

19 August 2015

Local Government Rates Capping and Variation Framework Review
Essential Services Commission
Level 37, 2 Lonsdale Street
Melbourne VIC 3000



Email: localgovernment@esc.vic.gov.au

To whom it may concern

Australian Services Union Submission in Response to ESC *A Blueprint for Change* Draft Report

The Australian Services Union (ASU) Victorian and Tasmanian Authorities and Services Branch provides the following remarks as our submission in response to the ESC draft rate capping and variation framework report, titled *A Blueprint for Change*.

Summary

Generally the ASU is disappointed with many of the Commission's proposals. We are not satisfied that the Commission's proposed framework either delivers on the government's objective to deliver 'cost of living' relief to ratepayers, nor are we convinced the Commission's rate cap model will ensure some of the feared 'unintended consequences' of rate capping (namely service cuts, infrastructure cuts, job losses among others) will either be avoided or addressed in a timely fashion.

The ASU is opposed in principle to any form of rate capping and remains so committed. We ask that this submission be read in conjunction with our submission to the ESC Rates Capping and Variation Framework consultation paper and our comments made to the Victorian Legislative Council, Environment and Planning Committee inquiry into rate capping.

On the specifics of the rate cap and variation framework as espoused in the present report, we believe the framework:

- Lacks nuance, it offering a 'one-size-fits-all' cap that treats local government as if it lacked any difference from Council to Council
- Welcome the move away from a strictly CPI based rate cap
- The 60% CPI/40% WPI weighting in devising the yearly cap needs to be reassessed, with the labour component given greater representation
- We are opposed to the inclusion of the 'efficiency factor,' which lacks any real justification for inclusion in the rate cap framework
- We fear the rationale used to underpin some parts of the framework will lead to 'market testing' of services, followed by contracting-out and attendant jobs losses
- Note the rate cap won't cap all ratepayers rates
- Believe the variation process is too bureaucratic, and simultaneously unclear in important areas
- Believe the absence of 'triggers' in the variation process will lead to Councils neglecting their service/infrastructure obligations by failing to apply for a variation when one is reasonable and sensible
- Believe the variation process is far too reliant on individual judgement and less on reliable and predictable criteria on how the Commission will judge variation applications. This problem is exacerbated by the lack of an appeal mechanism

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union • Victorian and Tasmanian Authorities and Services Branch • ☎ 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

- Believe the monitoring framework will not prevent the ‘unintended’ consequences it was intended to stop.

These are some of our many concerns with rates capping in general, but with the framework designed by the Commission in particular.

Nevertheless we propose to address the Commission’s recommendations in the order in which they appear in the *Blueprint for Change* Report and offer the following remarks.

The Cap

The ASU believes the proposal for a single cap applying to all Victorian local government is a blunt instrument that does not recognise the diversity of Victoria’s 79 councils. It is a shame the Commission hasn’t decided to devise a differential cap that acknowledges this basic reality, especially given the ESC does acknowledge the diversity of local government in its *Blueprint for Change* report. The ASU does not believe a different cap applying to clearly categorised councils (e.g., small rural, large metropolitan, large regional etc) will in any way lead to confusion among ratepayers, since ratepayers will be aware in which category their own council is situated. Indeed it may serve an educative purpose for some ratepayers to discern why their council is treated different to others (viz., available revenue streams, demographic changes, demands for services and infrastructure and so on) thus going some way to demystify the rate setting process.

Moreover the cap as recommended takes a one-size fits all attitude that also serves to represent the cap as some type of ‘benchmark’ for appropriate rate rises. Ratepayers groups, tabloid journalists and others less informed will certainly take the Commission’s rate cap as a benchmark applicable to all councils. Considering the diversity of local government this is an absurd situation, yet one the Commission has created with its ‘one cap for all councils’ approach.

We believe that if a cap must be imposed a differential cap would seem to be a more sensible and nuanced approach that simply acknowledges the diversity of the sector. On this basis we reject the Commission’s recommendation number one.

