



**Community  
Legal Centres  
Queensland**

# Preliminary submission to the Review of the National Partnership Agreement on Legal Assistance Services

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# About Community Legal Centres Queensland Inc.

All Australians understand and value the idea of a “fair go” – that we will be treated equally and fairly regardless of the circumstances we face. This extends to our legal systems, and community legal centres play a vital role in making Australia a safer and fairer place to live, by ensuring that everyone has access to justice.

Community legal centres are independent, community-run organisations that provide legal help to anyone who asks. There are more than thirty of these organisations across Queensland providing legal advice and ongoing representation and support.

**Community Legal Centres Queensland is the peak body for Queensland’s community legal centres, and we work with those centres towards a fair and just Queensland.**

We help community legal centres so they can provide effective, high quality services to their communities.

We help the network of community legal centres keep informed, united and relevant.

We help disadvantaged and vulnerable people in the community to understand their legal and human rights, access legal help, and be heard and respected.

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

# Contents

Executive summary .....	1
1. Legal assistance services .....	4
2: Collaborative service planning .....	12
3. Funding arrangements .....	18
4. Performance monitoring and reporting requirements .....	23
5. Roles and responsibilities.....	27
6. Areas for improvement.....	29

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# Executive summary

For over forty years, Queensland's community legal centres have provided efficient, effective and impactful legal help to everyday Queenslanders, focusing on the needs of the most marginalized and disadvantaged people in our community.

For almost two and a half years of these four decades, Governments' primary policy and funding mechanisms to support this work, has been set out in the National Partnership Agreement on Legal Assistance Services (the **NPA**). The implementation of the NPA in Queensland has been a collaborative effort between the parties (the Commonwealth and Queensland governments), legal assistance services (which includes those services named in the NPA – Legal Aid Queensland and community legal centres (including unfunded organisations) – and others, including Aboriginal and Torres Strait Islander Legal Services, Aboriginal Family Violence Prevention Legal Services, pro bono services provided by the private profession, and others), which builds on existing practices, policies and relationships.

Based on our experience in Queensland, we suggest that legal assistance services thrive when certain conditions are met, including:

- Adequate funding is provided, with certainty;
- Service providers are focused on quality services, delivered to those clients that need the most legal help;
- There are structures that support collaboration, sector-wide service design, use of evidence (but not reliance on quantitative data) to support service system design;
- Innovation is incremental, sector-led and client-focussed;
- A peak body is able to properly represent its members;
- The State Government (Department of Justice or its equivalent) is actively involved in shaping policy/strategy for legal assistance service systems;
- Service providers understand and respect the role and work of one another, recognizing respective strengths and experience;
- There are strong relationships between legal services and community organisations, particularly at a local/community level.

In our view, the NPA hasn't had a significant impact on the settings that support a thriving legal assistance sector; largely this is because these conditions were already in place. In particular, the 2013 review of the legal practitioners' interest on trust account fund (**LPITAF**) by the Department of Justice and Attorney-General (**DJAG**) recommended a number of changes that strengthened this state's strategy, funding and policy of legal assistance services. Implementation of the LPITAF review recommendations was progressing well before the NPA, so the NPA has had limited impact here in Queensland. This ecosystem provided a context for successful and effective implementation of the NPA, and Queensland's successes may not have been as clear without these existing conditions (differences which may be observed in other states/territories).

We understand that the NPA may have had more of an impact on these settings in other jurisdictions, both positively and negatively, and we leave it to organisations in those jurisdictions and our national peak, the National Association of Community Legal Centres (**NACLC**), to provide more information about the impacts of the NPA implementation elsewhere.

Within this context, we make the following observations about the effect of the NPA in Queensland:

### **1. Legal Assistance Services**

- a. Queensland's community legal centres continue to deliver services efficiently and effectively
- b. Queensland's community legal centres deliver services that are 'value for money'
- c. community legal centres' work is integrated and holistic
- d. Our clients are vulnerable and disadvantaged
- e. We can't meet the need for legal help across Queensland
- f. The LPITAF review made significant changes to policy and funding legal assistance in Queensland
- g. The NPA hasn't really changed the efficiency or effectiveness of community legal centres' work
- h. The best innovations are incremental and led by the sector

### **2. Collaborative service planning**

- a. System management requires coordination and collaboration
- b. QLAF provides an important role coordinating collaborative service planning
- c. It's not possible to find an equation or formula that identifies, and meets, need for legal services
- d. Collaborative service planning must also be done locally/regionally
- e. Individual organisations are undertaking their own strategic and service planning
- f. A functional peak body supports collaborative service planning processes
- g. Collaboration is undermined by competitive tensions
- h. Collaborative service planning isn't the same thing as cutting costs.

### **3. Funding Arrangements**

- a. Any discussion about funding arrangements must acknowledge the inadequacy of current resources
- b. Longterm certainty in funding (for the sector/ program and individual organisations) is vital
- c. The Queensland approach to funding allocation and administration supports the service system
- d. Funding uncertainty and new funding programs outside the NPA undermine the service system
- e. While SACS supplementation is useful, low community sector wages undermine our ability to attract and retain quality workers

### **4. Performance monitoring and reporting requirements**

- a. Data collection has been a serious problem, because of the Commonwealth's underinvestment in CLASS
- b. Client survey data offers further proof that Queensland's community legal centres are doing great work
- c. While existing reporting to the Commonwealth provides accountability, they do not improve service delivery

### **5. Roles and responsibilities**

- a. The Queensland Government has provided strong leadership in undertaking its role/responsibilities under the NPA
- b. It's disappointing that the Commonwealth has worked around the NPA when it suited them

- c. Peak bodies must be properly supported

## **6. Areas for improvement**

In this area of the submission, we draw together suggested conclusions for the review.

The key recommendation of the review of the NPA should be that the quantum of funding under the NPA is insufficient to provide for the effective and efficient achievement of its objective. Ideally, the review should recommend a substantial increase in funding, and attempt to quantify this increase. This aspect of the review's work should be mindful of the need for 2019-20 budget processes, so as to ensure sustainability and certainty for services and clients.

As set out in other parts of this submission, and based on our experiences under the current NPA in this state, Community Legal Centres Queensland recommends additional areas for improvement and opportunities to enhance current and future arrangements

Based on our experience, any future NPA should focus on those policy settings that foster thriving legal assistance services. The NPA may be able to influence those settings, and any requirements under the NPA should be focused on supporting that environment in jurisdictions where it is under-developed (including, for example, providing useful guidance on collaborative service planning, ensuring state/territory government are providing adequate resources, supporting peak bodies, etc). However, the NPA should not simply codify existing and historical practices (such as identifying priority clients) or impose requirements that undermine or divert efforts from these priorities (such as ill-suited data definitions and collection).

# 1. Legal assistance services

... the impact that the NPA has had on the delivery of efficient and effective legal assistance services, including consideration of:

- (a) the appropriateness and utility of the objective and outcomes in supporting the delivery of legal assistance services, including consideration of:
  - (i) relevance to the current landscape of the legal assistance sector, and
  - (ii) existing research about legal need and service delivery
- (b) whether the NPA promotes legal assistance services that are effective, efficient and appropriate and represent value for money, including consideration of:
  - (i) integrated legal and non-legal services
  - (ii) the broader role these services provide within communities
  - (iii) the use of different modes of service delivery, and
  - (iv) value for money as consisting of a range of factors, including cost of service delivery, and qualitative factors relating to services, service location, client complexity, among others.
- (c) whether the NPA has improved the targeting of legal assistance services to people facing disadvantage, including priority clients (Schedule B), thereby improving access to justice for those who have the greatest legal need.

## A. Queensland's community legal centres continue to deliver services efficiently and effectively

Embedded in the Queensland procurement processes for the distribution of State and NPA funding was an interpretation of the concepts of effective and efficient in way that ensured that these concepts prioritised quality of services and value for money. For example, in a de-centralised State a particular service model or geographic focus may necessitate a greater amount of funding due to the challenges of a particular priority group's barriers to accessing services and the intensity of support that is required. It was well-understood by the Queensland government and the sector that cheaper isn't always better when it comes to effective service delivery to vulnerable clients. The question of value for money involved non-financial factors of sustainability, quality and appropriateness of services.

The points of difference for many community legal centres in Queensland from other legal assistance services in ensuring resources were used for the efficient and effective delivery of services includes the use of:

- volunteers
- pro bono assistance
- community partnership, including universities
- shared resources coordinated by funded sector peaks
- co-location and other shared services arrangements
- funding diversification strategies

By way of example, the 2016 NACLC Census results on volunteers in Queensland included:

- 89.3% of respondent community legal centres involved volunteers in their activities
- The top 4 types of volunteers that contributed to community legal centre activities included:
  1. Lawyers
  2. Law Students
  3. PLT Law Graduates
  4. Administrative assistants
- Collectively volunteers provided over 4000 hours of time in 25 community legal centre across Queensland, many of those hours directly providing services to client or providing administrative and governance support.



## Accreditation scheme supports effective and efficient services

Quality standards in community legal centres and their connection with the effectiveness and efficiency of services are systematically evaluated and monitored through the National Accreditation Scheme (**NAS**) which has been in place since 2011, prior to the implementation of the NPA.

NAS is an industry based certification process of community legal centres that supports and recognises good practice in the delivery of community legal services. The NAS provides a quality assurance process that gives community legal centres, funding bodies and clients confidence that community legal centres are operating according to good practice and industry standards. The NAS promotes a culture of on-going continuous quality improvement.

Funded peaks, such as Community Legal Centres Queensland are central to the implementation and success of the NAS by providing on site visits as part of the assessment process, improvement reports and monitoring and support to build the capacity of community legal centres to meet the NAS standards. In Queensland, efficiency in reporting has meant that NAS outcomes are shared with the State program manager and are still as an integral part of the service system.

The review of the NPA should acknowledge the valuable contribution of the National Accreditation Scheme, in providing a framework of quality assurance and continuous improvement.

## Evaluating and measuring outcomes

Community Legal Centres Queensland undertook a Self-Evaluation toolkit project, supported by the Queensland Government. This project developed a Theory of Change for the Queensland community legal centres sector with a practical set of tools that community legal centres could apply to compile an impact report and provide input for internal service improvement processes. This toolkit can be found at [www.communitylegalimpact.org](http://www.communitylegalimpact.org).

This is an important part of the work of community legal centres telling their stories and the impact they have in their communities, so that government and non-government investors and supporters can be confident that their investment is making a difference in people's lives.

In May 2018, Community Legal Centres Queensland coordinated a survey of 1,757 clients of Queensland community legal centres. While a survey is required under the NPA, the Queensland Government engaged us to coordinate the survey, providing a deeper level of understanding of clients' experiences. Key feedback included:

- 95% of clients say they would recommend the legal centre to other people;
- 96% of clients say staff listened to their legal problem in a friendly and respectful manner;
- 94% of clients say staff helped them understand how to deal with their legal problem and provided them with options;
- 94% of clients say they know where to get help if they have another legal problem in the future.

