



Consumer Credit
LEGAL SERVICE

Strategic Plan

2023- 2027

(Revised October 2024)



Acknowledgement of Country

Consumer Credit Legal Service (WA) Inc (CCLS) acknowledges the Traditional Owners of the land where we are located, the Whadjuk people of the Noongar nation, and all other First Nations peoples.

We pay our deepest respect to their Elders past and present and recognise this land was never ceded.

We acknowledge Aboriginal and Torres Strait Islander peoples strong connection to land, water, family, and community.

This Land is, was, and always will be, Aboriginal and Torres Strait Islander Land.



Our Vision

A community whose members are empowered to access free-of-charge information and advice to support their financial and consumer rights.

Our Purpose

To empower people experiencing challenging financial and consumer legal matters and advocate for fairer financial systems and consumer laws.

Our Values

Compassionate, Respectful,
Trustworthy, Collaborative and
Innovative

Theory of Change - Strategic Narrative

Consumer Credit Legal Service has a key role to empower, educate and represent consumers and key stakeholders on matters in relation to credit, debt and consumer issues. By providing information, referral, legal advice, support, education and representation, consumers are empowered to seek support, make informed choices and self-advocate to improve social and economic outcomes.

Because:

There is a need for legal advice and representation to consumers in WA in the areas of credit, banking and finance.

This is particularly the case for people with a disability, people with mental health challenges, people from Culturally and Linguistically Diverse backgrounds, Aboriginal and Torres Strait Islander people and people experiencing family violence

We believe:

That as the only specialist consumer CLC in WA that we have a role to empower, educate and represent consumers and key stakeholders on matters in relation to credit, debt and consumer issues.

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To employ evidence-based approaches to ensure its work is consumer informed and consumer led.

So, we provide:

Information, referral, legal advice, support, education and representation

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Genuinely engaging employment and volunteering opportunities

That leads to:

Consumers are empowered to seek support, make informed choices and self-advocate to improve social and economic outcomes.

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Happy and productive workforce

That results in:

All consumers have access to safe lending practices and can get support when they experience hardship.

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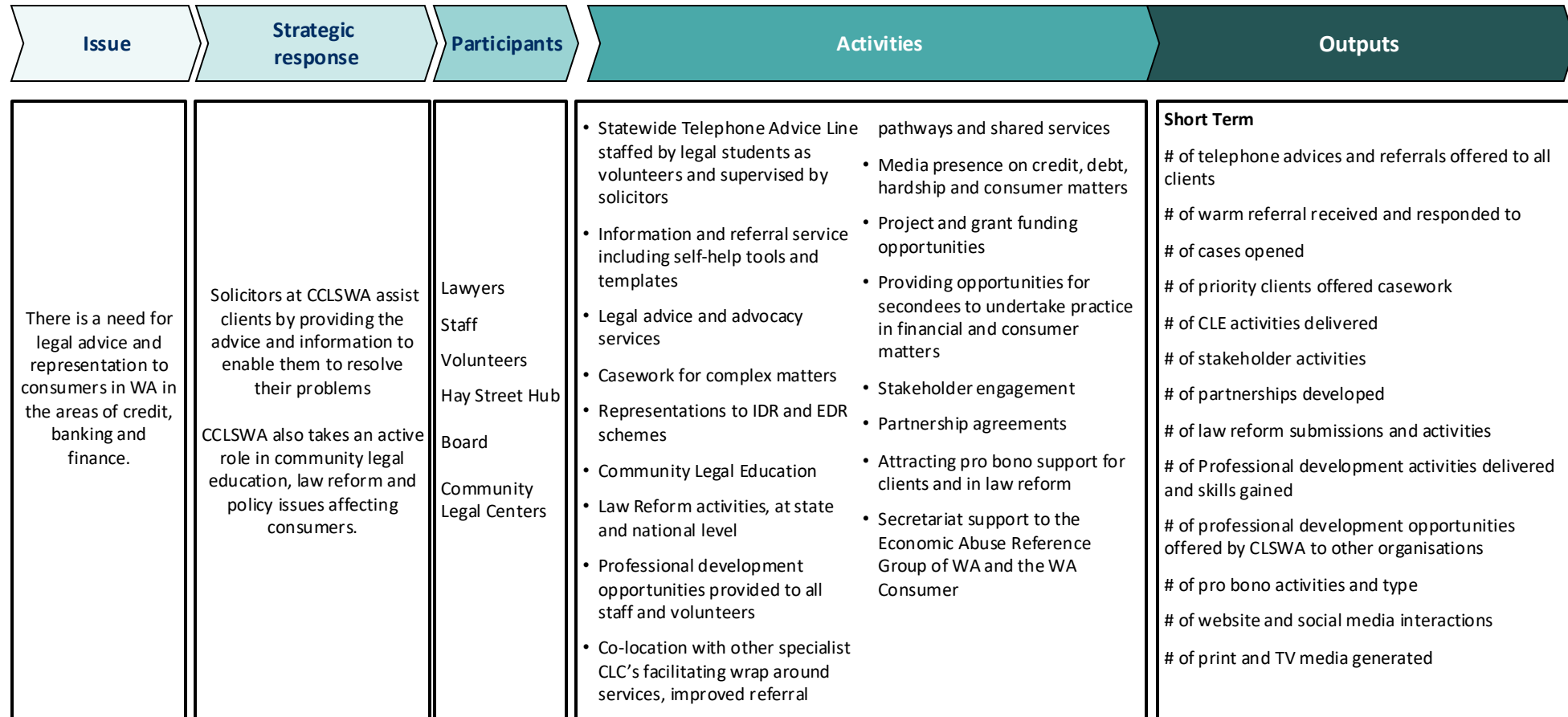
There are safer financial and consumer products in the market that do not exploit consumers.

