

Submission to the PAEC Inquiry into the Victorian Government's Response to the COVID-19 Pandemic

Justice Connect

Jul 2020

Contents

Executive summary	3
Our recommendations	3
About Justice Connect.....	7
Our expertise relevant to this submission	7
Who we help.....	7
How we help	7
Our work responding to disasters and crises	7
Our work in response to COVID-19 in Victoria and increased demand for legal help	8
Victorian government response to COVID-19	10
What worked well.....	10
What could be improved, and our recommendations	10
Clear, coordinated and consistent communication to the community	10
Support required for not-for-profit and community organisations at the front line of the COVID-19 crisis.....	13
Supporting courts and tribunals to respond to COVID-19.....	16
Protecting older people from elder abuse	18
Preventing homelessness and compounding legal issues during the COVID-19 pandemic.....	19
Supporting human-centred digital transformation of the legal sector and legal services	22
Annexure A.....	23

Executive summary

Justice Connect welcomes the opportunity to make a submission to the Public Accounts and Estimates Committee (PAEC) on the Victorian government's management of the COVID-19 pandemic.

This submission builds on the evidence provided before the PAEC by Justice Connect's Homeless Law program.

Our submission explains the work of Justice Connect during COVID-19 and responds to what the Victorian government did well and where the Victorian government could do better in response to the COVID-19 pandemic, now and through the long recovery.

Our recommendations are drawn from our expertise in supporting community organisations and working with people who are unrepresented or at risk of homelessness and elder abuse, using digital platforms to increase access to justice, and developing clear and dynamic self-help tools and resources.

Justice Connect would welcome a further opportunity to address the PAEC directly in response to this submission.

Our recommendations

Communicating restrictions

Recommendation 1: Communicate changes to directions clearly, consistently and as early as possible

We recommend that, where at all possible, when changes to directions are agreed upon (inside or outside of the National Cabinet process), the Victorian government:

- Communicates any proposed changes clearly and widely – in multiple formats and translated into languages spoken across Victoria – at least 24 hours before the changes come into effect.
- Produces and keeps updated a comprehensive set of FAQs that accurately reflect the directions.
- Announces any changes to restrictions once a draft of directions has been agreed upon and publishes guidance about the new directions online as the changes are announced publicly.
- Publishes the new directions online at least 12 hours before they take effect. This will ensure Victoria Police, lawyers and the community better understand their effect and can raise any concerns before enforcement begins.

Recommendation 2: Create clear pathways for community feedback

We urge the government to establish forums to enable clear avenues for community and legal community sector feedback and engagement on changes to directions. This could be by:

- Establishing responsive processes tailored to the needs of different parts of the community that allow the public to ask questions about the restrictions.

- Establishing a community sector-wide response taskforce that can quickly respond to and support government actions in a crisis, including the community legal sector, community support services, community health sector and Victoria Police.

Recommendation 3: Victoria Police take an educative approach to the enforcement of restrictions

We recommend that Victoria Police:

- Provide guidance to officers to take an educative approach to issuing fines and warnings and use enforcement action as a last resort, after people are given adequate opportunity to understand the new restrictions.
- Collect and publish data on the enforcement of restrictions, including:
 - Specific data when police stop, question or issue a warning to a person regarding public health restrictions, including officer details, perceived race/ethnicity, Aboriginal and Torres Strait Islander status, reason for stop, location, time and outcome of stop.
 - Regularly make available de-identified datasets on the locations and circumstances of COVID-19 related stops, fines and enforcement measures taken, allowing for the data to be analysed and cross-referenced with demographic data by an independent body. This could be IBAC, VEOHRC, Victorian Ombudsman or Crime Statistics Agency.

Supporting not-for-profits

Recommendation 4: Regulators must issue statements early

Victorian regulators should issue supportive regulatory approach statements that reduce non-essential compliance obligations so not-for-profit organisations have timely notice of changes to their legal obligations.

Recommendation 5: Fix fundraising

The Victorian government must legislate reform to ensure a fit-for-purpose, nationally consistent fundraising regime using the Australian Charities and Not-for-profits Commission as the centralised 'one stop shop' for reporting and registration.

Recommendation 6: Protect volunteers returning to work

The Victorian government should task the Victorian Managed Insurance Authority, working in collaboration with Volunteering Victoria and Justice Connect, with providing options for COVID-19 volunteer protection to support the safe return to the workplace for Victorian volunteers.

Recommendation 7: Accessible checks for screening volunteers

To support the fluid deployment of properly screened volunteers, fund the development of a platform that enables volunteers to obtain, keep updated and prove their police and Working with Children checks.

Recommendation 8: Harmonise Working with Children and other checks

Work with other Australian governments to fast-track national harmonisation of Working with Children Checks and the establishment of a national database for checking their on-going status.

Supporting courts and court users

Recommendation 9: Coordinate communication of essential information on the operation of courts and tribunals in Victoria in times of emergency

We recommend that Court Services Victoria is resourced and supported to develop a crisis response framework that can be activated in times of emergency to coordinate communication of essential information, including online, on the operation of courts and tribunals across Victoria, which is accessible to all court users including unrepresented parties.

Recommendation 10: Support courts and tribunals to undertake user-centred digital transformation and ensure technology for the remote conduct of proceedings is widely embedded and accessible

We recommend that the Victorian government fund and equip Victorian courts and tribunals to take a user-centred and accessible approach to digital transformation, to ensure courts can operate at full capacity, remotely, during COVID-19 and the long-overdue modernisation of the courts. We urge courts to ensure that digital transformation considers the needs of the wide range of court users, so that technology and processes are accessible to everyone. We encourage courts and tribunals to consider best practice approaches and learn from progressed jurisdictions such as the UK.

Protecting people from elder abuse

Recommendation 11: Remote witnessing – strengthen safeguards and broaden documents

We urge the Victorian government to:

- Retain remote witnessing arrangements beyond the COVID-19 pandemic
- Allow remote witnessing for the appointment of a medical treatment decision-maker.
- Increase safeguards for remote witnessing by requiring:
 - Lawyers to initially speak to the principal alone, to permit them to speak freely and confirm they are free of duress, and to check their capacity to make the documents.
 - Where possible, a portable device (such as a smartphone or tablet) should be used by the principal (rather than a desktop computer) so that the witness is able to get a broad visual of the room and anyone else present before witnessing the document.

Supporting people at risk of homelessness

Recommendation 12: Support people experiencing or at risk of homelessness to stay safely housed during COVID-19

Justice Connect recommends that the Victorian government:

- Extend the current temporary COVID-19 tenancy protections until 31 March 2021, so tenants can stay securely housed.
- Extend and create more financial relief for Victorians, so tenants can maintain their rent payments as COVID-19 continues and during the recovery period.
- Provide more resources for integrated legal, financial and social work services to help with tenancy issues, debts, fines and other compounding issues for at-risk Victorians.
- Invest in more suitable and safe social housing with supports, as a key part of the social and economic recovery from COVID-19 – we need at least 6,000 new social housing properties each year for ten years, including at least 300 Aboriginal housing units a year.

