1. That the Commonwealth include a component seeking expressions of interests from providers that can demonstrate the capacity to deliver emergency funds through the emergency relief and food relief programs during times of national natural disaster in the next tender for the FWC Activity programs.
- 2. That the Commonwealth offers emergency relief providers the ability to embed disaster relief into businessas-usual operations, and access funding that includes a preventive component, can be targeted to areas at elevated risk of future disasters and enables providers to tailor responses to client need.

Focus Area 2: Changing client needs

3. That recognising the number of people in crisis seeking assistance on a business-as-usual basis under the FWC Activity programs, and the number of episodes a presenting person requires to have their needs addressed, the Department of Social Services increase the baseline funding of emergency relief under the FWC Activity programs by a minimum of 30 per cent for the 2024-25 period and beyond.

Focus Area 3: Best practice service delivery

- 4. That the Department of Social Services support providers that want to explore the benefits and challenges of providing wraparound support for people in need of emergency relief and food relief as part of their service delivery model, including the development of methods for monitoring referrals and evaluating referral outcomes; and
 - (i) If the Department of Social Services is supportive of this, it considers matching these activities with a per capita supplementary funding amount; and
 - (ii) If the Department of Social Services agrees with (i), it build this additional activity into the next tender for the FWC Activity programs.

Focus Area 4: Workforce capacity and capability

- 5. That the Department of Social Services ensures that the next tender for the FWC Activity programs includes adequate financial resources to allow providers to cover the costs of delivering training to their FWC workforce. This would enable employees and volunteers to gain sufficient capacity and capability to respond to rising demand and the increased complexity of the needs of an expanding number of vulnerable clients.
- 6. That the Department of Social Services supports providers to promote cultural diversity and inclusive practice within FWC Activity programs, including enabling them to explore opportunities for the co-design of services with Aboriginal Controlled Community Organisations and Indigenous-led and multicultural organisations, and disability providers.

Focus Area 5: Place-based approaches

7. That grant funds should not be redirected from universal service provision to a place-based approach. If the Department of Social Services determines that a place-based approach to funding FWC Activity programs is to be adopted, it should be funded in addition to universal service provision.

Focus Area 6: Future funding arrangements

- 8. That FWC Activity programs offer grant agreements of no less than four years and no more than five years.
- 9. That the Department of Social Services undertake periodic reviews of grant indexation with the goal of passing on to providers additional funds that cover the real costs incurred by providers.

Focus Area 7: Improved outcomes and data

10. That the Department of Social Services builds the evidence base to inform the ongoing design and delivery aspects of FWC Activity programs by making further investments in the sector's data collection, linkage, integration, dissemination, and data analytics capacity.



RESPONSES TO QUESTIONS BY FOCUS AREA

1. Current operating environment and systemic issues

What future role do you see for FWC programs in disasters, and other crisis events?

The Society's emergency relief programs are well-positioned to assist people during and after natural disasters or other crisis events. The Society in Australia's organisational structure means there are people on the ground in impacted communities when disasters occur and who can assist with long-term recovery.

The Society in Australia self-funds most of its disaster response work. This means that fundraising is diverted away from business-as-usual operations. This is unsustainable and is particularly challenging as natural disasters become more frequent and prolonged and people's capacity to donate is significantly impacted by external economic factors, such as the current cost of living crisis.

The Society in New South Wales (SVdP-NSW) continues to support communities impacted by the flooding that devastated parts of the state throughout 2022. SVdP-NSW has distributed over \$5.5 million in funds it raised for direct financial assistance to people worst affected by the floods. It has also distributed \$1.3 million in Commonwealth disaster-relief funding, supplied over \$3.9 million in grant payments and disbursed over \$1.6 million in youchers and other assistance.

The future role for the Society's emergency relief programs in disaster response will be defined by an ability to embed disaster capabilities into core operations, and to access funding that includes a preventive component, can be targeted to areas at elevated risk of future disasters, and enables providers to tailor responses to client need.

The Society's capacity to respond adequately and quickly to meet needs on-the-ground would be enhanced by a more flexible funding approach that expedites the process under the Commonwealth Grant Rules and Guidelines for allocating grants or varying existing grant agreements, and which supports tailored responses to client needs by expanding opportunities to fund what is needed. For example, it became very apparent on the Lower South Coast of NSW during the 2019-20 bushfires that mental health support services were needed. However, they were not available and could not be sub-contracted through the additional financial grants moneys that flowed through the emergency relief component of the FWC Activity program that the Society received, as they did not constitute emergency relief.

