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Justice Reinvestment Section
First Nations Justice Taskforce
Attorney-General's Department
3–5 National Circuit
BARTON ACT 2600

By email: justicereinvestment@ag.gov.au

National Justice Reinvestment Program Grants and Unit

I write to you on behalf of the Aboriginal Legal Service (NSW/ACT) Limited ('ALS') and thank you for the opportunity to provide a submission on the future of the National Justice Reinvestment Program and the independent National Justice Reinvestment Unit.

The ALS is a proud Aboriginal community-controlled organisation and the peak legal services provider to Aboriginal and Torres Strait Islander adults and children in NSW and the ACT. We currently undertake legal work in criminal law, care and protection law, and family law, and discrete areas of civil law. We also undertake broader work in law reform and wrap-around programs for community wellbeing.

The ALS welcomes the Government's \$81.5 million commitment to develop justice reinvestment ('JR') initiatives, including \$69 million over four years from 2022 - 2026 for place-based community-led reinvestment initiatives for up to 30 communities, and \$12.5 million over four years to establish an independent National Justice Reinvestment Unit to coordinate and support justice reinvestment initiatives at a national level. The ALS also welcomes the Government's investment in Alice Springs and Halls Creek in line with stated election commitments.

The ALS and justice reinvestment

The ALS has played a pivotal role in the development and growth of justice reinvestment in NSW, having auspiced Just Reinvest NSW and Maranguka in Bourke from its inception, both of which have now grown into standalone organisations.

The ALS's strategic priorities include platforming community voices in advocacy to reduce contact with the legal system, incarceration, interaction with the child protection system and deaths in custody. As part of this approach, the ALS is embedding a JR approach across all our operations, practices and policies.

Working with the lived experience and expertise within Aboriginal communities, the ALS JR approach involves listening to and supporting communities' ideas and solutions on initiatives that will reduce contact with the justice system. This early intervention and prevention approach includes looking at how our communities are treated and harmed by the police, through the courts, and within corrections. Law and order approaches, and the continuing legacy of historic and current systemic discrimination and racist policies and practices continue to drive Aboriginal and Torres Strait Islander people into the quicksand of the legal system with dire consequences. Aboriginal and Torres Strait Islander people continue to face barriers, blockages and harm in the child protection education, health, housing, and employment sectors. Governments must reckon with, address and redress the intergenerational trauma caused through the "justice" and related systems through a lens of community strength, cultural safety, community control and self-determination.

Priority issues for the ALS in relation to National JR

Our priorities in relation to justice reinvestment and the National JR Program and Unit are all aligned to the following over-arching principles:

1. ***Justice reinvestment approaches must be embedded within the existing Closing the Gap (CTG) framework and architecture.***

The National Agreement on CTG requires all levels of government including government initiatives, funding, and processes to work in genuine partnership with Aboriginal communities and organisations to make and sustain change. The CTG Priority Reforms set a framework under which Government has committed to work with organisations and communities to deliver on the socio-economic targets, including the justice targets. Justice reinvestment falls within this commitment and must therefore be embedded in this work.

2. ***National Aboriginal & Torres Strait Islander Legal Services (NATSILS) is integral***

The CTG Priority Reforms, and in particular, Priority Reform 2 (Building the Community Controlled Sector) make it clear that Aboriginal Community Controlled Organisations ('ACCOS') have a lead role in delivering sustainable, funded services to meet community need. As the peak for legal services for Aboriginal and Torres Strait Islander people in Australia, the role of NATSILS in justice reinvestment in Australia must be recognised and supported.

3. ***Justice reinvestment approaches and funding must be place-based and community-led. This involves working at community pace.***

The ALS currently sits on the AGD's Design Reference Group (DRG). The messages coming from the Aboriginal and Torres Strait Islander experts on the DRG are clear: program funding and delivery must not be rushed and needs to unfold at community pace. It is critical that Government adopt approaches consistent with the CTG Priority Reforms and listen to and act on communities' expertise on processes and outcomes.

4. ***Commonwealth and State/Territory collaboration is essential***

Governments must collaborate to determine and align their respective roles and processes across and between jurisdictions. This must include considerations of equity in funding across jurisdictions, commensurate with the Aboriginal population.

