

Questions and Answers

Commonwealth Financial Counselling Helpline

Application Process

1. How can I apply for funding under the Financial Wellbeing and Capability (FWC) Activity?

You must submit your grant application using the application form, which is available on the [GrantConnect](#) and [Community Grants Hub](#) websites. The application form includes help information.

2. What is the closing time and date for applications?

Applications must be submitted by **2.00pm (AEST) on 22 August 2018**. It is recommended that you submit your application **well before the closing time and date**.

3. If I am not able to submit my application by the due time and date, can I be granted an extension?

No, extensions will not be given.

If an application is late or the Community Grants Hub is requested to approve a lodgement after the closing date the [late application policy](#) available on the Community Grants Hub website will apply.

4. Do I need to answer each question on the application form in a particular order?

You can navigate around the application form and answer questions in any order you choose. However, all questions are mandatory unless otherwise marked. The application form will not allow you to submit your application until all mandatory questions are addressed.

5. How can I submit the application form?

The form is an online application form that you must submit electronically. The Community Grants Hub will not provide application forms or accept application forms for this grant opportunity by fax, email or mail.

6. Is my organisation eligible to apply if it is not a legal entity?

Certain non-legal entity types can be considered eligible for this grant opportunity. Eligibility criteria are included in the Grant Opportunity Guidelines at section 3.

7. Can my organisation apply for more than one funding round?

There will be an open competitive funding round, for each of the following FWC sub-activities: Emergency Relief, Food Relief, Commonwealth Financial Counselling and Financial Capability and Commonwealth Financial Counselling Helpline.

Organisations can apply for multiple sub-activities. You must provide a separate application for each, in accordance with the respective Grant Opportunity Guidelines.

Only one application will be accepted per sub-activity. For example, one application for Emergency Relief, one application for Commonwealth Financial Counselling Helpline.

8. When will I know the outcome of my application?

You will be notified of the outcome of your application at the end of the selection process. For probity reasons, to treat all applicants fairly and equally, it is not possible to give you information about the status of individual applications during the assessment process.

9. What feedback will be available for this grant round?

A feedback summary will be published on the Community Grants Hub website to provide all organisations with easy to access information about the assessment process and the main strengths and areas for improving their applications.

Individual feedback for this grant opportunity may be requested within 30 days of receiving an outcome notification. Feedback will be provided within 30 days of receiving the request.

10. If we are unsuccessful, will the department be involved in communicating to local stakeholders and clients that services will no longer be provided by our organisation?

It is up to individual organisations to communicate changes to their services to local stakeholders and clients. The Department of Social Services will ensure that the outcome of selection processes is publicly available and can provide advice to support organisations that have been unsuccessful in the funding round.

11. How can I find out about other Commonwealth Financial Wellbeing and Capability funding opportunities in my state or region?

Further information about open grants can be found on the [Community Grants Hub website](#). You may wish to [subscribe](#) for updates.

Funding

12. How much funding is available for this Program?

Refer to the Grant Opportunity Guidelines for an outline of funding allocations in your area.

13. Is the funding ongoing?

Grant agreements will be offered for four and half years, from 1 January 2019 to 30 June 2023.

14. When will funding commence?

Funding agreements will be in place by 1 January 2019. Successful organisations will be sent an offer of grant funding by the Department of Social Services once the grant round and assessment process has been completed.

15. What are the conditions of funding for this grant?

A copy of the terms and conditions for the FWC Activity are included in the grant opportunity documentation.

16. What can my organisation use the grant funding for?

The grant money can be used in accordance with the information outlined in the Grant Opportunity Guidelines.

Commonwealth Financial Counselling Helpline

17. Why have you redesigned the FWC activity?

The FWC Activity has been redesigned to ensure Commonwealth funding to services is appropriately targeted and aligned with the Government's policy priorities, while providing a firm legislative footing for this Activity.

The Government has a responsibility to ensure activities undertaken by organisations funded under the FWC Activity are aligned to a head of power in the Commonwealth of Australia's Constitution. To address this, eligibility criteria will be applied to all FWC sub-activities.

18. What are the eligibility criteria for clients to receive services from the Commonwealth Financial Counselling Helpline?

