

# TRANSCRIPT

## LEGISLATIVE COUNCIL LEGAL AND SOCIAL ISSUES COMMITTEE

### Inquiry into Victoria's Criminal Justice System

Melbourne—Friday, 5 November 2021

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Mr David Limbrick

Mr Edward O'Donohue

Mr Tim Quilty

Dr Samantha Ratnam

Ms Harriet Shing

Mr Lee Tarlamis

Ms Sheena Watt

**WITNESS** (*via videoconference*)

Ms Kathleen Maltzahn, Chief Executive Officer, Sexual Assault Services Victoria.

**The CHAIR:** Good morning, everyone, and welcome back. As I am sure you know, this is the Legal and Social Issues Committee's public hearing for our Inquiry into Victoria's Criminal Justice System.

We are very pleased to welcome Kathleen Maltzahn, who is the CEO of Sexual Assault Services Victoria.

Kathleen, could I just let you know that all evidence today is protected by parliamentary privilege, and that is under our *Constitution Act* but also under the Legislative Council standing orders. Therefore any information that you provide today is protected by law. You are protected against any action for what you say today during this hearing. However, if you were to repeat the same things outside this hearing, you may not have the same protection. Any deliberately false or misleading information provided to the committee could be considered a contempt of Parliament.

We are recording today via Hansard. They will provide you with a transcript in the coming days. I encourage you to have a look at that and make sure that we did not misunderstand you or mishear anything that you said. Ultimately that transcript will form part of our report and will also go up onto the committee's website.

Kathleen, we are really pleased with and we thank you for your submission and your significant recommendations within your submission. If you would like to make some opening remarks, then we will have a committee discussion. Thanks again.

**Ms MALTZAHN:** Thank you very much, and thank you to the committee for having me today. I want to start by acknowledging of course that I am on Wurundjeri ground, and I pay my respects to elders past and present, including anyone who might be watching today. I also want to acknowledge the fortitude, really, of survivors of sexual violence who have got us to this point where we are talking about it much more openly. Thank you again for inviting me to be here today.

I wanted to start by saying that I understand that the committee is looking really holistically at the criminal justice system but to say that we focused much more on survivors I guess being treated as offenders or potential offenders, in part because the Victorian Law Reform Commission of course is doing such a significant piece of reform work at the moment, and we have really intensively participated in that and are awaiting with interest their report. So I will focus today again, similarly, as with the submission, on the issue of survivors—not on the criminal justice system, in a sense—as witnesses.

In starting, let me just say briefly that Sexual Assault Services Victoria is the new peak body for, as the name suggests, sexual assault services across the state. We have 17 members. We were previously known as CASA Forum, and we see something in the order of 17 000 victim-survivors a year, including both people who have been recently assaulted and people who are coming to us in the context of historic sexual assault.

In terms of the focus of the committee, one of the things that we wanted to say very clearly is that although we often think of the criminal justice system as a place where victims come in relation to sexual violence and where perpetrators are held to account, it is really important to acknowledge that many, many—too many—victim-survivors are caught up in the court system as offenders and to really make the point that we frequently misunderstand trauma, distress and anger that have resulted from unattended trauma that flows from violence. We know the huge numbers of children who experience sexual violence, and adults, and for too long people have not got either a justice response or a therapeutic response. For too many people that then results in their behaviour, in a sense, being misconstrued as, I guess, intentionally wrong. So this submission is really wanting to look at that space.

So we really want to recommend that the committee have a focus on the significance of trauma and the way that drives behaviours. Now, that is not to say that whatever those behaviours are they are acceptable or reasonable or that they might not impact on other people and that there does not need to be accountability about that but to understand that if we deal with that trauma, we may lessen that behaviour, and that is better for that person and better of course for anyone their behaviour is impacting on. I am talking here broadly but not focusing here so much on violent crime, although recognising of course that this plays into violent crimes. So

we would like to see better education essentially of the various players in the criminal justice system on the way sexual violence is a driver of criminalisation and a better understanding that we are criminalising the stress and anger and trauma.

Partly to address that, we would like to see more work done in prisons, when people have already been sentenced and imprisoned, and we have two services that provide support in prisons, but only essentially in women's prisons. And we know, including through the royal commission into institutional child abuse, that there are many prisoners who are survivors of institutional child abuse, and we would like to see support for them in prisons expanded. But we would also like to keep people out of prisons. There are not diversionary programs that are specifically focused on survivors of sexual violence. We would like to see them, but we understand that if you have diversionary programs, you need a good therapeutic response built in, so we recommend that.