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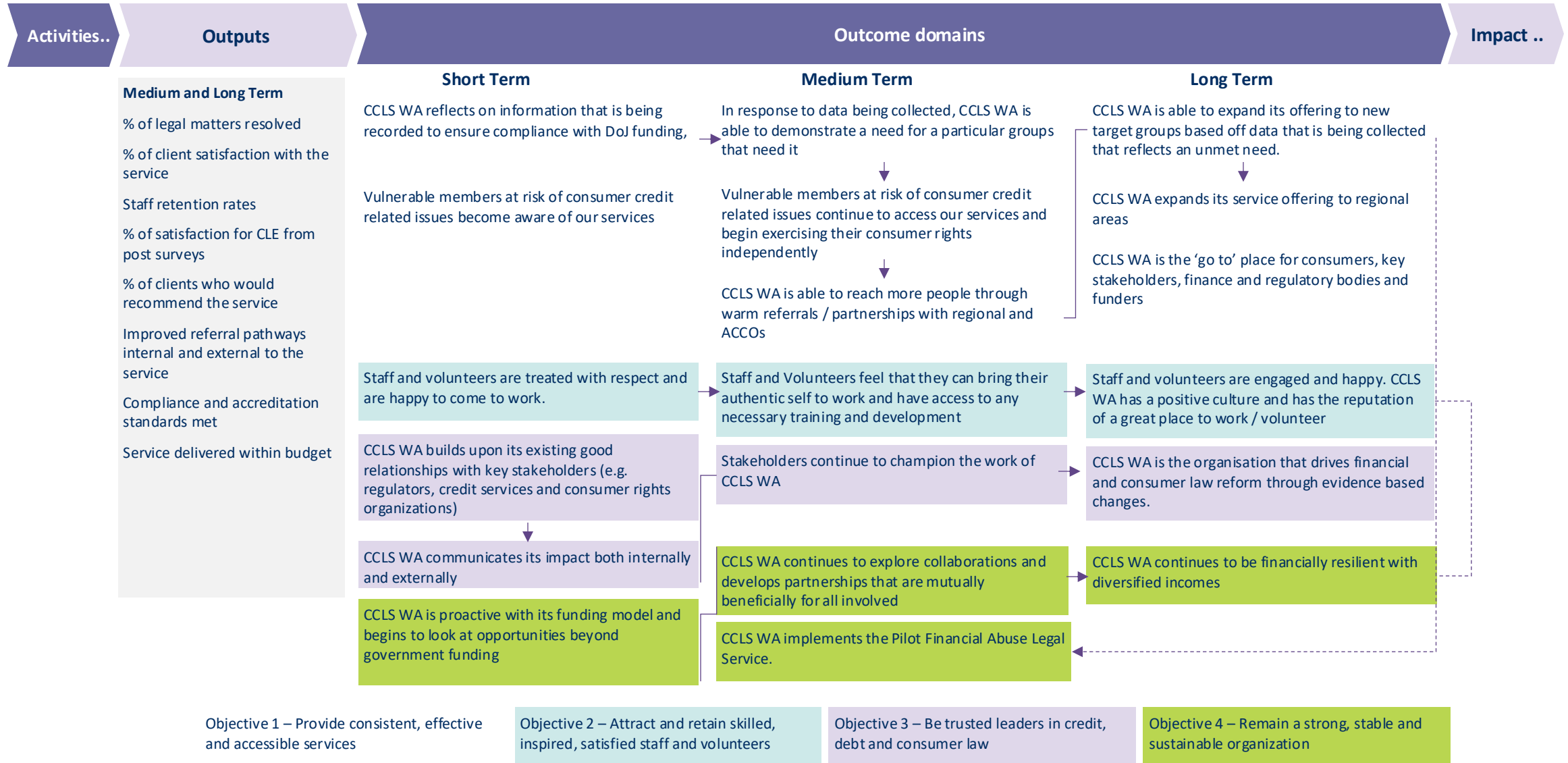
An organisation with a positive culture and a good reputation