Supporting digital transformation of the legal system

Recommendation 13: Fund and incentivise human-centred digital transformation of the legal system to ensure people can access legal services when face-to-face services are limited

The Government needs to take action to incentivise and support faster digital transformation that includes:

- Addressing system-level issues so that these are not baked into digital solutions.



- Prioritising the experience of people engaging with the legal system in its transformation (giving at least the same weight, or greater weight, to the needs of people engaging with the legal system compared with the needs of lawyers, judges, service administrators etc).
- Appropriately balancing investment in back-of-house digital transformation with consumer-facing initiatives.
- Ensuring that skills and capabilities currently lacking in the legal assistance, court system and legal sector are identified, and that relevant skills and expertise are brought into the sector.
- Funding solutions that work, including ensuring that appropriately qualified panels and teams are designing solutions, assessing proposals and funding applications, and making resourcing decisions.

About Justice Connect

In the face of huge unmet legal need, Justice Connect designs and delivers high-impact interventions to increase access to legal support and achieve social justice. We help those who would otherwise miss out on assistance, focusing on people disproportionately impacted by the law and the organisations that make our community thrive.

We work to ensure people and organisations can access the right legal help at the right time, to avoid the negative impacts on their wellbeing or organisational health due to legal problems. We believe in a fair and just world, where communities are supported to engage with and fully participate in our legal system.

We are a registered charity, operating in Victoria for more than 25 years.

Our expertise relevant to this submission

Who we help

We focus on assisting people and organisations that would otherwise miss out on expert assistance. Our specialist programs focus on client groups and issue areas, from Victorians experiencing or at risk of homelessness and older Victorians experiencing elder abuse, to our Not-for-profit Law service that focuses on assisting community organisations to navigate the law. Our broader services aim to meet unmet legal need in the community and court system, deal with novel and/or complex legal issues, and respond to emerging issues in the community, including most recently the bushfire and COVID-19 crises.

How we help

Justice Connect has many in-house lawyers that work across our programs and in partnership with community-based organisations to reach and assist people and organisations with their legal problems. We also work closely with a network of over 160 law firms and many barristers to match unmet legal need that we cannot handle in-house. Our award-winning Pro Bono Portal enables us to handle increasingly high volumes of referrals using algorithms to help efficiently place matters. We leverage around 45,000 pro bono hours each year.

We are increasingly focused on using technology, online resources and self-help tools to provide legal assistance at scale. Our significant investment in digital innovation and in providing self-help resources has helped us scale our impact, reach more people and deliver better services to the people and community organisations we support. Our [Gateway Project](#) was awarded the 2019 Victorian Premier's Design Award in Service Design. In addition to delivering direct services, we identify system-level issues and the drivers of unmet legal need and deliver interventions to improve laws and the legal system, and prevent legal problems before they start. We also advocate for better responses to legal need and contribute to cross-sector service design initiatives.

Our work responding to disasters and crises

Over more than a decade, Justice Connect and its predecessors have played a central role in the legal response to disaster and crises, including:

- 2009 Black Saturday bushfires in Victoria
- 2017 Bourke St Massacre in Melbourne
- 2019-2020 bushfires primarily in Victoria and NSW
- 2020 COVID-19 crisis, nationally, but with a sharper focus on Victoria and NSW

When these public health crises and disasters have occurred, we have seen existing legal problems exacerbated and new legal needs emerge, including many cases of newly at-risk cohorts and communities.

Our work in response to COVID-19 in Victoria and increased demand for legal help

We have continued to run our legal services at full capacity during COVID-19, adapting our face-to-face services to online and phone-based models. Having to work remotely either didn't change our work or was possible with a quick pivot because we were already set up to operate across multiple locations, with technology products accessible online.

We have two main websites - justiceconnect.org.au (that provides information and services to individuals) and nfplaw.org.au (that provides information and services to community groups and social enterprises). Usage data shows:

- justiceconnect.org.au website traffic more than doubled with new user numbers up by 170% since the start of 2020. Between March and June, the website had an average of 38,000 user sessions per month, an increase of 290% compared to the same period in 2019. Victorian users made up almost half of our website traffic in that period. Most of this was to self-help resources: in 2019-2020, we had a 500% increase in unique page views of our legal resources, as compared to 2018-2019.
- from 1 March to 30 June, nfplaw.org.au saw website traffic increase of 26% from the previous four months, averaging 22,100 user sessions monthly.

Since May there has been a slight dip in overall web user numbers. People have shifted from predominantly looking for resources that explain the restrictions, to seeking information to help them navigate employment, financial and tenancy issues and the policing of restrictions, and issues related to running their organisations and managing volunteers.

There has also been an increase in overall requests for legal assistance across Justice Connect, and as a result we have delivered increasing numbers of legal services. Between March and June 2020, there was a 41% increase in online requests for legal help from people, organisations and referrers, as compared to October to December 2019. We had a 23% increase in one-on-one legal assistance, including casework, advice, representation and referrals, in the same period. Since the start of 2020, the number of pro bono referrals made to law firms by Justice Connect has increased by a very significant 50%, with 425 referrals to pro bono firms since January.

We established a cross-organisation project team to closely monitor data and trends and adapt our services. In response to the changes in legal need during COVID-19 we:

- Launched [Justice Connect Answers](#), an online tool that connects people with lawyers who can answer their simple legal problems for free. Since we began piloting the tool in April, we've helped more than 100 people, with 27% of questions related to employment and 10% related to financial problems.
- Updated and relaunched our [Dear Landlord](#) self-help tool which helps tenants write to private landlords about tenancy issues. We were responding to a spike in legal need: in April, 58% of letter writer users were 'about to miss a rent payment', and in May, 47.6% of letter writers users had "missed two or more rent payments". The tool now helps renters navigate the eviction moratorium and rent reduction agreements introduced as a result of COVID-19.
- Established COVID-19-dedicated landing pages for our self-help resources [for people](#) and [not-for-profits](#) with COVID-19-related legal questions. We created and maintained 24 new resources in response to legal questions from not-for-profits and people about the restrictions and governments' emergency powers, employment, tenancy, debt, accessing and dealing with courts and managing employees, privacy, insurance and governance in a crisis.
- Piloted a COVID-19 advice line for rough sleepers and their support workers. Questions have related to how the Chief Health Officer's directions apply to rough sleepers, whether spot COVID-19 testing is mandatory, the enforceability of COVID-19-related infringements and the privacy obligations of organisations housing rough sleepers. The pilot will continue until at least 31 August 2020.
- Provided nine free webinars to more than 2,000 people to help not-for-profits navigate COVID-19-related legal issues, such as managing employees and volunteers, conducting annual general meetings using technology, and managing occupational health and safety risks.
- Commenced a comprehensive and targeted online outreach program to reach and connect with people looking for legal information and access to legal services online, including using paid digital advertising and Google Ads grants.