Community Legal Centres Queensland played an important coordinating role with the client survey which ensured consistency and rigour in the client survey process. This coordination ensured that minimal community legal centres resources were not diverted from their day-to-day in obtaining client feedback.

### Coordinating community legal information and publications

An important function of Queensland's legal assistance services is to provide information to the community about their rights and responsibilities. This 'community legal education' (**CLE**) can be undertaken face-to-face (one-on-one or to groups), or through the provision of information and publications. Long established as an integral part of legal assistance services, the aim of community legal education is to enhance the legal capability of the public by being responsive to the diversity of legal need across the community. Accordingly community legal education is one element within a broader interdependent continuum of legal assistance service responses and can be a critical component in reducing or minimising individual legal problems at an earlier stage.

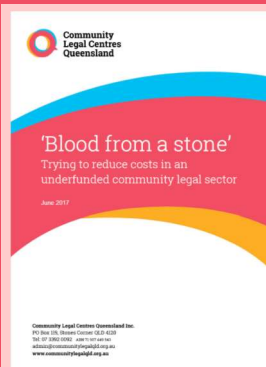


In 2015, Community Legal Centres Queensland conducted an audit of CLE resources and activities in Queensland to identify whether there was duplication of efforts and resources in this area. The audit concluded that legal assistance services had produced over 450 publications in few years leading up to the time of audit without duplication in terms of content, form and audience. In the instances where the resources cover the same content areas, the materials are distinguishable in term of meeting the needs of specific target audiences. The report also acknowledged that community engagement in the production of the resource was key in providing timely and appropriate response to legal issues when the community needed it.

This is just one way that we have challenged funders' perception that there is any substantial duplication in community legal centres' work, and the NPA review should confirm that there isn't duplication in our work.

## B. Queensland's community legal centres deliver services that are 'value for money'

NACLC commissioned an in-depth research report to demonstrate the extent to which community legal centres provide government with value for money. The *Economic cost benefit analysis of community legal centres* report was published in June 2012, and found large net economic benefits provided by community legal centres, including a very high rate of return from direct services work (information, advices and casework) provided by community legal centres, and a clear justification of community legal centres in economic terms. It also notes that community legal centres perform an essential role in prevention and early intervention of legal problems: the earlier a community legal centre becomes involved, the greater the savings. This research is out of date, and more research is required to adequately measure the financial impact of legal assistance services.



### Identifying cost savings

In June 2017, Community Legal Centres Queensland was funded to produce a report on identified cost savings opportunities within the legal sector and within the broader community sector. This report: *Blood from a stone: Trying to reduce costs in an underfunded community legal sector* identified limited areas for costs savings in the operating budgets of community legal centres due to the underinvestment in expenditure not specifically related to providing direct services. This underinvestment is consistent with benchmark research across the social and community sectors.

Community legal centres throughout Australia are engaged in group buying initiatives such as national schemes for insurances, the accreditation and standards performance pathways online portal, management support online resources and templates, online legal publications and database subscriptions such as LexisNexis, online videoconferencing tools, and state government procurement schemes for stationery and office supplies. These schemes and partnerships have been successful in minimising costs for individual centres.

## Quantum of funding impedes efficiency and effectiveness

Taking the CLE example above, while generally structured to avoid duplication and maximise effectiveness and efficiency, the quantum of funding has inhibited structural reforms that could result in better coordination of publications and information in community legal centres and the legal assistance sector more broadly.

Our *Coordinating community legal information and publications: A discussion paper for Queensland legal assistance services* report recommended providing funding to develop and share a best practice guide for the development and maintenance of CLE; to support the CLEAR database, including having a Queensland project officer one day per week to support centres to use this resource and enhance its user-friendliness; and to convene an annual legal assistance services conference to support relationships and ad hoc conversations between legal assistance services.

## Pro bono and volunteers add value to governments' investment

Community legal centres have a long history of demonstrated success in obtaining and coordinating volunteer and pro bono support from private lawyers and other professionals, leveraging a total of more than \$23 million worth of free legal assistance each year (*Why community legal centres are good value*, NACLC, 2008). This adds greatly to the total hours, dollar value and range of expertise of the services provided.

Community legal centres attract and maintain significant volunteer support from the private legal profession, with more than 2200 private solicitors and another 1600 professionals, law students and others around Australia regularly providing approximately 300,000 hours of voluntary legal services and support each year. Community legal centres also attract significant pro bono support from private law firms by way of secondments or other legal services. This has been estimated to be over 25,000 hours each year.

As noted above, the 2016 NACLC census shows that 89.3% of the Queensland community legal centres responding to the survey used volunteers in the 2015/16 financial year, equating to 1565 volunteers donating 4,111 volunteer hours per week.

Over half (55.6%) of the community legal centres participating in the census had a pro bono partnership, equating to close to 25,000 total hours per year, with most partnerships involving direct legal service delivery (80%) and/or provision of advice or assistance to the community legal centre (66.7%). 19.2% of our members received funding from philanthropic funding sources, and 30.8% from fundraising and other sponsorship, with approximately 4 hours per week being spent on funding-related activities.

## C. Community legal centres' work is integrated and holistic

Community legal centres offer flexible, integrated and holistic services. In Queensland, there are strong relationships with community organisations, other legal assistance providers, and other partners to support this work. Later in 2018, Community Legal Centres Queensland will undertake a study of the impact of these partnerships, based on the sector-wide evaluation framework available at [www.communitylegalimpact.org](http://www.communitylegalimpact.org).

The QLAF recognises the value of these partnerships, and includes the Queensland Council of Social Service (**QCOSS**) and Department of Human Services (**DHS**) in its membership.

### Health Justice Partnership launched to support women experiencing violence

In 2017, Women's Legal Service launched a Health Justice Partnership at Logan Hospital to support women experiencing domestic and family violence.

Domestic violence is the leading cause of death, disability and illness of Australian women aged 15-44 and health services are ideal settings for routine enquiry and early intervention. Health care clinicians see on average at least one abused woman each week, although the symptoms and signs may not be obvious. By intervening early, the Logan Health Justice Partnership is creating safer futures for Logan women and their children affected by domestic and family violence.

The Health Justice Partnership solicitor, Emergency Department clinicians, social workers and staff throughout Logan Hospital will be working to identify women who need assistance with domestic violence and ensuring they receive the referrals they need to get help.

## D. Our clients are vulnerable and disadvantaged

NACLC 2016 Census data provided that:

- almost half (42.9%) of the 28 community legal centres surveyed identified as being located in a rural, regional or remote location, and 92.9% provided legal outreach
- Queensland community legal centres assisted vulnerable and disadvantaged clients from priority groups including Aboriginal and Torres Strait Islander people (26.4%), people with a disability (21.4%) and people from a CALD background or community (27.7%)

- Queensland's community legal centres provide specialist programs to the following client groups: Aboriginal and Torres Strait Islander people (33.3%); people experiencing domestic or family violence (33.3%); people experiencing homelessness (23.8%); older people including those experiencing elder abuse (28.6%); people from CALD backgrounds (33.3%); people in prison (23.8%); people with a disability (38.1%); and young people (33.3%).

Since being established in the 1970s and 1980s, Queensland's community legal centres have always maintained a focus on assisting the most vulnerable and disadvantaged members of our society. There are too many examples to note, but some include: LawRight's (formerly QPILCH) LegalPod work with young people transitioning from state care to independence; Prisoners' Legal Service's assistance for incarcerated persons and their families; the Seniors Legal Assistance Support Services throughout Queensland; vital help for Indigenous women experiencing domestic violence provided by Aboriginal and Torres Strait Islander Women's Legal Service North Queensland; and support for immigrants from CALD backgrounds by the Refugee and Immigration Legal Service. The NPA has had minimal impact on identifying vulnerable groups and/or service provision.

Priority client group / Calendar year	2015 No. & % of total clients	2016 No. & % of total clients	2017 No. & % of total clients
Young people (up to 24 years)	4,156 (9.12%)	4,858 (9.16%)	4,429 (9.69%)
Older people (65 and over)	5,024 (11.02%)	5,574 (10.52%)	5,000 (10.94%)
Low or Nil income	33,816 (74.17%)	40,019 (75.49%)	23,836 (52.17%)
People with disability / mental illness	5,639 (12.37%)	7,528 (14.2%)	7,186 (15.73%)
Aboriginal or Torres Strait Islander Australians	3,016 (6.62%)	4,027 (7.6%)	3,786 (8.29%)
People from culturally or linguistically diverse backgrounds	3,279 (7.19%)	4,052 (7.64%)	4,978 (10.9%)
People experiencing domestic and family violence	9,499 (20.84%)	16,176 (30.52%)	17,037 (37.3%)
People experiencing or at risk of homelessness	4,077 (8.94%)	5,685 (10.72%)	2,964 (6.49%)
<b>TOTAL CLIENTS</b>	<b>45,590</b>	<b>53,009</b>	<b>45,686</b>

Comparative CLASS data from 2015/2016/2017 provided that there has been little change across the priority client groups serviced by community legal centres in Queensland over the past 3 years (refer to table below). Most priority areas have increased slightly including young people, people with disability or mental illness, Aboriginal or Torres Strait Islander Australians and people from CALD backgrounds. The levels of people experiencing domestic and family violence has increased significantly (further explanation provided below at 1D(i)). However, we note concerns with drawing any conclusions based on data from CLASS; as NACLC has advised:

*the transition from the CLSIS database to the CLASS database in April 2017, coupled with the introduction of new data definitions and categories of service provision, has meant that CLASS data and reports for 2015-16, 2016-17 and 2017-18:*

- *May not be an accurate count of actual services delivered by each individual organisation, and*
- *Cannot be usefully compared to reports for previous years.*

*It is expected that CLASS data and reports from 2018-19 onwards will more accurately capture the work of each individual organisation. It is therefore recommended that 2018-19 be considered the "baseline" year for monitoring of service trends. See [http://www.nacalc.org.au/cb\\_pages/class.php](http://www.nacalc.org.au/cb_pages/class.php) for more information.*

It is vital that the Commonwealth properly invest in improving the collection of data, including improving systems, providing training, and clarifying definitions.

### Community legal centres respond to emerging needs like the NDIS

Queensland Advocacy Incorporated (**QAI**) is a specialist community legal centre providing legal advocacy to people with disability. QAI's NDIS Appeals Support service works to ensure that all people with a disability have access to a support person and access to legal services. NDIS Appeals Support

assists people with disability with reviews and appeals against National Disability Insurance Agency decisions regarding eligibility for funding for reasonable and necessary supports to allow the person with a disability to participate and contribute to social and economic life to the best of their abilities. This appeal work is also being done by Legal Aid Queensland, who can provide legal representation for appeals against NDIS decisions.

Both state and federal governments provide funding for emerging needs or particular client groups (such as the Women's Safety Package, supporting people through royal commissions and redress schemes, Seniors Legal And Support Services, coronial law services, etc), which can support and complement community legal centres' focus on priority groups and priority areas of law, including those articulated in the NPA.