As noted above, National Council has been involved in assisting the Commonwealth to distribute funds through FWC Activity programs during times of national natural disasters. Other national charities – The Salvation Army and The Australian Red Cross – have also been also involved. The Society has previously called for standing panels to be established in locations deemed at high-risk of a natural disaster and we understand that NEMA is currently preparing these maps.

A future iteration of the FWC Activity programs should include a component that invites expressions of interest from providers that can demonstrate the capacity to deliver emergency funds through the emergency relief and food relief programs during times of national natural disaster in the next tender for the FWC Activity programs.

Successful applicants should then be registered on a panel from which the Commonwealth could request assistance. The members of the panel would need to have good linkages to the National Emergency Management Agency.

What other Australian Government policies, frameworks, reforms, or systems issues are changing the way FWC services are delivered, or impacting FWC clients?

The Society's emergency relief and financial counselling services are facing sustained, increasing levels of demand due to the cost of living and housing crises nationally. The Society in Canberra-Goulburn (SVdP-C-G) reported a 16.9 per cent increase in demand in FY 2022-23 and has forecast a 17 per cent increase in demand in the current financial year based on Q1 data. In NSW, there was a 15 per cent increase in demand for emergency relief assistance in July to November 2023 when compared with the same period in 2022. In South Australia, the crisis help line received 19,268 calls in FY 2022-23, an increase of close to 3,000 calls when compared to the previous year.



The Society was pleased to see increases to income support payments, particularly JobSeeker, and Commonwealth Rent Assistance in the May 2023 Federal Budget but notes these increases are not enough to help vulnerable people avoid financial crisis.

The Society's analysis over the past decade identifies key issues that are driving persistent levels of poverty and disadvantage that impact FWC clients and place pressure on FWC Activity programs. These include the prohibitive costs of living; inadequate low-income support payments; a lack of affordable housing (for renting and to buy); limited social housing options; unfunded or insufficient levels of government-funded housing and homelessness programs; and inadequate funding and services for refugees and people seeking asylum including gaps in service provision.

Many people living in poverty are already receiving the combined support of government agencies and charities. For the worst types of poverty there are obvious solutions, for example, increasing the base rate of income support payments and income threshold for income support recipients, properly funding the Status Resolution Support Service (for people seeking asylum), increasing Commonwealth Rental Assistance, and increasing social and affordable housing and finding a replacement for the National Rental Affordability Scheme that ends in 2026.

A framework that significantly impacts FWC clients is the National Strategy for Volunteering. Volunteers play a pivotal role in the delivery of emergency and food relief for The Society in Australia and across the sector. In view of this, it is concerning that volunteering has steadily declined over the past decade and experienced a pronounced drop during the COVID-19 pandemic. Efforts have been directed to overcome this challenge. However, the absence of a strategic approach to volunteering significantly hinders the development of the volunteering infrastructure in Australia.

2. Changing client needs

In what ways can FWC programs and services better respond to current and future client demand, and people with complex needs?

The Society in Australia is struggling to meet growing demand for assistance nationally. SVdP-NSW, our largest jurisdiction, had fully expended their total FY 2024 FWC Activity grant funding by August 2023.

The ability to fill funding gaps through fundraising is constrained by donor fatigue and reduced discretionary income among donors and visitors to Vinnies shops. This leaves people in crisis with limited options because providers across the community sector are experiencing similar pressures. The Society in Victoria (SVdP-Vic) reports that people in need of assistance are turning to credit cards or Buy Now Pay Later products to pay for daily essentials or to avoid losing their homes.

Baseline funding for the emergency relief program needs to be increased for the Society in Australia to continue to meaningfully assist people in crisis and to help account for the:

- increased cost of daily living essentials, transport, utilities, and housing;
- sustained elevated levels of demand (forecast to continue throughout 2024);
- emergence of a new cohort of people seeking emergency relief, including full-time employees and mortgagees;
- increased instances of repeat requests for assistance; and
- increased wages and costs of delivering services for the Society nationally.

Recognising the number of people in crisis seeking assistance on a business-as-usual basis under the FWC Activity programs, and the number of episodes a presenting person requires to have their needs addressed, the Society recommends an increase to the baseline funding of emergency relief under the FWC Activity programs by a minimum of 30 per cent for the 2024-25 period and beyond.

An uplift in funding would also enable providers to adequately cover both the direct and indirect costs of service provision.



What do you consider is an effective FWC early intervention approach for a person at risk of financial stress and hardship?

People at risk of financial stress and hardship are best assisted by being connected with a specialist service that can provide them with the resources, advice, and support to help alleviate crisis.