The eligibility criteria for clients to receive assistance from the Commonwealth Financial Counselling Helpline *is not being able to pay a bill, or at imminent risk of not being able to pay a bill.*

The eligibility criteria does not change the purpose of the Commonwealth Financial Counselling Helpline, which is to provide a single contact point for people to access financial counselling, either immediately on the phone or via a referral to face-to-face services. Your service will need to apply the above eligibility criteria within this framework.

19. What does “unable to pay their bills, or at imminent risk of being unable to pay bills” mean?

Imminent risk takes its everyday meaning of “close” or “near”. Each organisation will be expected to exercise its professional judgement to assess if this is the case for a presenting client.

Whilst determining eligibility, an organisation may also identify underlying issues (such as mental health issues, housing instability or addiction) and can facilitate a referral to other related services where appropriate.

A bill can include (but is not limited to): food, utilities, medical expenses, or basic household goods. For example, a client presenting with a bill that falls for payment within the next calendar month, which they will be unable to pay, would be considered at imminent risk of being unable to pay their bills.

20. How will I demonstrate to the Department of Social Services that I am applying the eligibility criteria?

You will be required to report in Data Exchange (DEX) and submit an annual service report. You will be required to provide assurance in the annual service statement that your service is meeting the eligibility criteria.

21. Where should I go for further information?

Please email your enquiries to support@communitygrants.gov.au or call 1800 020 283.

Consortium applications

22. What is a lead organisation?

If you submit a joint application as a consortium, you must nominate a lead organisation for the application. The lead organisation for the project will, if your application is successful, sign the Grant Agreement, receive the funding and assume legal responsibility for performing the activities and meeting the outcomes under the Grant Agreement.

A lead organisation must be a legal entity as listed in section 3.1.1 of the Grant Opportunity Guidelines.

23. Would the Department prefer a consortia (joint) approach?

Applications submitted from individual organisations will be neither preferred nor disadvantaged over applications from consortia. Applications will be considered on their merits, based on:

How well it meets the criteria

How it compares to other applications

Whether it provides value for money.

24. Can a proposed subcontractor also be a subcontractor noted as a party adjoining a competing bid?

A proposed sub-contractor or consortium member can be a party to more than one application, including competing applications.

New questions and answers added 30 July 2018

25. Is DSS now requiring a different data set to what is currently used in the DEX system?

Organisations delivering FWC services will be required to collect client information (e.g. identifying and demographic characteristics) and enter this directly into the department's performance reporting solution, the Data Exchange (DEX). These requirements have not changed under the redesigned FWC Activity.

Under the redesigned FWC Activity organisations will also be required to participate in the partnership approach as a condition of the grant agreement. The main focus of the partnership approach is collecting information about the outcomes achieved by clients as a result of service delivery. Support is available for organisations implementing the partnership approach including training webinars, tailored program guidance and task cards. Further information can be found at <https://dex.dss.gov.au/>

In addition, organisations will be required to only report individual client records, and not unidentified or group clients. This change has been made to improve the accuracy of the data collected.

26. If so, for what purposes will DSS be using this personal information?

There are no changes to the way the Data Exchange collects or uses personal information. Client level data provided through the Data Exchange is **de-identified** so that no identifiable client information is able to be used by the Department. **De-identified** information is used for the purposes of policy development, grants program administration, research and evaluation. Further information about client privacy is available in the Data Exchange Protocols https://dex.dss.gov.au/wp-content/uploads/2017/03/data_exchange_protocols.pdf

The purpose of the partnership approach is to provide an overall picture of the complexity of client need and offers organisations the ability to share information on the outcomes achieved through interaction with their service. The partnership approach also ensuring that programs are supported by evidence on what achieves outcomes for clients. Effective outcomes measurement is vital to ensuring the Department can demonstrate the effectiveness of the clients' service interaction.

27. Has DSS considered the impact these data collection requirements will have on services such as the National Debt Helpline? These include the likelihood that some clients will not proceed with the service, as well as the time it may take for services to collect this data.

Under the FWC redesigned Activity organisations will be expected, as part of the obligations of the grant agreement with the Department, to collect and report client data (including, where the grant agreement specifies, the partnership approach).

While organisations are expected to ask clients for information, there is no obligation on clients to provide this information in order to receive a service. Organisations delivering FWC however, will be required to engage with potential clients to determine if they meet the eligibility criteria.

