NATIONAL
FAMILY VIOLENCE PREVENTION
AND LEGAL SERVICES
FORUM

The National Family Violence Prevention Legal Services Forum submission to the Commonwealth Attorney-General's Department regarding the Exposure Draft of the Family Law Amendment Bill (No. 2) 2023

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Executive summary

The National Family Violence Prevention and Legal Services Forum (the National Forum) welcomes the opportunity to respond to the Family Law Amendment Bill (no. 2) 2023 Exposure Draft ('the exposure draft'). We commend the Attorney General's Department for putting forth these amendments, especially where these amendments acknowledge family violence. For too long, the perpetrators of family violence have been able exploit the legal system to continue their pattern of violence and abuse – this must end.

This submission focuses on the anticipated impacts of these amendments on those experiencing family violence, specifically where they relate to Aboriginal and Torres Strait Islander people.

In summary, the forum holds the following views:

Property reforms

Property decision-making framework

- We support the proposed amendments that allows the court to consider the relevance and economic impact of family violence as part of a family law property matters, including proposed amendment to establish a new contributions factor for the effect of economic and financial abuse. However,

We also call for greater clarity of debt calculations in circumstances of family violence.

Principles for conducting property or other non-child-related proceedings

- We support the proposed approach to establish Less Adversarial Trial (LAT) processes for property or other non-child-related proceedings but emphasise the need for this expansion to be culturally safe and legally assisted, where it involves Aboriginal and Torres Strait Islander people.

Duty of disclosure and arbitration

- We broadly support disclosure amendments. However, we note that civil or criminal penalties for non-compliance may have a disproportionate negative impact on Aboriginal and Torres Strait Islander people. We thus emphasise the importance for these amendments to consider the unique financial and economic circumstances of as Aboriginal and Torres Strait Islander people.
- We stress that Aboriginal and Torres Strait Islander people must be empowered to understand their duty of disclosure, and their related impacts. We call for any awareness raising relating to the duty of disclosure to occur in a way that is accessible, culturally informed, and sensitive.
- We broadly support arbitration amendments. However, we note that the arbitration amendments do not discuss family violence. We stress that arbitration presumes an equal playing field in which both parties have the capacity to put their views forward freely and effectively, without fear or censorship. This is simply not the reality.

- Aboriginal and Torres Strait Islander women who have experienced family violence might benefit from a less adversarial process such as arbitration if they have access to culturally safe and specialised legal assistance throughout the arbitration process.

Children's contact services

Regulatory scheme and non-compliance key changes

- We support these amendments. However, we call for regulations to ensure that – where Children's Contact Services (CCS) provide for Aboriginal and Torre Strait Islander children and their families – the standards and requirements for CCSs reflect best-practice. Specifically, one that embeds a child's identity, culture, family, community, and kinship connection in their provision of meaningful support.

Case management and procedure

Attending family dispute resolution before applying for Part VII order

- We support these amendments but note that self-representing parties, especially those who do not have the financial means to appoint legal representation, might be disadvantaged by these amendments. We call for further clarification of how this amendment will ensure equity in the parenting order process for parties who are self-representing and are financially disadvantaged or otherwise, such as Aboriginal and Torres Strait Islander communities.

Amending the requirement to attend divorce hearings in person and delegations

- We support these amendments and consider that it facilitates the easier participation of parties in rural or remote areas, for whom court attendance might be onerous.

Commonwealth Information Orders

- We support these amendments and consider it important that kinship relationships are included in the expanded category of persons under subsection 67N (8), to ensure the safety of Aboriginal and Torres Strait Islander children.
- We consider that including kinship ties within Commonwealth Information Orders (CIO) acknowledges the unique extended relationships that Aboriginal and Torres Strait Islander children share with adults in their community and ensures that these relationships are considered in relation to a child's safety and welfare.
- We note however that the sharing of such information should not place individuals at risk of harm and call for further clarity regarding how any potential risk of harm will be mitigated.

General provisions

Costs orders

- We agree with the amendments. However, we express the need to further clarify how a "means-tested legal aid" scheme would operate, and consider that

in operationalising such a scheme, a court should not make an order for parties to make contributions if doing so would cause financial hardship.

Clarification of inadmissibility provisions

- We support these amendments and consider that these will clarify the Commonwealth's intent that evidence of anything said in these confidential contexts is inadmissible before *any* court – including State and Territory courts.