Members of the Society do this through direct, ongoing relationships with disadvantaged and marginalised people living in poverty. Individuals and families assisted in this way benefit from trusted relationships that provide emergency relief, financial advice and referrals and information in response to mental or physical health issues, needs related to housing instability or domestic and family violence, for example.

The Society is only able to assist people that seek help or who are referred by others. However, there is a widespread non-take-up of programs and services that is driven by a lack of awareness about services, the stigma associated with asking for assistance, and a perception that the cost or barriers to accessing help outweigh the expected benefits.

Improving access to information and encouraging help-seeking behaviours are important components of an effective approach to early intervention.

3. Best-practice service delivery

How can the sector and the department better support organisations to provide wraparound services, and effective referral pathways for clients, particularly those with complex or multiple needs?

Wraparound support is particularly beneficial for recurrent clients to establish referral pathways. Thorough assessment and triaging when clients first present for emergency relief facilitates successful wraparound support and has the potential to relieve pressure on the program.

Assessment and triaging require adequate funding and suitably skilled staff and volunteers, and training and resources are needed to enable the FWC workforce to assist vulnerable people to navigate referral pathways.

The Society in Queensland (SVdP-QLD) identifies a need for services to gain a better operational picture of how wrap-around support is delivered, particularly in the monitoring of referrals and evaluation of their outcomes, before determining if it represents best practice for their service.

The Society recommends that the department support providers that want to explore the benefits and challenges of providing wraparound support for people in need of emergency relief and food relief as part of their service delivery model, including the development of methods for monitoring referrals and evaluating referral outcomes.

If the department is supportive of this approach, it should consider matching these activities with a per capita supplementary funding amount and build this additional activity into the next tender for the FWC Activity programs.

SVdP-QLD supports the recent integration of Asklzzy into service agreements for funded providers. This ensures that Asklzzy remains a dynamic, current, and user-friendly online community directory to connect people in need with essential services. SVdP-QLD encourages the department to continue to support a unified source of accurate information and further streamline the delivery of wrap-around services.

Have you experienced a high-quality financial wellbeing and capability service and what did this look like?

Has your organisation introduced a service improvement or innovation that is making an impact in improving client outcomes? What can be done differently or more efficiently in FWC programs, such as the national arrangements for the National Debt Helpline?

In 2024, SVdP-NSW plans to expand its 'Vinnies Vans' services to meet demand in areas such as Greater Western Sydney, Campbelltown, and Coffs Harbour, and increasing the number of stoppages on existing services in response to increased need. Close to 3,000 volunteers give their time to support these vans each year by preparing meals, driving vans, delivering assistance, and supporting people experiencing hardship with referrals to additional services.



In 2022-23, this service has supported twice as many people compared with prior to the COVID-19 pandemic, with 2,500 people seeking assistance each week from the van services in Sydney alone. The expansion of services will be complemented by an enhanced capacity to capture and analyse data on the impact of the service offering, including referrals made.

SVdP-QLD are working toward the development of a centralised database which will allow different systems to connect and share data. Using a robust data governance framework, this will provide an increased capacity to quickly refer people receiving emergency relief to other specialist and mainstream programs offered by SVdP-QLD, including NILS and services for disaster relief, youth, education, refugees, families, and homelessness.

Ozanam House accommodation and homelessness resource centre operated by the SVdP-Vic (VincentCare) provides a combination of accommodation and health and wellbeing services to people experiencing homelessness. Services include a GP and nursing clinic, Victoria's only dentistry clinic for people experiencing homelessness, access to legal information, case management and alcohol and drug programs.

What approaches could help fill FWC service gaps, including in food relief and in regional and remote areas?

During the COVID-19 pandemic, SVdP-QLD established a virtual model of assistance that drew on volunteers from across the state to deliver emergency relief. Payments and support were provided online via food vouchers and online payments. Learnings from this approach have since been adopted in times where local capacity is limited in regional and remote areas, during disaster relief, and over the Christmas period to account for staff and volunteer shortages.

SVdP-QLD is expanding on this approach in partnership with Woolworths by working to develop a purchase order as an alternative to gift cards as a way of delivering emergency relief. Among other features, the purchase order can be emailed to clients, which can fill a gap in food relief in regional and remote areas.

4. Workforce capacity and capability

How can the sector and department ensure the FWC workforce has sufficient capacity and capability to meet rising demand and the needs of vulnerable clients?

The department can ensure that the next tender for the FWC Activity programs includes adequate financial resources to allow providers to cover the costs of delivering training to their FWC workforce. This would enable employees and volunteers to gain sufficient capacity and capability to respond to rising demand and the increased complexity of the needs of an expanding number of vulnerable clients.

