



Industry Guideline

Preventing and responding to financial abuse (including elder financial abuse)

1. Purpose of the industry guideline¹

This industry guideline:

- Explains what financial abuse can look like and how it can impact customers and a bank's relationship with their customers; and
- Outlines a framework for banks to raise awareness and promote consistent arrangements to deal with suspected cases of financial abuse

This guideline reflects good industry practice, and the ABA encourages members to use the principles in this guideline to put in place internal processes, procedures, and policies.

The ABA has prepared consumer fact sheets about financial abuse and setting up powers of attorney that banks can share with their customers. These can be accessed at www.ausbanking.org.au.

2. About this guidance

The **Banking Code of Practice (the Banking Code)** sets out the standards of practice and service in the Australian banking industry for individuals and small business customers, and their guarantors. The Banking Code provides safeguards and protections not set out in the law. It complements the law and, in some areas, sets a higher standard than the law.

This guideline complements the provisions of the Banking Code that requires member banks to take extra care with vulnerable customers, including those that may be experiencing financial abuse. The Banking Code notes that a bank may only become aware of a customer's vulnerability if the customer tells their bank about it.

In this context, extra care includes training staff to act with sensitivity, respect, and compassion, and working with customers to find a suitable way to undertake their banking. Banks will also be respectful of confidentiality, make communications easy, provide guidance to help customers maintain and regain control of finances, and refer customers to external support services where appropriate.

Other requirements in the Banking Code relevant to financial abuse include:

- *Part 7 of the Banking Code*, outlines protections for prospective guarantors including requiring the prospective guarantor to sign the guarantee independently from the borrower and requiring three days for the guarantor to consider their obligations (where they do not obtain legal advice or fall within one of the other exemptions).²
- *Part 5 of the Banking Code*, outlines provisions for not approving a new loan, or an increase to a loan, where the coborrower does not receive a substantial benefit unless the bank has taken reasonable steps to ensure the coborrower/s understand the risks of the loan, why they want the loan, and are satisfied they are not experiencing financial abuse³.

¹ This industry guideline does not have legal force or prescribe binding obligations on individual banks. While the ABA's industry guidelines are voluntary, this industry guideline has been developed with input from, and agreed to by, member banks. The ABA encourages member banks to follow this industry guideline and incorporate it into their internal processes, procedures and policies.

² Banking Code of Practice, March 2020, pp.33-36, <https://www.ausbanking.org.au/wp-content/uploads/2020/06/2020-Code-A4-Booklet-with-July-1-COVID-19-Special-Note-WEB.pdf>

³ Banking Code of Practice, March 2020, p.41, <https://www.ausbanking.org.au/wp-content/uploads/2020/06/2020-Code-A4-Booklet-with-July-1-COVID-19-Special-Note-WEB.pdf>

This guideline should be considered in conjunction with the *ABA Industry Guideline: Responding to requests from a power of attorney or court-appointed administrator*. While powers of attorney arrangements are an important tool for protecting a customer's future financial circumstances, some attorneys may misuse this power, either inadvertently or deliberately. Banks have an important role to play in establishing that attorneys are properly authorised to undertake transactions on behalf of their principal.

The ABA has developed two guidelines relating to financial abuse, *Preventing and responding to financial abuse* and *Preventing and responding to family and domestic violence (FDV)*. This guideline focuses broadly on financial abuse of customers, which may be by family members or others. The second focuses on family and domestic violence particularly intimate partner violence. The ABA recognises that financial abuse by a family member is a form of family and domestic violence, and that there are some common themes in both industry guidelines.

The new aspects of this guidance are to be implemented within 12 months of release. Matters carried forward from the previous guidance (December 2014) should already be implemented.

3. Background

3.1 What is financial abuse?

Financial abuse occurs when someone takes away another person's access to money, manipulates another person's financial decisions, or uses another person's money without their consent⁴. The abuser could be a partner, a family member, carer, guardian, or friend. Where the abuser is a partner or family member, the abuse constitutes family violence.

Financial abuse is a serious and far-reaching problem that can happen to anyone. However, some people, such as the elderly, people with a cognitive impairment, people with a disability or other vulnerable people are at greater risk, as they are more likely to depend on others for assistance with their financial matters.