In terms of which forms of revenue the cap will apply to, we draw the Commission’s attention to our principled opposition to any rate cap. However we perceive the potential for unexpected consequences to arise from the rationale employed by the Commission to exclude ‘service rates and charges’ from the cap. While we are supportive of the notion that this revenue source will not be subject to the rate cap, we are concerned that the Commission has decided to exempt it from the cap on the grounds that garbage collection services are market tested. Explicit in this is that so long as ‘market testing’ for garbage services happens the Commission will not apply the cap to service rates and charges.

The ASU is concerned by this reasoning on the ground that it implies that if a garbage collection service has not been ‘market tested’ a cap may be applied. This is especially concerning for workers where garbage collection services are provided direct by Council and are not subject to ‘market testing,’ as this recommendation may compel those Councils to ‘market test’ garbage in order to avoid ESC scrutiny. If this scenario were to occur we fear that a Council may be compelled to contract out their garbage collection services, thus costing jobs. Unfortunately this particular aspect of the Commission’s framework confirms some of the fears the ASU has harboured in respect to rate capping from its inception and which we expressed in our original submission to the ESC. Further we fear this may be the proverbial ‘tip of the iceberg’ with the Commission in future requiring Councils to test other services in the market. In this eventuality we would see a *de facto* reintroduction of the

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

failed Kennett government policy of Compulsory Competitive Tendering (CCT), one done so by stealth and one that does not reflect, in any conceivable way, the present government's policy.

In relation to the Commission's recommendation the cap apply to rates and charges paid by the average ratepayer the ASU believes the cap will not meet the government's objective of delivering a cap for all rate payers. In maintaining the cap will be applied to a 'typical' or 'average' ratepayer, the Commission is stating the cap will apply to a non-existent, statistical construct and not an actual ratepayer. Indeed the Commission itself concedes this point.¹

A cynic may say that this aspect of the cap confirms it, for many ratepayers, as a rate cap that doesn't cap rates.

The calculation of the cap is one of the most significant aspects of the framework. Again the Commission has departed from the government's election promise to cap rates at CPI and has instead proposed an amalgam of CPI + Wages Price Index (WPI), with a 60% CPI/40% WPI weighting. The ASU welcomes a loosening of a purely CPI based cap, but we note the universal position of the sector that CPI is not a measure of council costs. Unfortunately the Commission has not heeded this element of the sector's advocacy efforts.

The ASU is not convinced the 60%/40% breakdown of the cap accurately reflects most Councils' labour expenses. It may for some, or even on average (that fraught statistical fiction), but certainly not for all. We believe the inverse (60% labour – 40% other) is closer to reflecting the reality. A cursory glance at many Council budgets shows this to be the case. In addition, it is also true that labour costs under contracts duly entered into by a council are not captured in the 40% weighting. Therefore, if any weighting is to be allocated to labour costs within the cap, we believe the weighting must be far higher than the 40% currently proposed.

In addition we are concerned the ESC nomination of 40% for labour costs and nomination of WPI as a measure of those costs may lead to councils doing perverse things. Namely, we are concerned the setting of 40% for labour costs may be seen by Councils as a benchmark for the level of expenditure they are to allocate to labour in their budgets. While this may be reflective of the reality for some councils, others with larger service programmes and therefore larger workforces may be forced to compress their workforce to a level where it does constitute 40% of expenses, with the accompanying cuts to services. In addition, the choice of WPI may be used by Councils as some sort of benchmark for permissible wage increases. On this point we again draw the attention of the Commission to our remarks in our first submission regarding the bargaining process under the *Fair Work Act*. We are concerned the perception created by the use of WPI as a wage benchmark may lead to industrial disputation where a Council seeks to impose a WPI derived wage increase (judging by the cap model we believe Councils will offer sub-WPI pay offers) but the workforce does not agree to the offer. We believe that had Councils not been restrained from raising revenue and were able to bargain normally, the chances of industrial disputation may be more avoidable.

¹In light of these uncontrollable factors, we consider that the best option for the rate cap involves applying the rate cap to a 'typical' or 'average' ratepayer – although we recognise that there will be some or many ratepayers who experience higher and lower rate changes than this notional ratepayer.' *A Blueprint for Change*, p. 10.