We want to say one thing just very briefly, which is summarising the submission: we know that many young people in the government's care experience sexual violence in a range of ways—from outside perpetrators, from other children et cetera—and if we could better deal with that, we would actually stop a lot of criminalisation and incarceration.

Finally, our services both work with people who have experienced sexual violence who display what we call harmful sexual behaviours. These may be offences but are not always. There is this very important program that recognises that children and young people essentially, when they display or use harmful sexual behaviour, are often responding—not always, but often—to violence that they have experienced and sometimes that they have seen, for example through pornography increasingly. We want a therapeutic response. There is a very good program that our services provide that works with those children and young people and their families as well as with the children that they use the behaviours against and maybe cause harm to. But like all the services we provide, they are really inadequate, in a sense, to cope with the volume. If we do that, we know that we will stop sexual offending into the future. So I just wanted to I guess summarise what we have said in writing, and then I would be very pleased to respond to any questions or thoughts that you have.

**The CHAIR:** Thank you, Kathleen. I appreciate the priority that you have put on prevention and that therapeutic response at that early stage. Certainly I have found one of the quotes in your submission:

... violence increases the risk and effects of imprisonment, and imprisonment increases the risk and effects of violence ...

We have heard so many times that the vast majority of women in prison are victims of crime and often victims of family violence and sexual assault. You talked about that terrific program from Fitzroy Legal Service and those extraordinary women who have made that happen. I am just wondering what that would look like when we add—you talked about how to keep victims of crime, specifically those survivors, out of the prison system. I wonder if you could just elaborate a little bit more. What would be the triggers? When someone is arrested how do we start those triggers and how do we start that process to prevent them from being remanded and enable them to be bailed at the very least?

**Ms MALTZAHN:** I should start by saying I am not a lawyer and we are not a legal service, so if I can talk about what we would like to see, I guess—

**The CHAIR:** Yes.

**Ms MALTZAHN:** we will work out how that fits with the current system. If I could just step forward I guess a little bit beyond the initial arrest period, at a minimum after sentencing or through sentencing at the moment some magistrates, the judicial officers, are very sort of attentive to the impacts of violence and will put a whole lot of things in place but they are quite constrained and the corrections process is very constrained. So often what happens is that people are sent off to a range of programs—they are told to work on their drugs and alcohol et cetera—but actually the foundational issue is trauma. And you have to be careful of course about mandating therapeutic processes. The problem at the moment is often the most traumatised people are the less likely to access services, and the reality is actually if you are trying to access services for historic violence—ours, for example—you will wait a long time in some cases, not always. So if we could have within the justice system capacity for people to access diversionary programs that include therapeutic access—it would have to be funded—that would make a difference. The Darebin/Fitzroy Legal Service is a model for that. But I think you would want to add on a sort of greater therapeutic component, and there is the CIS program and a whole lot

of models for this. But again they are often for people who have not offended very much, and we know that people who have offended more have often experienced violence.

In terms of just stopping people being remanded into prison, I do also feel that where police have a better sensitivity to violence they can recognise how harmful or not the person might be to community, and so moving away from that default position of, 'Here's a really bad person. He'—or she—'has got a really long criminal record potentially. Just put them in jail', and going, 'We understand now that this is symptomatic'. And again you see police going, 'Oh, okay. We've dealt with this person as a victim of crime through the institutional child abuse process. We're going to deal with them a bit differently'. But if the police do not get access to—and other people in the criminal justice system—training about the impacts of trauma, they cannot make those determinations and they just think, 'Oh, they're spinning a story'. So I think training at every point to allow people to use the discretion that is in the system would make a difference.

We often talk about trauma-informed approaches, and that can be very superficial. But really good training that does not deny the impact of harm that other people might be having but understands causal factors where there is impact on others, and then structured programs that move away from problematising the person's behaviour and saying, 'You have to have drug treatment' without linking them in with the therapeutic programs that address the reasons for their drug use, for example, would make a difference I think.

