Final grant report: Financial Rights Online Self-Help Tools

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<th>Grant recipient</th>
<th>Financial Rights Legal Centre</th>
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<td>Position</td>
<td>Policy Officer</td>
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<td>Law and Justice Foundation</td>
<td>$12,000.00</td>
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1. Description of the project

Describe the project in just enough detail so that anyone can understand it. What was the aim of the project, who was the intended audience and what strategies did you implement to achieve the aim?

Financial Rights Legal Centre has developed a sample letter generator - a new online self-help resource for both consumers of financial services and community workers. The tool created enables consumers to type in their personal details and generate accurate and professional legal letters for dispute resolution purposes. Many websites (including our own) had static sample letters where the user must download a word document, insert input and delete all the instructions. The idea of this tool was that users would answer a series of simple questions and a customised letter would be automatically generated, making it less daunting to use and minimising the risk that the user would leave in generic examples and instructions instead of inserting their own tailored information.

There are a number of established pathways consumers in Australia can pursue a dispute with their banks, insurers or other financial services including mandatory internal dispute resolution services and free external dispute resolution services such as the Financial Ombudsman Service and the Credit and Investments Ombudsman. Many consumers are able to self-advocate but just require a little nudge in the right direction. Most people don’t need legal advice to get the ball rolling. This sample letter generator is aimed at nudging those consumers. There are also large numbers of community workers who could help consumers write and send letters to financial institutions but they are at times concerned that they will miss some important legal information. The sample letter generator is also aimed at these community workers. Once the program was launched it was promoted heavily with relevant community workers including financial counsellors, LawAccess NSW call centre workers, community legal centres, NSW Fair Trading and Legal Aid NSW.
2. The project – what happened?

How did the project come about?
Financial Rights Legal Centre is a community legal centre specialising in financial services, particularly in the areas of consumer credit, banking, debt recovery and insurance. We operate two advice lines: the National Debt Helpline (“NDH”) and the Insurance Law Service (“ILS”). We provide referrals to face-to-face financial counselling services in NSW but are also available for case work assistance including negotiations, written legal advice and representation. We found that our two phone services were overrun. At the time the ILS did not meet the overwhelming demand for the service, answering only 58% of calls on average. The NDH was less stressed, answering 75-85% of calls, but demand has since increased on both lines. We therefore wanted to encourage more consumers and community workers to self-advocate using our websites at www.financialrights.org.au and www.insuranceclaw.org.au. Given our static sample letters were under-utilised we thought a more interactive tool could assist consumers to help themselves.

Briefly set out the project stages and what happened in each stage.

Stage 1: Content finalisation
We carefully reviewed each of our static sample letters to ensure that they are accurate and up to date with the law. Working with a web content developer we re-structured the letters to be more interactive and generate tailored information.

Stage 2: Information Architecture & Design Services
We then finalised our design expectations with our web program developer regarding application interfaces and user experience including the look and feel via mock-ups and functional specifications. This was complex and difficult but after a number of iterations we finalised the architecture and design. We had to change to a new web developer half way through the project for a number of reasons, and this caused significant delays.

Stage 3: Production
Our web developers created the letter generator as a series of flexible and editable forms on our Word Press based website (www.financialrights.org.au). We started with 3 live letters which we extensively tested before continuing to build a total of 14 letters. Only about half of these letters were funded with the LJF Grant, and Financial Rights provided the funding for the rest. Much of the production and edits were done in house by Julia Davis and Drew MacRae, which was challenging and time consuming to learn but will be invaluable going forward because now we are able to do any necessary changes ourselves and even develop new letters going forward.

Stage 4: User-testing
The first stage of testing was done in-house with our 12 solicitors and 8 financial counsellors. Extensive feedback was created in this round of testing and the 3 prototypes were adjusted. Then in the second stage of testing we delivered the three prototypes of the letter generator to select other legal centres and financial counselling centres, including LawAccess NSW and Financial Counselling Australia and received feedback from community workers who will be using and promoting the letter
generator. We also got feedback from regular consumers. We used this feedback to further improve the 3 prototypes and inform our development of the remaining 11 letters.