Recommendations

Considering the above views, the National Forum provides the following recommendations:

Recommendation one: provide greater clarity on debt calculations in circumstances of family violence for amendments relating to a property disclosure framework.

Recommendation two: ensure that any expansion to LAT processes for property or other non-child-related proceedings is culturally safe and legally assisted, where it involves Aboriginal and Torres Strait Islander people.

Recommendation three: ensure that disclosure amendments consider the unique financial and economic circumstances of Aboriginal and Torres Strait Islander people.

Recommendation four: ensure that information relating to the duty of disclosure is provided in a way that is accessible, culturally informed, and sensitive.

Recommendation five: ensure a greater acknowledgement and incorporation of family violence challenges into arbitration amendments.

Recommendation six: ensure that where CCSs provide for Aboriginal and Torres Strait Islander children and their families, and that these services are culturally appropriate.

Recommendation seven: provide further clarity on how amendments relating to the requirement to attend family dispute resolution before applying for a Part VII order will ensure equity in the parenting order process for parties who are self-representing and are financially or otherwise disadvantaged, such as Aboriginal and Torres Strait Islander communities.

Recommendation eight: include kinship relationships in the expanded category of persons under subsection 67N(8), to ensure the safety of Aboriginal and Torres Strait Islander children.

Recommendation nine: further clarify how a “means-tested legal aid” scheme would operate.

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About the National Family Violence Prevention Legal Services Forum

The National Forum was established in May 2012 and is the National Peak Body for Family Violence Prevention Services (FVPLS) around Australia that provides culturally safe and holistic services to First Nations people affected by family violence – predominantly women and their children. The National Forum provides expert national advice in areas of policy, planning and law reform, and advocates for safety and justice for First Nations people affected by family violence.

The National Forum represents 13-member Family Violence Prevention Legal Services (FVPLS) across Australia that provide culturally safe and specialist legal and non-legal assistance and support to Aboriginal and Torres Strait Islander victim-survivors of family violence – predominately women and children. The national forum members are:

- Aboriginal Family Law Service Western Australia (Perth Head Office, Broome, Carnarvon, Kununnura, Geraldton, Kalgoorlie, Port Hedland)
- Aboriginal Family Legal Service Southern Queensland (Roma)
- Binaal Billa Family Violence Prevention Legal Service (Forbes)
- Central Australian Aboriginal Family Legal Unit Aboriginal Corporation (Alice Springs Head Office, Tennant Creek)
- Djirra – formerly Aboriginal Family Violence Prevention and Legal Service Victoria (Melbourne Head Office, Mildura, Gippsland, Barwon South-West, Bendigo and shortly also Echuca-Shepparton, La Trobe Valley and Ballarat)

- Family Violence Legal Service Aboriginal Corporation (Port Augusta Head Office, Ceduna, Pt Lincoln)
- Many Rivers Family Violence Prevention Legal Service (Kempsey)
- Marninwarnitkura Family Violence Prevention Unit WA (Fitzroy Crossing)
- Ngaanyatjarra Pitjantjatjara Yankunytjatjara Women's Council Domestic and Family Violence Service (Alice Springs, NPY Tri-state Region)
- Queensland Indigenous Family Violence Legal Service (Cairns Head Office, Townsville, Rockhampton, Mount Isa, Brisbane)
- Thiyama-li Family Violence Service Inc. NSW (Moree Head Office, Bourke, Walgett)
- Warra-Warra Family Violence Prevention Legal Service (Broken Hill)
- North Australian Aboriginal Family Legal Service (Darwin Head Office, Katherine)

The National Forum works with its members, communities, governments, and other partners to raise awareness about family violence effecting First Nations people, and it also advocates for culturally safe legal and holistic responses to this issue. The National Forum provides a unified voice for its FVPLS members in areas of national policy, planning and law reform, and being a member of the national Coalition of Peaks. The National Forum is committed to the national Closing the Gap targets.

Our work is informed by evidence, and we aim to influence government policy, to advocate for First Nations people affected by family violence, and to advance the goals of the FVPLS sector.

The National Family Violence Prevention Legal Services Forum submission

The National Forum thanks the Attorney General's Department for the opportunity to provide this submission in response to the exposure draft. Family Law reform is much needed. For too long, the perpetrators of family violence have been able exploit the legal system to continue their pattern of violence and abuse – this must end.