## We focus on cultural safety to make services accessible

We acknowledge that community-controlled legal services for Aboriginal and Torres Strait Islander people provide leading services for Indigenous Australians, and acknowledge the work of those organisations in Queensland (some of whom are our members, and others valued partners). Funding for those services are generally provided through programs outside the NPA, some of which are currently under review. We respect their expertise, greatly value their services, and work in partnership with those organisations.

The National Accreditation Scheme for community legal centres throughout Australia commenced in 2013, with the aim of ensuring high quality legal services, governance standards, community development and education, and access, inclusion and client feedback. Phase 2 of the scheme, released in early 2016, places additional emphasis on ensuring cultural safety in Queensland's community legal centres.

The scheme includes requirements for centres to be actively committed to ensuring access, equity and non-discrimination for clients, staff, volunteers and governing body members, including Aboriginal and Torres Strait Islander people, people with disability, people from CALD backgrounds and other priority groups. Centres undergo a rigorous assessment and continuous improvement process, including seeking formal and informal feedback regarding client satisfaction.

In addition to direct service delivery, community legal centres have a high level of engagement with their local Aboriginal and Torres Strait Islander community, through community outreach work, participation in NAIDOC week and other community events, involvement in advisory councils and community education activities. Many Queensland community legal centres undertake cultural awareness and safety training (77.8%) and 50% have developed or are developing a Reconciliation Action Plan (NACLC Census 2016).

## Interpreter services ensure access for people from culturally/linguistically diverse backgrounds

Community legal centres in Queensland provide accessible advice and support for people from culturally and linguistically diverse (**CALD**) backgrounds, including arranging professional, qualified and impartial interpreters, at no cost to the client. Interpreters are provided either over the phone or on-site, which provides greater flexibility and access for people living in rural, regional and remote communities, or those requiring immediate and urgent assistance. People from CALD backgrounds already experience numerous barriers in accessing and understanding their rights and obligations under Australia's legal system, and without community legal centres and their arrangements with interpreters, would be faced with further injustice. The Commonwealth divested responsibility for coordinating and funding telephone interpreter services to the States/Territories under the NPA; the Queensland Government set aside funding for this purpose, and worked closely with Community Legal Centres Queensland to build their understanding and allocate appropriate funding.



## Family violence

Community legal centres have assisted more people experiencing domestic and family violence has substantially increased, but this is likely due to other external factors including the release of the *Not Now, Not Ever* Report into Domestic Violence in Queensland in early 2015, which brought domestic violence to the attention of governments and the public, assisting to reduce the stigma faced by people experiencing DV and encouraging higher levels of reporting, prompting legislative and policy changes, additional funding allocation for state-based DV duty lawyer initiatives, and an increased focus by community legal centres on responding to the connections between DV issues and other legal problems.

While community legal centres have been providing free legal services to people affected by DV, there has been a shift in focus to accommodate for this increase in demand. One such example is the Refugee and Immigration Legal Service (**RAILS**), who recognise the intersections between and additional vulnerabilities facing people from CALD backgrounds who were escaping DV, given that separation from their violent partner could also mean deportation back to an unsafe country of origin and/or separation from their children. RAILS provides ongoing representation services and casework for people experiencing DV who are applying for a permanent partner visa in Australia and has strong referral networks with specialist family law community legal centres and DV services to ensure those most in need are able to receive prompt expert assistance.

## E. We can't meet the need for legal help across Queensland

Community legal centres are unable to meet the enormous need for legal assistance in Queensland, resulting in many clients being turned away. Queensland respondents to the 2016 NACLC census identified insufficient resources as the main reason for client turnaways in the 2015/2016 financial year (76.2%). In total, it was estimated that almost 55,000 people were unable to access legal support from a community legal centre, however, approximately 60% were provided with an appropriate, accessible and affordable referral to another service/organisation.

On average, Queensland community legal centres employ approximately 13.5 staff comprising of full-time, part-time and casual employees. This equates to just over 10 full-time equivalents. The bulk of these are lawyers and other staff providing direct service delivery to clients. Even with this heavy focus of resources on front-line services, Queensland's community legal centres simply can't meet community demands for our services.

## Law reform assists us to deal with systemic issues increased demand

According to the NACLC Census, 70.4% of Queensland's community legal centres engaged in policy advocacy and law reform activities in the 2015/16 financial year. The majority of this work involved preparing submissions to inquiries and reviews (85%), meeting with their local member of parliament (65%), and advocating via social and other media (55%). These included issues such as submissions on special circumstances court diversion, the introduction of a Human Rights Act for Queensland, improved blue card application processes, domestic violence aggravation and strangulation, support for seniors, debt and tenancy law.

Community legal centres in Queensland have indicated that there has been a marked reduction in the law reform and advocacy work they can undertake on behalf of their clients and local communities. This is due to a number of factors including a decreased appetite for law reform and lobbying by Government, unless centres have been invited to respond to specific requests for submissions, reduced funding and resources, increased demand on centres for legal help, increased emphasis on providing higher and higher numbers of direct services such as legal advice and representation (often at the expense of other activities, such as community engagement). This has resulted in an inability to deal with many systemic legal and social issues faced by clients of community legal centres.

## F. The LPITAF review made significant changes to policy and funding legal assistance in Queensland

In 2012, Queensland's Department of Justice and Attorney-General undertook a Review of the allocation of funds from the Legal Practitioner Interest on Trust Accounts Fund (LPITAF). The objective of the Review was to establish a new model of transparent decision-making so that all LPITAF funding allocations are directed and applied in a manner that maximises service delivery to Queenslanders across the state, while ensuring the ongoing viability of the LPITAF. Key findings of the Review included:

- the range of legal assistance services and service delivery models of LPITAF recipients respond well to the legal needs of Queenslanders
- funding strategies should be adopted to guide decision-making at a practical level to maximise service delivery across Queensland
- there are cost effective initiatives already in use within the sector, recommending that project funding should be offered for development of a plan to make access to specialist legal services more equitable across Queensland, building on existing initiatives.
- the Review was not able to identify any true duplication of legal services being delivered by LPITAF recipients.
- active and ongoing relationships between service providers and planning and coordination at the State-wide and regional levels are key to ensuring duplication does not occur.
- Legal Aid Queensland, through the QLAF has a central support and coordination role, promoting communication, collaboration, and reduced duplication.

The Review made 33 recommendations to support transparent decision-making and robust governance, effective service design and delivery, collaborative and client-focused services, and capacity-building of community organisations.

Queensland funding processes for community organisations: 2017-20

	PLANNING <i>In consultation with the Queensland Legal Assistance Forum</i>	EVALUATION PROCESS <i>In consultation with the Department's Procurement area</i>	APPLICATION PROCESS <i>In consultation with Community Legal Centres Queensland</i>	OUTCOMES <i>Final decisions of the Queensland Attorney-General</i>
State and Commonwealth funding	<p>Planning discussions were held to:</p> <ol style="list-style-type: none"> <li>1. seek feedback on the strategies that would underpin the distribution of funding over 2017-20; <ul style="list-style-type: none"> <li>– once approved by the Queensland Attorney-General, the funding strategies directly informed the criteria used to evaluate the quality of the proposed services</li> </ul> </li> <li>2. seek feedback on the breakdown of the Commonwealth funding allocated to Queensland Community Legal Centres under the National Partnership Agreement on Legal Assistance Services 2015-20, including on the amounts to be set aside for: <ul style="list-style-type: none"> <li>– translating and interpreters services;</li> <li>– statewide collaborative service planning initiatives;</li> <li>– program management costs; and</li> <li>– CLASS maintenance</li> </ul> </li> <li>3. oversee the establishment of Queensland's evidence base, which was delivered by Community Legal Centres Queensland <ul style="list-style-type: none"> <li>– once endorsed by the Queensland Legal Assistance Forum (ensuring sector ownership), the evidence base was used by applicants to support their applications</li> </ul> </li> </ol>	<p>Applications would be:</p> <ol style="list-style-type: none"> <li>1. evaluated against criteria relating to the quality of the services (the funding strategies), specifically: <ul style="list-style-type: none"> <li>– The legal assistance services focus on, and are accessible to, people facing vulnerability and disadvantage.</li> <li>– The legal assistance services are appropriate, proportionate, client-focused and tailored to people's legal needs and capabilities.</li> <li>– The legal assistance services are collaborative with government services and other services to provide joined-up services to address people's legal and other problems.</li> <li>– The legal assistance services identify and resolve legal problems in a timely manner before they escalate.</li> <li>– The legal assistance services empower people to understand and assert their legal rights and responsibilities and to address, or prevent, legal problems.</li> </ul> </li> <li>2. evaluated against a criterion relating to the value for money of the services, specifically: <ul style="list-style-type: none"> <li>– In the context of client needs and locality, the model for delivering the services provides value for money in terms of the services that can be delivered with the funding sought.</li> </ul> </li> </ol> <p>The Evaluation Team would consider the outcomes of the evaluation and an appropriate mix of services to ensure viability of the service system when making recommendations to the Attorney-General.</p>	<p>Applicants were required to:</p> <ol style="list-style-type: none"> <li>1. demonstrate how they deliver legal assistance services in accordance with the principles of the National Strategic Framework for Legal Assistance 2015-20; and</li> <li>2. draw on the latest evidence and analysis of legal need, overlaid with any additional evidence (i.e. local evidence) to support their applications.</li> </ol> <p>The application pack was comprised of:</p> <ol style="list-style-type: none"> <li>1. application guidelines;</li> <li>2. application form; and</li> <li>3. supplementary guide (a practical resource to assist applicants to complete the application form).</li> </ol> <p>Consultation ensured that:</p> <ul style="list-style-type: none"> <li>– the language translated to the applicants;</li> <li>– we were asking the right questions that would allow applicants to demonstrate how they met the evaluation criteria; and</li> <li>– applicants were supported to provide appropriate responses to the questions.</li> </ul> <p>We invested in building the sector's capability to participate in competitive funding processes. State funding was allocated to Community Legal Centres Queensland to deliver:</p> <ul style="list-style-type: none"> <li>– the supplementary guide; and</li> <li>– a workshop and webinars on Queensland's evidence base and how it can be drawn on to support applications.</li> </ul>	<p>The Queensland Attorney-General's decisions were made in the context of scheduled cuts to Commonwealth funding (approximately \$2 million per annum from 2017-18). To ensure viability, it was crucial that funding and services were reduced with the least impact on the integration, efficiency and effectiveness of the service system.</p> <p>The funding allocations best promoted an integrated, efficient and effective service system and directed investment towards priority areas in a phased and sustainable way. However, to implement the scheduled Commonwealth funding cuts, many community organisations were set to receive reductions of 3.25% or 8.25% on their 2016-17 allocations for core services (indexed).</p> <p>Outside of the greater Brisbane area, only one organisation that provides general legal assistance services was allocated funding in each major area. This ensured equitable access to services across the state. These general legal assistance services are complemented by a network of statewide, specialist legal assistance services.</p> <p>Funded services complement, and do not duplicate, each other, and collaborate with other legal and non-legal organisations to better plan for and deliver legal assistance services across the state.</p>
Commonwealth defined funding		<p>Applications would be evaluated in the same manner as the process for allocating State and Commonwealth funding, without the services system viability considerations (the Commonwealth defined funding would build on the funded core services system). The evaluation criteria were tailored to meet the Commonwealth's service parameters, being family law and family violence related legal assistance services.</p>	<p>Applicants were required to apply for funding in the same manner as the process for allocating State and Commonwealth funding. The application questions were tailored to meet the Commonwealth's service parameters.</p>	<p>After reversing the 3.25% and 8.25% cuts implemented through the process for allocating State and Commonwealth funding (outside of the funding process), the Queensland Attorney-General allocated the remaining Commonwealth defined funding in a way that best promoted the most integrated, efficient and effective service system 'layer' that is focused on meeting the legal needs of people experiencing family law problems, and domestic and family violence.</p>

The outcomes of the Review continue to inform the Queensland Government's approach to setting policy and strategy, and its funding processes for community organisations. Additional funding provided under the NPA slotted into the structures and systems introduced following the Review.