5. ***Reinvestment mechanisms must be developed***

Government must take the opportunity to develop financial mechanisms to ensure the costs saved through community-led initiatives are divested out of the harmful criminal justice system and reinvested back into communities to sustain self-determined change. Approaches must involve a genuine commitment to working differently - and must be developed in partnership with ACCOs.

Our responses to the specific JR Design Discussion Paper questions are annexed below. Should you wish to discuss our submission, please contact the ALS through our policy team on policy@alsnswact.org.au or (02) 9213 4100.

Yours sincerely

Karly Warner

CEO

Aboriginal Legal Service (NSW/ACT) Limited

ALS Submission to the National Justice Reinvestment Design Discussion Paper

Justice Reinvestment and Closing the Gap

The National Agreement on Closing the Gap (**'CTG'**) requires that all levels of government and government processes work in partnership with Aboriginal people to overcome the inequality experienced by Aboriginal and Torres Strait Islander people and achieve life outcomes equal to all Australians. These outcomes are articulated through socio-economic targets and priority reforms.

It is vital that the development and implementation of the National Justice Reinvestment Program and the independent National Justice Reinvestment Unit (**'National JR Program and Unit'**) are consistent with the targets, Priority Reforms, and overall objectives and outcomes of the CTG National Agreement.

Priority Reform 1 – formal partnerships and shared decision making

CTG Priority 1 outcomes mean that Aboriginal and Torres Strait Islander people are empowered to share decision-making authority with government to accelerate policy and place-based progress on CTG through formal partnership arrangements.

In NSW, the CTG formal partnership is constituted by the Aboriginal Justice Partnership (**'AJP'**), co-chaired by the ALS and the NSW Department of Communities and Justice (**'DCJ'**). At the National level, this formal partnership is constituted through the Justice Policy Partnership (**'JPP'**), which is co-chaired by National Aboriginal & Torres Strait Islander Legal Services (**'NATSILS'**).

The ALS submits that the implications of the overarching commitment to these formal partnerships under CTG means that the development and implementation of the National JR Program and Unit, as well as the accompanying decision-making processes should be executed through these existing partnership structures, where Aboriginal community voices and expertise are sharing decision-making with government.

Priority Reform 2 – building the Aboriginal community-controlled sector

CTG Priority Reform 2 is concerned with building the Aboriginal Community-Controlled sector and acknowledges that Aboriginal and Torres Strait Islander community-controlled services are better for Aboriginal and Torres Strait Islander people, achieve better results, employ more Aboriginal and Torres Strait Islander peoples, and are often preferred over mainstream services. This priority recognises the strength, expertise and right to self-determination by Aboriginal and Torres Strait Islander communities.

Priority 2 explicitly seeks to increase the amount of government funding for Aboriginal and Torres Strait Islander programs and services provided by Aboriginal and Torres Strait Islander community-controlled organisations (**'ACCOS'**). It also notes the need for sustained capacity building and investment, dedicated Aboriginal and Torres Strait Islander workforce, and dedicated, reliable and consistent funding.

The ALS submits that government commitment under this priority reform means, in practice, that the AGD should ensure that funds under the National JR Grant Program should be directed towards ACCOs to support JR initiatives with the communities that they work with.

Historically, a significant majority of expenditure on Indigenous specific funding has gone to mainstream service providers. the ALS recommends AGD quarantine a specific amount of funding for

ACCOs to support the National Agreement on CTG and in recognition that ACCOs are best placed to provide services and support work within their communities.

It is the ALS experience that larger organisations will often have greater capacity to submit high quality applications. This often favours large organisations in metropolitan areas and may not necessarily align with the greatest need. Measures should be put in place to bolster opportunities and incentivise ACCOs to make applications.

Specific consideration should also be given to how the grant application process can be improved to increase access to a diverse range of groups within Aboriginal and Torres Strait Islander communities. An equitable approach to funding distribution may require enhancing access, providing targeted assistance, and actively consulting these groups.

CTG Priority Reform 3 – transforming Government and embedding cultural safety

Priority Reform 3 calls on governments, their agencies, and institutions to be accountable for CTG including through the services they fund, and to be culturally safe and responsive to the needs of Aboriginal and Torres Strait Islander people.

Key elements of this priority reform involve Government delivering services in partnership with Aboriginal and Torres Strait Islander peoples and communities and increased accountability through transparent funding allocations. It also involves Government actively and purposefully transforming mainstream agencies and institutions to ensure they are culturally safe.

