

Submission to Infrastructure WA on the
Foundations for a Stronger Tomorrow: Draft State Infrastructure Strategy

15 September 2021

The Western Australian Council of Social Service Inc. (WACOSS) welcomes the opportunity to make a submission to Infrastructure WA on the *Foundations for a Stronger Tomorrow: Draft State Infrastructure Strategy* (Draft Strategy).

WACOSS is the peak body for the community services sector in Western Australia and works to create an inclusive, just and equitable society. We advocate for social and economic change to improve the wellbeing of Western Australians, and to strengthen the community services sector that supports them. WACOSS is part of a network consisting of National, State and Territory Councils of Social Service, who advance the interests of people on low incomes and those made vulnerable by the systems that have been put in place.

This submission seeks to provide feedback on the recommendations for particular sectors and cross-cutting themes, identify critical elements missing from the recommendations, and further information and evidence that support relevant recommendations.

Recognising Social Infrastructure as Infrastructure

One of the key positive aspects of the Draft Strategy is that it has taken an appropriately broad definition of infrastructure that includes social infrastructure as part of its consideration of strategic infrastructure planning and processes.

This is critical not only because to not include it would result in an incomplete understanding of the infrastructure needs of the state, but also because the provision of social infrastructure has a profound impact on the demand for various forms of physical and economic infrastructure. Further, it acts as a significant economic driver and is integral to the economic health and diversification of Western Australia.

It is important to recognise that our planning strategies and infrastructure investments are designed and intended to deliver social outcomes that build and enhance community. We seek to ensure our built spaces and public institutions are functional and useful for people, and their ultimate value depends on how they are used by local communities to enhance their productivity, connectedness, health and wellbeing. Hence effective physical and social infrastructure must be useable and our evaluation of its performance and value for money comes down to how is it actually used, and the civic outcomes that result. Ultimately form must follow function. Increasingly our efforts are seeking to create 'place' – physical locations whose meaning and social value are defined and endowed by what citizens make of them. A good place is at the heart of a great community.

We note that, while the importance of *creating place* (ensuring infrastructure delivers social value that creates, supports and enhances community) is spread throughout the strategy ... from the identified triple-bottom line to the strategy objectives (3 “Support access to social services and improve Aboriginal wellbeing,” and 5 “Maximise wellbeing and cultural strategic opportunities for community”) it is not clear how principles of community development are built into planning and design processes nor how social outcomes are evaluated with infrastructure users. The Vision Statement clearly identifies the aspiration that WA is “the place to be” in 2042 because of opportunities, standards of living and quality of life, and yet is not explicit in how we ensure that planning decisions are achieving that goal. Place and community are more than just ‘liveability and amenity’.

We recommend that community development objectives and outcomes are included in the Planning and coordination recommendations (p266-8)

The link between public infrastructure and public services that seek to deliver community value is particularly important, and there is a recognition that more thought and effort needs to be put into how we link inclusive places to our efforts to engage and uplift those citizens who are most vulnerable to social exclusion. More progressive local governments seek to take a community development approach to building civic infrastructure around their public institutions, and look to see how anchor institutions such as public libraries, civic offices and shopfronts are connected to social infrastructure and social services. Hence we see deliberate efforts to co-locate childcare and family services, emergency relief providers, support for seniors or people with a disability, community resource centres and neighbourhood centres, and cultural hubs for local Aboriginal and CALD communities. LGAs may partner with charities and not-for-profit services and offer subsidised rent, and jointly seek government and philanthropic funding. Best practice sees these community hubs co-designed with local communities to create age-friendly, child-friendly and just plain friendly places.

Building social infrastructure and investing in care work is not only a significant source of employment, but also supports those it provides services for to participate in the social and economic life of their community. A well-funded, resourced and accessible care sector can enable those who would otherwise be engaged in informal and unpaid care work within their families to access paid employment.

A sustained commitment to the care sector is fundamental to guaranteeing universal access to essential community services for all, regardless of people’s income or where they live. Universal access to services provides a strong basis for effective primary prevention and early intervention strategies, that can assist people before issues they are experiencing escalate or to direct them to more intensive support where it is needed.