SVdP-Vic highlights the value of and need for case management staff to work with people with complex needs. This work often falls to financial counsellors, who lack the capacity and skills to provide this specialised case management support. SVdP-Vic also recommends greater training and resources for staff and volunteers to assist vulnerable people through increased awareness of financial scams and the risks associated with Buy Now Pay Later products.

SVdP-QLD identifies the challenges to the sector's workforce capacity due to the decline in volunteering in Australia. Research by Volunteering Australia found that volunteering among people aged 18 years and older has significantly declined. In 2014, volunteers contributed 743.3 million hours to the community. By 2020, this had decreased to 489.5 million hours.

This has major implications for programs such as emergency relief, where the Society's members (not staff) are the main avenue through which assistance is provided. The situation is further exacerbated by the increase in demand now being experienced.

The 2023-24 Volunteer Grants Program was a welcome recognition of the need for additional support for the role of volunteers.



What are some ways the sector and department could better support Aboriginal community-controlled and Indigenous-led organisations, multicultural organisations, and disability providers to deliver FWC services?

SVdP-Vic deliver several programs in partnership with local Aboriginal Community Controlled Organisations (ACCOs), including the successful 'My Money 'community education program in partnership with Rumbalara Aboriginal Co-operative. SVdP-Vic highlight the benefits of fostering inclusive practices and the promotion of cultural diversity within programs, which involves the co-design of services with Indigenous and multicultural providers, and equitably sharing program resources.

A significant barrier for First Nations People in accessing services is a reluctance to access mainstream or what is perceived as faith-based services. To overcome this barrier, services could consider either colocation with ACCOs and Indigenous-led organisations or outreach in partnership with these organisations.

The Society recommends that the department supports providers to promote cultural diversity and inclusive practice within FWC Activity programs, including enabling them to explore opportunities for the co-design of services with Aboriginal Controlled Community Organisations, Indigenous-led and multicultural organisations, and disability providers.

5. Place-based approaches

What are the advantages or challenges of a place-based approach to funding FWC services into the future?

The Society supports place-based initiatives and adopting a community-led approach to assisting those in need, particularly in areas where there is entrenched disadvantage. Place-based funding enables communities to access and use funding to meet their local needs and aspirations in a more integrated, holistic manner, while also strengthening community capacities through participation in program governance and decision-making about funding allocations.

The Society in Australia believes universal service provision has a vital role to play, particularly with respect to early intervention and prevention. However, any significant changes to grant allocations and structures toward a place-based approach under the FWC Activity would have a significant impact on how we assist those in need, particularly with respect to potential referral pathways.

As such, the Society recommends that grant funds should not be redirected from universal service provision to a place-based approach. If a place-based approach is to be adopted, it should be funded in addition to universal service provision.

Do you have experience in working in place-based or shared decision-making models of service delivery? What are your reflections? Please provide examples.

SVdP-NSW has identified the implementation of place-based approaches as a priority initiative under its Strategic Plan 2024-28 to deliver more and better outcomes for the most disadvantaged communities. This work emphasises partnering with community members to design local solutions and guide action.

Place-based pilots have commenced at the Nagle Centre in Campbelltown and at the Redfern Vinnies Support Centre Hub. While still in its infancy, the rollout of place-based approaches will enable SVdP-NSW to increase its impact by sharing resources and collaborating with local communities to achieve better outcomes.

Considerable time and resources are required to establish effective place-based approaches. As outlined by SVdP-C-G, much of the effectiveness of this approach is dependent on the quality of local leadership and service footprints.

6. Future funding arrangements

What would sustainable and more flexible FWC grants funding look like for you?

Longer term grant agreements of no less than four years and a maximum of five years would lead to more sustainable FWC grants funding. This would enable longer-term planning, reduce the costs associated with frequent re-tendering processes, and provide more certainty and stability to the entire sector.



To improve flexibility, these arrangements should include periodic reviews of grant indexation to account for changes in inflation, wages growth, and other service delivery costs or extenuating circumstances. Grant funding over the term of the agreement should also be commensurate with the risk borne by the provider.

The Society recommends that the FWC Activity programs offer grant agreements of no less than four years and no more than five years, and that the department undertake periodic reviews of grant indexation with the goal of passing on to providers additional funds that cover the real costs incurred by providers.

How can FWC funding arrangements be structured in the future to better respond to local community needs, and time-limited surges in need?