The ALS submits that the AGD must explicitly ensure that cultural safety and transparency are embedded in the development in the National JR Program and Unit.

We additionally refer to and endorse the Aboriginal Peak Organisations NT ‘Partnership Principles for working with Aboriginal organisations and communities in the Northern Territory’¹ as a positive, principles-based approach to guide transformative partnerships that support ACCOs. Embodying the spirit and substance of the UN Declaration on the Rights of Indigenous Peoples, these Principles were developed through an understanding that a fundamental shift is required in policy approaches towards Aboriginal communities and that a genuine commitment from Government is required to enable an environment that supports ACCOs.

CTG Priority Reform 4 – shared access to data and information at a regional level

Priority Reform 4 calls on government to enable access to, and capability to use locally relevant data and information.

Justice reinvestment, as is currently practised across Australia, has a focus on data-driven initiatives. However, we note that in practice, Government has lagged in fulfilling its commitment to provide communities with the level of place-based and state/Territory comparative data they have requested.

The ALS submits that the development and implementation of a National JR Program and Unit provides Government and the AGD with the opportunity to do better on data and work harder to realise communities’ access to their own data. It also provides the opportunity to genuinely commit

¹ See <https://www.amrric.org/wp-content/uploads/2019/12/21070504-APO-NT-Partnership-Principles-Updated-version.pdf> (viewed April 2023)

to Indigenous Data Sovereignty and Governance practices in JR locations. Support to build data sovereignty and governance capability should be considered, and could be explicitly tasked to, and monitored by, the JR Unit – providing the JR Unit itself is an ACCO.

Meeting Justice Targets 10, 11, 12 and 13

The National JR Program and Unit must include funding and roles that develop financial mechanisms to ensure the costs saved through community-led initiatives are divested out of the harmful criminal justice system and reinvested back into communities to sustain self-determined change. It is through this divestment and reinvestment that JR can play a role in increasing government and communities' ability to meet the CTG justice targets.

National Justice Reinvestment Program – Responses to JR Design Paper

What sort of activities should be funded through the National Justice Reinvestment Program?

Should funding be available to support governance, data collection and analysis, and other foundational and operational aspects of justice reinvestment, including through partnerships with organisations outside of the community?

The ALS is of the view that to properly account for different JR approaches determined at a community level, a principles-based approach to funding should be developed. This is preferable to an approach that looks like a list of eligible funded activities which risks becoming or being perceived as unnecessarily prescriptive and lead to communities excluding themselves from funding opportunities.

Ideally, these principles should be developed with ACCOs, and emerging Aboriginal community-led initiatives (short of ACCOs) who are well-placed to articulate those principles based on their experience and expertise in working with government and other funders to support local change initiatives to lower interactions with the justice systems. The range of activities for which funding is available needs to be flexible and dependent on communities' self-determined aspirations. We note that some organisations may require support to apply for funding, and the processes for grant applications should be adaptable and inclusive, noting in particular grassroots organisations' different technical capabilities.

Transparent funding accountability frameworks should be developed, so communities across Australia can easily understand where and how JR funding goes – and how communities can learn from each other.

Funding should be available for ACCO capacity and capability building, in recognition of the role that JR plays in contributing to CTG Priority Reform 2. Building the capability and capacity of ACCOs supports organisations' sustainability, future operations and ultimately, outcomes for communities. We note that too often, funding is available for programs and service delivery rather than, for example, staff leadership development, funding the implementation of tech solutions, training on evaluation and outcomes measurement, change management and succession planning. These are capabilities an organisation needs to be able to operate successfully, achieve outcomes for the communities they serve and be in a secure position to attract funding to sustain those outcomes into the future.

In relation to funding for particular activities, we make the following comments:

- The ALS generally supports the availability of funding for governance, data collection and analysis, and other foundational and operational activities.
- In the interests of scale and leveraging “whole of government” support for data across prospective JR sites, consideration should be given to allocating some of this responsibility to the JR Unit, provided the JR Unit is an ACCO and its data work is built on and supported by Indigenous Data Sovereignty principles.
- Funding should be available for ‘emerging’ initiatives that enable communities to explore novel or innovative approaches or initiatives.
- The allocation of funds for external consultancy work should be considered carefully. We suggest incorporating funding guidelines that require external consultancy to include components of local skills-growth and skills sharing with communities.