Health care and social assistance is already one of the largest employing industry in Western Australia, but is also projected to grow faster than any other area of the economy over the next five years.¹ This growth is being driven in part by rapid growth in disability services as the National Disability Insurance Scheme is implemented across WA, but also as services develop to meet the

¹ State Training Board (2019) *Social Assistance and Allied Health Workforce Strategy*

needs of an aging population, and national and state health reform arrangements shift towards person-centred care.

“Sustained investment in care is not only vital to societies, it also provides an indispensable motor for economic growth and an antidote to the destructive impact of failed austerity policies” – Sharan Burrow, ITUC General Secretary

Research commissioned by the International Trade Union Confederation found that if Australia invested 2 per cent of its GDP in the care industry, it would directly create 356,812 new jobs and raise the employment rate by 2.3 per cent.² When both the indirect effects through the supply chain and the induced effects from increased demand within the economy are added, this sees the creation in Australia of 613,597 new jobs and a rise in the employment rate of 4 per cent.

In comparison, the same level of investment in construction only directly increase the employment rate by 0.5 per cent and by 2.5 per cent when indirect and induced effects are taken into account.

Investing in the care economy also has a profound impact on closing the gender employment gap, with the modelling showing that 79 per cent of the new jobs created by this level of investment would be taken by women, increasing the employment rate for women by 3.7 per cent and decreasing the gender gap by 2.6 per cent. This far outpaces what would be seen in the construction industry, where only 11 per cent of the jobs would be taken by women and their employment rate would rise by just 0.1 per cent.

We note that community services are currently not listed as part of the eight sectors identified in the draft strategy and recommend that community services is included as part of the broader care sector as identified using the ABS category of *Health and social assistance*. This is consistent with the outcomes of the Sustainable Health Review and recommendation 75 (*“Rebalance investment toward community-based services to reduce demand on hospitals...”* p279). It also maintains *Social and affordable housing* as a separate category that reflects the importance of housing as social infrastructure, while still mapping onto state social housing policy that seeks to ensure access to social housing is supported by wrap-around service provision to maintain tenancies and address barriers to participation.

We recommend that the care sector is identified using the ABS category of Health and social assistance.

As part of strategic infrastructure planning and processes, we must also consider the type of jobs that we are creating. Creating jobs through the development of social enterprise, for instance, has a dual impact. Social enterprise not only supports the growth of employment opportunities but also contributes to critical social impact outcomes. Social enterprises also offer meaningful opportunities for job-seekers experiencing disadvantage and vulnerability, which provides an additional layer of benefit for Government and for the community. However, supporting social enterprise development and establishing a social procurement strategy are critical to create this dual impact.³ Social Traders estimated in 2018 that for every \$100,000 dollars spent on social procurement (i.e. preferencing

² Jerome De Hanau, Susan Himmelweit, Zofia Tapniewska and Diane Perrons (2016) *Investing in the Care Economy: A gender analysis of employment stimulus in seven OECD countries*, UK Women’s Budget Group, International Trade Union Confederation

³ Impact Seed (2019), [The Role of Impact Investment in Achieving Our Priorities](#)

businesses who used social/disability/Aboriginal enterprises in their tenders for government contracts) 1.5 jobs are created for vulnerable and disadvantaged job-seekers in Victoria.⁴

To truly diversify and build a resilient economy, we need to reinstate and publicly support existing and new local manufacturing capacity and skills, and recognise the premium and benefit of localised, regional production through appropriate government support to support re-localisation. Worker-owned cooperatives are a critical part of this picture, creating quality, empowering jobs for community members, keeping profits remaining and circulating within the community, allowing employees to accumulate wealth through an ownership stake, and developing democratic, grassroots decision-making skills.⁵ The community wealth building approach, successfully implemented in places such as Cleveland and the Preston City Council area, provides a clear model for how community-shared ownership can create inclusive and sustainable economies.⁶

Digital Connectivity

It is welcome that the Draft Strategy recognises the challenges of the digital divide in Western Australia. While access to digital technology is increasingly essential to access government services and to participate in our community, digital access is not shared equally. Clear economic, social and geographical barriers and inequities persist.

