



4 February 2013

Mr Edward O'Donohue MLC
Chairperson
Scrutiny of Acts and Regulations Committee
Parliament House
Spring Street
East Melbourne VIC 3002

Dear Mr O'Donohue

Justice Legislation Amendment (Cancellation of Parole and Other Matters) Bill 2013

1. The Commission welcomes the opportunity to contribute to the Scrutiny of Acts and Regulations Committee's ('SARC') consideration of the Justice Legislation (Cancellation of Parole and Other Matters) Bill 2013 ('the Bill'). We invite SARC to make the Commission's submission available on the Committee's website.

Background and legislative framework

2. The Bill amends the *Corrections Act 1986* in relation to parole and the *Children Youth and Families Act 2005* ('CYFA') in relation to legal representation of children in family division proceedings.
3. The Commission was recently involved in court proceedings which considered the right of young people to legal representation in protection proceedings and the meaning of the phrase "mature enough to give instructions" in the CYFA and has particular concerns about the proposed amendments to legal representation eligibility.
4. The proposed amendments to the CYFA have the result that no child aged under 10 years will be legally represented in Children's Court family division matters unless the Court determines that there are "exceptional circumstances". In those cases, a child under 10 years old will be represented on a best interests basis (where the lawyer acts in accordance with what he or she considers is in the best interests of the child) regardless of the child's maturity and capacity to directly instruct a lawyer.
5. Family division matters deal with a variety of matters relating to the protection and care of children, including child protection proceedings that may remove children from their parents, or intervention orders relating to family violence. They frequently deal with allegations of physical, sexual or emotional abuse, or neglect. Orders in family division proceedings can have significant and long-term impacts on the children who are involved in the proceeding.
6. The proposed changes represent a significant shift from the legislation as it is currently drafted, which provides for a test based on maturity rather than purely chronological age.

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7. The Second Reading Speech to the Bill states that the matter of maturity “being a creature of practice rather than law” has resulted in uncertainty in the Children’s Court as to whether and how children should be legally represented and this uncertainty has created delay in the resolution of proceedings. The Statement of Compatibility states that a distinction for legal representation on a direct instructions model based on an age of 10 is more consistent with the timely and effective protection of children in their best interests than a rule based on contested evaluations of maturity. It refers to a general acceptance that children at around 11 years of age are better able to use logic and reason in abstract decision making, such as is required in the giving of legal instructions, and that contested evaluations of maturity have led to the proliferation of proceedings and delay, citing the Victorian Supreme Court decision of *A & B*.
8. In the current environment, contested evaluations of maturity do not appear to be an issue of significant occurrence. The *A & B* case is the first time that a decision as to whether a young person was mature enough to have legal representation on a direct instructions basis (as opposed to a best interests basis) has been reviewed by the Supreme Court.
9. The inclusion of a set age below which a young person will not be entitled to legal representation is out of step with the representation of children in protection proceedings in other Australian jurisdictions. While each state and territory law varies, each provides for the representation of children in court proceedings, generally on a direct instructions basis if they are mature enough to give instructions and on a best interests basis if not. For example, in South Australia, under the *Children’s Protection Act 1993* (SA) a child *must* be legally represented and if not capable of giving instructions will be represented on a best interests basis. Similarly, in Western Australia, the Court must order legal representation for a child on a direct instructions basis if the child is mature enough or otherwise on a best interests model.¹ In NSW, while the legislation includes a specified age (12 years old) below which a child will be considered incapable of giving instructions, it is a presumption that can be rebutted with evidence of the child’s maturity.² Where a child is incapable of giving instructions they are represented on a best interests basis and where capable on a direct instructions basis.
10. It is such a model that was recommended by the Protecting Victoria’s Vulnerable Children Inquiry Report in 2011. The Report concluded that legal representation for children was central to ensuring children are heard in proceedings that involve important decisions about their lives. It recommended that the CYFA should be amended so that a child under 10 is presumed not to be capable of providing instructions unless it is shown otherwise and a child over 10 is presumed to be capable unless it is shown otherwise. This recommendation would see all children have legal representation appropriate to their capacity, of which maturity would remain a central determinant.

Outline

11. Although it may be necessary for practical purposes to stipulate an age at which children are *presumed* to be capable of giving instructions, this should not preclude the Children’s Court from having the flexibility to decide that a child aged 10 years or less has the requisite maturity to instruct a lawyer.