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

However we are deeply troubled by the proposed 'efficiency factor' that will see the cap shrink over the course of several years. There is no cogent justification for this aspect of the cap. Nor is it going to provide any meaningful 'relief' for ratepayers, being as it is a .05% reduction on annual rates. However while the savings per ratepayer due to the efficiency factor will be miniscule, an inverse importance in terms of lost revenue will be felt by Councils with a corollary for services.

It is an inescapable reality that if the cap is set too low it will have deep and negative consequences for the entire local government workforce, the services they provide and the essential infrastructure and capital works programmes all Councils undertake. The ASU and many Councils have repeated this warning time and again yet the ESC appears impervious to these concerns.

Therefore on balance, while welcoming the move away from strict CPI, the ASU is not satisfied with the cap as set out in terms of weighting for labour costs, the choice of measure for labour cost may be more nuanced and the 'efficiency factor' serves no cogent purpose aside from yet another punitive stick to whack a Council and must be abandoned.

The Variation Process

In his introductory remarks to *A Blueprint for Change*, ESC Chair Dr Ron Ben-David writes that the rate cap and variation system must not be an 'edifice to bureaucratic elegance.'² Unfortunately the framework as currently set out appears to be the most elegant of bureaucratic edifice the ASU has seen.

There is far too much uncertainty around the variation process. The application process appears too bureaucratic and time consuming. The decisions to be made by the Commission seem far too subjective and based on the proclivities of the decision maker(s), not on solid and predictable criteria. Nor is nuance allowed in this system, seen in the lack of appeal mechanism or the up or down approval process with no ability for a Council to improve a variation application.

The Commission's expectations on things a Council must do prior to applying for a variation imply its passive involvement in the work of Council. True, the Commission will not summarily reject a Council's application for variation, but, we are led to believe, the likelihood of that variation being successful is dimmed if the hoops set for council by the Commission have not been satisfactorily navigated first.

The absence of 'triggers' for variations or cap exceptions is problematic, and the ASU is concerned at their total absence. To state the obvious, why should a Council have to 'justify' a rate increase when faced with post-disaster reconstruction? Or meeting the costs of a defined benefit superannuation shortfall? But a more nuanced concern is that where Councils choose not to apply for a rates variation, even where one is sensible and reasonably justified. As the Commission would be aware one of the shortfalls of the 'rate pegging' system in NSW is the reluctance of Councils to apply for a variation to increase rates, even where there is a fully justified case for doing so. There are several reasons for this: the system may be bureaucratic; Councils opt for the lazy option and simply live within the cap; or the decision to make a variation application is politicised. Regardless of the reason, failure to apply for a variation leaves the community worse off with crumbling infrastructure, inferior services and so on. Yet one means of remedying this problem is to have some mechanism in place that will either induce or compel a Council to apply for a variation if and when it is necessary.

But the Commission has decided not to include any trigger in the framework. This will mean Councils won't apply for a variation even where it is justified, not dissimilar to the circumstances in NSW. The

² *A Blueprint for Change*, p. iii.

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

ASU is especially concerned that in a local government election year, councillors – and the decision on whether a council applies for a variation will be a political one made by councillors, not an administrative one made by officers – will be extremely reluctant to apply for a rates variation lest they be seen as having failed to adequately manage their council budget, failing to living within the means of the false benchmark set for them by the Commission and it's state-wide, one-size fits all rate cap. And while the Commission asserts that its monitoring process will aid in the endeavour to avoid Councils doing these things, the reality is that no means of compelling Councils to apply for a rates variation is there, either in the framework or the *Local Government Act*. Thus, and with all due respect, the ASU believes the Commission's proposed safeguard in the form of the monitoring system, will be ineffectual, impotent and ignored by Councils. The only means to avoid this scenario, save scrapping the rate cap altogether, is to include a form of trigger to either compel or induce a council to apply for a variation.

On the issue of how a Council is to demonstrate the need for a variation to the Commission, the ASU believes the process is too cumbersome for Councils and interventionist on the part of the ESC. We note recommendation 7 that sets out 5 criteria a Council is to address in their rates variation application. But what we don't know is how the Commission will assess applications against these criteria.