How was information about the tool distributed?
Information about this tool was primarily distributed electronically, although we have made several presentations about it at community legal education sessions and other networking events.

What was the extent of the distribution?
The following steps were also taken to distribute the electronic link to the tool:
1. Direct emails about the new tool were sent to over 90 community workers and other relevant stakeholders (Ombudsmen, Government regulators, consumer groups, etc.)
2. Emails with information about the tool were sent to various Peak bodies to forward onto their members including CLCNSW, NACLC, FCA, FCAN and the Civil Justice Strategy Group.
3. Information about the tool was uploaded to the CLEAR database and was selected as the “Featured Project” for the month of April
4. Direct contact was made with the ASIC MoneySmart team to ensure links were placed on the right pages of the MoneySmart website.
5. Direct contact was made with LawAccess NSW to ensure the call centre workers were aware of the tool and were able to refer callers to it directly
6. Direct contact was made with NSW Fair Trading’s education resources team, and they have agreed to update their resources to include information about the tool, or at least to our websites (which have the tool on the homepages).
7. Emails were sent to various members of LIAC and feedback was received.
8. An article about the new tool was included in the March Financial Rights E-flyer which is distributed to over 330 consumers and community workers. A follow-up article in our June E-flyer encouraged workers to try using the Letter Generator on their phones (over 350 recipients).
9. We Tweeted about the new tool extensively, and were retweeted and mentioned over 30 times, reaching over 2000 twitter users.
10. Kat Lane, one of our principal solicitors launched the Letter Generator at the FCAQ conference to a large audience of financial counsellors, who were thrilled.
11. Greg Russel, one of our senior financial counsellors gave a short presentation on the Letter Generator to over 500 financial counsellors at the May 2017 FCA conference in QLD.
12. Drew MacRae, our Policy & Advocacy Officer did an interactive presentation to the Technology & Communications Network at the NSW CLC Quarterlies in May 2017 (Over 20 attendees)
13. Alex Kelly, one of our principal solicitors did a 10 minute interview on The Daily Drive with Kayley Harris and Nick Bennett where she explained the value and ease of the Sample Letter Generator: https://omny.fm/shows/the-daily-drive/how-to-write-a-letter-to-a-big-organisation (8 June 2017)
14. Kat Lane mentioned our Letter Generator on ABC’s The Checkout on 19 June when talking about the dangers of Payday Loans (https://www.youtube.com/watch?v=GGAmHKudG0E)
15. Finally, we plan to present on the new tool at our 30th Anniversary Event taking place in July 2017, and distribute paper brochures about the tool along with our other web resources.
If applicable, at the time of this report, what has been the extent of use of your resource? Four months after the launch the Sample Letter Generator has been viewed over 8,000 times, with over 6,000 unique views. Unfortunately there is no way to tell how many of those views resulted in a completed letter being generated and sent to its intended recipient, but we are still encouraged by the statistics we have been able to track.

Now that the project has concluded, how did the implementation and/or the outcome differ from what was originally intended? Did anything surprise you? Were there any unintended outcomes? The outcome is not very different from what we originally intended, except maybe the tool we created is much more complex than we originally envisioned.

What surprised us the most was how difficult it was to build a new digital tool. The development process ran into countless potholes, dead-ends and delays. Many of those problems were of our own making since we did not effectively plan the project out at the front end. We thought we knew what we wanted, but until we got started we didn’t realise that we wanted much more functionality out of this digital tool than we originally envisioned. Without knowing much about how interactive websites work we came up with a lot of ideas that were not practicable within our original budget and we suggested a lot of changes that did not work with the tool as it was originally envisioned by the web developer.

One unintended outcome was that our own staff have now become much more skilled in website development than we ever planned! We ended up having to do a lot of the production work in-house in order to save on web developer costs, so we effectively taught ourselves how to code, construct and edit the form tools for Word Press. However, now we have the capacity to do our own edits of the program, as well as create new letters as we need them.

3. Evaluation

What questions did you ask to evaluate whether you had achieved your aim?