Theory of Change

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Theory of Change



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Impact

All consumers have access to safe lending practices and can get support when they experience hardship.

There are safer financial and consumer products in the market that do not exploit consumers.

We have access to information and processes to have our voices heard on issues that matter to us

People with lived experience are included in government and regulatory decisions that impact on their financial wellbeing.

A safe place for people experiencing family violence.

A safe place for people from CaLD and ATSI communities

Consumers know and can exercise their financial and consumer rights

WACOSS Outcome Framework – Empowered: We have access to justice

WACOSS Outcome Framework – Stable: We can pay for things we need and we are financially secure

WACOSS Outcome Framework – Safe: We are free from exploitation, abuse and neglect

Strategic Priorities

**Provide
consistent,
effective and
accessible
services**

**Attract and
retain skilled,
inspired,
satisfied staff
and volunteers**

**Be trusted
leaders in
credit, debt and
consumer law**

**Remain a
strong, stable
and sustainable
organisation**



Inputs

- A compassionate and emotionally intelligent staff and board
- Services that are culturally safe and appropriate
- Shared central office space co-located with Women's Legal Services and Circle Green and Ruah Mental Health Legal Service
- Capacity to undertake regional visits
- Funding to June 2025 from the Department of Justice with a possible 5-year extension
- Project and Grants funding
- Qualified and experienced legal and non-legal staff
- Strong volunteer and secondee support
- Strategic and business plans
- Part of Consumer and Financial Advocacy Network (nationally-based)
- Specialist knowledge by legal staff in credit and consumer law
- Strong stakeholder engagement at a state and national level
- Representation in key forums nationally and statewide
- Priorities assistance to clients experiencing other barriers
- Skilled Board of Management
- Good engagement and support from pro-bono partners
- Equipment and resources to undertake the work required
- Evidence-based research and theory to underpin the work
- Contemporary and accessible website with self-help templates and fact sheets
- Development of consumer-led practice models
- Developing a Reconciliation Reflect Plan

Activities

- Statewide Telephone Advice Line staffed by legal students as volunteers and supervised by solicitors
- Information and referral service including self-help tools and templates
- Legal advice and advocacy services
- Casework for complex matters
- Representations to IDR and EDR schemes
- Community Legal Education
- Law Reform activities, at state and national level
- Professional development opportunities provided to all staff and volunteers
- Co-location with other specialist CLC's facilitating wrap around services, improved referral pathways and shared services
- Media presence on credit, debt, hardship and consumer matters
- Project and grant funding opportunities
- Providing opportunities for secondees to undertake practice in financial and consumer matters
- Stakeholder engagement
- Partnership agreements
- Attracting pro bono support for clients and in law reform
- Secretariat support to the Economic Abuse Reference Group of WA and the WA Consumer Advocacy Network.