Through consultation with our member organisations, WACOSS understands increasing gaps in digital access and literacy were made evident through COVID-19 restrictions and impacts. Across the state, public libraries, community resource centres and neighbourhood centres are serving as critical anchors for technology access but are being stretched to capacity with increasing numbers of people presenting with complex technology issues and needs. This includes an increasing number of people seeking assistance to access and complete government forms including G2G, Centrelink and vaccination bookings. Many voluntary community-based programs, initially intended to support seniors and other excluded groups to gain digital literacy, have been overwhelmed by demand from citizens who are seeking access to government services. This is a direct result of Digital Government and digital first policies that have seen all Government transactional services moved online and local and regional government shopfronts closing down. Unfortunately, those groups of citizens who are most vulnerable and most likely to rely on government services and supports are also those at greatest risk of digital exclusion, through lack of ability, access and affordability. We are hoping that the proposed [WA Digital Inclusion Blueprint](#) will address these issues.

We recommend that support for marginalised populations to access and navigate digital services, particularly government services online, is included in the Draft Strategy.

For children and young people in the midst of COVID lockdowns, having access to online learning and a safe place to study could make all the difference between thriving and increasing educational disadvantage. WACOSS understands that some primary school teachers were having to deliver hard copies of resources to families during lockdown and that not all families had the capacity to support young people with their remote education. While the crisis has seen a welcome boost to telehealth

⁴ Pro Bono Australia (2018), [Victoria Launches Australian-First Social Procurement Framework](#)

⁵ Democracy Collaborative, 'Worker Cooperatives', community-wealth.org/content/worker-cooperatives

⁶ Marjorie Kelly and Sarah McKinley, 'Cities Building Community Wealth' democracycollaborative.org/content/cities-building-community-wealth-executive-summary

services and online consultations, we also need to recognise limited access by some of our most vulnerable health users.

One in four Western Australian households in the lowest income quintile do not access the internet, compared to almost universal access for the highest quintile.⁷ 33.3 per cent of *100 Families WA* family members reported that they did not have and could not afford access to the internet at home.⁸ After housing costs, families in the lowest income quintile are typically committing around 3.7 per cent of their total expenditure to digital goods and services, while the third income quintile is committing around 3 per cent and the highest quintile around 2.5 per cent. Significantly, one in ten families in the lowest income quintile, are committing 10 per cent or more of their total expenditure towards digital products and services.⁹ The Bankwest Curtin Economics Centre (BCEC) has identified this as 'digital stress'.

Using this measure, BCEC determined that digital stress is most pronounced among single parents and single women, particularly those in rental accommodation. Around 17.4 per cent of single non-elderly female renters are in digital stress, along with 12.3 per cent of elderly single women and 12.2 per cent of single parents in rental housing.

As stated by the BCEC researchers, "WA's distance from other states, and levels of remoteness within WA make internet access a greater necessity for those living in WA, independent of income level." The cost of internet connection, however, means that only 74 per cent of those in the lowest income quintile and 78.6 per cent in the second quintile access the internet in WA. This compares to 99.2 per cent in the highest quintile. 91.8 per cent of the third and 93.6 per cent of the fourth quintile in Western Australia access the internet, demonstrating a clear income divide.

It is time we recognised that digital access has become an essential service within our society (like electricity and water) - and treat it as such. This requires introducing arrangements that ensure affordable and equitable access, including examining opportunities for concessions and hardship policies. Further, it is integral that we support and expand public access to digital infrastructure, including free Wi-Fi and terminals at public libraries, community resource and neighbourhood centres with adequate staffing and support to enable access to public services online. We also need a strategy to ensure that all social housing tenants have affordable access to digital connectivity, as part of the support we wrap around their tenancies to deliver better life outcomes.