The Review occurred before the formation of the NPA, but considered the lack of coordination between state and federal funding allocations:

The Review explored the respective roles of the Commonwealth and Queensland Governments in allocating funding to LPITAF recipients to provide legal assistance services in Queensland. There was widespread call for a sophisticated, collaborative approach between the two Governments in deciding which services each will fund. In future, DJAG should consult with the Commonwealth Government and other Queensland Government departments about their funding priorities and proposed allocations for each funding round and as required. The goal is **the systematic simplification of funding arrangements for funded organisations and the respective Governments**. [emphasis added].

Since the Review was completed, DJAG have undertaken a number of procurement processes, with iterative improvements in the strategy and the process, based on the policy settings outlined in the Review (2014 LPITAF allocation, 2015 allocation of federal funding under the NPA, 2016-17 consolidated procurement of state/federal investment, 2017 allocation of NPA 'defined funding').

It was fortunate that the LPITAF review had been undertaken prior to the implementation of the NPA, meaning the Queensland Government was able to clearly its strategic priorities, and allocate funding accordingly. This created a fertile context for the introduction of the NPA.

## G. The NPA hasn't really changed the efficiency or effectiveness of community legal centres' work

Given the decades-long experience of Queensland's community legal centres, the sophisticated role of QLAF, our relationships with Legal Aid Queensland and other services and institutions, and a dedicated team in DJAG focussed on strategy and funding for Queensland's legal assistance services, it is difficult to measure the impact (if any) of the NPA.

One clear benefit is a single decision-maker for funding and strategy, that ensures funding decisions aren't made in a contradictory way. However, the Commonwealth's preparedness to work outside the NPA for legal assistance services (including the Women's Safety Package, Family Advocacy and Support Services (**FASS**), and new elder abuse services) entirely undermines this potential benefit.

We could say that the NPA and the strategic framework for legal assistance services provided a shared language and clearer definition of our work; however, implementation and support for new data definitions and collection undermined this perceived positive.

In our view, Queensland's implementation of the NPA has been strong and positive, but this was largely achieved as a result of the strength of our sector's relationships, our relatively sophisticated system infrastructure, and our commitment to quality services and outcomes for clients. These factors aren't attributable to the NPA, but are necessary for successful implementation of the NPA.

## H. The best innovations are incremental and led by the sector

A hallmark of the Queensland legal assistance sector has been the collaborative relationship between legal assistance services and the Queensland Department of Justice and Attorney-General. In particular Community Legal Centres Queensland has worked closely and collaboratively with Department of Justice and Attorney-General representatives throughout the implementation of the NPA. This working relationship would not be possible without the State allocating specific resources to Community Legal Centres Queensland to engage in this collaborative work, providing advice to government about the impact of policy settings in the community.

This productive working relationship has had a number of positive outcomes including:

- An agreed procurement process for NPA and State funding that involved Community Legal Centres Queensland supporting community legal centres and other community organisations in the procurement process;



- Identifying Community Legal Centre Queensland as having the sector leadership to develop practical resources to assist with the planning and evaluation of services;
- Sector-led regional service planning through Community Legal Centres Queensland working with local Legal Assistance Forums;
- Coordination at a sector level of the client survey, which had direct links to broader evaluation work of community legal centres;
- Thorough consultation through QLAF and its working groups to ensure innovative projects have the support and the consideration of the legal assistance sector, and the reduction of competitive procurement processes;
- A overall understanding that any change management in the legal assistance sector and service innovations should led by the sector; are incremental to ensure base line services are maintained; and that the sector and Department share a common value of getting the right services to the community.

Over the course of the NPA, genuine partnership has developed and matured between Community Legal Centres Queensland and the Department to ensure the right service mix that is most effective for the funding envelope.

## Technology isn't a silver bullet, and requires focussed investment

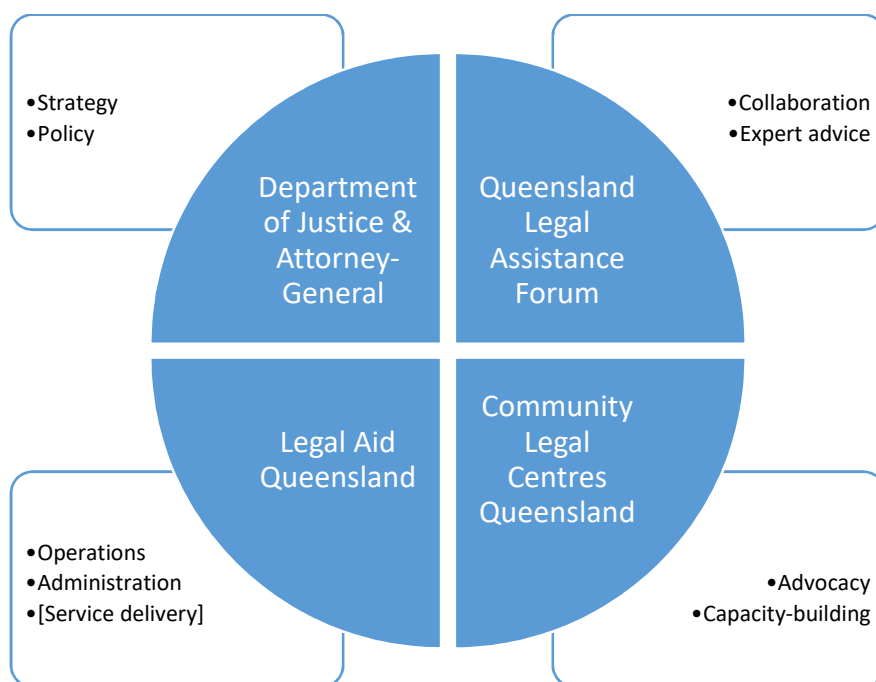
A number of Queensland's community legal centres have developed tools using technology, both client-facing tools (including for 'navigators' and 'noticers' like community services and family members) and back-office/administrative tools. However, these tools require focussed investment, and community legal centres generally aren't prepared to divert service-related resources (that require achievement of service targets under funding agreements) to complete this work. Generally, technological advances have been achieved in partnership with specialists, relying on voluntary, *pro bono* and/or philanthropy/sponsorship.

## 2: Collaborative service planning

... the implementation of collaborative service planning by the Parties, and the extent to which it is contributing to the objective and outcomes of the NPA.

### A. System management requires coordination and collaboration

In Queensland, legal assistance services recognise and respect the complementary roles of different organisations supporting collaborative service planning, and collaborative service delivery. As far as this relates to the work of community legal centres, the system management functions are set out below:



### B. QLAF provides an important role coordinating collaborative service planning

The Queensland Legal Assistance Forum (**QLAF**) plays a central role in driving Queensland's collaborative service planning. The QLAF is comprised of representatives from across the broader legal assistance sector, and practically the QLAF:

- implements and oversees collaborative service planning;
- endorses updates to Queensland's evidence base;
- drives best practice in service design, and continuous improvement;
- oversees and enhances the roles of statewide, regional and specialist legal assistance forums in service system design; and
- provides feedback to the Queensland Government on funding strategies based on evidence and best practice in service design.

Each year, the QLAF endorses a project plan (published at [www.qlaf.org.au](http://www qlaf.org.au)), which provides a coordinated and collaborative framework for how it will drive collaborative service planning. The structure of the project plans include:

- working together;
- planning for legal assistance services;

- maintaining an evidence base;
- best practice in service design; and
- continuous improvement.