- Undertook an information campaign via social media to help reach people looking for assistance with engaging and digestible legal information, resulting in a 400% increase in engagement with our social media information sharing posts.

Victorian government response to COVID-19

What worked well

From our work helping people, community organisations and social enterprises navigate the Victorian changes in law and policy in response to COVID-19, we consider the following were positive steps in Victoria's response:

- Legislative and regulatory changes to support tenants experiencing financial hardship, including the moratorium on evictions and rental reduction scheme.
- Investing in improving and increasing social housing, being \$500 million on 168 new homes and upgrading 23,000 homes.
- Additional \$17.5 million funding to enable community legal centres, Aboriginal legal services and Victoria Legal Aid to respond to COVID-19, including \$521,500 to Justice Connect for increased service delivery and to scale up our award-winning Pro Bono Portal to assist people experiencing the social and economic impacts of COVID-19.
- Fines Victoria suspending their debt campaigns and execution of criminal and civil warrants.
- Supporting the Victorian Civil and Administrative Tribunal with \$5.2 million to update its systems and enable digitisation of files and processes.
- Legislative changes to enable greater flexibility in Victorian courts and wider legal system, including allowing for the remote witnessing of documents, to deliver ongoing court and legal services despite COVID-19 restrictions.
- Additional support for prisoners post-release, including a new 44-bed crisis accommodation facility at Maribyrnong.
- Introducing the COVID-19 Worker Support Payment which included people who missed out on paid work because they had to self-isolate or quarantine as a result of their volunteering.
- Consumer Affairs Victoria announcing a supportive COVID-19 regulatory approach for not-for-profit incorporated associations and fundraising.

What could be improved, and our recommendations

Justice Connect makes the following observations and recommendations from our experience helping people and community organisations navigate the Victorian changes in law and policy in response to COVID-19.

We acknowledge the significant uncertainty the Victorian government faced, and continues to face, in responding to the COVID-19 pandemic, and the need for quick decision-making and action to respond to the public health crisis. There is no 'how-to guide' and this is an opportunity, with the benefit of some hindsight, to learn for next time.

Clear, coordinated and consistent communication to the community

During a public health crisis all of government must work to communicate clearly and consistently about changes in law and policy that impact people's lives, especially when there is a focus on enforcement.

Justice Connect believes community confusion due to the below factors help explain why in March and April 2020, the most-read page on our website for Victorians was our resource explaining the emergency powers, the Chief Health Officer's directions and the policing powers.

Restrictions were changing almost every second day

Justice Connect first published a resource on Victoria's restrictions on 26 March 2020 and updated the resource eleven times in less than a month. Many of these changes were in response to unintended consequences and unrealistic limitations in the restrictions, reported in the media or raised by the community. For example, initially there was no exception for rough sleepers who couldn't 'stay home' and hairdressers had just 30 minutes to cut a person's hair.

There were mixed messages on the practical effect of new restrictions

Early in the pandemic, and in May, leaders attempted to use the National Cabinet to harmonise restrictions. When the question of visiting partners arose during the Stage 3 Stay at Home restrictions in March the Prime Minister told the public that yes, you could visit your partner. When asked about partners the [Victorian Premier said](#) having friends over was 'breaking the law' and [the Victorian Police Minister tweeted](#) that, no, partners were not allowed for 'social reasons'. A day later, [Victoria's Chief Health Officer tweeted](#) that they didn't intend to penalise partners who visited each other, and an exemption would be made.

Chief Health Officer's directions are published just a few hours, or even a few minutes, before they come into effect

The face covering directions – which came into effect at 11.59pm on 22 July – were published at about 9pm that night. This is an improvement from the March Stage 3 restriction directions, which were published a few minutes before they came into effect. This leaves little time for lawyers, Victoria Police and the public to read and understand their practical effect. In late March and early April, this was particularly problematic because the Department of Health and Human Services' (DHHS) coronavirus website was yet to include comprehensive FAQs on the restrictions. Information on the DHHS coronavirus website often contradicted Federal announcements.

Public communications and information on the DHHS coronavirus website have been unclear about content of directions

On the eve of the first Stage 3 restrictions in March, the Prime Minister and the Victorian Premier had given conflicting advice on visiting family who lived separately and used very different language to explain the rules. The Prime Minister 'urged' people not to leave their home unless it was for essentials, whereas the Premier said people 'should' only be outside for shopping, work, exercise or medical reasons. The DHHS' FAQ on Stage 3 read: 'Does that mean I'm allowed to have more than two people over to my house? No. Victorians should be staying in their own homes.' This answer didn't properly reflect the law, which allowed people to meet with one other person, not from their household, outside the home, but didn't allow family split across houses to enter each other's homes.

More recently, FAQs for public housing tower residents held under detention directions posed the question 'What if I refuse to be tested?'. But this question was not actually answered in the purported answer, which also didn't explain that people who refuse to be tested will be detained for a further 10 days – something that was written in the direction.

Using words like 'essential', 'should' and 'need to' in public communications confuses the public about the legal status of that advice

When restrictions were eased on 11 May, an additional reason to leave the house was added: visiting friends and family. The public messaging before the directions were published told people only to visit 'if they really needed to'. It was unclear how this would be reflected in the law. When the laws were published (about an hour before they came into effect) there was no limitation on in what circumstances you could visit friends or family. The continued use of the terms 'essential' and 'non-essential' to describe the businesses and activities that may continue to operate also often confuses the public, who wonder why certain businesses in their area remain open, when our leaders tell us not to shop there – for example, [shoe shopping](#).

Enforcement-focused policing response when rules are changing quickly can lead to incorrect enforcement and fear in the community

Before the PAEC on 19 May 2020, Victoria Police reported that it had issued 5604 fines for breaches of the directions and 1000 warnings. This is far more than any other jurisdiction. This, coupled with the issues outlined above, has resulted in police incorrectly fining members of the public due to their misunderstanding of the directions. For example, [a man was incorrectly fined for using a car wash, which were allowed to operate at the time](#).

It has also led to fear in the community. Justice Connect received an inquiry for advice on the Chief Health Officer's directions from a woman who lives in a retirement village. The village was threatening to call the police on residents if they left their units in the village. The woman had a practice of regularly checking up on two of her neighbours, one of whom had dementia and the other of whom was visually impaired. She relied on the aged pension and was scared about breaking the rules and being fined if the village management called the police.