An example of digital infrastructure that is being used to meet community need is the Community Organised Resource Exchange (CORE). Developed by WACOSS and its social enterprise DropIn Solutions, with funding from Lotterywest, CORE enables the sharing of resources between local businesses and not for profit sectors. The CORE portal allows businesses and charities to list resources for use of, and distribution by community based services and organisations, including food, material aid and logistics infrastructure.

As well as better coordinating and supporting the charity sector, CORE can lead to the more standardised distribution of resources. The platform will become a valuable tool when responding to

⁷ Steven Bond-Smith, Alan Duncan, Daniel Kiely, and Silvia Salaza (2018) [Falling Through the Net: The Digital Divide in Western Australia](#), Bankwest Curtin Economics Centre, Focus on Western Australia Report Series, No. 11

⁸ 100 Families WA Baseline Report

⁹ BCEC (2018) *Falling Through the Net*

climate emergencies or natural disasters where the need for resources to rebuild and sustain communities is much higher than supply.¹⁰

We recommend that online systems that enable access to and coordination of community services and emergency relief are recognised as social infrastructure and resourced appropriately.

Aboriginal cultural heritage, wellbeing and enterprise

Australia's unique cultural heritage as the home of the oldest continuing culture on the planet is increasingly being recognised as an important source of our communal identity and a way to embed deeper meaning, connection and history into place. Recent efforts, such as the development of Yagan Place – reconnecting Perth CBD and Northbridge and building a cultural heart and meeting place for the city – demonstrate the potential. We can learn from the success of our neighbours in Aotearoa, who have built brand New Zealand around Maori art and culture to create a sense of national pride and a unique adventure travel destination. We still have a long way to go in renaming and reclaiming place, with many of our landmarks still named after colonial leaders directly responsible for the massacres of our first nations people.

Building economic opportunities for Aboriginal people and for closing the gaps on social, economic and health outcomes and life opportunities must include investing in Aboriginal human services capability, with more community-owned local services providing direct support and assistance.

The State Government's Aboriginal Procurement Policy has quickly and significantly surpassed its mandated targets,¹¹ providing a strong basis to be more ambitious and expand beyond its original focus. There is untapped potential for delivering employment outcomes, improved service quality, trust and impact by focusing on the Aboriginal human services workforce.

The Department of Communities ACCO Strategy¹² has identified that procurement of services from ACCOs should be prioritised where there is over-representation of Aboriginal people in service need, significant under-use of services or much poorer outcomes. To put this into practice, a plan and resources are needed to build local capability and demonstrate progress against development targets.

Aboriginal community-controlled services already deliver a larger and increasing proportion of community services in other jurisdictions, particularly in service areas where there are a significant proportion of Aboriginal service users. This includes child safety and intensive family support; out of home care and family reunification; justice diversion and youth at risk services; mental health, alcohol and other drug services; health, education and aged care.

There is a strong and well-established Aboriginal community-controlled health sector in WA that has the capacity, the community reputation and trust, and the local governance structures to play a critical role in establishing or supporting new local community services. With support they could

¹⁰ [Community Organised Resource Exchange](#)

¹¹ Hon Ben Wyatt (2020) '[Government's Aboriginal procurement exceeding expectations](#)', *Media Statements*, Government of Western Australia

¹² Department of Communities, [Aboriginal Community Controlled Organisation Strategy to 2020](#)

establish local Aboriginal community services quickly and sustainably, leveraging established local infrastructure and their experience in training and supporting an Aboriginal workforce. Non-Aboriginal led community services have also committed to work in partnership with emerging ACCOs, and to step back and allow them to take responsibility and control.¹³

A critical aspect is the development of local place-based services that are responsive to local community needs; service procurement and commissioning mechanisms that are culturally safe and secure; contracting pathways that enable transfer of control over time to community-based providers; and investment into enabling Aboriginal services and workers to engage in service evaluation and contribute to regional service system planning and design.

We recommend that the Draft Strategy propose the development of an Aboriginal human services workforce development strategy including resources to build the capacity of Aboriginal Community Controlled Organisations to meet targets for public service delivery.