Short-term outputs

of telephone advices and referrals offered to all clients

of warm referral received and responded to

of cases opened

of priority clients offered casework

Outcomes of case work including debt waivers/reductions and favorable client outcomes

of CLE activities delivered

of stakeholder activities

of partnerships developed

of law reform submissions and activities

of Professional development activities delivered and skills gained

of professional development opportunities offered by CLSWA to other organisations

of pro bono activities and type

of website and social media interactions

of print and TV media generated

Medium & long-term outputs

% of legal matters resolved

% of client satisfaction with the service

Staff retention rates

% of satisfaction for CLE from post surveys

% of clients who would recommend the service

Improved referral pathways internal and external to the service

Compliance and accreditation standards met

Service delivered within budget

Mapped to the WACOSS Outcomes Measurement Framework

Short-term outcomes

Safe

We are free from exploitation, abuse and neglect.

- Evidenced changes in legislation or regulation
- Consumers know and can exercise their financial and consumer rights
- A safe place for people experiencing family violence.
- A safe place for people from CaLD and ATSI communities
- Consumer Credit Legal Service is the 'go to' place for consumers, key stakeholders, finance and regulatory bodies and funders

Medium-term outcomes

Stable

*We can pay for things we need
We are financially secure*

- All consumers have access to safe lending practices and can get support when they experience hardship.
- There are safer financial and consumer products in the market that do not exploit consumers.

Long-term outcomes

Empowered

We have access to justice

- We have access to information and processes to have our voices heard on issues that matter to us
- People with lived experience are included in government and regulatory decisions that impact on their financial wellbeing.
- Law reform initiatives consider the needs of priority groups.

Objective 1 – Provide consistent, effective and accessible services

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
1.1 Ensuring services are targeted and meet highest need	Short term	<ul style="list-style-type: none"> • Delivery against DoJ annual statement of services • Data reflects access by priority groups as defined by DoJ • Launch the new Financial Abuse Legal Service (FALS) pilot. 	<ul style="list-style-type: none"> • Full delivery of targets set out in the Statement of Services • Number of interactions and number of clients for the new FALS along with feedback from these clients & stakeholders. 	<ul style="list-style-type: none"> • Undertake a review of current data and develop a dashboard report of services to priority clients • Ensure resources developed are in plain English • Deliver CLE targeting priority groups and issues
1.2 Expand service offerings (region and type)	Med-long term	<ul style="list-style-type: none"> • Data reflects increased regional and remote access to services • Organisational visits made to regional centres • Warm referral process promoted, and support provided to other services • Funding options expanded to include a diversity of service offerings 	<ul style="list-style-type: none"> ▪ Increase in the number of clients from regional and remote locations by 20% ▪ # of visits to regional and remote areas and services delivered including CLE ▪ Increase in the number of warm referrals received by 25% ▪ Evidence of funding outcomes. ▪ # and types of increased services provided 	<ul style="list-style-type: none"> • Undertake two regional visits in the 12-month period – priorities for period are currently Kimberley and Murchison • Continue to socialise the warm referral process to key referral agencies (CLC's, i.e. Financial Counsellors) and measure success • Explore opportunities for funding to diversify services, including bankruptcy, insurance and superannuation. • Develop a plan for a fee for service training arm of CCLS