Should funding be able to be directed to a range of activities within a community?

As noted above, the ALS view is that funding must be flexible and consistent with principles of justice reinvestment being place-base and community-led. Decisions about the types of activities community wish to undertake should be determined by communities. This includes ensuring that funding criteria are sufficiently broad and inclusive.

Funding should consider a “staged” or “stepped” approach that reflects and is responsive to emerging community development of JR approaches. This could involve, for example:

- an initial grant of funding to support building local leadership and governance
- a subsequent grant to build data capability
- subsequent rounds of funding for projects that grow out of step 1 and could include community priority setting, funding for subject matter “working groups”.

How can the Government ensure the grants process is accessible to communities and organisations wanting to apply for justice reinvestment funding?

Funding and grants processes should be designed around core principles of accessibility and transparency, respecting that communities will come to this process with divergent needs and aspirations, and at varying paces. Being community-led, a justice reinvestment approach requires time to bring people and community together to pursue place-based change to address the complex drivers that lead Aboriginal people into harms of the justice systems. This requires time and forbearance to work at the pace determined by community. This means grants processes should:

- be flexible and not overly prescriptive in terms of funding rounds and cycles
- incorporate criteria and eligibility that are not overly complex and prohibitive. For example, funding should meet the needs of emergent structures of grassroots collectives or organisations so that they are not automatically excluded from potential funding opportunities because they are not incorporated entities.
- provide support to communities that do not have access to grant writing expertise. The independent JR Unit could provide assistance, or a “start-up” grant could provide grant application assistance. We note that the Foundation for Rural and Regional Renewal, in

collaboration with philanthropist Vincent Family Foundation (VFF) has expertise in this kind of grant making and could be a useful guide.

- be alert to the fact that costs for JR activities in remote communities are likely to be higher than in other areas. We recommend consideration be given to a remote “loading” so that more remote communities are not comparatively disadvantaged.

We note that the “readiness support” for potential JR applicants referred to in the Discussion Paper has only just recently been made available. While we endorse the readiness support being offered, we note that the availability of this support is not being widely publicised (it is not on the AGD’s website, for example). We also note that applications for readiness support close at the end of April. We reiterate our concerns about the pace at which this important initiative is being rolled out.

Are there particular processes you or your community have found challenging when looking to apply for grants or funding in the past?

The ALS receives funding from various government and non-government sources. The ALS’ key funding challenges include:

- insufficient funding to keep up with demand for services
- securing baseline funding and funding for core operating functions, which allow for foundational work and the ability to scale up and down as community needs shift
- funding insecurity inhibits long-term planning and budgeting
- short term funding
- mainstream services receiving funding to support Aboriginal communities without accompanying ACCO funding
- timeframes set by government to apply for some grants rounds are unrealistic and don’t account for the pace required to ensure applications are culturally safe and support self-determination
- tender and proposal submissions often require a level of detail that can be challenging to respond to given that short timeframes inhibit the necessary consultation processes
- time taken by officials to review and assess submissions can be long and inhibit planning and budgeting processes
- inflexibility of government to divert from approved Business Cases
- perception that decisions on some grant sources are pre-determined and/or determined politically
- onerous and burdensome reporting requirements, including lengthy reports at unreasonably frequent reporting intervals for multiple funding sources, can be inhibiting.

We understand that for some smaller ACCOs and grassroots organisations, challenges include:

- difficulties in writing complicated applications
- difficulties submitting online applications
- not having appropriate corporate structure to receive and administer funds
- difficulties competing with large (and largely non-ACCO) organisations that have increased grant writing and grant management resources
- onerous reporting that prohibits consideration of initiating applications.

Are there barriers to accessing government funding that could be removed, or supports or resources that would make the process for applying for funding more accessible?

Consistent with CTG priority reforms, funding for Aboriginal and Torres Strait Islander programs should be prioritised and/or quarantined for ACCOs. In some circumstances, consortium or partnership arrangements between ACCOs and non-ACCOs might also be appropriate. This will significantly assist smaller ACCOs who are not required to compete with larger mainstream organisations.