By comparison, NSW Police issued 1018 fines between 26 March and 2 May. In NSW during the first few months of restrictions police were encouraged not to stop people in cars and seek legal advice or speak to a supervisor before acting on an alleged breach. In the ACT, the police have stated that they would not issue fines in breach of restrictions and are taking an educative approach to enforcing restrictions, rather than proceeding by way of fine or penalty at first instance. We also echo the concerns of Flemington Kensington Community Legal Centre about fines being disproportionately issued in low-socio economic and high migrant areas and the lack of transparent data about who is stopped and in what circumstances.

The FAQs need to be clear that they apply to a broader range of worker and workplaces, such as community groups

With more than 1.5 million volunteers in Victoria,ⁱ these workers needed clarity that volunteering was included in one of the four reasons for leaving home because it falls within of the exception of leaving home for 'work' and is permissible where it cannot be done remotely and where complying with all other government restrictions and safety requirements. These groups are typically small and volunteer-run, with very little capacity to search for and interpret the directions.

We acknowledge that since mid-April the DHHS coronavirus website has done a much better job of communicating the restrictions to the public.



Recommendation 1: Communicate changes to directions clearly, consistently and as early as possible

We recommend that, where at all possible, when changes to directions are agreed upon (inside or outside of the National Cabinet process), the Victorian government:

- Communicates any proposed changes clearly and widely – in multiple formats and translated into languages spoken across Victoria – at least 24 hours before the changes come into effect.
- Produces and keeps updated a comprehensive set of FAQs that accurately reflect the directions.
- Announces any changes to restrictions once a draft of directions has been agreed upon and publishes guidance about the new directions online as the changes are announced publicly.
- Publishes the new directions online at least 12 hours before they take effect. This will ensure Victoria Police, lawyers and the community better understand their effect and can raise any concerns before enforcement begins.



Recommendation 2: Create clear pathways for community feedback

We urge the government to establish forums to enable clear avenues for community and legal community sector feedback and engagement on changes to directions. This could be by:

- Establishing responsive processes tailored to the needs of different parts of the community that allow the public to ask questions about the restrictions.
- Establishing a community sector-wide response taskforce that can quickly respond to and support government actions in a crisis, including the community legal sector, community support services, community health sector and Victoria Police.



Recommendation 3: Victoria Police take an educative approach to the enforcement of restrictions

We recommend that Victoria Police:

- Provide guidance to officers to take an educative approach to issuing fines and warnings and use enforcement action as a last resort, after people are given adequate opportunity to understand the new restrictions.
- Collect and publish data on the enforcement of restrictions, including:
 - Specific data when police stop, question or issue a warning to a person regarding public health restrictions, including officer details, perceived race/ethnicity, Aboriginal and Torres Strait Islander status, reason for stop, location, time and outcome of stop.
 - Regularly make available de-identified datasets on the locations and circumstances of COVID-19 related stops, fines and enforcement measures taken, allowing for the data to be analysed and cross-referenced with demographic data by an independent body. This could be IBAC, VEOHRC, Victorian Ombudsman or Crime Statistics Agency.

Support required for not-for-profit and community organisations at the front line of the COVID-19 crisis

In times of crisis, people and communities turn to charities and other not-for-profits for help. The sector employs one in eight Australians and relies on hundreds of thousands of volunteers for service delivery, with 1.5 million Victorians volunteering each year.ⁱⁱ More than 80% of Australia's charities turn over less than \$1 million per annum, and 49% of Australia's 57,000 charities are volunteer-run with no paid staff.ⁱⁱⁱ Victorian not-for-profits receive significant government funding to deliver services to people at greatest risk of bearing the brunt of economic downturns and health crises. They are central to building (and restoring) community connectedness, even in times of physical distancing. For all these reasons, the COVID-19 response (and any future disaster or crisis response planning) must embed the Victorian not-for-profit sector's role and needs in it.

COVID-19 has created an invidious situation for many Victorian not-for-profits and other community-based organisations. They have faced the same challenges businesses have – needing to quickly move staff to remote working, the need for equipment and software and, in some cases, for personal protective equipment. But they have faced many additional challenges, including:

- How to manage volunteers and those people who must complete government-mandated programs, many of whom have additional risk factors such as age and medical conditions
- Higher demand for their services as a result of the crisis

- Reduced levels of income as they have had to cancel fundraising events
- Uncertainty about government and philanthropic funding if they are unable to meet deliverables (for example, unable to take young people on camps).

Community organisations and not-for profits had all these changes and extra laws and restrictions to navigate, typically with fewer legal, human resources and information technology capacity than businesses.

Communication from regulators

Government regulators should communicate early and consistently to ensure people and organisations have certainty where the rules impact their ability to meet legal and other requirements.

For example, within a few days of the first Stay at Home directions, many groups contacted us concerned about how to hold their annual general meetings, which they would normally have held in person. We received so many enquiries that we developed a free online resource (over 8,000 views) and added a free webinar (266 participants, 352 watched the recording). The Victorian regulator, Consumer Affairs Victoria (CAV) took time to announce what approach it was going to take. This put groups under extra pressure at a time when they needed to be solely focused on moving to remote working and how best to still deliver their services.

It is helpful that CAV has now issued a statement granting a three-month extension for holding annual general meetings and waiving the application fee. But this would be better as a blanket exemption, rather than requiring thousands of separate applications. This creates additional work for both the organisations and CAV staff, who have other more pressing COVID-19 regulatory issues. The extension should also be granted to all Victorian incorporated associations, as members may belong to associations outside the current Melbourne and Mitchell Shire lock down areas, where the extension has been granted.

It would be sensible to build the consideration of these types of regulatory support mechanisms into future disaster planning so they can be issued more quickly and, where appropriate, as 'across the board' exemptions to save each group having to make an application.



Recommendation 4: Regulators must issue statements early

Victorian regulators should issue supportive regulatory approach statements that reduce non-essential compliance obligations so not-for-profit organisations have timely notice of changes to their legal obligations.

Need for fit-for-purpose charitable fundraising regulation

As part of its response to the COVID 19 pandemic, the Victorian Government needs to support the ability of charities to fundraise. [June 2020 modelling](#) by Social Ventures Australia and the Centre for Social Impact showed a 20% fall in revenue for more than 16,000 charities that employ staff and found that:^{iv}

- 88% of charities would immediately be making an operating loss;
- 17% would be at high risk of closing their doors within six months, even when taking their reserves into account; and
- more than 200,000 jobs could be lost as a result of cost-cutting and organisational closures.

There are well known regulatory barriers to fundraising that need to be removed – the COVID-19 crisis has simply shone a brighter light on the out of date Victorian fundraising laws, *Fundraising Act 1998* and *Fundraising Regulations 2009*.