Climate change and sustainability

Climate change is the most significant and complex environmental challenge facing contemporary society. As noted by DWER, Western Australia is one of the most fire-prone regions in the world making it particularly vulnerable to the impact of increasing temperatures and drying conditions driven by climate change.¹⁴ Further, rising sea levels will continue to impact our coastal areas towns and cities, extended periods of drought will continue to contribute to our drying landscape, and WA will see increases in the frequency of other extreme weather events.¹⁵ It is critical that WA begin to make the transition to a cleaner, renewable and sustainable economy for all.

Poverty significantly increases peoples' susceptibility to poor health and wellbeing outcomes resulting from climate hazards such as heatwaves, droughts, floods, cyclones, and wildfires. Research conducted by the Centre for Urban Research at RMIT highlighted the significant risk posed to at-risk households by the increasing prevalence of extreme heat, particularly in our tropical northerly climactic regions. This research found that nearly 88 per cent of surveyed service providers were aware of people considered 'at-risk' from climate-related hazards accessing their services, reporting that they often opted to avoid using air conditioners, with half also not using fans due to electricity costs.¹⁶ Many of the service providers reported people experiencing adverse health impacts or declining mental health as a result of these conditions.¹⁷ Not only does poverty increase the risk of poor mental and physical health from climate impacts, these outcomes further undermine

¹³ WACOSS and the Noongar Family Safety and Wellbeing Council (2019) [Partnering with Aboriginal Community Controlled Organisations to deliver trusted services with stronger outcomes for Aboriginal people](#)

¹⁴ Department of Water and Environmental Regulation. (2019). [Climate change in Western Australia: Issues paper 2019](#).

¹⁵ Ibid.

¹⁶ Nicholls, L., McCann, H., Strengers, Y., & Bosomworth, K. (2017) [Heatwaves, homes and health: Why household vulnerability to extreme heat is an electricity policy issue](#).

¹⁷ Ibid.

individuals' income and asset position as well as their human capital, due to loss of productivity, employment, and education.¹⁸

It is overwhelmingly clear that those experiencing poverty are likely to be more vulnerable to the impact of climate change. With little to no access to resources, disposable income, choice, power and social connections, peoples' ability to cope, adapt and recover from these hazards is limited.¹⁹ The provision of information and knowledge is simply not enough. A challenge for WA in decarbonising our energy supply is in ensuring we have an equitable transition to renewable energy, where everyone is supported in addressing this global issue.

As the only state with rising carbon emissions, Western Australia clearly needs to do more to combat climate change. Australia is a signatory to the Paris Agreement to limit global warming to below two degrees Celsius and pursue a limit of 1.5 degrees above pre-industrial levels.²⁰ In order for Australia to meet its contribution to these targets, serious action must be taken to decarbonise our economy. This is a significant challenge for Western Australia, where emissions have *increased* by 23 per cent above the State's 2004 baseline.²¹

Research examining past transitions has shown that prolonging the lifetime of declining industries, instead of proactively supporting alternatives, can lead to high costs in the short, medium and long terms.²² This includes ongoing subsidies and financial support to these declining industries, increased costs for worker retraining and unemployment benefits, as well as higher health and environmental costs, and missed opportunities to diversify the economy. By acting early, and anticipating and addressing changes, better and more just outcomes can be achieved, not only for those on low incomes, but for all workers, consumers and communities.

If Western Australia is to be serious about its contribution to national and global emissions, it is critical that as part of its forward infrastructure planning, that new fossil fuel projects, including opening up new gas fields or expanding existing sites, are not supported in any capacity. While a just transition is necessary to safeguard the wellbeing of workers and local communities, and to ensure the reliability of our energy system, new fossil fuel proposals must have no role to play in that if we are to meet the challenges now facing us.

¹⁸ Islam, S. N., & Winkel, J. (2017) [Climate change and social inequality](#) (United Nations, Department of Economic and Social Affairs DESA Working Paper No. 152).

¹⁹ Intergovernmental Panel on Climate Change. (2007) [Climate change 2007: Impacts, adaptation and vulnerability](#).