Financial abuse can take many forms and often consists of several actions which take place over a period of time, rather than a single event. Financial abuse is sometimes combined with other forms of abuse and neglect. It may include the following:

- stealing, taking, or 'borrowing' a person's money, debit or credit cards, possessions or property without their knowledge or consent
- limiting or denying a person access to their money or bank statements
- forging someone's signature, forcing them to sign a document or misleading them about the contents of the documents they are signing
- using a person's money or assets knowing that the person is unlikely to complain because they are dependent on the other person for care and support (note, consent or authorisation can be coerced in this situation)
- using another person's money for purposes against that person's wishes
- pressuring another person to sign or change a will, power of attorney, enduring power of attorney or contract
- using an enduring power of attorney in a way that is not in the interests of the principal or is not consistent with the principal's instructions (e.g., this could be taking money from their account to pay for personal bills).
- pressuring another person to act as a co-borrower or guarantor for a loan/joint loan when they do not wish to do so.
- making a person pay for another person's expenses (e.g., where they share a home with another person and do not contribute to bills, maintenance, and other expenses despite being asked to do so).

⁴ ASIC - <https://moneysmart.gov.au/financial-abuse>

3.2 Recognising potential financial abuse

ABA member banks have obligations under the Banking Code to take extra care with customers who are experiencing vulnerability, including those experiencing financial abuse.⁴ Although financial abuse can impact anyone, cognitive incapacity can increase the risk of financial abuse and can make it difficult not only for the person impacted, but also for bank staff to know what to do and where to escalate.

All banks should be aware of potential warning signs of financial abuse. These include:

Customer facing context: when the customer:

- appears to be coerced into making transactions
- remains silent while another party does all the talking / appears to be taking instructions from someone else whilst dealing with branch staff / or talking to the bank over the phone
- appears withdrawn and fearful (particularly of the person accompanying them)
- does not appear to understand the documents they are signing or the transaction they are approving
- does not understand or is not aware of recently completed transactions
- withdraws large or unusual amounts of cash, particularly while accompanied by a person the customer does not appear to know well, or who appears to be influencing the customer in relation to the transaction gives implausible explanations or is confused about what they are doing with their money
- expresses concern about missing funds, or personal or financial documents
- indicates they should have enough money to pay bills but are unable to do so (e.g., they complain of having no heating despite the fact they can afford it)
- unusual requests such as adding an additional party/ies as a signing authority or switching to digital access.

Other suspicious activity includes a third party presenting a withdrawal form or cheque signed by the customer, but the rest of the form is filled out in different handwriting; or when withdrawals or transfers are made on behalf of the customer without prior direct contact from them.

Digital context: when the customer

- makes unusual or uncharacteristic transactions, such as large increases in withdrawals or unusual purchases or third-party transfers, for example an overseas holiday or a new car
- transactions made from a location where the customer is unlikely to be located
- changes are made to an address on an account by an authorised third party, or requests are made by the authorised third party to send correspondence to them
- changes in operation of the account or unusual activity following the appointment of an enduring power of attorney.

There can also be an increase in financial abuse during major crises that result in economic pressure (this may include natural disasters, economic or financial crisis, and pandemics). Banks should be alert to potential increases in financial abuse during these times.

3.3 Understanding why it is difficult for customers to seek help or report abuse

If financial abuse occurs in a relationship where the customer trusts or depends on the abuser, the customer may fear reporting the abuse for a range of reasons:

- they fear losing the relationship, possible retaliation from their abuser and potentially being isolated from their family.

- they may be dependent on the abuser for their care and/or the care of children, and worry about how they will manage without this support
- they may be reluctant to believe that someone they trust is exploiting them
- they may want to shield their abuser from legal repercussions, despite wanting to stop the abuse
- they may believe it is their fault or feel ashamed that their child or family member is harming them
- they may fear that no-one will believe them or a view that reporting the abuse will be pointless

Due to the sensitive and complex nature of financial abuse, in particular elder financial abuse, it should be recognised that in some cases the victim may wish to retain an amicable relationship with the perpetrator, and that this ought not be used against them in the bank's investigation of the situation.

A customer may find it difficult to report financial abuse if they are isolated, have limited mobility, cognitive impairment, speak limited English, or are dependent on family members or others for support and access to services.

Cultural factors may also influence perceptions of financial abuse as well as approaches to problem-solving among people from culturally and linguistically diverse communities, including Aboriginal or Torres Strait Islander people.