Right now, many charities, especially small volunteer run charities, are facing a choice between closing their doors, or trying to fundraise for their survival online. Thousands of smaller charities are reliant on fundraising events (fun runs, dinners, sausage sizzles). Under current Victorian laws it has not been possible for them to quickly pivot to online fundraising in a legally compliant way. It takes several months to work through the seven different State and Territory fundraising approvals. We know CAV are doing their best to fast track approvals, but this doesn't resolve the problem. Staff (often volunteers) must still work out how to apply and do the paperwork up to seven different times, in seven vastly different ways. What they

really need to be working on is making the best actual fundraising ask in what is a crowded and difficult fundraising environment.

Like other States, Victorian fundraising laws do not address online fundraising. They were written pre-internet (and the dominance of online and crowdfunding platforms), pre-Australian Consumer Law scheme and pre-Australian Charities and Not-for-profits Commission. For more than 25 years the sector has been calling for a nationally consistent and modern regulation, most recently under the banner of the [#FixFundraising](#) coalition and [the Charities Crisis Cabinet](#). It is the biggest red tape burden for the sector.^v



Recommendation 5: Fix fundraising

The Victorian government must legislate reform to ensure a fit-for-purpose, nationally consistent fundraising regime using the Australian Charities and Not-for-profits Commission as the centralised 'one stop shop' for reporting and registration.

Need to improve protections for volunteers

During COVID-19, nationally, around two in three volunteers stopped volunteering between February and April 2020, amounting to an estimated loss of 12.2 million hours per week of volunteer work.^{vi} In a national survey, 80% of responding volunteer-involving organisations said they had stood down volunteers as a result of COVID-19, with three-quarters of these standing down between half and all of their volunteers. At the same time, 37% of these organisations reported an increase in demand for their services due to the pandemic.^{vii}

Safely restarting volunteer programs during changing COVID-19 restrictions is complex and resource-intensive.

- Safely restarting volunteers entails additional complexities especially where volunteers, or people being supported by volunteers, are in vulnerable categories, such as people over 70 or those with disabilities.
- Some (but by no means the majority) of volunteer involving organisations take out Volunteer Accident Insurance but this product has fallen short in the COVID-19 situation – accidents are covered, but illness (COVID-19) is not.

The Victorian Government COVID-19 Worker Support Payment is helpful when an employee volunteers outside of their work hours and, while volunteering, contracts COVID-19 or becomes a close contact. They can be eligible for the support payment if they are unable to do their paid work. This is one expense a volunteer may incur, but if they are not in the paid workforce, they may still incur other expenses such as non-Medicare rebateable medical expenses for rehabilitation (as we learn about the long-term effects of the virus), or costs to cover other caring responsibilities they have.

To improve this situation – to 'build back better' and support the return of our volunteer workforce – Government supported insurance or other solution is needed. The Victorian Managed Insurance Authority (that already provides insurance to government funded organisations including for their volunteers) should be tasked with developing a response to this volunteer protection gap.



Recommendation 6: Protect volunteers returning to work

The Victorian government should task the Victorian Managed Insurance Authority, working in collaboration with Volunteering Victoria and Justice Connect, with providing options for COVID-19 volunteer protection to support the safe return to the workplace for Victorian volunteers.

Need for verified and portable volunteer screening credentials

With the possible long-term withdrawal of some existing volunteers due to COVID-19, encouraging new volunteers will be critical to the continuing operations of many not-for-profit organisations. Volunteer programs will need to be supported to adapt to new engagement methods necessitated by COVID-19 and consider the trend towards issue-based and ad hoc volunteering.

A large proportion of volunteer work is conducted with young people and other vulnerable cohorts (those living with disabilities, frail aged etc). Current processes for volunteer credential checks, such as Working with Children Checks and police checks, are onerous for potential volunteers, costly for organisations and likely to impede volunteer recruitment. Non-portable credentials and different State and Territory-based policies and processes for Working with Children Checks are major barriers to efficient volunteer onboarding, with the latter identified by the Royal Commission into Institutional Responses to Child Sexual Abuse as a significant risk in the child protection system.

There are initiatives already being developed within the sector (notably by the Australian Red Cross) that, with a small investment from Government, could be scaled up in response to the pandemic.



Recommendation 7: Accessible checks for screening volunteers

To support the fluid deployment of properly screened volunteers, fund the development of a platform that enables volunteers to obtain, keep updated and prove their police and Working with Children checks.



Recommendation 8: Harmonise Working with Children and other checks

Work with other Australian governments to fast-track national harmonisation of Working with Children Checks and the establishment of a national database for checking their on-going status.

Supporting courts and tribunals to respond to COVID-19

In Victoria, each court and tribunal announced and implemented changes to the way they operated in a siloed and fragmented way. Many took time to adapt to running proceedings and hearings remotely due to a lack of digital infrastructure.

Communicating changes to courts and tribunals

There was no central place for information, and information was collated by institutions such as the Law Institute of Victoria and Judicial College of Victoria for their stakeholders. For example, the Judicial College of Victoria created a 'Coronavirus and the Courts' page explaining the different practices put in place across jurisdictions.

In April-May 2020, we saw a 14% increase in the number of enquiries from unrepresented litigants concerned about the impact of COVID-19 on their existing court case, and their ability to access justice remotely. In response, Justice Connect created resources on accessing courts during COVID-19 restrictions and explaining conducting of proceedings remotely, such as explaining what it means for a decision to be made on the papers, and how to file documents electronically.

The lack of clear communications in changes to practice to court users, including prosecutors, has led to people being arrested and imprisoned improperly. For example, in April 2020 an Aboriginal man was imprisoned for two weeks after warrants were issued when he didn't attend a hearing. He was not required to attend the hearing due to a Magistrates' Court practice direction to reduce the number of people at the court.

It is vital that there is coordination of essential information for all court users, including unrepresented parties, in times of emergency. This is consistent with recommendation 2.4 of the 2016 Access to Justice Review, that courts and tribunals should continue to be the main providers of information about their jurisdictions and consider ways to make information more accessible.^{viii}



Recommendation 9: Coordinate communication of essential information on the operation of courts and tribunals in Victoria in times of emergency

We recommend that Court Services Victoria is resourced and supported to develop a crisis response framework that can be activated in times of emergency to coordinate communication of essential information, including online, on the operation of courts and tribunals across Victoria, which is accessible to all court users including unrepresented parties.

Increasing accessible digital infrastructure to provide continuity in court proceedings

COVID-19 has exposed weaknesses in Victorian courts' and tribunals' ability to operate remotely. These issues extend from filing practices to holding proceedings.

Many lists across all Victorian jurisdictions were suddenly suspended after COVID-19 hit, as courts and tribunals took steps to move towards remote hearings. Although matters in most jurisdictions began to be re-listed by telephone or video conferencing in late May, this has been at reduced capacity.