This is where the ambiguity of the variation process sets in. It is not inconceivable the Commission refusing a rates variation if it isn't satisfied with the mode of service delivery as there appear to be no restrictions preventing it from doing so. For example, the ESC says: 'It would be helpful to submit business cases or cost-benefit analyses where higher rates are being proposed in order to fund the delivery of new or expanded services, or new infrastructure.'³ So if the Commission is not satisfied the business case supports a service being provided a particular way, there is nothing to prevent the Commission from refusing a rates variation. We do not suggest the Commission will act in this way – we merely make the point there is nothing to prevent it from doing so.

The Commission is also seeking Councils demonstrate they 'have considered reprioritising funding from other areas of expenditure; and the reasons for not proceeding with that reprioritisation (in part or in whole). The application will need to demonstrate that councils have whether other suitable funding or financing options have been considered and the decision (and reasoning) reached in relation to those options.'⁴

These requirements represent a form of intervention in Councils' business seemingly at odds with the Commission's stated claim that the rates cap system is not meant to interfere in the Council's decision making process or service delivery models and aims to maintain the autonomy of local government.⁵ How else, hypothetically speaking, can a decision of the ESC to refuse a rates variation on the grounds that the Commission is not satisfied with the reasoning behind the service delivery business case (or any other grounds for a rates variation) be interpreted?

What is certainly obvious is that the framework is not a simple 'tick and flick' exercise. It appears to be an intrusive and cumbersome process, a near forensic examination of Councils' budgeting decisions and service delivery priorities by an external body that will undermine the autonomy of

³ *A Blueprint for Change*, p. 21.

⁴ *A Blueprint for Change*, p. 21.

⁵ *A Blueprint for Change*, p. 24.

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● ☎ 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

local government. And how the Commission will be able to assess (potentially) up to 79 applications for a rates variation in a timely and well-considered manner remains an enduring mystery.

Underpinning our concern at the variation process is the near total reliance on the Commission exercising sound judgement. Essentially the Commission is saying ‘trust me’ when it comes to approving/rejecting applications for variation, taking it upon itself to ‘play God’ on whether a Council is able to respond to a pressing need in their community. A decision made by an obscure, unknown, unaccountable, bureaucratic arm of the Victorian public sector.

The framework does not provide for an appeal; does not provide for a Council to re-submit a variation application if it is refused by the Commission; and most concerning is the lack of clarity around how the Commission will make its decisions. We do not see any solid criteria in the framework that will ensure predictability in the way the Commission will conduct its assessments on whether to approve/refuse variation applications. Instead the ultimate decision on whether to approve/refuse a variation application will be a subjective one, coloured by the individual proclivities or biases of a Melbourne based, ESC bureaucrat.

In approving/rejecting variation applications the Commission’s recommendation is to simply hold yes or no powers on rates variation approvals, which is highly problematical. What if the ESC gets it wrong? What if the Commission denies an application unjustly? To expect a Council to spend ratepayers’ money overturning this decision in the courts⁶ is time consuming, costly and therefore impractical. Thus the inability for a Council to appeal a Commission decision, or at least re-submit a variation application, can leave a Council in budgetary limbo. Under such circumstances the potential repercussions on a Council could be devastating – it could force a council into significant debt; cost jobs; cost infrastructure. Nor is the ESC itself required to explain or justify its decisions on approving/rejecting a variation application.

Another scenario where we have little confidence in the variation process is the circumstance where the Commission determines a variation application may be justified in part, but not in whole. It is unclear how the Commission will treat such variation applications. To put it simply, if a Council applies for a variation, but the Commission is satisfied only two-thirds of the variation is ‘justifiable,’ will the Commission approve the variation or refuse? This again represents ambiguity in the framework that has the potential to leave Councils in significant difficulty as said Council can conceivably be forced onto the rate cap and the need that necessitated the rate variation will be left unmet.

From the ASU’s perspective, the system for approval of variations lacks detail, save taking the Commission’s decisions on trust which is a deeply flawed process. It seems to leave decisions on what is or is not an ‘acceptable’ rate increase to the amorphous subjectivity of an individual judgement, in this case the Commission’s. Put in other words, what a Council may see as an application satisfying the 5 point criteria required for a rate variation can be interpreted by someone else as failing to satisfy the same. Indeed changes in personnel at the Commission may see different outcomes for like or identical variation applications – thus presenting a lack of consistency in decisions. This is because it is up to an individual judgement on whether a rate variation ‘satisfies’ the 5 point criteria. It is not based on some exact, predictable, scientific formula so to speak.