Strategy	Time Frame	How we will drive change	How we will measure success	Priority Actions 2024/25
1.3 Elevate the voice of lived experience in service delivery and planning	Short term	<ul style="list-style-type: none"> The service model service meets the needs of consumers, in particular priority groups. Ongoing client surveys are conducted, and feedback is used to shape service delivery priorities and models of service. 	<ul style="list-style-type: none"> Published lived experienced framework 70% satisfaction achieved in client and stakeholder surveys Evidence of client and stakeholder surveys being presented, and recommendations acted upon 	<ul style="list-style-type: none"> Develop a lived experience framework for the organisation (based on the WACOSS model) Client surveys developed and collected for all clients accessing the service on an ongoing basis Results of surveys are provided to staff and the Board on a quarterly basis Undertake annual stakeholder surveys
1.4 Ongoing Monitoring and evaluation	Ongoing	<ul style="list-style-type: none"> Robust data collection methods that capture data necessary for reporting and for service evaluation are in place, Qualitative research including case studies and consumer stories and impact reporting dashboard in place 	<ul style="list-style-type: none"> Action step fully operationalised Use of qualitative research in reporting and Evidence of meeting compliance requirements and quality cross checks 	<ul style="list-style-type: none"> Develop and deliver a qualitative research evaluation method such as issue-based focus groups, Most Significant Change technique, SROI.
1.5 Look to collaborate with Aboriginal Community Controlled Organisations to expand regional capacity and delivery	Short to medium term	<ul style="list-style-type: none"> Develop a Reflect Reconciliation Action Plan Advisory opportunities in place with representatives from regional, remote and metropolitan Aboriginal Community. 	<ul style="list-style-type: none"> Working Group minutes and actions # of ACCO consultations and their engagement Increase in the current number of ATSI clients accessing the service by 20% # of ATSI staff/volunteers/Board members recruited Evidence of culturally appropriate resources and materials developed/accessed 	<ul style="list-style-type: none"> Continue the work of the endorsed Reflect RAP including a Reflect RAP working group Reach out to ACCO's to promote the service, consult on issues relevant to the community and engage in referral pathways Actively recruit Aboriginal staff, volunteers and Board members Develop and present culturally appropriate CLE material and promote

Objective 2 – Attract and retain skilled, inspired, satisfied staff and volunteers

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
2.1 Maintain flexible attractive workplace benefits	Ongoing	<ul style="list-style-type: none"> Employment conditions offer flexible hours to assist with caring responsibilities and work life balance Regular staff surveys and performance reviews take place 	<ul style="list-style-type: none"> High staff retention rates 90% satisfaction in staff survey results Annual performance reviews completed, and feedback provided to Board 	<ul style="list-style-type: none"> Ensure recruitment processes and employment conditions promote a culture of a flexible workplace Embed psychological safety measures into practice for staff, volunteers and the Board.
2.2 Expand the utilisation and retention of volunteers and secondees	Short to Medium term	<ul style="list-style-type: none"> All Volunteers and secondees are provided with appropriate training, supervision and support Volunteers gain a genuine experience working with consumers 	<ul style="list-style-type: none"> # Number of volunteers recruited and trained, and the retention rates are high Evidence of training provided and access by volunteers Evidence of volunteer valuing activities 80% satisfaction from volunteer & secondee satisfaction surveys 	<ul style="list-style-type: none"> Continue to deliver recruitment drives for volunteers on a regular basis Undertake regular review of training for volunteers and secondees Continue to implement and promote volunteer valuing activities such as awards, skill development opportunities, the provision of references etc. Undertake an annual volunteer/secondees survey Use information gathered above to begin to explore the return on investment for volunteers and secondees
2.3 Ensure appropriate training and development for staff	Ongoing	<ul style="list-style-type: none"> Staff can access resources for training and professional development Minimum professional development standards are met 	<ul style="list-style-type: none"> Training manual completed and operationalised % of budget allocation to training and professional development increased # of PD/training activities attended, satisfaction measured, and skills outcomes registered in a skills audit/register 	<ul style="list-style-type: none"> Develop, appropriately fund, and formally assess an annual training and PD plan that meets staff, client, and business needs of the organisation Continue to provide supervisor training to all legal staff