Magistrates' Courts responded by delaying all non-urgent proceedings by at least six months. We have observed that matters that have continued with an in-person listing during COVID-19 have placed lawyers and clients at risk, with safety measures more focused on protecting court staff than court attendees. For example, due to the lack of digital infrastructure early in the pandemic, one of our lawyers was required to attend Ringwood Magistrates' Court for a bail variation hearing in-person. During this attendance a court staff member instructed him to sit in the near-empty court room while he waited for his client's matter to be called. When the Magistrate entered, and his client's matter was not called first, he was told to wait in the busy, crowded foyer. It appears that the Magistrates' Court has done planning to reduce the risk of COVID-19 spread to its staff, but needs to consider the impact of its changes on court users.

Hearings at Victorian Magistrates' Courts are now being conducted on Webex. While an ability for lawyers and hearing participants to attend court remotely is welcome, this platform may not be accessible to all clients, especially those experiencing homelessness. Facilitating attendance by some clients has required lawyers to attend offices and see their client face-to-face to assist them to attend their hearing. This may be because the client does not have access to technology, has an intellectual or other disability or requires specialist assistance. These face-to-face interactions between client and lawyer means that while some health risks are managed through remote hearings, not all risks are eliminated. We have also noticed issues at the Victorian Civil and Administrative Tribunal where represented clients have been conferenced into hearings without their lawyer also being conferenced. For clients who are not familiar with court and tribunal processes or are unable to self-advocate, the practice risks hearings going ahead without the presence of advocates, and potentially needing to be vacated.

In jurisdictions that are more progressed in their move to digital hearings, thoughtful approaches have been explored to increase service accessibility, such as the [Assisted Digital Support approach in the UK](#). These approaches have been recently evaluated,^{ix} and Victoria would be well served by leveraging the experiences of more experienced jurisdictions.



Recommendation 10: Support courts and tribunals to undertake user-centred digital transformation and ensure technology for the remote conduct of proceedings is widely embedded and accessible

We recommend that the Victorian government fund and equip Victorian courts and tribunals to take a user-centred and accessible approach to digital transformation, to ensure courts can operate at full capacity, remotely, during COVID-19 and the long-overdue modernisation of the courts.

We urge courts to ensure that digital transformation considers the needs of the wide range of court users, so that technology and processes are accessible to everyone. We encourage courts and tribunals to consider best practice approaches and learn from progressed jurisdictions such as the UK.

Protecting older people from elder abuse

Justice Connect welcomes changes that allow Enduring Powers of Attorney (**EPoA**) and wills to be witnessed remotely. This has allowed our lawyers to witness documents without risking the health of our clients and lawyers, while also increasing the accessibility of these documents to people in regional and remote areas. However, changes should be made to:

- ensure that medical treatment decision-makers can also be appointed remotely; and
- to improve safeguards to protect remote witnessing from being manipulated by an abuser.

During COVID-19 it is especially important for older people – the community most at risk of dying if they are infected – to have appointed a medical decision-maker. The appointment of a medical treatment decision-maker was not included in the documents that can now be witnessed remotely. Without in-person legal appointments, our clients need to see their doctor face-to-face to appoint a medical treatment decision-maker. But with many doctors operating only by phone or video conference, some clients are unable to have this document witnessed. The inconsistent approach to remote witnessing these documents has meant the legal effect of clients' decisions is delayed or unable to occur.

At the time of any disaster, the older people in our community are particularly at risk of abuse and harm. Growing pressure caused by job, housing and financial insecurity for many adult children place older Australians at risk of elder abuse. If a medical treatment decision maker or EPoA are not made, close family are often put in charge of the older person's medical and financial affairs.

While the changes to witnessing arrangements are being effected strictly in response to the COVID-19 crisis, in the long term these arrangements could particularly benefit older people experiencing abuse in regional and rural Victoria, along with people with chronic health issues who are unable to meet with a lawyer face-to-face.

We support these changes being permanent, so long as there are additional safeguards to reduce the chance that remote witnessing enables elder abuse. Currently, there are no requirements for a lawyer to check whether other people are present in the room with the principal before the lawyer confirms that the principal is free of duress and checks their capacity to make the documents. As the law stands, an abuser could pressure a principal by being physically present, or by monitoring the video call.



Recommendation 11: Remote witnessing – strengthen safeguards and broaden documents

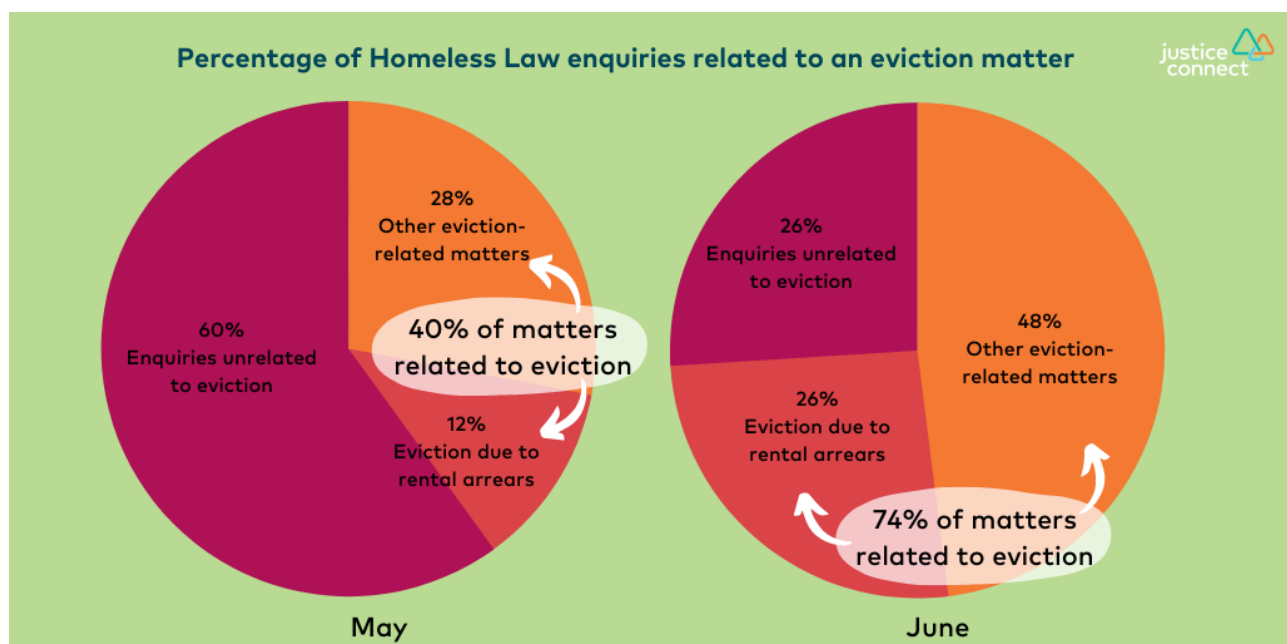
We urge the Victorian government to:

- Retain remote witnessing arrangements beyond the COVID-19 pandemic
- Allow remote witnessing for the appointment of a medical treatment decision-maker.
- Increase safeguards for remote witnessing by requiring:
 - Lawyers to initially speak to the principal alone, to permit them to speak freely and confirm they are free of duress, and to check their capacity to make the documents.
 - Where possible, a portable device (such as a smartphone or tablet) should be used by the principal (rather than a desktop computer) so that the witness is able to get a broad visual of the room and anyone else present before witnessing the document.