⁶ This recourse for redress has been identified in *Local Government Rates Capping & Variation Framework Review: Draft Report Volume II – Supporting Material and Analysis*, pp. 79-80.

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

Even the ESC recognises some of the risks involved in these sort of judgement calls:

‘...some degree of judgement will unavoidably need to be exercised by the Commission when assessing how well an application meets those expectations.

‘In exercising that judgement, we must strike a balance between being too lenient and being too restrictive. Ratepayers would soon lose confidence in the framework’s capacity to promote discipline and transparency in the rate setting process if the Commission systematically erred in favour of councils. Conversely, an approach that consistently erred against councils could lead to perverse outcomes and communities could become disillusioned if their councils were prevented from providing sought after services.’⁷

So while the Commission intends to subject councils to scrutiny, it hasn’t applied the same degree of rigour and accountability to its own processes nor has it undertaken to justify its own actions, preferring to act as financial kingmaker (or breaker) for all 79 councils in Victoria.

Monitoring and Reporting

The Commission recommends a monitoring regime be put in place to oversee the rate cap framework. One of the arguments used to justify this is an effort to avoid the NSW scenario where councils don’t apply for variations so as to avoid the rate cap process:

‘One of the key concerns identified during our recent consultations, particularly by councils and peak bodies, was the risk that in order to avoid the variation process, councils may reduce their expenditures on services and critical infrastructure following the introduction of the framework. Many submissions cited the current financial and infrastructure challenges facing the local government sector in NSW as evidence of the potential impacts and unintended consequences of capping council rate revenue. We have heeded these warnings. We are confident that our proposed monitoring and reporting arrangements will promote transparency of, and accountability for, rate and service outcomes in Victoria by highlighting unexplained reduced performance.’⁸

Yet how this is supposed to compel a Council to deliver service/infrastructure if a Council chooses not to because of rate capping is unclear. The ESC seems to believe that its popularity and recognition in the community is such that all it need do is name and shame a council for cutting services in order for that council to rectify its mistake.

Nor does the monitoring and reporting component of the rate cap framework provide assurance that councils **will** apply for a variation when it is sensible and justified to do so. We have already discussed the absence of ‘triggers’ and further absence of any mechanism to induce or compel a council to apply for a variation.

On balance, the ASU believes the monitoring and reporting component of the framework – while well intended – lacks meaningful enforceability to correct wayward councils and will therefore not succeed.

Conclusion

⁷ *A Blueprint for Change*, p. 24.

⁸ *A Blueprint for Change*, p. 29.

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499

As you can see the ASU harbours many and varied concerns with the rate capping and variation framework as envisioned in the Commission's report. How these concerns are addressed is up to the Commission. We are not prepared to simply leave issues as significant as those canvassed in the *Blueprint for Change* draft report to a 'trust me' basis, which seems to be the preferred approach of the Commission. It is incumbent on the Commission to devise ways that will guarantee services and jobs will not be lost and infrastructure not neglected as a consequence of its framework. So far the framework has failed to allay the concerns of the ASU and our members.

Should you wish to discuss any matters in relation to this submission, please contact ASU research and policy officer Robert Bozinovski via 9342 3400.

Yours sincerely



RICHARD DUFFY
BRANCH SECRETARY

Authorised by ASU Branch Secretary, Richard Duffy

Australian Services Union ● Victorian and Tasmanian Authorities and Services Branch ● ☎ 1300 855 570

Branch Secretary

Richard Duffy

Branch Executive President

Lisa Darmanin

MELBOURNE OFFICE

PO Box 37 / 116 Queensberry St

Carlton South, Victoria 3053

Phone: (03) 9342 3400

HOBART OFFICE

265 Macquarie Street,

Hobart TAS 7000

Phone: (03) 6224 3411

CONTACT US:

Email: info@asuvictas.com.au

Web: www.asuvictas.com.au

ABN: 76 569 632 753

Member Contact Centre

1300 855 570

Toll Free: 1800 133 096

Fax: (03) 9342 3499