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2023/24
2.4 Identify opportunities for staff to expand their skills and profile	Ongoing	<ul style="list-style-type: none"> • Social media and website highlights staff achievements in case work and law reform • Media sees CCLS as a credible news source for matters relating to credit, debt and consumer law. • Engage in projects/CLE/committee representation 	<ul style="list-style-type: none"> • # of social media posts and measure of engagement and sharing of posts • Increase in social media followers by 20% • Evidence of media articles/opinion pieces being published and reshared • Engagement in projects and committee representation 	<ul style="list-style-type: none"> • Continue to regularly post on social media and website on achievements of staff, informative case studies and testimonials • Maintain a register of media conducted and associated media contacts • Support staff to develop skills and PD with committee and project work
2.5 Sustain a positive workplace culture where staff are empowered and backed by a team approach	Ongoing	<ul style="list-style-type: none"> • Work life balance is a priority for staff • Regular staff and team meetings take place • Work Health and Safety is monitored, and critical incidents are reported and responded to in a timely manner 	<ul style="list-style-type: none"> • Low leave accruals/high retention rates • Staff working hours reflect their contracted hours of work • # of team meetings and supervision sessions conducted and attendance to be at least 80% • # of critical incidents and evidence on them being managed 	<ul style="list-style-type: none"> • Continue to monitor leave provisions and overtime via timesheets • Continue to ensure team meetings occur regularly using a meeting agenda (and WHS as a standing agenda item) with action notes recorded and distributed • Register of critical incidents is kept and actions taken to minimise risk • Ensure a quality induction is provided for all staff and volunteers

Objective 3 – Be trusted leaders in credit, debt and consumer law

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
3.1 Leverage collaboration with key stakeholders to achieve our purpose	Medium to long term	<ul style="list-style-type: none"> • MOU's/Formal agreements are in place with key partners that work with the organisation • Good relationships are in place with key stakeholders including regulators, finance and credit services and consumer rights organisations. 	<ul style="list-style-type: none"> • # of partnership agreements in place and with which stakeholders • # of key stakeholder meetings attended by CCLSWA staff • Evidence of CCLSWA contribution to stakeholder engagement 	<ul style="list-style-type: none"> • Implement the MOU with FCAWA in support of financial counsellors • Implement the Heads of Agreement developed with WLSWA, Ruah and Circle Green through the Hay Street Hub • Liaise with key stakeholders and attend regular forums, networks and advocacy opportunities
3.2 Drive financial and consumer law reform	Ongoing	<ul style="list-style-type: none"> • Organisation drives or participates in law reform activities in the consumer, credit and debt areas of law • Organisation is an advocate and signatory to national law reform activities that respond to consumer needs • Organisation has a strong media presence 	<ul style="list-style-type: none"> • Law reform and policy plan and distribution list • # of presentations at conferences/forums/networks • Evidence of submissions developed or contributed to and the outcomes • Evidence of consultation activities with consumers and key stakeholders 	<ul style="list-style-type: none"> • Develop an annual policy and law reform plan informed by client needs, and socialise to key stakeholders both informally and formally via consultations and other engagement processes • Continue to provide the WA perspective on policy and reform issues at the state and national level through presentations at workshops and conferences, and representation on key committees and forums • Continue the development and implementation of a media plan and strategy on financial and consumer law reform

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
3.3 Promote service outcomes to all stakeholders	Short to medium term	<ul style="list-style-type: none"> Website and social media to consumers is contemporary and accessible Outcome based reporting is provide to key stakeholders 	<ul style="list-style-type: none"> # of type and amount of pro bono support including cash, in-kind of secondees and the economic value % of social media by type – information, education, law reform and consultation # of hits on the website and forms/templates downloaded and number of inquiries through the website form 	<ul style="list-style-type: none"> Continue to leverage pro bono support and offer opportunities to partner with key stakeholder organisations via secondees, collaborative projects, and other initiatives Use social media to communicate information, ideas and service level impacts/case studies Website is continuously updated reflecting current services, information, client journeys, impacts and outcomes
3.4 Developing advocates for our service	Short to medium term	<ul style="list-style-type: none"> Key stakeholders champion the work of the organisation in their workplaces Organisation has strong working relationships with people of influence 	<ul style="list-style-type: none"> Volunteer Alumni established with at least 20 active members Participation and outcomes of Financial Abuse Roundtable including presentations on the outcomes Evidence of other grants or in-kind resources received # of consumer groups held Register of volunteer/pro bono/ secondee hours 	<ul style="list-style-type: none"> Continue to support the CCLS Volunteer Alumni to maximise its impact Continue to engage with pro bono partners from the 2023 Financial Abuse Roundtable to progress potential outcomes Explore how to appropriately engage with CCLS consumers to harness their voice