Sometimes people may not be aware that financial abuse is taking place, particularly if information is withheld from them (i.e., account statements and other mail is being redirected or is intercepted) or they have limited financial literacy.

4. Principles for good industry practice

Financial abuse is complex and can present challenging situations for a bank employee. Banks need to help their customers without restricting their freedom of choice. In cases of suspected financial abuse, it is important to be vigilant and cautious, while remaining respectful.

There are several steps banks and financial institutions can take to reduce the risk of financial abuse of a customer:

4.1 Develop internal bank guidelines and procedures

Banks should develop internal guidelines and procedures that take reasonable steps to identify and prevent financial abuse, including:

4.1.1 Protect customer confidentiality and safety

Banks should ensure a customer's contact information is kept secure and confidential, for example:

- Customer contact details should not be communicated or disclosed to others
- Identify safe ways to communicate with a customer who has been recognised as being affected by financial abuse, for example by asking the customer to nominate a safe time to talk and the best way for the bank to get in touch with them (such as by phone, email, SMS, web mail or a phone message). Circumstances may change, so where practical, continue to ask the customer about the safest way to make contact.
- Inform customers about the circumstances and nature of information that must be shared with their authorised representatives on their account.
- Contact details such as phone and address should be updated to reflect the customer and not their attorney or representative, for example, customers who have moved into assisted living should have these details reflected and not contact details of their support people listed to ensure banks are still able to validate accuracy of customer information.

4.1.2 Help customers to manage their own finances

Banks should presume customers have the ability to make decisions about their banking services, however, some customers may need support in making and communicating decisions about their banking facilities. Where it is known that the customer has the capacity and ability to make decisions about their banking decisions, banks should help customers put in place arrangements that allow the customer and/or their support people to manage their banking. For example, banks can provide:

- products with features that help customers manage their account, such as ‘two to sign’ arrangements, pre-set digital and card limits, transaction notifications, blocks on overseas transactions made on cards and digitally, other proprietary features provided by banks.
- assistance to a customer concerned about their privacy or security, and wants to change their passwords and PINs.
- secure options to enable properly authorised third parties e.g., carers, to carry out banking functions for an authorised person without breaching the terms and conditions of accounts, for example a bank may be able to provide a dedicated card/pin for the authorised person (so transitions can be tracked), read only account access and limits on the type of transactions and/or amounts. Appropriate authority would always need to be provided by the customer or administrator/trustee.
- recommendations to customers, to seek advice and plan ahead to enable formal arrangements to be put in place when it appears appropriate, such as an enduring power of attorney with clear instructions, so a trusted person/s can help them manage their finances. For more information on helping a customer set up their support team refer to [Safe & Savvy: A guide to help older people avoid abuse, scams and fraud](#).

Banks may develop easy to follow customer information or support for customers who are not familiar with internet banking, so they know how to use internet banking safely.

4.1.3 Make it easier for customers to communicate with the bank

Banks should consider adopting the following practices to make it easier for customers to communicate with them:

- identify the best way to contact a customer (such as by phone, email, SMS, or a phone message).
- minimise the information that a customer is required to provide and the number of times a customer discloses the same information. For example, where possible in complex situations, customers should speak to the same staff member.
- make the bank’s communications with customers as clear as possible, particularly when the bank is aware that a customer is experiencing vulnerability or has limited English⁵.
- help the customer to access a qualified, independent interpreter to assist with communication where appropriate.

4.1.4 Help customers when accounts are in dispute

Banks will review circumstances where a customer informs the bank they were subjected to financial abuse, or family and domestic violence, when entering into a transaction, or where the customer was not aware of a transaction. Banks should escalate these issues quickly to their relevant Internal Dispute Resolution area. Banks should also take action to preserve funds whilst a dispute is being investigated, to protect all parties involved.

⁵ In accordance with the Code chapter 13: being inclusive and accessible

4.2 Clear guidance on the use of powers of attorney and authority to operate arrangements

Banks should provide clear guidance to staff, so they understand the legal and procedural obligations of different decision-making instruments including powers of attorney, an authority to operate, and substituted decision-making arrangements made by a court or tribunal⁶.