¹ Children and Community Services Act 2004 (WA), s 148.

² *Children and Young Persons (Care and Protection) Act 1998* (NSW), ss 99-101.

12. By denying access to direct instructions legal representation for children under 10, and by limiting access to best interests legal representation for children under 10 to “exceptional circumstances”, the amendment limits the rights of children to protection in their best interests, the right to equality and the right to a fair hearing. These rights are protected in sections 17(2), 8(3) and 24 of the *Charter of Human Rights and Responsibilities Act 2006* (‘Charter’).
13. It is the Commission’s view that the Statement of Compatibility for the Bill does not adequately explain whether the Bill is compatible with human rights and how it is compatible. The Statement of Compatibility:
 - 13.1. takes a narrow view of the right of children to protection in their best interests in section 17(2) of the Charter that is not supported by Victorian and international jurisprudence and therefore reaches the conclusion that the right is not limited;
 - 13.2. does not adequately consider whether the right to a fair hearing (section 24 of the Charter) is limited, as the right of children to protection in their best interests affects the interpretation of what is required for a child to receive a fair hearing;
 - 13.3. does not address the right to equality (section 8 of the Charter), which is clearly limited by the Bill; and
 - 13.4. does not explain how the limitations on these rights are such reasonable limits as can be demonstrably justified, as is required by section 7(2) of the Charter.
14. That children should be able to participate and have their voices heard in legal proceedings and decision-making processes that affect their lives has long been recognised in Victorian legislation both in the CYFA and its predecessor the *Children and Young Persons Act 1989*. These amendments are contrary to the purpose of the legislation, which has so far aimed to enable the meaningful participation of children in proceedings that directly affect them.
15. The Commission is of the view that the amendments are not reasonable or demonstrably justified in accordance with section 7(2) of the Charter, which requires limitations on rights to be proportionate and the least restrictive means reasonably available to achieve the purpose that the limitation seeks to achieve.

Right of the child to protection in his or her best interests

16. Section 17(2) of the Charter provides that every child has the right, without discrimination, to such protection as is in his or her best interests and is needed by him or her by reason of being a child.
17. The Statement of Compatibility takes a limited view of the nature of the right in section 17(2) by not fully taking into account both the international human rights law on which the Victorian right is modelled and the best interests principle as it applies in Victoria and the CYFA itself.
18. The Commission would like to provide some further information about the application and scope of the right.

International law relevant to the interpretation of the right

19. International law is relevant to interpreting Victorian law (see section 32(2) of the Charter) and to determining the nature and scope of the human rights protected in the Charter (see *Momcilovic v The Queen* (2011) 245 CLR 1 at [18] (French CJ)).
20. The Explanatory Memorandum to the Charter explains that section 17(2) is based on Article 24(1) of the International Covenant on Civil and Political Rights ('ICCPR'), which provides:

Every child shall have without discrimination as to race, colour, sex, language, religion, national or social origin, property or birth, the right to such measures of protection as are required by his status as a minor, on the part of his family, society and the State.
21. Section 17(2) differs only from Article 24(1) of the ICCPR by its inclusion of the best interests principle. The best interests principle is enshrined in Article 3 of the Convention on the Rights of the Child ('CROC'), the primary international instrument on children's rights, which Australia ratified in 1990. Article 3 of the CROC states that the best interests of the child must be a primary consideration in all actions concerning children.
22. It is clear that the best interests of the child includes the protection and promotion of their human rights. The UN Committee on the Rights of the Child has stated that: "Every legislative, administrative and judicial body or institution is required to apply the best interests principle by systematically considering how children's rights and interests are or will be affected by their decisions and actions"³
23. It is also clear that the best interests of the child must be determined with reference to the individual circumstances of the particular child "such as the age, the level of maturity of the child, the presence or absence of parents, the child's environment and experiences."⁴
24. Importantly, the child's own views must also be taken into account in the determination of their best interests. For that reason – as outlined by the Victorian Supreme Court in *A & B v Children's Court of Victoria & Ors* [2012] VSC 589 ('A & B') – the UN Committee on the Rights of the Child has observed that the best interests of the child cannot be determined without allowing children the opportunity to be heard, as outlined in Article 12 of the CROC. Article 12(1) assures, to every child "capable of forming his or her own views, the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child." Article 12(2) states that, for this purpose, the child shall "in particular be afforded the right to be heard in any judicial or administrative proceedings affecting the child either directly, or through a representative or an appropriate body".
25. The UN Committee on the Rights of the Child has explained that Article 12 not only establishes a right in itself, but should also be considered in the interpretation and implementation of all other rights. It has observed that, because compliance with Article 12 facilitates the essential participation of children in all decisions affecting their lives, the objective of achieving the best

³ UN Committee on the Rights of the Child, General Comment No 5: General Measures of Implementation of the CROC (2003) at [12].