The exposure draft proposes significant amendments to clarify and support the framework for making property and financial orders in the Family Law Act. This includes:

- Aligning the decision-making principles for property settlement in sections 79 and 90SM with existing case law;
- Introducing family violence as a new factor for consideration when determining property settlement orders, when relevant to the circumstances of the case;
- Extending the less adversarial trial procedures to property and financial matters; and
- Inserting a specific duty of disclosure in property and financial matters to the Family Law Act, that would apply during court proceedings or when a party is preparing to start a proceeding.

Other amendments aim to more clearly identify the categories of family law matters capable of arbitration and permit arbitrators to seek procedural orders from a court, redraft section 117 (costs orders) to identify when Independent Children's Lawyers can

recover their legal costs and strengthen Commonwealth Information Orders (section 67N).

Amendments are reflected in four schedules, which will be discussed in turn in our submission:

- Schedule one: property reforms
- Schedule two: children's contact services
- Schedule three: case management and procedure and
- Schedule four: general provisions

We note that the focus of the amendments reflected in the exposure draft rightly considers family violence and its different manifestations and prescribes legislative mechanisms in consideration of this. Whilst this is a commendable direction and principled approach to ensuring a just and equitable family law system that supports the safety of women, children, and families who are experiencing family violence, we note that the circumstances and experience of family violence encountered by Aboriginal and Torres Strait Islander communities is unique, and amendments must reflect this. Our submission focuses on these amendments as they relate to Aboriginal and Torres Strait Islander people.

Schedule 1: property reforms

Property decision-making framework

The forum supports amendments to the Family Law Act on the principles a court will take when considering whether to make an order to alter the interests of the parties to the relationship in any property, which are:

- Identifying the existing legal and equitable rights and interests, and liabilities, of the parties to any property.
- Considering each party's respective contributions to the property of the relationship (current paragraphs 79(4)(a))-(d), (f)-(g) (for married couples); 90SM(4)(a)-(d) and (f)-(g)) (for de facto couples).
- Considering the parties' current and future considerations (current subsections 75(2) (for married couples) / 90SF (3) (for de facto couples)) and
- Determining whether it is just and equitable to make any order to alter a party's interest in property (current subsections 79(2) (for married couples) / 90SM (3) (for de facto couples)).

Specifically, the forum supports these amendments because it takes into account family violence in all its forms as a new factor for the court to consider as part of assessing parties' contributions and current and future considerations in determining property settlement. We note that given the mental, physical, and emotional consequences of family violence on a victim-survivor, introducing the effect of family violence in the assessment of a party's contributions enables the court to consider the

impact of the conduct on a party's ability to contribute during the relationship, for example, through a reduced ability to engage in paid work and contribute financially.

In addition, because family violence can sometimes manifest itself in coercive and controlling behaviour that prohibits or makes it dangerous for victim-survivors to engage in activities that afford them financial independence, we support that the amendments will also take family violence into account as an overarching factor to be considered as part of the other specific contributions factors (for example, the effect of coercive and controlling forms of family violence could be relevant to understanding a party's non-financial, homemaker contributions). Importantly, given the sometimes long-lasting physical, emotional, and psychological consequences of family violence on victim-survivors, and the negative impact these consequences have on the daily undertakings of victim-survivors, including their ability to financially support themselves, we support these amendments because it takes account of parties' current and future considerations. We consider that because the effects of family violence are ongoing, it is imperative that the court considers the financial impact of family violence on the party and ensures any property settlement makes provision for those ongoing costs and/or limited future earning capacity as appropriate.

Finally, we note that the proposed amendments would enable the court to consider any debts incurred by either of the parties to the relationship or both of them, as a negative financial contribution to the property pool, consistent with the current approach in case law. We consider that debt can be incurred by victim-survivors as a result of family violence, and especially coercive and controlling behaviour, wherein

individuals have little choice but to acquiesce to the demands or actions of their perpetrator. It is not uncommon that debt is incurred by victim-survivors who were either coerced into doing so or did so in the hopes of placation and an improved relationship. We express the need to further clarity how debts incurred in situations of family violence will be taken into account in these amendments, and how they will align with the other family violence considerations of this amendment.