**The CHAIR:** I just have one quick question on the programs that you are running at Tarrengower and at Dame Phyllis. We have an extraordinary number of women on remand now—particularly at Dame Phyllis, not so much at Tarrengower. Are your programs accessible to anyone who is on remand or are they only for sentenced?

**Ms MALTZAHN:** They are definitely open to anyone who is incarcerated, so yes, definitely people on remand. And in fact this sort of creates this complication. For the vast, vast majority—I agree, women, but I actually think it is true for men when we look at the experiences of institutional child abuse, and we have not even scratched the surface around familial child abuse for men—of women and gender-diverse folk who are in women's prisons, yes, our services are absolutely available. But often what happens is, again, like all our services, while our funding has been increased over the recent years and we welcome that, it is not secure, predictable funding. It is year by year very often, and that includes at the moment in the prisons. So we do not have enough staff, it is difficult to attract staff when you can only offer a year-long salary, and so the people in women's prisons are on waiting lists even to see our services in prison. And sometimes we also get the dynamic where we start working with people and, particularly when they are on remand, they then leave and we do not have strong enough mechanisms to link them back in to continue.

**The CHAIR:** Yes, I think that was a very strong point in your submission. Thank you. I will go to Tania and then again Kaushaliya, then Sheena.

**Ms MAXWELL:** Thank you, Chair. Kathleen, thank you so much for joining us. I am going to ask a bit of a tricky question actually, and it is probably addressing the elephant in the room, if you like. What recommendations would you make to support victims of sexual assault to prevent them from becoming involved in the justice system? Because many of victims of sexual assault do not want to hear about the history of trauma that the perpetrator has experienced. We know that sexual assault is often a violent offence, and I have a lot of victims that say to me, 'I don't care about what they have been through'. How do we find the balance for that? How do we still support those victims who have not gone on to perpetrate or offend with the ones that have? It is something that is such a violation of a person's body, and often for those victims they cannot get past that or the background of the perpetrator. Where do we find that balance?

**Ms MALTZAHN:** I really agree. That is a really important question, and I should again say partly what I am talking about. I am not talking primarily about people who are committing sexual offences here, apart from when I am talking about children and young people; I am talking about the people who are being picked up driving without a licence again, for drug-related crimes again, for petty theft again. Now, that does not mean they might not also be perpetrating a range of violence, and this is where I really do think this gets very complex.

I think that we always have to prioritise the rights and wellbeing of the victim-survivor of sexual assault, and I do not think that any sexual assault survivor has to even put their mind to the situation of the perpetrator, still

less try to understand them. That is not their job, but as a community I guess we have a job, which is partly to understand—whether it is people who commit sexual violence or the other things that I am describing—that left unattended they will continue possibly to do things that cause a lot of harm. So we as a community, and I guess you as our lawmakers, have an opportunity—and as budget-setters to some extent—to try and intervene so that those people will change their behaviour. That does not mean that they should not be charged. It does not mean that they should not go to jail potentially—I mean, that is a debate.

None of this is about saying, ‘Oh, poor perpetrator of sexual violence. We’ll worry about them’. It is more about, I guess, this question of how we hold the line. I mean, I do think better recognition of the impact of sexual violence all around makes it better for victim-survivors, including, as you say, those people who do not offend. It is also very important when we talk about how unattended trauma can lead to criminalisation. To be really clear, that it is not to say that if you have experienced sexual violence you are going to turn into some sort of monster. Of course you are not, and the vast majority of people do not. We have to be really clear that the perpetration is not a result, in simple terms, of sexual violence and the only outcome. We know that very, very clearly.

**Ms MAXWELL:** Thank you, Kathleen. We talk about and you spoke about police being upskilled. I think what we have heard through our inquiry is that we are tending to place more and more responsibility on Victorian police officers, whereas I am wondering whether we should be improving the referral process to support services and ensuring that those support services are receiving those referrals, because we know that Victoria Police are trained to do a job. We have heard time and time again, particularly around family violence, they are not equipped to handle it. I should not say to handle it, but they do not have the background. They do not have the enormous amount of knowledge that is required to deal with something that is very delicate when you are dealing with victims, but also in how you are working with the perpetrator. But that is where those referrals are so important. Do you see that as an issue? We know in rural and regional areas the resources often do not exist or, as you said, Kathleen, there are enormous waitlists.