⁴ UN High Commissioner on Refugees Guidelines on Determining the Best Interests of the Child, May 2008, cited in *Neulinger v Switzerland* (2012) 54 EHRR 1087 at [52].

interests of the child cannot be met if the components of Article 12 are not respected and the child is not respected as a subject with his or her own views.⁵ That determining a child's own views in accordance with Article 12 of the CROC is an important part of determining the best interests of the child has also been recognised by the United Kingdom Supreme Court (see *ZH (Tanzania) v Home Secretary* [2011] 2 WLR 148 at [34]-[37]).

26. For these reasons, the Commission disagrees with the Statement of Compatibility in its assertion that Article 12 does not inform the determination of what is in the best interests of the child and is not relevant to ensuring the right of children in section 17(2) to such protection as is in his or her best interests.
27. The Commission also disagrees with the Statement when it says that Article 12 does not prescribe "any particular formula for providing the child with an 'opportunity to be heard' in the context of family division proceedings." Article 12 requires that a child be able to participate in proceedings to the extent of their wishes and capacity. In its General Comment on Article 12 (General Comment No 12, 2009), the UN Committee on the Rights of the Child explained that:
 - the phrase "capable of forming his or her own views" creates an obligation to assess the capacity of the child to form an autonomous opinion to the greatest extent possible;
 - the right of a child who is "capable of forming his or her own views" to express those views "freely" refers to the child's right to express their own perspective;
 - the requirement that a child's views be "must be given due weight in accordance with not just age but also maturity" means that age alone cannot determine the significance of and weight to be given to a child's views; and
 - where possible, the child must be given the opportunity to be heard directly in proceedings and where there is a representative, the child's views must be transmitted correctly to the decision maker by the representative.
28. The amendments make age the sole determinant of what weight should be given to a child's views. They remove the ability of the Court to assess the capacity of children under 10 to form their own views, and remove the opportunity of children under 10 to be heard directly in most instances. Contrary to the Statement's conclusion, the amendments are inconsistent with these Article 12 requirements.
29. The proposed amendments allow the Court in "exceptional circumstances" to determine it is in the best interests of a child aged under 10 to be legally represented and may adjourn the hearing to allow this to happen. In the exceptional cases in which this occurs, the amended provision would not allow children to be legally represented on a direct instructions basis. The right of a child who is capable of expressing his or her own views to express those views "freely" cannot be given effect by a lawyer presenting those views in a way that the lawyer considers to be in the child's best interests (as opposed to advocating for what the child wants). As observed by Garde J in *A & B* (at [97]-[99]), it has been recognised that best interests representation in a scheme that otherwise promotes the participation of children is a diminished form of legal

⁵ UN Committee on the Rights of the Child, *General Comment No 12: The right of the child to be heard* (2009) at [74] and [68].

representation and only appropriate where a child is assessed as not capable of instructing a lawyer or does not wish to do so.