In summary, we support the proposed amendments that allows the court to consider the relevance and economic impact of family violence as part of a family law property matters, including proposed amendment to establish a new contributions factor for the effect of economic and financial abuse. However, we also call for greater clarity debt calculations in circumstances of family violence.

Principles for conducting property or other non-child-related proceedings

We note that amendments would insert a new Division within Part XI— *Procedure and evidence* of the Family Law Act to establish LAT processes for conducting non-child-related proceedings. This new Division would be underpinned by a set of principles adapted from existing section 69ZN to be relevant to non-child-related proceedings:

Principle 1: The court is to actively direct, control, and manage the conduct of the proceedings.

Principle 2: The proceedings are to be conducted in a way that will safeguard the parties to the proceedings against family violence.

Principle 3**:** The proceedings are to be conducted without undue delay and with as little formality, and legal technicality and form, as possible.

We welcome the expansion of the LAT process to include non-child-related proceedings. We consider that this will provide the communities that we represent with a more simplified and flexible approach to property proceedings that will be conducted with as little formality, and legal technicality and form, as possible. In doing so, however, we emphasise the need for any expanded LAT process to be culturally safe and legally assisted, where it involves Aboriginal and Torres Strait Islander people.

We also support that consent is not proposed to be a requirement for the new division to apply to non-child-related proceedings and believe this amendment will allow victim-survivors a more equitable LAT process, especially where there are challenges in obtaining consent from parties in circumstances where LAT processes may provide safeguards and be beneficial to the resolution of the matter for the party impacted by, or the victim of, family violence.

In summary, we agree with the proposed approach to establish LAT processes for property or other non-child-related proceedings but emphasise the need for this expansion to be culturally safe and legally assisted, where it involves Aboriginal and Torres Strait Islander people.

Duty of disclosure and arbitration

We note that amendments would provide for a duty on parties to financial and property matters to disclose all relevant financial information to the other party and, in relation

to proceedings, to the court, the other party, and any relevant third parties. Specifically, the proposed amendments would:

- Apply the disclosure duty in financial and property matters to parties when they are preparing to commence proceedings, supporting the early resolution of disputes.
- Require legal practitioners (and any other family dispute resolution practitioners) to inform parties who are, or might be subject to the disclosure duty, about the duty, the circumstances when it applies and the potential consequences for breaches. They would also be required to encourage parties to take all necessary steps to comply with the duty.
- Identify some of the more serious consequences that a court may apply to address non-disclosure in proceedings such as punishing a person for contempt; staying or dismissing all or part of proceedings; making costs orders; and taking the failure to disclose into account when making property division orders.

We note that the non-disclosure of this information can be associated with financial abuse and misuse of systems and processes. We therefore broadly support these amendments and consider that promoting disclosure in the context of property and financial matters is crucial to the fair and timely resolution of disputes, an important aspect of a victim-survivor's recovery journey. We note two mechanisms that are articulated in the amendments, specifically relating to the consequences of non-disclosure, and the obligation of legal practitioners and Family Dispute Resolution Practitioners (FDRPs) to inform their clients about the disclosure duty.

Whilst we support compliance with disclosure, and consequences for non-compliance, we note that a punitive approach to non-compliance has not been effective for financially disadvantaged parties. We note further that civil or criminal penalties to non-compliance may have a disproportionate negative impact on Aboriginal and Torres Strait Islander people, exacerbating their high rates of criminal justice involvement. We thus emphasise the importance for these amendments to consider the unique financial and economic circumstances of parties, especially where these parties, such as Aboriginal and Torres Strait Islander people face disproportionate economic and financial hardship compared to other socio-demographics in Australia.

To ensure awareness of and compliance with disclosure, we consider that it is important for parties to be informed of disclosure requirements. Whilst we support the amendments requiring legal practitioners and FDRPs to inform parties who are, or might be subject to the disclosure duty, about the duty, the circumstances when it applies, and the potential consequences for breaches, we also stress that Aboriginal and Torres Strait Islander people must be empowered to understand their duty of disclosure, and their related impacts. We therefore call for any awareness raising relating to the duty of disclosure to occur in a way that is accessible, culturally informed, and sensitive.