## Queensland collaborative service planning processes: 2015-20

GOVERNANCE	PLANNING	2017-18 PROJECT PLAN
<p><i>Who we undertake collaborative service planning with</i></p> <p>The Queensland Legal Assistance Forum (QLAF) plays a central role in driving Queensland's collaborative service planning. The QLAF is comprised of representatives from across the <b>broad legal assistance sector</b>, specifically:</p> <ul style="list-style-type: none"> <li>Legal Aid Queensland;</li> <li>Community Legal Centres Queensland (CLCQ) (representing Queensland Community Legal Centres);</li> <li>Aboriginal and Torres Strait Islander Legal Service (ATSILS);</li> <li>Queensland Indigenous Family Violence Legal Service;</li> <li>Lawlight (representing the Queensland pro bono sector);</li> <li>Queensland Law Society (representing the Queensland pro bono sector);</li> <li>Bar Association of Queensland (representing the Queensland pro bono sector);</li> <li>Queensland Council of Social Services (representing the Queensland community services sector);</li> <li>Department of Human Services;</li> <li>Queensland Government; and</li> <li>Commonwealth Government.</li> </ul> <p>Practically, the QLAF:</p> <ul style="list-style-type: none"> <li>implements and oversees collaborative service planning;</li> <li>endorses <b>updates</b> to Queensland's evidence base;</li> <li>drives best practice in <b>service design</b> by: <ul style="list-style-type: none"> <li>establishing working groups and specialist legal assistance forums to inform best practice service delivery for priority client groups; and</li> <li>ensuring that existing and new services are developed in a collaborative manner with other legal and non-legal services;</li> </ul> </li> <li>drives <b>continuous improvement</b> by: <ul style="list-style-type: none"> <li>progressing current initiatives, including through assigning tasks to working groups and specialist legal assistance forums;</li> <li>identifying new initiatives as current initiatives are implemented; and</li> <li>supporting service providers to identify and adopt methodologies to better understand and measure the effectiveness of their services;</li> </ul> </li> <li>oversees and enhances the <b>roles</b> of statewide, regional and specialist legal assistance forums in service system design; and</li> <li>provides <b>feedback</b> to the Queensland Government on funding strategies based on evidence and best practice in service design.</li> </ul>	<p><i>How we undertake collaborative service planning</i></p> <p>Each year, the QLAF endorses a <b>project plan</b>, which provides a <b>coordinated and collaborative framework</b> for how it will drive collaborative service planning. The structure of the project plans include:</p> <ul style="list-style-type: none"> <li>working together;</li> <li>planning for legal assistance services;</li> <li>maintaining an evidence base;</li> <li>best practice in service design; and</li> <li>continuous improvement.</li> </ul> <p>The QLAF publishes its project plans on the QLAF website at <a href="http://www.qlaf.org.au">www.qlaf.org.au</a>.</p> <p><b>OUTCOMES</b></p> <p><i>What we've achieved so far</i></p> <p>Through the 2016-17 project plan:</p> <ul style="list-style-type: none"> <li>sector governance has been enhanced, with the QLAF driving collaborative service planning and establishing new, and maintaining existing, working groups and forums, including the: <ul style="list-style-type: none"> <li>Best Practice and Evidence Base working group;</li> <li>Mental Health service planning working group; and</li> <li>Aboriginal and Torres Strait Islander service planning working group;</li> </ul> </li> <li>an evidence base has been established, which informed the allocation of service delivery funding to community organisations over 2017-20 and ongoing collaborative service planning initiatives; and</li> <li>a work plan was delivered, consisting of six projects considered to have the greatest impact for statewide collaborative service planning (all of which have been allocated State project funding for their delivery).</li> </ul>	<p><i>What we're working on</i></p> <p>Through the 2017-18 project plan, the QLAF will:</p> <ul style="list-style-type: none"> <li>oversee: <ul style="list-style-type: none"> <li><b>regionalised collaborative service planning</b> through a project led by CLCQ. The project will pilot a regionalised collaborative service planning process in three regions in Queensland. Using evidence of legal need and their own expertise and experience, the project will enable local service providers to identify services provided locally; service gaps; or opportunities to 'draw in' specialist, statewide services;</li> <li>the development of an <b>Indigenous Legal Health Check</b> and delivery of collaborative, cross-sector legal service delivery in three Indigenous communities for two years;</li> <li>the development of <b>resources and training</b> for stakeholders that encourages collaborative service delivery, information sharing and referral pathways between the criminal justice system, Queensland Health and advocacy and support services, to better assist individuals experiencing mental health issues or with intellectual disability or cognitive impairment;</li> <li>the provision of support to up to five legal assistance service providers to implement Legal Health Check resources over 12 months through <b>active collaboration with community or health service providers</b>;</li> <li>the development of a best practice 'how to guide' for delivering <b>outreach services</b>; and</li> <li>the appointment of a <b>training and development officer</b> for the legal assistance sector to develop, deliver and/or secure training opportunities based on need; cross-sector training and partnerships leverage fee based training at discounted rates; coordinate mini regional conferences and develop sector specific content; and</li> </ul> </li> <li>develop <b>strategic legal assistance research and evaluation frameworks</b> to provide guidance on how it should identify and consider needs and priorities to support service development and planning, in alignment with the broader strategic direction of Queensland's legal assistance model. They will provide the foundation on which needs and priorities can be proactively agreed on and presented if opportunities arise for Government funding, philanthropic funding, partnerships with universities and in-kind contributions.</li> </ul>

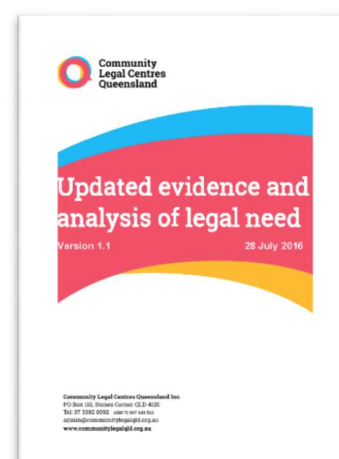
## C. It's not possible to find an equation or formula that identifies, and meets, need for legal services

Under the NPA and Queensland government policy, planning for legal assistance services requires evidence and analysis of legal need:

The first element of service planning is that the States use an evidence base to identify priority clients and the geographic locations in which people have the highest levels of legal need. This will enable the States to identify and analyse evidence of disadvantage, as a proxy for legal need, and target legal assistance services within their jurisdiction accordingly.

With funding from the Department of Justice and Attorney-General, Community Legal Centres Queensland prepared a report to summarise evidence of legal need in Queensland in July 2016; it uses demographic information as a proxy for legal need, based on leading international and Australian research. It draws primarily on work of the Law and Justice Foundation of New South Wales (LJF). It presents data that indicates the number and proportion of the Queensland population that fits into the NPA's 'priority client groups', across 13 regions in Queensland.

However, the Queensland Government and service providers recognise that there is no perfect formula or data-driven model to identify the need for legal assistance services, or how those demands can be met. The LJF's work has advanced a shared understanding of legal need, and seeks to use proxies for legal need based on indicators of the likelihood of legal problems, and people's capacity to respond, based on demographic



indicators. This reductive exercise can help provide some guidance on legal need, but quantitative and demographic data cannot form the basis of designing (and providing funding for) a statewide network of legal assistance services. The LPITAF Review *'found that the most cost effective way of allocating funding for the delivery of legal assistance services is to build on the existing service structure where possible and only fund the establishment of separate new services if necessary.'* The Productivity Commission stated:

Previous reviews have identified the need to build an evidence base to monitor the system and guide policy reform. The Commonwealth Attorney-General's Department considered that data on the justice system were lacking and statistics were inconsistently collected and reported.

The Commission concurs with these views. The absence of data has hampered policy evaluation and caused a reliance on qualitative assessments.

Transitioning to new data standards and the under-resourced implementation of the new CLASS database have added to difficulties in using data to support collaborative planning.

Any future NPA should recognise that demographic data has a limited role in supporting collaborative service planning. Local, regional and statewide planning should use this information to inform their planning, but it should not drive policy, service design or funding allocations.

## D. Collaborative service planning must also be done locally/regionally

Community Legal Centre Queensland has developed a pilot regional service planning process and plan in the Moreton and Ipswich regions, to be rolled out to 2 other regions by the end of 2018. The stakeholders involved in the planning process include the local legal assistance services and community organisations. The regional process develops a plan to inform the QLAF about the regional legal need, and the services needed to meet the need. The planning process involves considering the quantitative and qualitative data about priority groups and their legal need and developing a specific regional plan which may employ a range of strategies such as changes to referral pathways and links, training and development of legal assistance services' staff, scoping new services or activities, and identifying where additional resources are required.

The Queensland government's support of Community Legal Centre Queensland to led this work ensured that the planning process was sector lead and driven and was developmental in its approach.

The community legal centre sector has a long track history of networking and collaborating on a local and regional level without having a formal funding mechanism to facilitate this. These community led processes consider emerging community need, identify gaps and ensuring local resources are best coordinated to meet the needs. Two Townsville examples that go to both addressing local legal need and the changes required as a result of the implementation of the NPA include:

- Local services undertook a collaborative audit of family law services to ensure an better integration of service delivery;
- Legal assistance services met for a workshop to discuss data in light of the change management challenges required as a result of the introduction of the Data Standards Manual under the NPA.

## E. Individual organisations are undertaking their own strategic and service planning

Community legal centres, like other legal assistance services, are independent and autonomous organisations that undertake their own planning processes. This assists them to engage in collaborative service planning with ideas about their focus areas, and identify service gaps faced by their communities.

Community Legal Centres Queensland developed a Strategic planning toolkit to support community legal centres to engage in strategic and service planning. The toolkit was trialled with a several Queensland community legal centres who were looking for cost efficient and effective ways to plan. The [Strategic Planning Toolkit](#) is available on the Community Legal Centres Queensland website. Feedback on the tool (and Community Legal Centres Queensland's facilitation of planning workshops) has been positive.

## F. A functional peak body supports collaborative service planning processes

Good practice, effective and evidence-based approaches to collaborative service planning and funding allocation should involve the relevant peak association. In Queensland, funding and support for, as well as engagement with, Community Legal Centres Queensland has resulted in more positive outcomes for government, the sector and the community. In addition to providing funding to Community Legal Centres Queensland to undertake these activities, the Queensland Government continues to engage constructively around funding, administration, service delivery planning and policy development for legal assistance services.



Before the introduction of the NPA, AGD funded Community Legal Centres Queensland to develop a Queensland Community Legal Services Plan (**QCLSP**). The QCLSP engaged centres in planning better coordinated service delivery for the areas of law and vulnerable client groups that community legal centres target. The plan identified 92 actions to be implemented by QAILS (as we were called), our members, other service providers, governments and other stakeholders, to increase access to justice in Queensland.

This was the first time a broad scale project incorporating all 33 member centres in service coordination has taken place in Queensland and accordingly represents a significant step in the maturation of the community legal centre movement in the state.

Again, with a capable peak body having completed this work prior to the introduction of the NPA, the requirement for collaborative planning was already evidenced within the membership of Community Legal Centres Queensland, and Community Legal Centres Queensland had a demonstrated capacity to support collaborative services planning within its membership, and across the broader legal assistance landscape.

Community Legal Centres Queensland receives financial support from DJAG to deliver 'peak services' and has received project funding for a number of initiatives that support collaborative planning; without this support, the capacity of community legal centres to contribute to collaborative service planning processes would be limited.

## G. Collaboration is undermined by competitive tensions

Despite the successes of collaborative service planning in Queensland, we observe that collaboration is undermined by competitive tensions. Requiring individual organisations to 'tender' for core funding effectively pits service providers against one another, and political and funding opportunities can have a similar impact. It is easier for organisations to collaborate outside of funding application cycles.

## H. Collaborative service planning isn't the same thing as cutting costs

Streamlined services may be one consequence of collaborative service planning, but these initiatives are most successful when sector led and initiated. Another consequence of collaborative service planning can be unearthing previously unidentified need that requires new investment and specialisation that can address genuine access to justice issues. In that light, the list of things that could be considered in collaborative planning (at clause A10 of the NPA) aren't particularly helpful

In 2016/2017 Community Legal Centres Queensland examined potential cost savings in the community legal sector. The project produced the report "[Blood from a Stone](#)". A number of operational areas were tested for savings including human resources, office overheads, service delivery, governance and alternative funding. These areas included elements of "collaborative service planning" under the NPA including the viability of mergers, colocations, consolidation, use of technology and other resource sharing. Overall the project identified limited areas for costs savings for community legal centres in their operating budgets due to the underinvestment in expenditure not specifically related to providing direct services. This underinvestment is consistent with benchmark research across the social and community sectors.

### 3. Funding arrangements

... the effectiveness, efficiency and appropriateness of current funding arrangements in meeting the objective and outcomes of the NPA, including consideration of:

- (a) the shared responsibility of the Parties in the operation of the NPA and the provision of legal assistance services
- (b) if and how Commonwealth Social and Community Services (SACS) supplementation was distributed
- (c) the drivers of demand for legal assistance services
- (d) how and whether funding under the NPA supports the progress towards achieving its objective and outcomes
- (e) the interaction between the NPA and other Commonwealth funding arrangements for legal assistance services

#### A. Any discussion about funding arrangements must acknowledge the inadequacy of current resources

It is self-evident that, without adequate resources, it is unlikely that the objective and outcomes of the NPA could be achieved.