This should include correct procedures to check and verify third-party authorisations and power of attorney documentation. The *ABA Industry Guideline: Responding to requests from a power of attorney or court-appointed administrator* outlines a framework banks can use to manage requests from attorneys and administrators consistently, including how a bank verifies when an enduring power of attorney power comes into effect.

While powers of attorney are an important tool for protecting a customer's financial position, some attorneys may misuse this power, either inadvertently or deliberately. Banks have an important role to play in checking that attorneys are properly authorised.

Where bank staff form a suspicion that the attorney may not be acting in the principal's interest, this should prompt further consideration by the bank, which may include escalation to a specialist team, or questioning of the attorney, or a direct conversation with the principal if possible.

Signs that an attorney may not be acting in the principal's best interests include:

- transactions that do not appear to benefit the principal, such as overseas travel, purchases of cars or other household goods when the principal is confined to a nursing home
- high risk transactions, such as risky investments
- payments for renovations to the principal's home which do not appear to be to make it more comfortable or accessible for them, such as large extensions when the attorney is living there or will inherit the home.

Banks should maintain an up-to-date record of any disputes in relation to the account, the steps taken to resolve the dispute and the resolution. This will help the bank monitor the account and identify any potential misuse by an attorney.

If there are concerns that the customer is being financially abused the bank should consider contacting the relevant adult safeguarding agency in that state or territory for advice (refer to appendix 1).

Authority to operate forms

For bank specific authority to operate forms, a prominent and simple warning to customers should be included e.g. that what they are doing may expose them to harm and they may wish to talk to a trusted adviser before signing the document.

When an authority form is provided to a bank the bank should take reasonable steps to ensure the authority has not been obtained fraudulently or under duress and that the customer has capacity and the ability to make decisions about their banking decisions. Banks should make reasonable efforts to ensure that a customer is aware that they can revoke an authority to operate form.

For bank specific authority to operate forms, banks should have processes in place to periodically prompt customers to inquire if their existing authority to operate needs updating or changing (e.g. they may have been established some time ago).

Where someone else has authority on an account and there is a suspicion of abuse or other such scenario, it is important that the bank continues, where practical, to provide information to the account holder about their account transactions. This is important for oversight, but also a way of ensuring older people and/or people with a disability continue to be included in decisions if possible.

⁶ where a court or tribunal appoints a private manager or guardian, or a state-appointed trustee, guardian or advocate to make decisions on an individual's behalf (guardians and administrators) including financial management orders.

4.3 Investigate ways to identify potential financial abuse involving digital banking platforms

Banks use software and other digital tools to identify ‘suspicious transactions’ including fraud. Subject to individual bank system constraints, banks will investigate the feasibility of using existing suspicious activity monitoring technology to detect uncharacteristic behaviour that could be indicative of financial abuse. For example, an increase in uncharacteristic bank transfers picked up by the bank while monitoring for fraud and scams, may be an indication of financial abuse. A phone call to the customer to check on the transfer might allow the potential victim to say something and the bank to stop the transactions.

Banks will review circumstances where a customer informs the bank that they were subject to financial abuse or family and domestic violence when entering into a transaction, or where the customer was not aware of a transaction.

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Banks will consider a customer’s liability for a transaction where the customer informs the bank that they were forced to enter into the transaction as a result of financial abuse or family and domestic violence or were not aware of the transaction.

4.4 Provide appropriate employee training and awareness of policies

Banks should have training programs in place to equip staff with the knowledge and skills to help customers when there is either ‘disclosed’ and or ‘suspected’ financial abuse. Training should be relevant to the employee’s role and help staff to:

- be aware of the prevalence and practical effects of financial abuse on a bank customer (see section 3.3 Understanding why it is difficult for customers to seek help or report abuse)
- recognise the signs of potential financial abuse (see section 3.2 Recognising potential financial abuse) and family violence (see *Industry Guideline Preventing and Responding to Family and Domestic Violence*)
- understand the bank protocols to manage suspected financial abuse
- protect customer confidentiality and safety
- have an appropriate and private conversation with a customer where possible, including
 - information to help them understand and identify potential financial abuse.
 - where abuse is suspected, ‘clear, factual, and non-threatening questions’ to learn the reasons for a suspect transaction
 - an explanation of the implications of the suspect transaction or decision for the customer including suitability of guarantees or joint loans, and
 - careful listening to what the customer says and how they say it (observe body language when in person, tone on phone and whether they are being prompted to answer by someone else on the phone).
- know when to escalate to a team leader or supervisor, where the staff member thinks an account history should be reviewed to determine whether a transaction should be processed, stopped or reported to bank security (because of potential fraud), or whether a transaction involves another section of the bank and extra support is required.
- know how to make appropriate records of the conversation

- have clear internal referral pathways to specialist support staff or teams, for example from front line, complaint, fraud, investigations, and collections/hardship staff.