Preventing homelessness and compounding legal issues during the COVID-19 pandemic

COVID-19 has increased housing and financial pressures across Victoria, creating a new group of people at risk of homelessness due to financial insecurity. At the outset of COVID-19, the Federal government estimated that as many as 1 million people may become unemployed as a result of COVID-19, 24.4% of employed Australians do not have paid leave entitlements and one-third of those in the private rental market have previously been identified as experiencing housing insecurity.^x

Through Justice Connect's frontline services for homeless or at-risk Victorians during COVID-19, we have seen more people facing housing and financial stress, isolation, health problems, unemployment and justice system interactions, creating an emerging cohort of 'future homeless' and financially insecure, as well as compounding difficulties experienced by disadvantaged Victorians.



In this context and with the continuing uncertainty around the duration and impact of COVID-19, the number of people facing legal, financial and life issues will only continue to increase. Though the COVID-19 recovery phase presents genuine threats of increased homelessness and legal needs in our community, it also offers a unique opportunity to build a stronger social safety net, reduce inequality and ensure the pandemic does not entrench disadvantage.

Temporary COVID-19 tenancy protections for Victorians

Justice Connect welcomes the Victorian government's support to residential tenants during COVID-19, including the suite of temporary laws to help avoid evictions and reduce financial hardship. These temporary COVID-19 tenancy legal protections and supports have been critical in better-ensuring that Victorians can stay safely housed during COVID-19.

With the recent emergence of a second wave of COVID-19 in Victoria, it is essential for public health and the prevention of homelessness that the temporary COVID-19 tenancy laws continue until 31 March 2021, after which time the *Residential Tenancies Amendment Act 2018* reforms should commence in-full.

To maximise the effectiveness of the COVID-19 tenancy laws and the operation of the new Residential Tenancies Dispute Resolution Scheme, it will be critical to ensure that more Victorian tenants are aware of the temporary tenancy protections, in particular the rent reduction process and the DHHS rent relief grant. Based on figures provided by CAV in July 2020, there are almost 20,000 rent reduction agreements that have been lodged, but this is only 1.3% of over 1.5 million Victorian renters. In this context, it appears that many tenants are not accessing the temporary COVID-19 tenancy protections due to insufficient knowledge of their rights or fear of reprisal at the end of the current COVID-19 tenancy laws.

Providing accessible information and resources to tenants around their rights and options in relation to the COVID-19 rent reduction process, the DHHS rent relief grant and the Residential Tenancies Dispute Resolution Scheme, including where to get help, will ensure that more Victorian tenants can stay securely housed during the pandemic and the recovery phase.

More suitable, safe and stable public and community housing with supports

COVID-19 has also directly highlighted the importance of access to housing with supports, as part of an effective public health response. Through the Victorian Housing Peaks Alliance and as a member of the Everybody's Home campaign, Justice Connect has recently called for more public and community (social) housing, with wrap-around supports, to help end homelessness in response to COVID-19 and beyond.^{xi} We have already seen welcome responses, including the Victorian government's announcement of a \$500 million investment in social housing.^{xii} This is a great first step, but more is required to increase the state's proportion of social housing to the national average.

More than 82,000 people (including 25,000 children) remain on the state's social housing waiting list, and Victoria's social housing homes as a proportion of all households is 3.2%, well below the national average of 4.5%. Victoria needs to build 6,000 new houses each year, over ten years, so that the thousands in our community can finally have a safe, secure, permanent place to call home.

The Victorian government must use this opportunity to build on its positive changes to prevent homelessness by increasing investment in public and community housing, and holistically supporting Victorian tenants to stay housed.



Recommendation 12: Support people experiencing or at risk of homelessness to stay safely housed during COVID-19

Justice Connect recommends that the Victorian government:

- Extend the current temporary COVID-19 tenancy protections until 31 March 2021, so tenants can stay securely housed.
- Extend and create more financial relief for Victorians, so tenants can maintain their rent payments as COVID-19 continues and during the recovery period.
- Provide more resources for integrated legal, financial and social work services to help with tenancy issues, debts, fines and other compounding issues for at-risk Victorians.
- Invest in more suitable and safe social housing with supports, as a key part of the social and economic recovery from COVID-19 – we need at least 6,000 new social housing properties each year for ten years, including at least 300 Aboriginal housing units a year.

Supporting human-centred digital transformation of the legal sector and legal services

The COVID-19 crisis has brought the consequences of the legal assistance sector's failure to substantially digitally transform into clear relief. While some legal services across Victoria have closed services or operated at reduced capacity, thanks to our comprehensive online offering Justice Connect has seen requests for assistance significantly increase, we have delivered more legal services than before, and had incredible levels of engagement with our online resources and digital tools (up 500% compared to last year).

During the COVID-19 crisis we have rigorously monitored online engagement with our services and have published our findings – read our May analysis [here](#) and our June analysis [here](#). Our findings include that more people are looking for legal help online, there is an appetite for responsive and up-to-date information in a dynamic environment, and there are significant new unmet legal needs linked to COVID-19.

Our recent research supplements Justice Connect's extensive existing research and consultation work carried out over the last four years. We have found that most help seekers find the legal system hard to understand, that navigating legal assistance services is unacceptably complex and difficult, and many Victorians want to engage with legal services online. Read more about [our consumer research here](#), and read our 2019 summary of research findings, design process and evaluation of [our consumer-facing online initiatives here](#).

At Justice Connect, we see the consequences of the lack of digital transformation in the legal assistance sector limiting access to justice during the COVID-19 crisis in the following ways:

- Some legal assistance organisations are struggling to provide legal services in a remote working setting because they:
 - don't have a cloud-based case and file management system, or rely on paper files/records; and/or
 - cannot forward calls, mail and faxes from their office to staff working remotely.
- COVID-19 has limited face-to-face outreach services and drop-in clinics. In this context, outreach needs to move into online settings. This is made difficult because:
 - there is no central, up-to-date service directory available to the public covering all free legal services in Victoria;
 - many legal services have little to no online presence, are difficult to find via search engines, have little information about service eligibility on their websites and most do not offer online application pathways; and
 - Justice Connect has heard directly from several people who have looked for legal assistance online, have been unable to find legal help, and have purchased cheap and inappropriate legal

advice from lawyers in the USA (via www.justanswer.com/law), as these services ranked more highly in search results than Australian-based services. See Annexure A for the top search results for 'free legal help Melbourne' on 24 July 2020.