The Department acknowledges there may be a small number of occasions where clients do not want their personal information recorded, for example due to privacy concerns. In these circumstances, organisations should provide advice to clients about the way the Data Exchange collects and uses personal information. Further information about client privacy is available in the Data Exchange Protocols https://dex.dss.gov.au/wp-content/uploads/2017/03/data_exchange_protocols.pdf

New question added 7 August 2018

28. Page 10 of the Commonwealth Financial Counselling Helpline Grant Opportunity Guidelines (at 3.2.2) states that “You cannot use the grant for the following activities: unidentified clients, where identity and demographic characteristics are not collected”. However, as we understand it, client identity requirements (like name, DOB & residential address) are not required to be reported through DEX where the service is ‘Information / advice / referral’. Will that remain under the new arrangements, despite the statement in the funding opportunity guidelines?

As per the Data Exchange Protocols, regardless of service type (i.e. information/advice/referral), organisations should collect the information required to create an individual client record, if the client agrees to providing this information. This will not change under the redesigned FWC Activity.

29. Community legal centres are required to comply with a risk management guide published by the National Association of Community Legal Centres. Compliance to this guide is required for accreditation as well as for professional indemnity insurance purposes, and this covers not only legal services but ‘professional services’ delivered by the centre (an example of which is financial counselling). Staff providing financial counselling are thus required to comply with the ethical and conduct standards including client confidentiality. Client confidentiality means that legal services are not allowed to disclose the fact that advice has been provided without client consent, let alone the content of their instructions and advice. While consent can be obtained to share information with third parties, where client consent is not obtained then the service will be unable to comply with the client identity requirements referred to in the tender documentation. Is it intended that community legal centres not be able to deliver financial counselling pursuant to this tender?

The Grant Opportunity Guidelines for the Commonwealth Financial Counselling Helpline specify the eligible entities able to apply for this funding at 3.1. Please refer to this to determine if your organisation type is eligible to apply.

Protecting client privacy, consistent with the Department’s obligations under the Privacy Act 1988 (Privacy Act), is a fundamental design principle of the Data Exchange and has informed the Department’s operation of the Data Exchange since it was introduced.

The Data Exchange Protocols require providers to give their clients a standard notification when collecting personal information, which may be read out or explained to clients over the phone. No personal information will be stored in the Data Exchange if the client does not consent. Consent is completely voluntary. Further information about client privacy and consent is available on the Data Exchange website, and in the Data Exchange Protocols.

30. Privacy legislation allows disclosure of a person’s personal information for a purpose other than which it is collected in a relatively limited number of circumstances. The most relevant circumstance is where the client provides consent. As such, the Grant Opportunity Guidelines would appear to require a service provider to seek specific consent for sharing their client identity requirements with DSS. How is this intended to operate for Helpline services, where clients’ expectations are that services will be provided confidentially and the service is also promoted in this way? There is already a greater hurdle to gain client trust over the phone, and a much lower barrier to disengagement as the client can easily hang up. Further, has DSS considered how informed consent could be obtained for the Helpline services, which are high volume and where obtaining informed consent for each client would involve a relatively large amount of time (sometimes longer than providing the service where the question is straight forward and easily answered)? Has DSS considered the implications for access to the service of this requirement?

The Data Exchange Protocols require providers to give their clients a standard notification when collecting personal information, which may be read out or explained to clients over the phone. No personal information will be stored in the Data Exchange if the client does not consent. Consent is

completely voluntary. Further information about client privacy and consent is available on the Data Exchange website, and in the Data Exchange Protocols.

A [Privacy Brochure](#) has been made available to provide to clients, to help them easily understand the privacy arrangements as outlined in the Data Exchange Protocols.

When reporting client-level records, the personal information that service providers enter on the Data Exchange, either through the web-based portal, bulk uploading of files or a system-to-system transfer, will be stored by DSS on the Data Exchange. Only the organisation will access the personal information stored on this DSS-hosted information system. Information collected through the Data Exchange is de-identified and used for research and policy analysis only.

As a routine part of assessing the privacy impacts arising from the operation of the Data Exchange, in 2015 the Department commissioned the Australian Government Solicitor to undertake a privacy impact assessment. The privacy impact assessment assessed the Department's operation of the Data Exchange, looking at the Department's obligations under the Privacy Act and making seven recommendations. The recommendations and findings of the privacy impact assessment, as well as the Department's response are available on the Data Exchange website. Additional information about what a privacy impact assessment is and when they should be conducted is available on the Office of the Australian Information Commissioner website.