4.5 Refer the customer for extra support, if appropriate.

Customers who experience financial abuse may require additional support from the bank while they attempt to restore their financial position. Banks recognise financial abuse as a cause of financial difficulty.

Banks have **financial hardship programs** aimed at supporting customers experiencing financial difficulty. Customers impacted by financial abuse who are having trouble meeting their financial commitments with a bank should be referred to the bank's financial hardship team.

Banks may review circumstances where a borrower or guarantor says they:

- were coerced into the credit obligation, and they have received limited or no substantial benefit from the credit obligation⁷, and
- did not know they were responsible for a credit obligation, including a joint debt, a debt or credit card, or credit card limit increase, in the individual's name or as a guarantor.

Front line bank employees should support customers without credit products with the bank, but who are similarly experiencing financial difficulty due to the impacts of financial abuse, by suggesting other options of extra support such as opening new accounts to direct monies to or additional existing account security arrangements.

Bank employees are not generally trained to provide support for non-financial matters. Where appropriate bank employees may suggest a customer seek support from external services such as the Public Advocate, Public Guardian, elder abuse prevention service, financial counsellor, community legal centre or other relevant State or Territory government agency. It is the customer's choice whether they seek help or not, but the banks can offer to help customers find where they can get further assistance.

4.6 Refer customers to external support

Where appropriate, banks should provide customers with details of external support organisations⁸ for further assistance. It is the customer's choice whether they seek help or not. Referrals should be made on a case-by-case basis as and when appropriate and within any relevant bank frameworks – this may include 1800 ELDERHelp, seniors rights organisations, public advocates, professional financial counsellors and Legal Aid (see list at 5. *Where to go for more information and support*).

4.7 Reporting abuse to the relevant authorities, when appropriate

Reporting suspected abuse may also be a reasonable step for banks to take in some circumstances. It's important to note that in reporting abuse, bank should consider any potential safety risks the victim survivor could face due to a report being made.

Banks should not require a customer to report their abuser to the police or other authorities. This may put the customer in a difficult position with their family members or other support providers (especially in an elder abuse situation).

Where there is a concern or suspicion of the actions of a Power of Attorney the bank should proactively engage extra support on behalf of the customer such as contacting the relevant adult safeguarding agency in that state or territory for advice (such as an Office of the Public Advocate or Office of the Public Guardian and/or the relevant state or territory administrative tribunal) and/or police (refer to Appendix 1 Offices of the Public Advocates, Public Guardians and State Administrative Tribunals).

⁷Under the Code Chapter 17 a bank will not lend to a co-borrower unless they will receive a substantial benefit from the loan or they have taken reasonable steps to ensure the borrower understands the risks, understands the difference between being a guarantor and co-borrower, considered why the customer wants to be a co-borrower and are satisfied the customer is not experiencing financial abuse.

⁸ In accordance with the Code clause 41d

4.8 Raise customer awareness of policies and procedures

Banks can play a preventative role by educating customers about financial abuse policies and proactively encouraging customers to put in place arrangements to manage their finances. Banks should promote their financial abuse prevention to employees, customers, financial counsellors, community legal services, legal aid and specialist support services.

The following section, 5. *Where to go for more information and support* provides, a list of referral options for customers seeking additional information and support.

5. Where customers can go for more information and support

Advice and support

- **1800 ELDERHelp.** Tel: 1800 353 374 (national free call phone number that automatically redirects callers seeking information and advice on elder abuse with local phone line services).
- **Elder Abuse Action Australia (EAAA) knowledge hub Compass:** <https://www.compass.info/> has information and resources available for older Australian and the broader community.
- The **National Legal Aid Family Violence Law Help** website (www.familyviolencelaw.gov.au) provides advice on domestic and family violence and the law in Australia.