In relation to arbitration, we note that the amendments provide for one consolidated list of matters that may be arbitrated, irrespective of whether arbitration is court-ordered or privately arranged, and also extends the ability of arbitrators to make an application for court orders to either terminate, or facilitate the effective conduct of,

family law arbitration. We note further that the amendments also include an explicit power for the court to terminate arbitrations if it is satisfied that there has been a change in circumstances, and it is no longer appropriate to arbitrate the matter. We welcome amendments that will streamline the list of matters that may be arbitrated and consider that this will provide the communities we represent with a more simplified and flexible approach to arbitration. We also welcome amendments that give the court power to terminate arbitrations but call for greater clarity regarding what is considered a "change of circumstances". We note that arbitration proceedings can be exploited by a party as a mechanism of continued family violence against another party and consider that such instances should constitute a "change of circumstance" if this occurs.

We note more broadly that the arbitration amendments do not discuss family violence. We stress that arbitration presumes an equal playing field in which both parties have the capacity to put their views forward freely and effectively, without fear or censorship. **This is simply not the reality** in situations of family violence which inevitably involves power imbalance, coercion, and fear. We argue that this may be even worse for Aboriginal and Torres Strait Islander women who have experienced family violence, given the presence of additional, complex, and compounding barriers that affect their understanding of, and their equal participation in the arbitration process. However, these challenges can be overcome, and Aboriginal and Torres Strait Islander women who have experienced family violence might be able to benefit from a less adversarial process such as arbitration if they have access to culturally safe and specialised legal assistance throughout the arbitration process.

Schedule 2: Children's contact services

Regulatory scheme and non-compliance key changes

We note that the amendments will establish a framework to allow the government to develop regulations which provide standards and requirements for Childrens Contact Services (CCS) and enhance consistency across the sector including:

- the ability for regulations to prescribe any penalties associated with non-compliance with the standards
- making it an offence to provide children's contact services without accreditation
- imposing restrictions so that courts can only order families to attend an accredited CCS (that is, one that has met the standards enacted by future regulations) and
- establishing an additional duty for CCS and CCS Practitioners to report suspicions of child abuse or violence to the relevant authorities, as well as requiring CCS Practitioners to inform families that the best interest of the child(ren) should be the paramount consideration when giving advice or assistance to a person in matters concerning a child.

We support these amendments and consider it important that CCS's are more strongly regulated to ensure that the risk of poor service provision, and their consequences are mitigated for children and their families. Feedback received from national forum members highlight deficiencies in service provision. We also call for regulations to ensure that – where CCSs provide for Aboriginal and Torres Strait Islander children and their families – the standards and requirements for CCSs reflect best-practice. Specifically, one that embeds a child's identity, culture, family, community, and kinship

connection in their provision of meaningful support. It is also recommended that regulations require all CSS's to adhere to other relevant Federal, State or Territory government standards. Finally, we call for the framework established by amendments to ensure that services are provided for and regulated in regional and rural communities.

Schedule 3: Case management and procedure

Attending family dispute resolution before applying for Part VII order

We note that currently, section 60I of the Family Law Act requires parties to attend Family Dispute Resolution and attempt to resolve parenting issues before filing an application for parenting orders. A section 60I Family Dispute Resolution Certificate (FDR Certificate) must be filed, unless an exemption is sought. Exemptions include circumstances such as where the parties are seeking consent orders, there is a risk of family violence, or the application is urgent. We note further that based on the current wording of section 60I, courts do not have the power to reject non-compliant applications until *after* an application has been filed and proceedings have commenced. We consider this to be an inefficient process for both the court and parties, and welcome amendments that would enable the court to determine whether an exemption to the mandatory family dispute resolution requirements under section 60I applies *prior to* accepting filing of a Part VII (Children) application.

We note however that self-representing parties, especially those who do not have the financial means to appoint legal representation, might be disadvantaged by these

amendments, owing to complexities in legal drafting such as particularising requests for exemption. We therefore call for further clarification of how this amendment will ensure equity in the parenting order process for parties who are self-representing and are financially disadvantaged or otherwise (e.g. poor literacy).

Amending the requirement to attend divorce hearings in person and delegations

We note that currently, the Family Law Act requires a sole applicant for divorce to attend the court hearing in person, where there is a child of the marriage under 18. This is in contrast to joint applications and undefended sole applications for divorce (where no children are involved) which can be made in chambers without parties attending a hearing. We note that amendments will allow the court to determine sole divorce applications (where there is a child of the marriage under 18) in the absence of parties.