The terms of grant agreements should be longer in locations where services face difficult establishment conditions, such as limited services and infrastructure, and difficulty with recruiting appropriately trained and qualified staff. This structure would lay the foundation for improved capacity to respond to local community needs.

Improvements should also be made to transitional funding arrangements. These are needed to maintain service continuity, reduce the risk of service failure, and give grantees (existing and new) sufficient time to either wind down or establish new services. It takes time to do both well, including transferring cases, winding up staff, operations, and service outlets, and establishing or changing referral networks.

7. Improved outcomes and data

What are your views on the proposed FWC client and service-level outcomes and draft FWC Activity Program Logic? Are there outcomes your FWC services achieve that are not included? Can you see how your services align with the draft Program Logic?

The Society supports the inclusion in the FWC Activity Program Logic that emergency relief, as an acute crisis response, can have only a limited influence on medium- and long-term outcomes. These are achieved by engagement with wraparound services and referrals. Our members are equipped to provide a soft-entry point (via referral pathways) to medium- to long-term support which may result in more sustained outcomes for people in financial crisis. However, their primary function is to provide immediate financial and material support to people in crisis, in a way that maintains the dignity of individuals and families.

The Society is also pleased to see that the program logic presents a full and accurate context in which emergency relief is currently delivered, including recognition that service providers face increased financial pressure from the cost of delivering quality services and responding to high demand.

While the Society acknowledges the benefits of an outcomes approach, implementing it poses challenges, especially in measuring and monitoring the outcomes related to emergency and food relief because of the transactional nature of these programs. A sector-wide commitment is necessary to develop monitoring and accountability structures that reflect broader financial wellbeing goals for vulnerable individuals and families. It is equally important to recognise that such arrangements vary across providers based on scale, scope, and service type.

A stronger evidence base is imperative to inform the design and delivery aspects of FWC Activity programs. This necessitates further investment in data collection, linkage, integration, dissemination, and data analytics capacity within the sector.

The Society recommends that the department builds the evidence base to inform the ongoing design and delivery aspects of FWC Activity programs by making further investments in the sector's data collection, linkage, integration, dissemination, and data analytics capacity.

NEMA's 'Tell Us Once' project is designed to improve data sharing at the national level in time for national emergency declarations. Whilst this approach may not be required to the same extent for business-as-usual service delivery, NEMA may be able to offer insights.

Further, visibility of the MADIP project is limited. Service providers and the public would benefit from understanding this project, particularly its aim, how data will be linked, how it will be used, and how it potentially could inform program design and grant funding.



Additionally, targeted funding streams to support the monitoring and evaluation efforts of service providers are required to boost sector efforts to align FWC services with intended outcomes. As part of this initiative, robust data collection, monitoring, evaluation, and feedback protocols will not only help in the assessment of the effectiveness of FWC programs but also promote continuous learning for service providers. More work should be done with The Treasury's <u>Australian Centre for Evaluation</u> to progress this work.

Additionally, the medium and long-term outcomes in the program logic could benefit from a more condensed period. For instance, "client's material needs are met" is not an effective long-term measure of material adequacy for individuals and families in need of emergency and food relief due to the transactional design of these programs. Therefore, we suggest a shorter assessment period for some of the medium and long-term impacts of the FWC Activity programs.

Lastly, despite interconnections between FWC programs, the program logic fails to illustrate such connections. For instance, many emergency relief providers also offer financial counselling services but there is insufficient acknowledgement of how these services interact and complement each other to reduce financial stress.

Similarly, referrals to specialists and other supports are integral outputs of all FWC Activity programs, but their significance in alleviating financial stress and improving people's wellbeing is overlooked in the program logic. The Society understands the complexity and additional resources required to collect referral data but suggest that other forms of data collections, such as surveys, could be supported by the Commonwealth.

Does your organisation capture data on unmet client demand? If so, what information do you capture and how could the department work with your organisation to report this data?

The Society collects data on unmet demand to different degrees and in separate ways across jurisdictions. SVdP-QLD has recently begun to track how many of the calls received by their service for emergency relief result in the provision of assistance, and how many are referred to other providers. This undertaking is in its initial stages but will help identify possible best practice among regional variations in the Queensland service model and eventually inform improvement processes.

Data linkage has also been earmarked for research between the Queensland emergency relief and other program databases, including NILS, youth, housing, and migrant and refugee services.

Thank you once again for the opportunity to provide a response to the review of the FWC Activity programs. Please also refer to National Council's submissions to the Blueprint Expert Group — Developing a Not-for-Profit Sector Development Blueprint and A stronger, more diverse and independent community sector for more information.

Yours sincerely

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