Barriers that could be removed and supports/resources to make it easier to access government funding could include:

- Less formal or tight criteria
- Consider inviting (and paying) community people from JR sites to help the Program set the criteria and how grant applications are assessed?
- Consider “oral” applications or “in person” conversations in community rather than written applications
- Consider a process of initial or “start-up” grants to assist communities get more detailed applications together
- Consider auspice arrangements for small grass-roots organisations that want to apply for funding.

Short term funding cycles should be removed to support the development of ACCOs and sustain community-led change. We note AGD promotional material indicates that beyond the initial 4-year funding commitment until 2026, the Government has committed \$20 million funding for National JR. The ALS suggests that this ongoing funding be made transparent and longer-term funding be provided.

Who should be involved in assessing applications for justice reinvestment funding?

For example, should the Government ensure representation from First Nations people and justice reinvestment practitioners in assessment panels?

Consistent with principles that inform the CTG priority reforms, the ALS view is that Government accountability on funding allocations needs to be transparent (CTG Priority Reform 3) and that Aboriginal and Torres Strait Islander communities can share decision-making authority with government.

The ALS generally supports a process whereby Aboriginal and Torres Strait Islander people with experience in community-led work are represented on funding assessment or oversight panels. If doing so, the AGD should consider remuneration for participating in panels or oversight committees, noting that this work can be onerous. However, we need to be wary of situations where community members are put in culturally unsafe situations in decision-making.

We are unclear about what is meant to by “justice reinvestment practitioners” in this context – but suggest the same considerations around avoiding situations where Aboriginal people are set up in judgement of their peers may not be culturally appropriate in some circumstances. We also need to avoid potential conflicts of interest whereby members of a particular community already funded to undertake JR approaches are assessing other communities seeking funds from the same source.

We note that assessing applications for justice reinvestment support and funding has already commenced through the recently announced “readiness support” package through the Justice

Reinvestment Network Australia, Jumbunna and Ninti partnership. While we support the intention to assist communities exploring justice reinvestment, we are concerned that this has happened so quickly, without opportunity for real input or feedback, and that the timeframes for applying for this support are so narrow. We are also concerned that this process has not been discussed with the AGD's First Nations Taskforce's Design Reference Group.

How should the success and development of justice reinvestment initiatives be measured?

Justice reinvestment is an ongoing process, and preparation for implementation takes time. In this context, how should the success and development of justice reinvestment initiatives be measured – particularly during the initial stages of implementation, or where limited data is available?

Measuring progress and success of JR initiatives is complex, not least of which because JR generally involves long term change and systems transformation that doesn't necessarily deliver outcomes within short term funding cycles. This does not mean that accountability should not be a feature of JR initiatives, actions and outcomes.

We submit that consistent with a community-led, self-determination approach, measures of success should be determined by communities themselves. This may involve support, possibly from the JR Unit, on developing bespoke monitoring, evaluation, and learning (MEL) frameworks, informed by local Indigenous Data Governance and Sovereignty principles, so that community, rather than government, can develop and monitor their progress and outcomes, and self-determine their successes or otherwise.

Government also needs to be accountable for their role in the success or otherwise of JR initiatives and in the divestment in the criminal justice system because of successes at a community level. This aspect of JR work also needs to be measured.

For example, a local JR initiative to lower the instances of child removal from family may involve significant service sector reform to achieve the desired community-led outcomes. In this kind of systems-change work, whether these outcomes are achieved should not rest solely with community, but accountability should also sit with Government which must bear responsibility for facilitating or getting in the way of community-led change. Where successes are achieved, measurable divestment and reinvestment should occur in a cyclical manner.

We make the following additional observations in relation to outcomes:

- Monitoring and evaluation are not a one-size fits all – and the National JR Unit may have a role in developing and supporting communities' MEL options.
- National JR provides an opportunity to bring in fresh approaches to MEL work. There is an increasing pool of First Nations evaluation experts who are developing more culturally appropriate measurement tools and platforms. These approaches should be prioritised.
- First Nations MEL expertise should be engaged and costs for these should not be borne solely by communities nor solely from the JR Program and Unit funds. Emerging partnerships between communities and government under various National and State Closing the Gap initiatives could be leveraged to bear the costs of new outcomes measurement mechanisms.

How can the National Justice Reinvestment Unit best support justice reinvestment in Australia?

For example, should the Unit's focus be on providing technical assistance and other support to communities engaged or interested in justice reinvestment, or should it also conduct research, and provide best practice advice and advocacy as a public body? Are there priority needs or gaps the Unit should address?