²⁰ Australia is also a signatory to the United Nations Sustainable Development Goals, which include taking urgent action to combat climate change and its impacts.

²¹ Australian Government, Department of the Environment and Energy. (2019). [State and Territory Greenhouse Gas Inventories 2017](#).

²² Zinecker, A, Gass, P, Gerasimchuk, I, Jain, P, Moerenhout, T, Oharenko, Y, Suharsono, A.R. and Beaton, C (2018) Real People, Real Change – Strategies for just energy transitions. The International Institute for Sustainable Development.

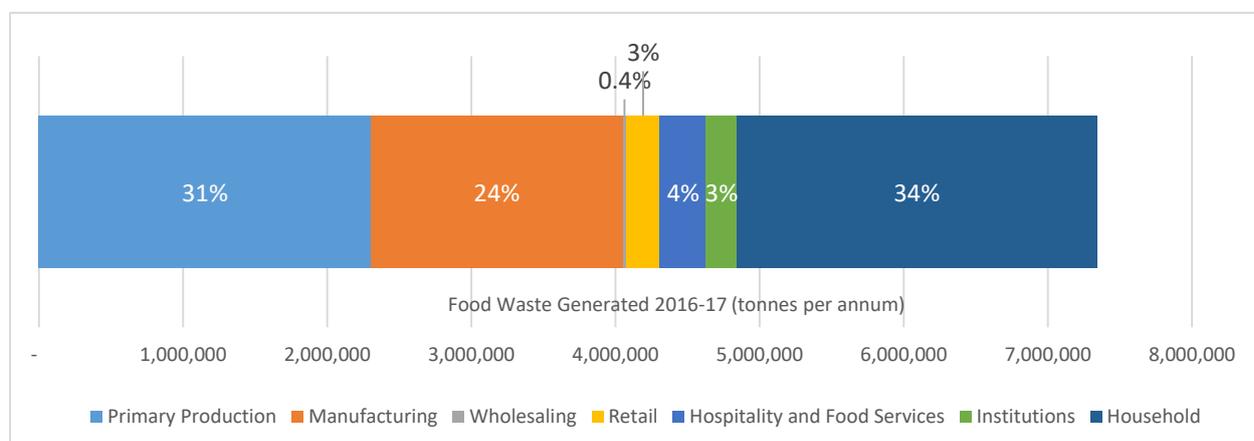
Waste

Another way in which Western Australia can take concrete action to lowering greenhouse gas emissions is by reducing food waste. The Intergovernmental Panel on Climate Change's (IPCC) *Climate Change and Land* report stressed the importance for reforming global food production systems amidst rising levels of food waste to reduce the amount of waste-related greenhouse gas emissions.²³ Each year, 7.3 million tonnes of food is wasted in Australia,²⁴ equating an estimated 298 kg per capita per year.²⁵ Once in landfill, food waste breaks down and emits greenhouse gases, including not only carbon dioxide (CO₂) but methane (CH₄), a greenhouse gas 28 times stronger than carbon dioxide.²⁶

The University of Tasmania's Institute for Sustainable Futures estimates that roughly 7.5 million tonnes of food waste represents a carbon dioxide equivalent (CO₂-e) of approximately 6.8 million tonnes.²⁷ Globally, the needless production, harvesting, transporting, and packaging of wasted food generates more than 3.3 billion metric tons of carbon dioxide.²⁸ As Australia ranks as the fourth highest food waster in the world (per capita),²⁹ it is critical that we align with global efforts to reduce food waste by half by 2030, thereby lowering greenhouse gas emissions.

There are multiple intervention points across the full food supply and consumption chain at which food waste can be reduced. This begins with reducing the surplus of food generated in primary production, accounting for 31 per cent of all food waste. Action at this stage not only diverts waste from land fill and reduces associated methane emissions, but saves the natural resources needed for production, packaging waste and transportation emissions.

National food waste generation by sector, 2016/17



Source: *National Food Waste Baseline (2019)*

²³ Intergovernmental Panel on Climate Change. (2019) [Climate change and land](#).