We support these amendments and consider that it facilitates the easier participation of parties in rural or remote areas, for whom court attendance might be onerous.

Commonwealth Information Orders

We note that currently section 67N of the Family Law Act empowers the FCFCOA to make Commonwealth Information Orders (CIO) that compel a Commonwealth department or agency (commonly Services Australia and Medicare) to provide information concerning the location of a missing child. This includes any information held concerning actual or threatened violence to a narrow category of persons: the child, a parent or another person whom the child lives with. We consider that this

information can facilitate the court making further orders for the recovery of a child, or to allow for the service of a parenting application. We note further that the current provisions of the Family Law Act that govern CIO are unclear. Based on the current provisions, it is unclear whether violence related information must be provided in the absence of location information and whether other secrecy provisions apply, if it is not mandatory to provide violence information.

We note that the amendments clarify that violence related information must be provided even if a department or agency does not have location information, and that CIO obligations apply regardless of other laws that may prevent information disclosure. Importantly, we note that the proposed amendments also expand the category of persons that a department or agency may need to provide violence related information about under CIOs, if ordered to do so by the court. Specifically, the department is considering the inclusion of kinship relationships in the expanded category of persons under subsection 67N (8).

We support these amendments and consider it important that kinship relationships are included in the expanded category of persons under subsection 67N (8) to ensure the safety of Aboriginal and Torres Strait Islander children. We consider that including kinship ties within CIOs acknowledges the unique extended relationships that Aboriginal and Torres Strait Islander children share with adults in their community and ensures that these relationships are considered in relation to a child's safety and welfare. We note however that the sharing of such information should not place

individuals at risk of harm, and we call for further clarity regarding how any potential risk of harm will be mitigated.

Operation of section 69GA

We note that currently, section 69GA is intended to ensure that courts prescribed in the Family Law Regulations can exercise the same jurisdiction under Part VII of the Family Law Act as courts of summary jurisdiction. We note that this amendment seeks to clearly specify that a court that is prescribed in the Family Law Regulations for the purpose of section 69GA is invested with federal jurisdiction for matters arising under Part VII of the Family Law Act (other than section 60G). We support this amendment.

Schedule 4: General provisions

Costs orders

We note that currently, law relating to costs in family law proceedings is largely set out in section 117 of the Family Law Act, with a number of related provisions in the Family Law Rules. Separately, we also note that the law does not currently allow a court to make an order with respect to Independent Childrens Lawyer (ICL) costs against a party who has received legal aid, or who would suffer financial hardship if they had to bear a portion of those costs.

We agree with the amendments that would repeal and remake the cost provisions in new Part XIVC of the Family Law Act and incorporate further details that are presently confined to the Family Law Rules. We consider that these amendments will provide greater clarity about the scope and application of the courts' power to order costs,

assisting parties, including self-represented litigants and non-parties associated with family law matters, such as practitioners, to understand those powers. Further, we also agree with amendments that will allow courts the power to order parties to make reasonable contributions. We consider that doing so better provides for individuals in financial distress through the freeing up of resources that might have otherwise been provided to individuals in less financial distress. However, we express the need to further clarify how a "means-tested legal aid" scheme would operate, and consider that in operationalising such a scheme, a court should not make an order for parties to make contributions if doing so would cause financial hardship.

Clarification of inadmissibility provisions

We note that the amendments include changes to sections 10E, 10J, 10V and 70NEF of the Family Law Act to expressly state that "court" includes any court of the Commonwealth, a State or a Territory – whether exercising jurisdiction under the Family Law Act or any other law of the Commonwealth, a State or a Territory. We note further that section 67ZB (which concerns the liability of people who make allegations or suspect child abuse) would be similarly amended to clarify that evidence of the relevant notifications and disclosures related to child abuse and family violence would not be admissible in proceedings before any court, unless the evidence is given by the person who made the notification or disclosure.

We support these amendments and consider that these will clarify the Commonwealth's intent that evidence of anything said in these confidential contexts is inadmissible before *any* court – including State and Territory courts.

End notes

The national forum thanks the Attorney General's Department for the opportunity to provide this submission in response to the exposure draft. Please contact Priya Devendran, **Senior Policy Officer,** National **Family Violence Prevention and Legal Service Forum on** pdevendran@qifvls.com.au.