Finance, debt and legal issues

- **National Debt Helpline**— You can talk to a free and independent financial counsellor from anywhere in Australia by ringing 1800 007 007 <https://ndh.org.au/>
- **Legal Aid** – Can provide advice on intervention orders, family law and civil / credit and debt matters. Find a legal aid commission at www.nationallegalaid.org/
- **Community Legal Centres (CLC)** – Can provide advice on AVOs, family law and credit and debt / financial counselling and other generalist civil law advice. Find a local CLC at www.naclc.org.au/
- **Australian Financial Complaints Authority (AFCA)** is a free, independent dispute resolution scheme to deal with complaints from consumers and small businesses about financial services products. <https://www.afca.org.au/> / 1800 931 678.

Online safety

- The e-Safety Commission's *Be Connected program* is designed to help older people navigate online banking.

Planning ahead: Guides to supported or substituted decision-making arrangements

- *Safe & Savvy: A guide to help older people avoid abuse, scams and fraud* provides information on helping a customer set up their support team.
- The Australian Guardianship and Administration Council (AGAC) website at www.agac.org.au/links has links to State and Territory agencies with information on power of attorney documents and other guardianship issues. The AGAC has produced a guide for customers about making an enduring power of attorney for financial decisions: *You Decide Who Decides*.
- ABA consumer fact sheet: *Setting up a power of attorney to help manage your banking needs*
- ADACAS *Your decision-making toolkit*, ADACAS is an independent, not-for-profit, advocacy organization helping people with disabilities, people with mental health conditions, older people and their carers.
- The Cognitive Decline Partnership Centre, University of Sydney has produced *Supported decision-making: A guide for people living with dementia, family members and carers*.

Appendix 1: Offices of the Public Advocates, Public Guardians and State Administrative Tribunals

Jurisdiction	Services
Australian Capital Territory	<p>ACT Human Rights Commission www.hrc.act.gov.au/ public-advocate / Tel: 02 62052222</p> <p>ACT Civil and Administrative Tribunal www.acat.act.gov.au • 02 6207 1740</p>
New South Wales	<p>NSW Ageing & Disability Commission has powers to investigate complaints of financial abuse against vulnerable persons and older peoples. https://www.ageingdisabilitycommission.nsw.gov.au Tel: 1800 628 221</p> <p>Public Guardian www.publicguardian.justice.nsw.gov.au Tel: 02 8688 6070</p> <p>NSW Civil and Administrative Tribunal (NCAT) www.ncat.nsw.gov.au Tel: 1300 006 228</p>
Northern Territory	<p>Office of the Public Guardian www.publicguardian.nt.gov.au Tel: 1800 810 979</p> <p>Northern Territory Civil and Administrative Tribunal (NTCAT) https://ntcat.nt.gov.au/</p>
Queensland	<p>Queensland Office of the Public Advocate has far reaching powers under the <i>Queensland Public Guardian Act 2014</i> to investigate allegations that an adult has been neglected, exploited, or abused. The OPG accepts 'good faith reports' from banks where they suspect financial abuse. https://www.publicguardian.qld.gov.au / Tel: 1300 653 187</p> <p>Queensland Civil and Administrative Tribunal (QCAT) www.qcat.qld.gov.au/ Tel: 1300 753 228</p>
South Australia	<p>South Australian Adult Safeguarding Unit (ASU) has powers to investigate suspected abuse against vulnerable adults. Contact the Abuse Prevention Phone Line on 1800 372 310, Monday to Friday, 9.00 am to 5.00 pm or by e-mail adultsafeguardingunit@sa.gov.au</p> <p>Office of the Public Advocate http://www.opa.sa.gov.au/ Tel: 08 8342 8200</p> <p>SA Civil and Administrative Tribunal (SACAT) www.sacat.sa.gov.au Tel: 1800 723 767</p>
Tasmania	<p>Office of the Public Guardian https://www.publicguardian.tas.gov.au/ Tel: 03 6165 3444</p>
Victoria	<p>Office of the Public Advocate https://www.publicadvocate.vic.gov.au/ Tel: 1300 309 337</p> <p>Victorian Civil Administrative Tribunal (VCAT) https://www.vcat.vic.gov.au/ 1300 018 228</p>
Western Australia	<p>Office of the Public Advocate www.publicadvocate.wa.gov.au Tel: 1300 858 455</p> <p>WA State Administrative Tribunal (SAT) www.sat.justice.wa.gov.au Tel: 1300 306 017</p>