²⁴ ARCADIS (2019) [National Food Waste Baseline: Final Assessment Report](#).

²⁵ United Nations Environment Program (2021). [Food Waste Index Report 2021](#).

²⁶ Intergovernmental Panel on Climate Change (2019).

²⁷ University of Technology Sydney (UTS), Institute for Sustainable Futures for the Department of Sustainability, Environment, Water, Population and Communities (2011) [National Food Waste Assessment](#).

²⁸ United Nations Food and Agriculture Organisation (2013). [Food Wastage Footprint: Impacts on natural resources](#).

²⁹ Rabobank. (2019) [Financial Health Barometer Food Waste Infographic 2019](#).

As surplus food often filters into the food relief system,³⁰ interventions to rescue surplus produce at primary, manufacturing, wholesaling and retail points have the dual benefit of reducing food waste while increasing the availability of nutritious food for the food relief sector. Currently there is no visual data based tool that identifies opportunities for the social, commercial and Government sectors to rescue safe and nutritious food waste to efficiently redistribute it for emergency food relief. Such a project, however, is in development in Western Australia.

With sustained investment, Fair Food IT (FFIT) project partners will build an online map that for the first time that integrates food supply and demand data at a granular geographic level (Statistical Area 1, Australian Bureau of Statistics) across Western Australia (WA) to increase food security and significantly reduce food waste. FFIT will match demand and supply: the map will show visually the demand (location and volume of food needed) with the supply (where food is produced, processed, transformed, stored and transported), resulting in significant food waste reduction. The FFIT will be underpinned by the Food Stress Index³¹ with the potential to assist decision making for welfare policy, planning and service provision, in both emergency food relief and disaster preparedness and response.

According to the Foodbank Hunger Report 2020, food charities have seen a significant increase in the demand for food relief. In 2019, 15 per cent of Australians experiencing food insecurity were seeking food relief at least once a week. In 2020 this has more than doubled to 31 per cent.³² Although charities are seeing demand for food relief become more erratic and unpredictable, overall numbers are up by an average of 47 per cent. Regional and remote communities are a third more likely to experience food insecurity than those living in capital cities, and children are especially vulnerable.³³ Aboriginal people experience significantly higher levels of food insecurity, across both the metropolitan and regional and remote areas.³⁴

Strategies that address food waste could theoretically feed more people, as well as offset greenhouse gas emissions, save natural resources, energy, revenue, and labour.

Energy

Energy costs disproportionately impact households on the lowest incomes, as they spend a much higher percentage of their disposable income on energy bills and have little if any capacity to absorb additional costs.

³⁰ Western Australian Council of Social Service. (2019) [WA food relief framework report 2019](#).

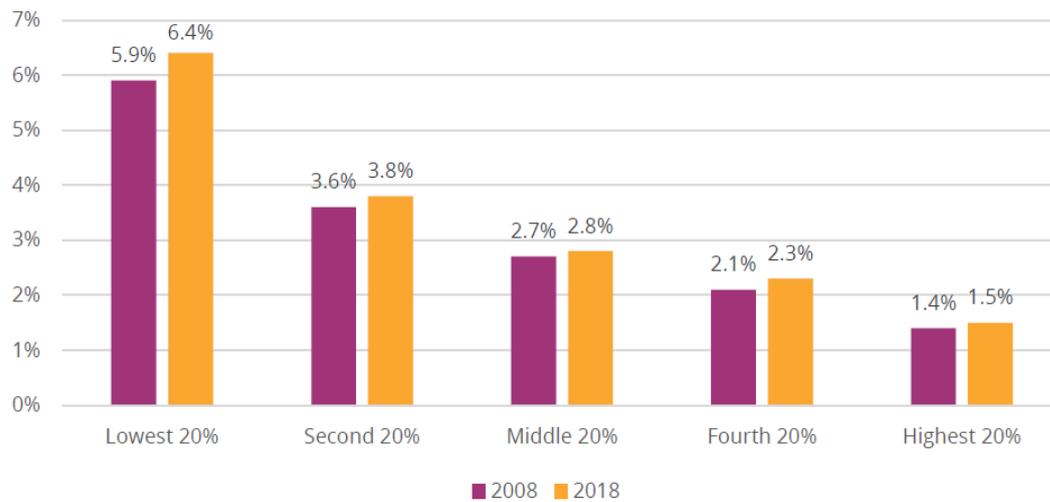
³¹ Landrigan TJ, Kerr DA, Dhaliwal SS, Pollard CM. (2018) Protocol for the Development of a Food Stress Index to Identify Households Most at Risk of Food Insecurity in Western Australia. *Int J Environ Res Public Health*,16(1):79. doi: 10.3390/ijerph16010079.