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
4.5 (Added after 2024 review) Implement the Pilot Financial Abuse Legal Service	24/25	<ul style="list-style-type: none">• Delivery of integrated service to women experiencing financial abuse.	<ul style="list-style-type: none">• Number of services provided• Key Stakeholder relationships established• Evaluation of the pilot and ongoing funding received	<ul style="list-style-type: none">• Engage a Solicitor and Social Worker• Work with WLSA and develop pathways for referral and integrated work• Source ongoing funding for the service beyond 2025

Objective 4 – Remain a strong, stable and sustainable organisation

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
4.1 Increase diversity of income streams and advocate for increased sustainable funding	Medium to long term	<ul style="list-style-type: none"> Dept of Justice and key decision makers know about the value and impact of the service as well as trends and gaps in service delivery Funding submissions are made for additional resources as opportunities identified 	<ul style="list-style-type: none"> Indexation payments paid and value Other income received and its value against budget # of MP's and other key stakeholders visited – a minimum of 6 to be achieved # numbers of grants applied for and those received 	<ul style="list-style-type: none"> Advocate for the implementation of the recommendations from the independent review of the National Legal Assistance Partnership (NLAP) Monitor demand resulting from rising inflation and interest rates and the Kimberley floods and seek additional funding if required Develop a proactive schedule of visits with key politicians and key decision makers to advocate for the CCLS service Continue to identify and apply for grants for specific projects
4.2 Sustain strong governance and business planning	Ongoing	<ul style="list-style-type: none"> Risk Management Plan in place Business Continuity Plan in place Strategic and operational plans in place Board operates well 	<ul style="list-style-type: none"> Board reports schedule met Monthly financial reports against budget delivered Strategic Plan on website and socialised to key stakeholders through newsletters Skills audit for Board members undertaken Board survey conducted with 100% participation 	<ul style="list-style-type: none"> Monthly Board continue with agenda's, reports and minutes produced in a timely manner Monthly financial report against the budget Strategic Plan review report finalised and published Review skilled based Board recruitment with a continued emphasis on increased diversification of membership Undertake annual Board survey

Strategy	Timeframe	How we will drive change	How we will measure success	Priority Actions 2024/25
4.3 Maintain systems and processes to support strong compliance and accountability	Ongoing	<ul style="list-style-type: none"> Accreditation standards are met Annual progress reporting to funders and regulators is completed 	<ul style="list-style-type: none"> Policy and procedure document register updated Meet all minimum cross check requirements Monthly strategic reports to the Board 	<ul style="list-style-type: none"> Regularly review policy and procedure documentation for continuous improvement Participate in annual cross check of accreditation standards and participate in the CCLS 2024 Accreditation Review Regular reporting to Board on outcomes using the strategic and operational plans
4.4 Collaborate for cost effective service delivery	Ongoing	<ul style="list-style-type: none"> Collaboration opportunities are identified Partnerships developed with other key services 	<ul style="list-style-type: none"> # of partnerships developed with ACCO's # % increase in the number of partnerships developed with other regulators/govt depts Evidence of cross collaboration with co-located services with at least 3 initiatives developed 	<ul style="list-style-type: none"> Share back end and service delivery functions with WLSWA, Ruah and Circle Green to achieve increased cost effectiveness Review existing MOUs and the resulting referral pathways to assess effectiveness and identify potential new MOUs to meet identified gaps Create a visual map plotting referral pathways and partnerships



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LEGAL SERVICE

Working for your
financial & consumer rights