Questions for Consumer-Users

User-testing the letter generator after it is published on the website with a group of consumers – chosen from callers to the hotlines that were advised to use the Sample Letter Generator. We called them back after a few days to ask:

1. Did you find this program easy to use?
2. Did you understand what information to put in each line?
3. Did you send the letter it to the intended recipient? How did that go?
4. Is there anything about the program that you wish was different?
**Questions for Community Worker-Users**

We surveyed CLCs, Financial Counselling offices, Legal Aid and Law Access 3 months after the launch to ask whether staff have been using the program.

1. Did you find the letter generator useful? (__) Very useful; (__) useful; (__) Same as existing sample letter resources; (__) not useful/hard to use ; Related comments

2. Do you think it will be easy for a consumer to use without assistance? (__) yes (__) no; If No, why

3. Have you used the letter generator with a client? (__) yes (__) no

4. What was the outcome? Comments

5. Would you recommend the tool to other community workers?

**What data did you gather to answer your questions?**

**Feedback from National Debt Helpline callers & community workers**

Across 2 months our staff referred 22 advice callers and a couple of community workers who called the helpline to the Sample Letter Generator. Of those callers I was able to get in touch with 15, 10 of which had used the tool and sent their letter to a financial service provider.

Of those callers or workers that used the tool, 100% gave positive feedback. Everyone said the tool was easy to use, they understood what information to put in each line, the letter helped them resolve or at least progress their dispute and they had no changes to recommend. (See attached de-identified Evaluation document)

Of the 5 people that had not used the tool, their main reason was that they had resolved or progressed their dispute in another way, usually by calling the financial service provider directly or they saw a financial counsellor. Only one person gave feedback that he felt too unsure about his ability to do anything without legal assistance to try the Letter Generator. That person I actually helped write a letter personally while I was on the phone with him getting feedback. I emailed him the letter when it was finished and he forwarded it on to his insurer. He was very grateful and happy about the letter.

A few positive quotes:

1. *Used the letter to send to the bank, it worked really well, I have a hardship variation now and things are getting back on track now that I started a new job – great customer service*

2. *It was a friend that made me aware of it – it was such a good helpful thing and I wish more people knew about it.*

3. *The letter generator is extremely easy to use, this client had a very good hardship proposal and without the assistance would have been incapable of writing the letter himself. Without the letter generator I do not think I could have written a letter for the client given the limited technology I had on hand.*
We have not conducted a post-launch formal survey of Community-Worker users (separately from the Helpline call-back interviews) which is something we originally intended to do. This is because the ongoing and informal feedback that we have gotten from community workers has been adequate for us to feel confident that our program is easy to use and being used regularly. We don’t currently have the resources to conduct another formal feedback survey, but we will continue to promote the tool heavily with community workers, CLC and Legal Aid lawyers and LawAccess workers and make sure they know to send feedback through to us.

**Did you achieve your aim? What did you find out?**

Our Aim:
To develop and promote online self-help tools that will enable consumers and community workers to better understand consumer rights and resolve disputes with financial services providers more effectively and efficiently.

Yes, we achieved the above stated aim. We have successfully developed and promoted the tools that we originally envisioned and from the feedback we have received it is clear that this tool has enabled both consumers and community workers to better understand consumer rights and resolve disputes with financial service providers more effectively and efficiently.

We found out that developing online tools is much harder than we thought, but now we know how to better budget for the next project, both financially and our time.

**4. Conclusion and recommendations**

**What is your conclusion?**
In the end we believe we have created a unique and truly useful tool for consumers and community workers. We applied our extensive knowledge of both users and financial services disputes to create a tool that we think really meets the needs we set out to meet. It was a long road, but we got there in the end. The web usage statistics from the first 3 months are very promising, and everyone that we have surveyed about the tool has found it useful to some extent. From our research there is nothing else like this available in NSW or even Australia for free for consumers.

**What are your recommendations for improvements both for the intended audience of your project, and for the strategy you used to achieve your aim? What would you do differently next time?**
Next time we would do a lot more planning at the front end with the web developer to make sure our expectations about functionality were realistic before starting the production work.

Improvements for the tool that we would like to see are an automatic feedback option for users in the final version with evaluation questions, and the ability to generate a saveable Word version of the letter.