Understanding of the best interests principle in Victoria and the CYFA

30. The principles of the CYFA itself are consistent with and promote this understanding of the best interests principle as it is recognised in international human rights law and comparative jurisdictions.
31. Section 10 of the CYFA, which sets out the best interests' principle, expressly recognises that: the protection of a child's rights is a component of the child's best interests; the best interests of the child must be determined with reference to the individual circumstances of the particular child including their age and maturity; and the child's own views must be taken into account in determining their best interests.
32. Section 10(2) states, "When determining whether a decision or action is in the best interests of the child, the need to protect the child from harm, to protect his or her rights and to promote his or her development (taking into account his or her age and stage of development) must always be considered."
33. The Supreme Court of Victoria decision in *A & B* highlighted the recognition in section 10(2) to have reference to each individual child's development as well as age in determining the child's best interests. Justice Garde held that whether a child was mature enough to give instructions required consideration of not just a child's age but also a child's "general maturity, capacity, insight and ability with language". In reaching this finding the Court relied on both the context and language of the CYFA and guidance from domestic authority and international jurisprudence, concluding that its interpretation was consistent with international law and with the best interests principles generally (see [100] and [108]).
34. Section 10(3)(d) provides that, in determining what decision to make or action to take in the best interests of the child, "consideration must be given to... the child's views and wishes, if they can be reasonably ascertained, and they should be given such weight as is appropriate in the circumstances."
35. If a child's views and wishes are to be considered and given due weight, a child's voice must be heard. In *Secretary to the Department of Human Services v Sanding* [2011] VSC] 42 ('*Sanding*'), Bell J recognised that the right of the child to be heard is part of the best interests principle recognised in section 10(3)(d) of the CYFA. Bell J held:

Ensuring that the voice of the child is heard is an important value. It is a best interest principle under the Children, Youth & Families Act that the child's views and wishes, if they can be ascertained, should be given appropriate weight (s 10(3)(d)). The court and the secretary must have regard to that principle in making decisions and taking actions under the Act. This is consistent with art 12 of the Convention on the Rights of the Child.
36. In *Sanding*, Bell J recognised that the CYFA ensured that the voice of the child was heard by facilitating the participation of children in proceedings (in section 522) and by enabling a child to obtain legal representation (in section 524) (see *Sanding* at [31]-[32], [187]).

The amendments to the CYFA limit the right in section 17(2) of the Charter

37. The right of a child in section 17(2) of the Charter to protection in their "best interests" recognises that children are vulnerable members of society and

require their best interests be taken into account in actions or decisions concerning them.

38. Understanding the best interests principle consistently with international human rights law and as it is expressed in the CYFA, it is clear that assessments of a child's capacity should not be based solely on age but on a child's maturity assessed on a case-by-case basis. Importantly, the child's own views must be taken into account in determining their best interests, which requires the effective participation of children in decisions that affect them.
39. By removing the entitlement of all children aged under 10 to instruct a lawyer to represent them in child protection and other family division proceedings, the amendment prevents children from effectively participating in such proceedings and thus limits their right to protection in their best interests.
40. The right of children to protection in their best interests requires the protection of their rights. As outlined below, the amendments limit the right to a fair hearing and right to equality and in so doing limit the right of children to protection in their best interests.
41. It is unclear what evidentiary base supports the conclusion in the Statement of Compatibility that the distinction based on maturity *"led to contested evaluations of maturity and Supreme Court litigation as to the meaning of maturity which prolonged resolution of protection proceedings (see A and B v Children's Court). Litigation on the matter of a child's maturity to give legal instructions had the potential to proliferate and delay proceedings."*
42. *A & B* is the only Supreme Court case the Commission is aware of which has involved consideration of the meaning of maturity and that case resulted in clarification as to the meaning of maturity. In that case the Supreme Court's review of the Children's Court finding as to the children's maturity did not delay the proceedings but was conducted and concluded before the date on which the Children's Court had listed the protection proceeding to come back before it.
43. The CYFA already recognises the possible harmful effect of delaying proceedings and guards against it. The best interests principle itself encourages the making of decisions without delay (section 10(3)(p)) and the adjournment powers of the court are limited for the same purpose (section 530(10)). Similarly, while section 524(2) currently states that 'the Court must adjourn the hearing of the proceeding to enable the child to obtain legal representation and, subject to sub-section (3), must not resume the hearing unless the child is legally represented,' sub-section (3) allows the court to resume a hearing without the child being legally represented if they have had a reasonable opportunity to obtain legal representation and have failed to do so.

The right to a fair hearing (Section 24(1))

44. The amendments clearly engage the right of children aged under 10 years to receive a fair hearing, which is protected by section 24(1) of the Charter. Section 24(1) relevantly provides that 'a party to a civil proceeding has the right to have the ... proceeding decided by a competent, independent and impartial court after a fair and public hearing.'
45. The Statement of Compatibility to the Bill concludes that the right is not limited because 'even assuming a child in a protection hearing is a 'party to a civil proceeding', the right in section 24(1) does not require a child to be represented directly, or at all in every case.'