**Ms MALTZAHN:** Yes, absolutely. So if we are talking about just in our case victims of sexual violence being able to access services, we absolutely welcome and encourage processes and resourcing that allow that. As you say, almost all of our services—I think all of them—operate waitlists. They try and manage those waitlists. They do everything they can. If you survived a recent sexual assault, you will not wait, but other people will and our services make this impossible choice. It is a sort of Sophie’s choice dilemma of who you choose not to get a service. So absolutely, better referral systems, the police referring to us more quickly, and resourcing them and us to do that is important.

But I would say that in a sense anywhere around the justice system—police, courts, us, although not formally part of the justice system, or we are in terms of recent assaults—it is actually about not just the community sector services taking on the work, because the police do have a core role around sexual violence, the courts have a core role. If we all can do our job better, it will work better for victim-survivors and it will mean that we hold perpetrators to account. It will mean we can stop perpetration going ahead. So we really welcome strengthening of processes to have better referrals. For example, in the police code of practice on sexual assault, there is basically a protocol that we should be referred to pretty quickly after someone contacts the police after a recent sexual assault, and for a whole range of reasons that is inconsistently implemented. Certainly COVID has made that difficult because SOCITs, for example, are—it is just harder to train people. We cannot get them to come into our services so easily et cetera so we are seeing that is an issue. We absolutely welcome more referrals, recognising that we are not actually resourced to be able to see a lot more people at the moment.

**Ms MAXWELL:** Thanks, Kathleen.

**The CHAIR:** Kaushaliya.

**Ms VAGHELA:** Thanks, Chair. Thanks, Kathleen, for your submission and for your time today. My question is a follow-on question from the Chair’s question. She asked about funding. I have visited the Dame Phyllis Frost Centre to see firsthand what sorts of services are being provided because it falls within my constituency. What I would like to know from you, then, is if you can tell us a little bit more about the sexual and family violence counselling services you are funded to provide in Victorian prisons. And what sort of results have you seen through that program?

**Ms MALTZAHN:** Thank you for that question. We, as you say, operate at Dame Phyllis Frost and at Tarrengower, and we offer, as you say, a sort of a broader program. We mainly focus on sexual assault in our non-prison services, but as you say, we include family violence and respond to trauma in those programs. I could send you through the numbers. I do not think I have them in front of me.

One of the things that we find is that our services there—so they offer groups and they offer individual support—often do fill a lot of gaps. Because sometimes what is offered in the prison means that people often really fall through the gaps. Even things about helping people when they are exiting—sometimes those processes do not work well, and our workers often sort of step into the breach because they are there and they are hanging around. I mean that in a professional way—you know, they are in the lunch room and they can talk to people about what is happening.

So it is a combination of individual therapy and group-based therapy, and I guess it is tailored to work within the time frame the person has, which often is not necessarily known in the remand context. Also, at Dame Phyllis Frost, WestCASA, who are the service that work there, have been doing training with staff. Initially I think they were planning to do training that was really about helping staff understand and have a trauma-informed response—although I think that is a difficult thing to do in a prison context to some extent—but in fact they have ended up tailoring some of their training actually to be not technically about debriefing for staff but actually helping staff process some of the experience they have. Because where you have prison staff sometimes working in very complex settings, not necessarily well supported, and a system that frankly is not human rights based, not trauma informed, that falls on individual staff, who are often not well-equipped for that. So they have actually been doing some of that work, I guess in recognition that you cannot really ask other people, or it is difficult to expect other people, to be trauma informed if they do not feel the difficulties that they encounter in their work are adequately addressed. So that is a little of what we do.

**Ms VAGHELA:** Thank you. I am also interested in your experiences with young people, especially those who are in contact with the youth justice system. Can you tell us a little bit more about how sexual abuse and trauma affect young people involved in youth justice and what they need in terms of support?

**Ms MALTZAHN:** So almost all of our services work with young people, and we have three services that work exclusively with children and young people. So it is a very important part of our work. Something like a third at least of our clients overall are young people, often with their families as well, and that includes some young people involved in the criminal justice system.

I think one of the important things is understanding developmental impacts of sexual violence on children and young people, because they are obviously in some ways different from the impacts on adults, and recognising that, not exclusively but often, sexual violence and other child abuse involves both the violation of sexual violence and the betrayal of trust. Because most often the person who commits violence against children is someone known and trusted—and often loved. So these are very complex things for children to process, and they essentially cannot really process them by themselves. I guess even in the family setting that can be very difficult, but particularly so when children are in residential care and you are talking about that being a compounding experience along with what might have gone before.