Justice Connect convenes the Victorian Justice Navigation Working Group with representatives from community legal centres, Victoria Legal Aid, the Victorian Legal Services Board, the Victoria Law Foundation, VCAT, universities and government. In late 2019 the working group developed two priority areas, and in light of COVID-19 has confirmed they remain most important in addressing flaws in the Victorian legal assistance sector ecosystem. They are:

- improving the online search experience for help-seekers by ensuring those looking for help can find clear, comprehensive information about services, that websites present information consistently, that guidance about eligibility is provided publicly, and that no matter where a help-seeker lands, they will be able to find their way to appropriate services; and
- increasing the use of human-centred design practices in designing service entry and exit points. The legal assistance sector and legal institutions remain far behind other industries in their digital transformation, and without significant investment and government incentivisation, will continue to fall further behind.



Recommendation 13: Fund and incentivise human-centred digital transformation of the legal system to ensure people can access legal services when face-to-face services are limited

The government needs to take action to incentivise and support faster digital transformation that includes:

- Addressing system-level issues so that these are not baked into digital solutions.
- Prioritising the experience of people engaging with the legal system in its transformation (giving at least the same weight, or greater weight, to the needs of people engaging with the legal system compared with the needs of lawyers, judges, service administrators etc).
- Appropriately balancing investment in back-of-house digital transformation with consumer-facing initiatives.
- Ensuring that skills and capabilities currently lacking in the legal assistance, court system and legal sector are identified, and that relevant skills and expertise are brought into the sector.
- Funding solutions that work, including ensuring that appropriately qualified panels and teams are designing solutions, assessing proposals and funding applications, and making resourcing decisions.

For questions in relation to this submission please contact:

Sue Woodward
Head of Not-for-profit Law
e: Sue.Woodward@justiceconnect.org.au
t: +61 3 8636 4468

Brendan Lacota
Head of Community Programs
e: Brendan.Lacota@justiceconnect.org.au
t: +61 3 8636 4446

Annexure A - Top search results for 'free legal help Melbourne' on 24 July 2020

Ad · www.justanswer.com/law ▼

Ask a Lawyer Online Now - VIC Lawyers Answer You ASAP

Questions Answered Every 9 Seconds. Get **Law** Answers Online & Save Time. 12MM+ Questions Answered. Helped Over 8MM Worldwide. Services: State-Specific Laws, Federal **Law**, International **Law**, Online **Legal** Experts, Know Your Rights.

Ask on JustAnswer Now

Get Answers from Real Experts 24/7.
Be Connected Online in Minutes!

Ask Employment Lawyers

Employment Lawyers are Ready to
Help You Now. Get Started!

Ad · www.askalawyeroncall.com/ask-a-lawyer ▼

Get Legal Answers in Minutes - Retainer-Free Attorney Chat

Connect with Online Lawyers. Get **Legal** Guidance Day or Night, Right at Home. 12MM+ Questions Answered. Helped Over 8MM Worldwide. Services: Power of **Attorney**, Inheritance, Changing Your Name, Child Custody, Adoption, Child Abuse, Prenuptial Agreements, Divorce, Alimony.

[Ask a Lawyer Online Now](#) · [Ask Family Law Attorneys](#) · [Tenant/Landlord Law Help](#)

Ad · www.hartleyslawyers.melbourne/ ▼

Free legal advice - 1st Interview Free

Sunshine, Fitzroy, Moonee Ponds, Kew, Hawthorn, Mt Waverley, Box Hill

Phone 1300 792 387 from 8 am to 6 pm weekdays for **free** information and **help** about the law. You can also speak to us in your language.

www.legalaid.vic.gov.au ▼

[Victoria Legal Aid | Helping Victorians with their legal problems.](#)

www.probonocentre.org.au › individual › vic ▼

[Links to Legal Help in Victoria - Australian Pro Bono Centre](#)

Free online legal information; **Free legal advice** representation in some cases, depending on the Community Legal Centre's eligibility guidelines. OR. Contact a ...

www.vcat.vic.gov.au › steps-to-resolve-your-case › ser... ▼

[Legal help or advice services | VCAT](#)

Victoria **Legal Aid** provides **free** legal information and education for all ... and provide duty lawyer services at our main venue on 55 King Street, **Melbourne**.

www.gotocourt.com.au › legal-advice ▼

[Legal Advice Hotline | 7am-midnight, 7 days | 1300 636 846](#)

Legal Advice. Call Our Australian **Legal Advice** Hotline to speak directly to a qualified Australian lawyer now. Open 7am - midnight, 7 days on 1300 636 846.

www.justice.vic.gov.au › justice-system › legal-assistance ▼

[Legal assistance | Department of Justice and Community ...](#)

Nov 1, 2019 - VLA offers **free** advice on what you may need to do to solve your legal problem, although it does not give **legal advice** on all matters. For those ...

i Volunteering Victoria, *Victorian Government COVID Submission 2020*, 3 July 2020, 3.

ii Ministerial Council for Volunteers, *Volunteers in Victoria: Trends, Challenges and Opportunities Report*, 2017, 6.

iii Australian Charities and Not-for-profits Commission, *Australian Charities Report 2017*, May 2019, 4.

iv Social Ventures Australia and the Centre for Social Impact, *Will Australian charities become COVID-19 casualties or partners in recovery? A financial health check*, June 2020.

v Deloitte Access Economics, *Cutting Red Tape: Options to alight state, territory and Commonwealth charity regulation*, 23 February 2016, 4.

vi Nicholas Biddle and Matthew Gray, *The experience of volunteers during the early stages of the COVID-19 pandemic*, Australian National University: ANU Centre for Social Research and Methods, May 2020, 2.

vii Volunteering Australia, National Snapshot: Volunteering during the COVID19 shutdown, Internal briefing paper, 12 May 2020, 1.

viii Access to Justice Review, *Summary and Recommendations*, August 2016, 35.

ix UCL Centre for Access to Justice, *Assisted Digital Support for Civil Justice System Users*, April 2018.

x Centre for Social Impact, *Homelessness and COVID-19*, 26 March 2020, 3.

xi For further discussion see, Justice Connect, *The Victorian Government must build more social housing to prevent a spike in homelessness*, 14 May 2020.

xii DHHS, *Almost \$500 million social housing boost to strengthen our economy and provide stability for Victorians*, 18 May 2020.