In that context, it is disappointing that this review will not specifically investigate the adequacy of the funding quantum under the NPA. However, it is open to the reviewers to find, and they should find, that the quantum of funding under the NPA undermines the effectiveness, efficiency and appropriateness of current funding arrangements as a mechanism to meet the objective and outcomes of the NPA.

The NPA also missed the opportunity to encourage states and territories to commit to funding legal assistance services. While it is right to say that governments should maintain some discretion in their budgetary processes, a properly negotiated NPA is an opportunity to address significant disparities in the proportion of funding provided by state/territory governments, as they existed before the NPA was formed:



Fortunately, Queensland Government funding was the second-highest proportion of any state/territory in 2013-14, and the Government remains committed to investing in our services. However, we observe that the relatively small proportion in other states/territories has affected the NPA's effectiveness nationally.



## B. Longterm certainty in funding (for the sector/ program and individual organisations) is vital

The introduction of the NPA was supposed to provide long-term funding certainty for the sector, and for individual organisations. This has not been achieved.

Queensland's community legal centres have had to engage in irregular funding procurement processes, every year from 2013-17 (under the NPA this has included additional funding under the NPA's funding allocation model, in 2015, in preparation for a triennial funding allocation in 2016, reinstatement of federal funding in 2017). This ad hoc, uncertain approach undermines any effort to long-term, sustainable and coordinated service delivery. Further, new funding programs outside the NPA undermine the service system, as discussed in **section 5D below**.

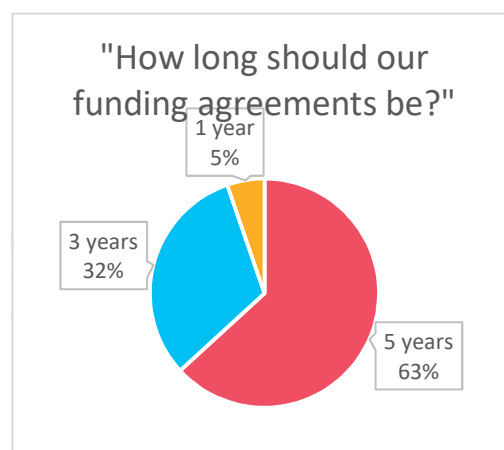
In particular, concerns about a 'funding cliff' built into the NPA undermined our work, and diverted resources from Community Legal Centres Queensland and our members, as we sought to communicate the impact of funding cuts to services, and advocate for the reinstatement of this funding. For our organisation, this involved:

- **meetings with 81 state and federal MPs:** As a result of these meetings 60% took direction action including signing a petition, writing to the State and Federal Attorney-Generals, lodging a motion in parliament or asking a question in parliament.
- **generating significant media coverage:** Mainstream media coverage included 166 print articles and 71 radio and TV interviews that highlighted the work of our members, and the impact of funding cuts. During the 12 month campaign, we posted 1,190 tweets which resulted in 741,144 impressions, and 827 individual Facebook posts which generated 586,609 impressions.
- **seeking support from our friends:** After the heads of the 7 law societies wrote an open letter calling for the cuts to be reversed, other statements of support and letters were provided by:
  - the President of the Uniting Church in Australia;
  - letter from 5 cross bench Queensland MPs;
  - the Services Union (which included a billboard calling for the cuts to be reversed);
  - the Deans of 30 law schools;
  - Tim Nicholls, Leader of the LNP and Ian Walker, Shadow Attorney-General; and
  - former Australian of the year Rosie Battie

Imagine if we'd have been able to focus on service delivery and capacity building of our members, rather than campaigning to maintain the funding *status quo*.

The 2013 LPITAF review report recommended that LPITAF funding should be allocated to community organisations in three year cycles to "*generally align with the Community Legal Services Program (CLSP) funding cycles.*" We agree that funding agreements should align with long-term program funding cycles, and strongly support moving to five year funding agreements where they align with a five-year intergovernmental funding arrangement, like the NPA.

Community legal centres would prefer long-term (five year) funding agreements. In an April 2015 poll of our members, 12 members preferred five-year funding agreements 6 preferred three-year funding agreements, and only one member (an unfunded organisation) preferred a one-year agreement.



In introducing five year funding agreements for community organisations in October 2017, Queensland Premier Anastacia Palaszczuk said locking in funding for vital community services and groups for five years gave them certainty and made them better able to plan service provision and retain vital staff:

This five-year funding provides organisations and community groups with the security and certainty they need, and ensures Queenslanders can access services and help when they need it most. ... The staff and volunteers

at these organisations work hard every day to ensure Queenslanders have the support and services they need, and increasing their funding contracts from three years to five years is a step in the right direction.

The NPA review should recommend long-term funding agreements for individual organisations.

## C. The Queensland approach to funding allocation and administration supports the service system

In Queensland there is a clear demarcation and complementarity between DJAG, Legal Aid Queensland and Community Legal Centre Queensland. All three organisations have a clear role and function to ensure that communities get the legal services they need.

- **DJAG** sets the strategic policy for legal assistance service, ensuring that the service system resources are maintained and developed in accordance with community need;
- **Legal Aid Queensland** undertakes the administrative function of ensuring community legal centres' compliance with State funding requirements so that DJAG has the information to report against NPA requirements
- **Community Legal Centres Queensland** provide policy advice to government and support and resources that contribute to building the capacity of community legal centres and the legal assistance sector to deliver efficient and effective services to their communities.

Community Legal Centres Queensland endorses DJAG's key role, as:

- the Department is the lead government agency implementing the NPA in Queensland;
- this structure reduces conflicts of interest between Legal Aid Queensland and community legal centres; and
- the model builds on the LPITAF review's recommendations that identified the need for greater transparency in the allocation of resources for legal assistance services.

QLAF fulfils an evidence and collaboration function which ensures all parts of the service system contribute to the strategic policy and system management of legal assistance services under the NPA.

The procurement process for NPA and State funding was a genuine collaboration between DJAG and Community Legal Centres Queensland which involved:

- consultation on service system design and a procurement process that would deliver an effective service system;
- consultation on application form design based on the principles National Strategic Framework for Legal Assistance;
- sector-based resources to assist organizations to apply for funding, including an [evidence of legal need guide](#) in line with NPA priorities and an application resource guide to support organisations applying for funding;
- regular sector updates about the progress of the procurement process;
- commitment to funding continuity in the time lag of Federal funding cut changes; and
- transparency in the government decision-making processes through regular communication.

This process ensures resource allocation and service delivery was aligned with NPA priorities and was aligned with local legal need and proven track record of services to meet the legal need.

Community Legal Centres Queensland endorses the Australian Council of Social Service's recommendations to improve funding certainty for community services:

- Ensure that new contracts are finalised at least 6 months prior to the end of existing contracts, in accordance with good governance and risk management principles
- Ensure that there is advance notice of at least 6 months of service procurement processes
- Where there are significant changes to the size, scope or nature of services tendered, ensure that there is clear and open consultation and collaboration with services concerning program design and service outcomes
- Support and encourage services to engage service users in service design and evaluation



- Ensure any funding or tendering process preferences the options of direct negotiation or select tender, with open tender processes only being used in circumstances where clear benefits for competitive processes can be demonstrated
- Ensure contracts operate with a presumption of a minimum of 5 years funding
- Ensure no contracts proscribe organisations from participating in independent research, policy development and public debate, including advocacy
- Provide for industry assistance, including transition funding, and job transfers to reduce the risks of increasing unemployment, and the loss of the expertise and skills of the existing workforces
- Ensure there is adequate provision for redundancies for staff affected by changes in service procurement.

## D. Funding uncertainty and new funding programs outside the NPA undermine the service system

When the NPA was introduced, it included a reduction in CLC funding from 1 July 2017, and significant efforts were deployed to reinstate this funding (see **section 3B** above). In Queensland, DJAG sought applications from community legal centres:

1. In 2013, for state funding for 2014-2017;
2. In 2014, for NPA funding for 2015-2017;
3. In 2015, for additional commonwealth funding for 2015-2017 (as a result of increased funding under the NPA's funding allocation model, which corrected historical underfunding of Queensland organisations);
4. In 2016, for state and NPA funding for 2017-2020; and
5. In 2017, for (reinstated) 'defined funding' under the NPA for 2017-20.

We anticipate that applications will be sought in late 2018 for funding from 2020; we hope that this will include Commonwealth funding under the NPA, but this will require budget commitments in 2019 from both levels of government. The opacity of the funding allocation model further confuses any attempt to understand the funding allocations under the NPA.

While the NPA was intended to provide funding certainty to the sector, it has instead resulted in further confusion and instability. This has resulted in difficulties retaining staff, which can have a direct impact on the number and quality of client services.

In addition to funding uncertainty, the Commonwealth has sought to provide funding for new legal assistance services outside the NPA, for services including the Women's Safety Package, Family Advocacy and Support Services, and new elder abuse services. This has undermined the NPA as the key mechanism to support funding, policy and strategy for legal assistance services, and further complicated system design and delivery.

## E. While SACS supplementation is useful, low community sector wages undermine our ability to attract and retain quality workers

The 'Pay Equity' cases (in Queensland in 2009 and nationally in 2011) acknowledged that the work conducted by the social and community services sector is undervalued based on gender – over 80% of paid workers in Queensland's community legal centres are women, and it was critical that governments committed to meet the cost of supplementation for organisations to meet the additional (justifiable) costs of wages.

That said, the NPA's identification of separate SACS funding has little practical impact on individual community legal centres.

As independent, community controlled organisations regulated by applicable legislation, our members are required to meet their legal obligations to pay employees at the applicable rates, including any equal

remuneration order amount. We are confident that our members meet these obligations, given the accreditation scheme reviews employment policies and systems, the outcomes of a confidential salary benchmarking survey we conducted in 2016, and regular communication about changes (increases) in award rates.

Community legal centres receive funding from the Queensland Government, and this income is expended on service costs, including an average 80c in every dollar being used to pay for wages/salaries and oncosts. Separately noting amounts of SACS supplementation does not assist in the operational or financial management of community legal centres, and the central issues raised in this part of the terms of reference are more relevant to transactions (and associated reporting) between government departments and across levels of government.

That said, over 90% of our members use award pay rates as the basis of wage-setting. Given the quality, experience and skills required of workers in community legal centres, and mindful of the remuneration paid by 'competing' employers in government and the corporate sector, these award rates do make it difficult for some community legal centres to attract and retain quality workers, particularly in regional areas.

Rather than simply focusing on SACS supplementation payments (important as they are), governments and legal assistance service providers should work together to develop workforce strategies to attract, retain and develop quality people. For example, DJAG has provided funding to Community Legal Centres Queensland to support training and development opportunities for existing and prospective staff, which has been supported (from time to time) with philanthropic grants to increase and expand training programs, particularly to support workers in regional areas. Community Legal Centres Queensland has also undertaken a national salary benchmarking survey to provide information to centre managers about comparability of classifications and salary levels, and NACLC's annual census provides important information to inform individual organisations' workforce strategies and practices. Again, this work is supported by the accreditation scheme, which requires centres to have contemporary employment practices, including appropriate strategies and policies to recruit and develop their people.