So I think you often then see children and young people doing things that when we look on in an uninformed way we understand as being naughty or bad or defiant or criminal, and sometimes those children and young people may be harming other people—and you know, I am not shying away from that. We want to hold children and young people to account. But we also have to understand what causes behaviour, and too often it is family violence, sexual violence—and these two are overlapping categories of course. I think if we were able to, I mean of course prevent is probably what we would all like to do, but intervene early, and then if we had not got there quickly enough and even when it was early gave kids access to therapeutic services—and sometimes, for example, in the case of children who use harmful sexual behaviour, that will be within a very robust accountability process; in that context it is not support, it is an accountability process but one that attends to the trauma. So I am not sure if I answered your question—but yes, it is something that we do work with, and I do think that we could head off a whole lot of kids doing stuff that gets them into trouble if we understood why they were doing those things.

**Ms VAGHELA:** Yes. Thank you.

**The CHAIR:** Exactly. Absolutely. Thank you. Sheena?

**Ms WATT:** Thank you so very much for being with us today and for your work with our community. I am just in awe of folks like you and all the members of CASA and the work that they do. I have a particular question about the needs and differences between those survivors that have been criminalised versus other survivors. Can you tell me a little bit about the kinds of clients across your membership? You mentioned you are a peak body, that is right, so I am assuming ‘membership’ is the right way to refer to your members. So what proportion of your client base themselves have been criminalised versus those that have not? Have you got any evidence data on that fact that all?

**Ms MALTZAHN:** Look, I do not think we do. I mean, we could tell you our prison numbers versus outside prison—

**Ms WATT:** Good. That might be fine if you have got something like that, yes.

**Ms MALTZAHN:** Yes, I could definitely try and get those. I do not think we would record information actually about people’s status in terms of whether they were involved with the criminal justice system as offenders.

**Ms WATT:** Okay.

**Ms MALTZAHN:** I mean, I am sure that we would in case noting, but I think probably we would not in our system. I can check that. I would say, and this is more a sort of professional judgement than data based, my sense would be that the more people were in contact with the criminal justice system—leaving aside children and young people around harmful sexual behaviours—unless they were in prison, the less likely we might be to see them. Because I think when people are in that situation where they, you know, have got drug dependencies, maybe mental health issues, a whole lot of stuff that has resulted from trauma—not to say that trauma is the only reason you might have those experiences—accessing services is difficult, and where there is a waitlist it is even more difficult. I also think the model of the sort of weekly or fortnightly counselling for an hour works well for some people, for many people, but I actually think there is an argument for residential services like we have for drug and alcohol, like we have in prison—which essentially is residential—like we have for mental health, but actually focused around recovering from trauma, for things like sexual violence and family violence. That is a roundabout way to not quite answer your question, but I do think those people are less likely to access the mainstream service system. That might be slightly different in some areas, but it is a real consideration of mine about, in a sense, how well our model reaches people who are most traumatised.

**Ms WATT:** Does that exist though, that residential model? Or is that something you are hoping to—it makes sense when you think about it.

**Ms MALTZAHN:** Yes. Look, I think that if you have private health insurance you can access residential trauma programs. Some of the private clinics have had them. I am not sure under COVID, but of course the people who are most traumatised may be less likely to have the money to pay for that sort of thing. Of course, I think drug and alcohol services increasingly are trauma informed and for a very long time have addressed violence, and they understand that as a causal factor in drug use—and to a lesser extent in the mental health system. But there is no standalone or even hospital-based residential trauma-related program for sexual violence. There are some for veterans et cetera, not sexual violence. So yes, it would be a new thing or a reorientating of some of the things we already have.

**Ms WATT:** That is helpful. Thank you.

**The CHAIR:** Thank you. Kathleen, with the programs that you have been running—or CASA, your organisation, certainly has been running—in the prisons, has there been any evaluation going to recidivism or reoffending? Obviously we know that that spiral of imprisonment joined up with PTSD or other traumas does lead to offending. Is there any assessment that you have been able to break that cycle with these programs?

**Ms MALTZAHN:** Can I get back to you on that?

**The CHAIR:** Yes. That would be terrific.

**Ms MALTZAHN:** I know that our workers believe it makes a difference. I am not sure whether we have some evaluations. I will check.