46. In *Sanding*, Bell J held that a protection proceeding in the Children’s Court is a civil proceeding for the purposes of s 24(1) of the Charter, and children and their parents are parties.⁶ This conclusion was supported, in his view, by the provisions of Part 7.3 of the CYFA, which refer to the child, the child’s parents and ‘other parties’.⁷ That children and young people should be parties to protection proceedings was also supported in the Report of the Protecting Victoria’s Vulnerable Children Inquiry, which recommended that the CYFA be amended to formally give children the status of a party in child protection matters regardless of her or his age.
47. The right to a fair hearing requires a child who is party to a protection proceeding to be able to participate effectively. Although “what will be required to afford a fair hearing to a child in a protection proceeding will depend on the capacity of the child, the nature of the proceeding, the issues at stake and the circumstances of the case”,⁸ where children are parties to the proceeding, the right to a fair hearing requires the children’s views to be heard and considered.⁹ Read together with the rights of the child in section 17(2), the right of the child to be heard in proceedings that directly affect them requires maximizing their participation in decision-making.
48. Participation should not be limited simply due to the age of a child. Where a child has “sufficient maturity to be able to express a view about what should happen to them”, affording a fair hearing will ordinarily require a Court to hear and consider what the child has to say.¹⁰ A test that considers the maturity of a child as well as their age is necessary to determine whether a child has capacity to directly instruct a lawyer.
49. If the current Bill passes, children under the age of 10 will never be entitled to direct legal representation. Where – and only where – exceptional circumstances exist, they may be entitled to representation on a ‘best interests’ basis. Other jurisdictions have recognised that best interests representation is a diminished form of legal representation. The English Court of Appeal in *Mabon v Mabon*¹¹ highlighted the importance of preferring direct instructions representation over best interests representation in cases where children are mature enough to give instructions, as necessary to comply with CROC. A lawyer acting on a best interests basis will be acting “*in what he or she believes to be in the best interests of the child*”, which does not vindicate the child’s best interests in a way that recognises their rights and maximises their participation in decision making which affects them.
50. It is the Commission’s view that a fair hearing requires that where a child has sufficient maturity to give instructions they should be permitted direct instructions representation. This is the optimal manner in which children can have their views heard and considered in the proceeding.

Section 8(3): right to equality before the law

51. The Statement of Compatibility does not raise the right to equality even though the amendments clearly limit the right to equality by setting an arbitrary limitation on children under 10 to participate directly in family division proceedings. This provision amounts to discrimination on the basis of age and

⁶ *Secretary, Department of Human Services v Sanding* [2011] VSC 42 at [206].

⁷ *Ibid* at [198].

⁸ *Ibid* at [211].

⁹ *Ibid* at [211].

¹⁰ *Ibid* at [212].

¹¹ [2005] 3 WLR 460.

the Statement of Compatibility does not address how this limitation on the equality right in section 8(3) of the Charter is reasonable or justified in accordance with section 7(2) of the Charter.

52. Section 8(3) of the Charter provides that ‘every person is equal before the law and is entitled to the equal protection of the law without discrimination.’
53. Justice Bell has analysed the scope and application of the s 8(3) equality right in *Lifestyle Communities Ltd (No 3)*¹² and in *Patrick’s Case*.¹³ *Lifestyle Communities* and affirmed that the right to equal protection of the law without and against discrimination in section 8(3) protects from discrimination, and from laws that are discriminatory in nature.¹⁴
54. The Commission believes that compliance with the right requires decisions about maturity and opinions about whether a child is mature enough to instruct not be reached on an arbitrary basis such as reference only to their age. To replace the current requirement in the Act to consider the children’s age *and* maturity and any other relevant circumstances that may be relevant to their capacity to instruct, with a requirement that age alone determines such a capacity, is contrary to the right to equality and not in the best interests of the child.¹⁵

Are the limitations reasonable?