## 4. Performance monitoring and reporting requirements

... the utility of the performance monitoring and reporting arrangements, including the collection of consistent and comparable service data in measuring the progress towards achieving the objective and outcomes of the NPA, including consideration of:

- (a) performance indicators (Clause 17)
- (b) performance benchmarks (Clause 18)
- (c) milestones (Clause 19)
- (d) reporting arrangements (Clause 20), and
- (e) support systems for data collection and reporting.

### A. Data collection has been a serious problem, because of the Commonwealth's underinvestment in CLASS

The stated purpose of the National Legal Assistance Data Standards Manual (**DSM**) was to facilitate the collection of consistent and comparable data for the legal assistance sector. However, since its release, there has been little if any training and support provided by the Attorney-General's Department regarding application of the DSM, which has resulted in much confusion for community legal centres in translating many of the legal aid definitions and practices (such as 'legal tasks') into a community legal centre context. In addition, our members have found the DSM is lacking in detail regarding the definitions and examples of work falling under each of the definitions. It has been left to Community Legal Centres Queensland, other state peaks and networks to consult with community legal centre workers on the ground to fill some of these gaps and build capacity around data collection and standardisation, although there is a long way to go.

Around the same time as the DSM release, the Commonwealth Government decided to cease funding for the CLSIS database by 30 June 2016 and hand over responsibility for the collection of client data for community legal centres throughout Australia to NACLC, which led to the development of a new custom database, CLASS.

The implementation of CLASS has been fraught with issues and delays, due to an extremely limited budget and unreasonable 12 month timeframe for transition of 30+ years of client data from CLSIS for 200+ community legal centres. Although NACLC and the database developers have been persevering under difficult circumstances, CLASS is still not operating at 100% capacity, which is causing complications for centres entering, searching and reporting on their client and centre data.

Together, these issues have resulted in undue administrative burden, inconsistencies and unnecessary stress being placed on community legal centres, who previously had a firm understanding of how the legal and other support they were providing was to be counted and reported on, and are spending considerable time and effort to ensure they are correctly recording the work they do.

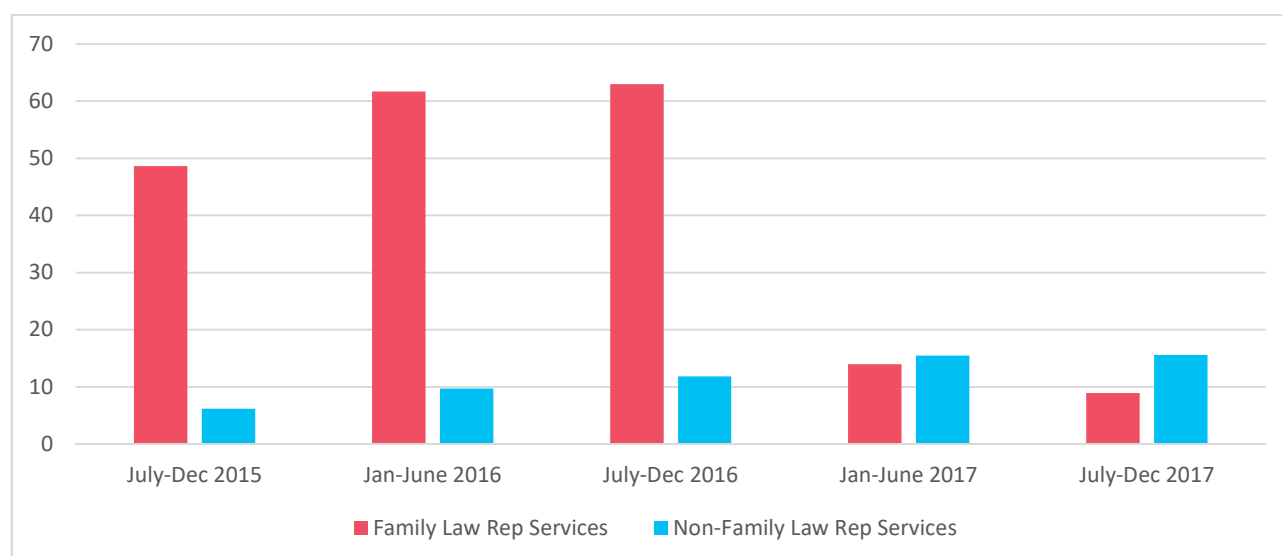
### Family violence

Community Legal Centres are some of the front-line services in the areas of family and domestic violence. In Queensland this has involved a number of community legal centres providing at court services through duty lawyer schemes and as a result the work increasing in this area for other types of services. There is an incongruity between the lived experience and the NPA data picture. These incongruities have a number of explanations including:

- A lack of shared understanding of the family violence indicator across the Legal Assistance sector, including how to capture the long term impact of family violence and the link with current legal need;
- The Data Standard manual being inadequate in its direction on family violence indicator data collection;

- The under-investment by government in the development of the CLASS data base and the critical change in business processes work that was required to fully implement the Data Standards Manual.

This is reflected in the performance indicator reports for family violence indicators, provided by the Queensland Government to the Commonwealth:



## B. Client survey data offers further proof that community legal centres do great work

In May 2018, Community Legal Centres Queensland coordinated a survey of 1,757 clients of Queensland community legal centres. While a survey is required under the NPA, the Queensland Government engaged us to coordinate the survey, providing a deeper level of understanding of clients' experiences. Key feedback included:

- 95% of clients say they would recommend the legal centre to other people;
- 96% of clients say staff listened to their legal problem in a friendly and respectful manner;
- 94% of clients say staff helped them understand how to deal with their legal problem and provided them with options;
- 94% of clients say they know where to get help if they have another legal problem in the future.

Answers to the questions were provided on a scale from 'strongly disagree' to 'strongly agree'. We assigned a value to each possible answer, to ascertain an average 'score' for each question (on a scale from 0 to 4):

- It was easy to access the legal centre when I first needed help: **3.43**
- The legal centre staff listened to my legal problem in a friendly and respectful manner: **3.69**
- The legal centre staff helped me understand how to deal with my legal problem and provided me with options: **3.59**
- The information and resources I received from the legal centre staff were very useful: **3.54**
- I am very likely to access the other service(s) that I was referred to by the legal centre: **3.40**
- I feel confident in the ability of the legal centre staff to assist me: **3.58**
- I am satisfied with the resolution of the matter I received assistance for: **3.41**
- I know where to get help if I have another legal problem in the future: **3.54**
- The legal centre was able to meet my specific cultural or personal needs: **3.51**
- I would recommend this legal centre to other people: **3.63**

It is pleasing that the averages, for all questions, are in the range 3.40-3.69 out of a possible 4.

These averages are also presented as a bar graph below:



## C. While existing reporting to the Commonwealth provides accountability, they do not improve services

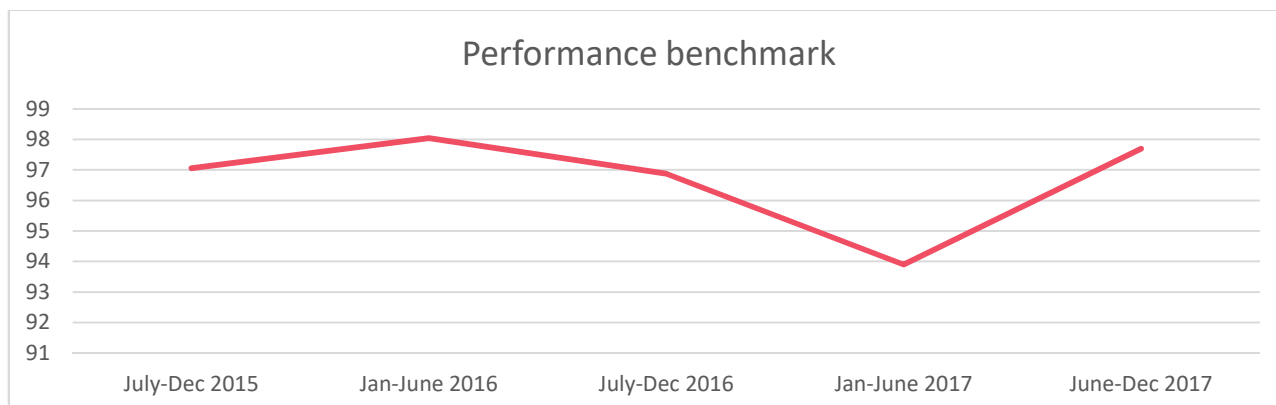
Given the reports provided by the Queensland Government to the Commonwealth under the NPA, there is a missed opportunity to use these accountability measures to provide information that might improve services.

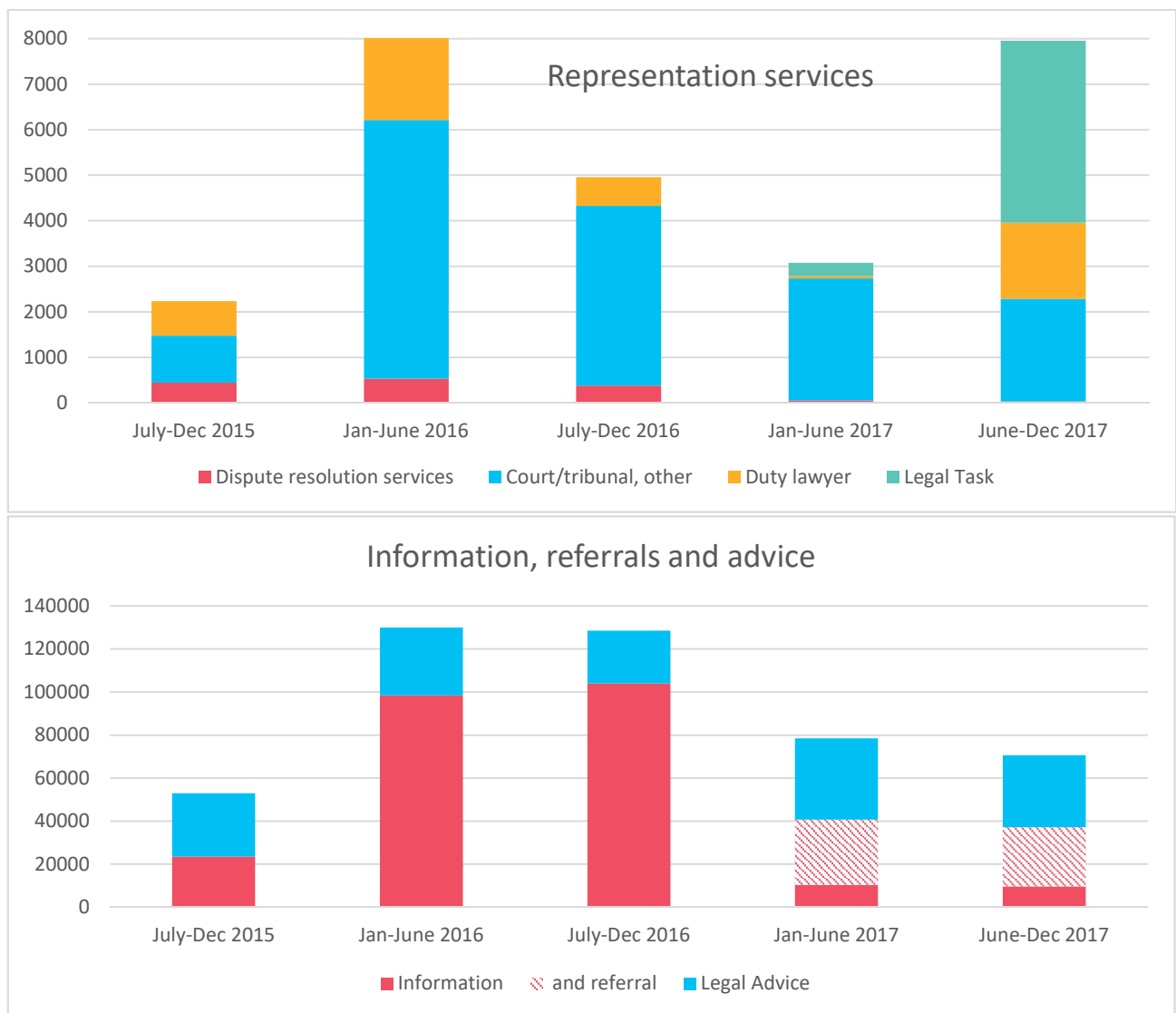
Noting NACLC concerns about reporting from CLASS, and 'workarounds' developed by individual community legal centres and program managers, half-yearly reporting for community legal centres shows:

- **Performance benchmark** (clauses 18(b) and 18(c) of the NPA) – proportion of clients receiving representation services, that are experiencing financial hardship;
- **Performance indicator** (clause 17(a) of the NPA) – proportion of clients receiving representation services, by priority client group; and
- **Performance indicator** (clause 17(d) of the NPA) – number of legal services, disaggregated by service type and law type.

These reports are discussed at half-yearly review meetings, attended by the Commonwealth, DJAG, Legal Aid Queensland and Community Legal Centres Queensland (although we note that representatives of service providers are not always invited to attend these meetings in other jurisdictions, which we consider an inexplicable oversight).

Although there is limited opportunity to reflect on these statistics in performance review meetings – and no forum to share insights nationally – Community Legal Centres Queensland has undertaken some rudimentary analysis, which we have shared with our members (at state conference), and is set out below:





The wild variations in these service numbers are more representative of changes in data definitions and the introduction of CLASS, and make it difficult to draw any conclusions about the effectiveness of the NPA in terms of outputs. However, sharing this information with our members does provide some further insights into the challenges and opportunities of service delivery and data capture.

## 5. Roles and responsibilities

... the extent to which the Commonwealth and the states and territories have fulfilled their agreed roles and responsibilities and how the Parties to the NPA and the legal assistance sector have worked together to support a holistic approach to addressing legal need.

### A. The Queensland Government has provided strong leadership in undertaking its role/responsibilities under the NPA

In our view, the Queensland Government has done an admirable job implementing the NPA in this state. This built on existing relationships, structures and strategies, and was implemented in a collaborative and constructive way, as detailed elsewhere in this submission.

In particular, the respective roles and responsibilities of DJAG, QLAF, Legal Aid Queensland and Community Legal Centres Queensland have been understood and respected, as have our relationships with other parties (including ATSILS, QIFVLS, the private profession, courts and tribunals, and other agencies).

NPA priorities were 'rolled into' state priorities, and the strategic framework for legal assistance services was a useful aspirational framework to assist with this work. In supporting sustainable funding for community legal centres, unsustainable LPITAF funding has been rolled into the state's consolidated revenue, allowing for stability and certainty.

In large part, this success stemmed from historical relationships and structures, and reforms instituted after the LPITAF review. Further, the fact that Queensland did receive an increase in federal funding from 1 July 2015 (as the NPA funding allocation model increased the proportion of CLC funding to Queensland) created an environment of constructive and forward-looking engagement, rather than creating a climate of deep cuts experienced in other jurisdictions.

The Commonwealth has missed an opportunity to provide national leadership under the NPA, and to provide forums to share national lessons. This breach has been partially filled by national groups (eg NACLC's conference and advisory groups) and individual organisations (eg Victoria Legal Aid's collaborative service planning symposium in May 2018). Any future NPA should include regular meetings of the Commonwealth, states/territories, legal aid commissions and community legal centres to share lessons under the NPA.

As noted elsewhere, the Commonwealth's preparedness to 'work around' the NPA when additional legal service funding was available, is regrettable. Any future NPA should have a mechanism for new, specialist funding to be provided.

### B. Peak bodies must be properly supported

Like other large states, Queensland is fortunate to have a funded community legal centre peak, that can contribute to the implementation of the NPA; manage consultation with individual services and provide information to government that balances the interests of its members with strategic policy priorities; and advocate to governments directly. Community Legal Centres Queensland and its members can take some credit for the relatively successful implementation of the NPA in this state.

In general terms, peak bodies are in a unique position to conduct analysis and research, and make recommendations for public policy issues that impact vulnerable and disadvantaged groups. They are able to build strong networks with other service providers, agencies and community organisations, and act as the repository of sector knowledge. This provides a cost-effective point of contact for the government in addressing the impact of their existing or future policies. A strong relationship with peak bodies assists governments in being accountable to the wider community.

Aside from the role of peak bodies in a public policy and research context, they also provide vital services and information to the community and other smaller organisations in the sector. This is achieved through raising information regarding community issues, promoting specific groups and individuals, and disseminating helpful guides and toolkits.

The NPA does not acknowledge any role for peak bodies, and minimal funding is provided by the Commonwealth to our national peak. While the Queensland Government acknowledges and supports our work, not all states are similarly supported.

The review of the NPA should acknowledge the role of peaks in supporting the implementation of the NPA, including properly resourcing those organisations for this work.



## 6. Areas for improvement

... identify areas for improvement and opportunities to enhance current and future arrangements.

The key recommendation of the review of the NPA should be that the quantum of funding under the NPA is insufficient to provide for the effective and efficient achievement of its objective. Ideally, the review should recommend a substantial increase in funding, and attempt to quantify this increase. This aspect of the review's work should be mindful of the need for 2019-20 budget processes, so as to ensure sustainability and certainty for services and clients.

As set out in other parts of this submission, and based on our experiences under the current NPA in this state, Community Legal Centres Queensland recommends additional areas for improvement and opportunities to enhance current and future arrangements, including:

- acknowledging the valuable contribution of the National Accreditation Scheme, in providing a framework of quality assurance and continuous improvement, and supporting sustainable resourcing for that scheme;
- confirming that there is no substantive duplication of effort in the work of legal assistance services;
- suggesting further work to measure the financial and economic impact of community legal centres' work;
- recognising the value of volunteers and pro bono in service provisions, while accepting that this is no substitute for a properly funded legal assistance sector;
- collecting data has been problematic under the NPA, with the implementation of new data standards and a new database, and that the Commonwealth should properly invest in improving these priority aspects of the NPA;
- improving the collection of data generally, but particularly in relation to domestic and family violence, and being led by frontline services in developing definitions and collection/tools;
- recognising that community legal centres are unable to meet demand for their services;
- lifting any restrictions on law reform and advocacy, to allow for improved early intervention and prevention of legal problems;
- recognising the limitation of NPAs to move all of the policy levers to support a thriving legal assistance sector, and focussing on those aspects that can be appropriately directed by a NPA;
- supporting change that is incremental and sector led;
- avoiding assumptions about the effectiveness of technology-focussed tools and tactics to provide effective legal help to vulnerable and marginalised people;
- supporting system management that articulates the complementary roles of different players, including the Commonwealth, State/Territory Government, Legal Aid Commissions, CLC peaks, and forums like QLAF;
- avoiding simplistic or reductive models that seek to enumerate legal need, or using those models as a basis for funding allocations;
- supporting collaborative planning at various levels, including within the CLC sector, statewide (through QLAF or equivalents); and locally/regionally;
- respecting the autonomy and expertise of individual organisations, and providing ways that they can contribute to collaborative planning, including the allocation of resources;
- valuing the contribution of peak agencies to support the NPA's implementation;
- prioritising long-term, certain and sustainable funding, both for the broad sector and for individual organisations;
- including mechanisms in a future NPA framework to allow for additional funding/services/programs (such as those currently outside the NPA, like the Women's Safety Package, FASS, etc);
- supporting workforce development priorities, which is best achieved through peak organisations;
- giving opportunities to service users to provide feedback, and using this information to report on achievements and identify opportunities for improvement;
- reporting and accountability measurements that are shared and support service improvement;
- sharing practices and lessons in national forums, with AGD to provide a coordinating role.

Based on our experience, any future NPA should focus on those policy settings that foster a thriving legal assistance services. The NPA may be able to influence those settings, and any requirements under the NPA should be focused on supporting that environment in jurisdictions where it is under-developed (including, for example, providing useful guidance on collaborative service planning, ensuring state/territory government are providing adequate resources, supporting peak bodies, etc). However, the NPA should not simply codify existing and historical practices (such as identifying priority clients) or impose requirements that undermine or divert efforts from these priorities (such as ill-suited data definitions and collection).

# Abbreviations and acronyms

<b>AGD</b>	Attorney-General's Department (Commonwealth)
<b>ATSILS</b>	Aboriginal and Torres Strait Islander Legal Service (Queensland)
<b>CALD</b>	Culturally and linguistically diverse
<b>CLASS</b>	Community Legal Assistance Services System
<b>CLC</b>	Community Legal Centre
<b>CLE</b>	Community Legal Education
<b>CLEAR</b>	Community Legal Education and Reform (database)
<b>CLSIS</b>	Community Legal Service Information System (database)
<b>CLSP</b>	Community Legal Services Program
<b>DHS</b>	Department of Human Services (Commonwealth)
<b>DJAG</b>	Department of Justice and Attorney-General (Queensland)
<b>DSM</b>	National Legal Assistance Data Standards Manual
<b>DV</b>	Domestic violence
<b>LAQ</b>	Legal Aid Queensland
<b>LJF</b>	Law and Justice Foundation of New South Wales
<b>LPITAF</b>	Legal Practitioners Interest on Trust Account Fund
<b>NACLC</b>	National Association of Community Legal Centres
<b>NAS</b>	National Accreditation Scheme
<b>NPA</b>	National Partnership Agreement on Legal Assistance Services
<b>PLT</b>	Practical Legal Training
<b>QAI</b>	Queensland Advocacy Inc.
<b>QCLSP</b>	Queensland Community Legal Services Plan
<b>QCOSS</b>	Queensland Council of Social Service
<b>QIFVLS</b>	Queensland Indigenous Family Violence Legal Service
<b>QLAF</b>	Queensland Legal Assistance Forum
<b>RAILS</b>	Refugee and Immigration Legal Service
<b>RLAF</b>	Regional Legal Assistance Forum
<b>SACS</b>	Social and Community Services



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