**The CHAIR:** That would be great, because I think in some ways you are somewhat unique; even though I hear you loud and clear about the insecure funding, your program has actually been running for quite a number of years now, so there is that decade of experience. Tania, did you have a further question?

**Ms MAXWELL:** I do. Thank you, Chair. Kathleen, recommendation 9, which focuses on residential recovery programs, is something that I would certainly encourage the government to be looking at. Recommendation 12 talks about young people in government care. If we are looking at early intervention, it is not the earliest intervention by any means, but on this particular topic I think that we have to turn our residential care into therapeutic units. We know that young people, particularly in rural and regional areas, who are showing sexualised behaviours may go to Box Hill for a maximum of two weeks. They are often under DHHS, or DFFH as it is now, but there are so many gaps in that level of support—going from residential care to Box Hill to then being transported back to residential care. That ongoing therapy around sexual assault, whether they are the victim of sexual assault or they themselves are starting to show those concerning sexualised behaviours—how do you think that we can address that better? Because they are often the young people that go on to offend and that end up in our justice system, as you say. Apart from suggesting a therapeutic approach, what else do you think we can do to prevent that from happening?

**Ms MALTZAHN:** I should say this is where I am like, 'I've only been here four months and I still need to learn some things'. Some of my colleagues would be able to talk to you about this with, I guess, a broader context. I would say that in terms of the criminal justice system the therapeutic treatment orders that are not always required but can be used with children and young people using harmful sexual behaviours are a very powerful tool and a very complex and interesting mix of absolute accountability and then the processing to allow children and young people to understand their own behaviour, take responsibility for it and essentially—what the therapists say is—resume the sort of normal pathway of appropriate development of their age in terms of sexuality and other things. So that is interesting, because it is sort of therapy but it is broader than that. As a tool to use it is an important one, and there is not enough understanding about that. Similar work is done—I am talking here about children who might exhibit sexual behaviours—outside that context.

For children and young people who experience sexual violence who are in residential care, I do think there are still barriers, even to accessing that sort of specialist therapeutic support. I know it is always difficult when services just say, 'Give us more money', and we are not exactly saying that. I mean, of course we are. We have really appreciated it when we get additional top-up funding. They call it boost funding. Initially with George Pell that led to a lot of people coming forward—we got a boost of funding. But it is all for one year. We get it halfway through the year. It is very hard to put staff on. So there is a question both about how much funding—and all of our services could probably see three, four times the amount of people they do—and it is also the security of funding.

I think that when you are talking about complex systems, like the residential care system, child protection, criminal justice, when you have got all these intersections, you need more time and space to do that work. So, for example, just talking from our perspective, we do therapeutic work and we are not funded to do case management. Family violence is a different model, but there is a case management component and it can be really helpful in just making sure all those linkages work. We do it anyway, but the model we are funded for does not do that.

I do think that with, for example, kids in residential care, it is probably thinking about a case management component to be really making sure kids get that access to therapeutic care, which is not always possible for residential workers to do. I should say this is not my area of expertise; my colleagues will talk on this better. But, yes, I think if we were able to give more kids more access to the therapeutic work we do, actually that would make a difference for them. It is not going to fix everything, but it can make a big difference and arrest that behaviour that might lead them to being in the criminal justice system.

**Ms MAXWELL:** Thank you, Kathleen.

**The CHAIR:** Thank you. Now, we have got just a few minutes. So, Kaushaliya or Sheena, compelling questions?



**Ms WATT:** I have no further questions, Chair.

**The CHAIR:** Thanks, Sheena. Kaushaliya.

**Ms VAGHELA:** I do not have any further questions.

**The CHAIR:** Terrific. Right on time in that case. Kathleen, thank you so much for your time with us today, and thank you also for taking some of those queries on notice. We very much appreciate that. As I mentioned at the outset, you will receive a transcript of today. Please just make sure that we did not misunderstand you or mishear anything that you said. On behalf of the committee, thank you for the work your organisation does. I think it is absolutely crucial. We appreciate your submission and the very strong recommendations that you have made to us. The committee will come back live at 1 o'clock, but committee members, do not go away. Thank you, all.

**Ms MALTZAHN:** Thank you very much.

**Witness withdrew.**