55. Since the Statement of Compatibility concludes that the rights are not limited, it was not necessary for it to consider whether the limitations on these rights are such reasonable limits as can be demonstrably justified, as is required by section 7(2) of the Charter. Under section 7(2) of the Charter, any limitation must be reasonable and demonstrably justified taking into account (a) the nature of the right, (b) the importance of the purpose of the limitation, (c) the nature and extent of the limitation, (d) the relationship between the limitation and its purpose and (e) any less restrictive means reasonably available to achieve the purpose that the limitation seeks to achieve.
56. For the reasons outlined above, the Commission is of the view that the Bill does limit rights, and therefore requires the Statement of Compatibility to consider whether the limitations are reasonable. The nature of the rights has been outlined above. The Statement does not fully address the nature of the proposed limitation, or the relationship with its purpose.
57. The Statement explains that the amendments are based on a “general acceptance” that children around 11 years of age are better able to provide legal instructions and the purpose of the amendments is to prevent the proliferation and delay of legal proceedings that resulted from the previous test based on maturity.¹⁶ What evidence this is based on is unclear. For many years the Children’s Court has been operating on a presumptive age of seven, in line with previous guidelines for legal practitioners that were endorsed by the President of the Children’s Court.¹⁷ The setting of a strict age-based distinction

¹² [2009] VCAT 1869.

¹³ [2011] VSC 327 at [42].

¹⁴ See *Lifestyle Communities Ltd (No 3) (Anti-Discrimination)* [2009] VCAT 1869 at [284]-[289] (emphasis added).

¹⁵ *Ibid* at [285]-[286].

¹⁶ “It is generally accepted that at around 11 years of age, a child is better able to use logic and reason in abstract decision-making, such as is required in the giving of legal instructions on sometimes complex issues. Prior to this age, abstract decision-making is limited.”

¹⁷ Akenson, L and Buchanan, L, *Guidelines for lawyers acting for children and young people in the Children’s Court* (Victoria Law Foundation, 1999).

is inconsistent with the *A & B* decision that identified the dangers of an assessment solely based on chronological age (see *A & B* at [105]).

58. The extent of the limitation on rights is made greater due to the fact that Victoria is the only Australian jurisdiction to provide that children who are not mature enough to give direct instructions should only be represented in “exceptional circumstances”.¹⁸
59. Even if the importance of the purpose of the limitation was established and its relationship to the limitation was explained, the fact that legislation in other States and Territories generally provides for children of sufficient maturity to be represented on a direct instructions basis, regardless of age, demonstrates that there are likely to be less restrictive means reasonably available to achieve the purpose the limitation seeks to achieve. For example, while the setting of an age to prompt the question of a child’s maturity to provide instructions is used in NSW,¹⁹ it is only a presumptive benchmark that can be rebutted with evidence of the child’s maturity.
60. The amendments to the legal representation provisions recommended by the *Protecting Victorian’s Vulnerable Children Inquiry* would also be less restrictive. Recommendation 53 of the Report of the Inquiry recommended that the CYFA should be amended to provide that:

A child named on a protection application should have the formal status of a party to the proceedings.

A child who is under 10 years of age is presumed not to be capable of providing instructions unless shown otherwise and a child who is 10 years and over is presumed capable of providing instructions unless shown otherwise;

A child who is not capable of providing instructions should be represented by an independent lawyer on a ‘best interests’ basis.

61. While there would be an age-based distinction regarding the entitlement to direct instructions representation, it would be rebuttable and all children would be assured of a form of representation on a direct representation model where mature enough and capable of providing instructions or otherwise on a best interests model. Such changes would be less restrictive on the rights of children and such an amendment would achieve the objective of the current proposed amendment to create certainty as how children should be legally represented
62. We recognise that the Committee does not have material before it that would provide evidence of whether the proposed limitations are reasonable and proportionate. We respectfully suggest that the Committee may benefit from requesting further information from the Minister about the purpose of the limitations and whether the amendments contained in the Bill are the least restrictive means of achieving this.
63. The Commission is of the view that the amendments are not consistent with section 7(2) of the Charter, which requires limitations on rights to be proportionate and the least restrictive means reasonably available to achieve the purpose that the limitation seeks to achieve.

¹⁸ See Victorian Law Reform Commission’s Report *Protection Applications in the Children’s Court: Final Report* 19, 324.

¹⁹ *Children and Young Persons (Care and Protection) Act 1998* (NSW) ss 99A-99D.

64. If the Committee would like further information regarding this letter, the relevant officer is welcome to contact Gudrun Dewey (Senior Legal Advisor) on 9032 3434 or Stephanie Cauchi (Senior Legal Advisor) on 9032 3408.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Karen Toohey', with a long, sweeping tail stroke extending downwards and to the right.

Karen Toohey
Acting Commissioner