We suggest the focus of the Unit need not be limited to technical assistance and should have flexibility to enable it to explore and adapt to need as JR is further developed across Australia. We would welcome the opportunity to provide further input once alternative models are proposed.

Without having a fixed focus, we suggest the Unit may benefit from forming partnerships and collaborations with experts from the academic, philanthropic and corporate sectors. This may, depending on governance structures, extend to having a skills-based board constituted in part by this kind of expertise.

We consider the JR Unit could usefully support JR in the following ways:

- be a sounding board to support to community aspirations and assist with troubleshooting
- provide expert and technical support including supporting communities to obtain data
- undertake research on JR models and case studies in Australia and internationally to share with communities in the capacity of a JR clearing house
- take the lead in exploring and establishing “reinvestment” mechanisms – that is, develop funding mechanisms so that savings made by communities are given back (reinvested) to communities.
- bring JR communities together regularly and allocate dedicated funding for this purpose
- assist communities to broker cross-sector leadership support from government
- consider and develop ‘best practice’ guidelines
- assist communities with policy advice and policy positions
- work with justice sector ACCOs to support the case for legislative and policy reforms that will lower interactions with the criminal justice system
- assist with policy and advocacy for individual JR sites – or the “JR movement” collectively (with protocols developed on how this is done).
- organise and run training and professional development to facilitate skills transfer to communities to do policy and advocacy – ie build local capability and support local expertise.

What functions or services should the Unit provide?

The ALRC recommended the key purpose of the body should be to provide technical expertise in relation to justice reinvestment, assistance in developing justice reinvestment plans in local sites, and maintenance of a database of evidence-based justice reinvestment strategies.

Are there other important services or functions the Unit could provide? Are there any functions the Unit should not provide, or processes it should not be involved in, such as funding decisions?

Please refer to our response above for possible services or functions of the JR Unit.

We note that given justice policy and practice is generally situated in the domain of States and Territories, the Unit must be tasked with developing and maintaining strong partnerships across justice and justice-adjacent State, Territory, Local as well as Federal Government agencies.

Again, we note clear alignments and overlap with the National Agreement on CTG. We would welcome an approach that folded the National JR Program and Unit into the CTG partnership and co-governance processes and approaches.

The ALS submits that depending on the constituency of the Unit's governance, enabling the Unit to make funding decisions could be, or be perceived to entail, a conflict of interest. This would be unhelpful and may make people and communities distrustful of the Unit. Importantly, the Unit needs to be transparent, accountable and use funds efficiently to support communities to lead their change.

How should the Unit be structured and governed?

The ALRC recommended that the body be independent of government and overseen by a board with Aboriginal and Torres Strait Islander leadership. Key stakeholders have also suggested a variety of structures and governance arrangements with an emphasis on embedding First Nations leadership and expertise and ensuring independence. While the Unit will be independent of government, feedback is welcomed as to how it should be staffed, structured, and governed.

The ALS strongly supports the proposal for the JR Unit to be independent of government. Consistent with the CTG principles and priority reforms, the Unit could be embedded into an Aboriginal Community-Controlled Organisation or Aboriginal justice sector peak. We suggest that this question be deferred to the JPP, given the clear link to CTG targets on lowering incarceration.

We also note the recently constituted Design Reference Group (the DRG) and query whether there is an expanded role for the current DRG in guiding decisions in relation to structure and governance, or NATSILS at least.

Where should the Unit be located?

Should the Unit have a central location? If so, where should it be located to best support justice reinvestment in Australia? Should it maintain an office in a capital city for proximity to government departments and other national bodies, or in a regional area to promote close working relationships with regional and remote communities engaged in justice reinvestment?

The ALS does not have a view on where the Unit should be located. However, consistent with the principles and priority reforms under CTG, the Unit could be embedded into an ACCO or Aboriginal justice sector peak. This could be a decision that is deferred to the National Coalition of Peaks and the JPP, given the clear link to CTG targets on lowering incarceration.

We also note the recently constituted Design Reference Group (the DRG) and whether there is a role for the DRG in decision making.

The ALS welcomes the opportunity to discuss any matter raised in this submission. If you have any questions, please contact the ALS Policy team via email on policy@alsnswact.org.au.