³² Foodbank (2020) [Foodbank Hunger Report 2020](#).

³³ Godrich, S., Lo, J., Davies, C., Darby, J. & Devine, A. (2017) 'Prevalence of socio-demographic predictors of food insecurity among regional and remote Western Australian children' *Australian and New Zealand Journal of Public Health*

³⁴ Lee, A., Ride, K. (2018). *Review of nutrition among Aboriginal and Torres Strait Islander people*. *Australian Indigenous Health Bulletin*, 18(1). <http://healthbulletin.org.au/articles/review-of-nutrition-among-aboriginal-and-torres-strait-islander-people>

**Electricity and gas expenditure as a percentage share of income
by disposable income quintiles (Australia-wide)**



Source: ACOSS and the Brotherhood of St Laurence (2018)

Home energy inefficiency is a key driver of utility stress and energy poverty for low-income households. Common causes of energy inefficiency are little or no insulation; inefficient or faulty built-in heating, cooling and hot water devices; significant draughts caused by structural problems, such as broken windows and window frames, collapsing roofs, and holes in flooring; and a lack of window coverings.³⁵

Households living in poor quality housing with inefficient appliances have limited capacity to reduce their exposure to extreme heat, and older households often underestimate their vulnerability to adverse health outcomes. Many aged pensioners put their health and life at risk in an effort to keep energy bills down, leading to poorer wellbeing outcomes and rising health care costs. Infants and young children growing up in poor quality housing face poorer health and higher rates of chronic illness that can have developmental and lifelong impacts. Inadequate housing ultimately costs us all more as a community, through the associated burden of chronic disease.

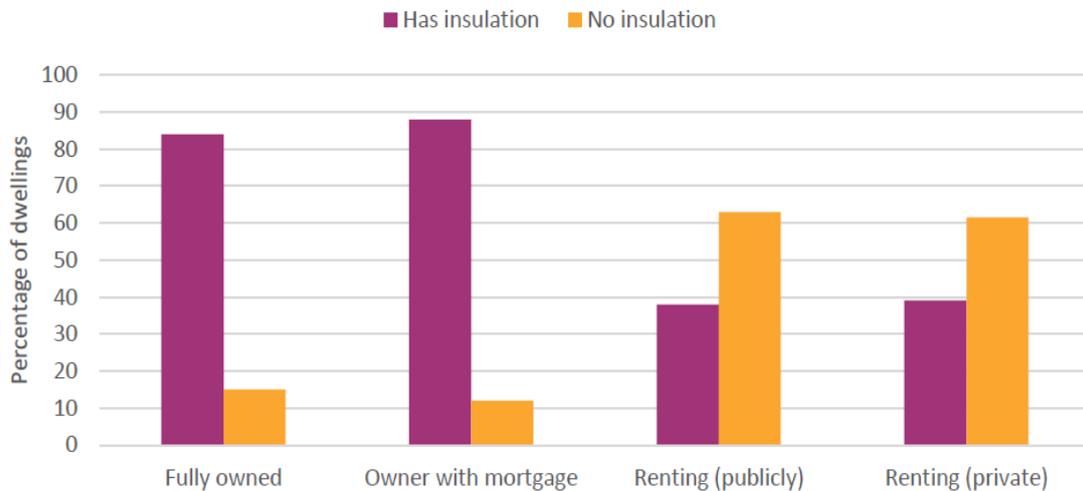
The Draft Strategy rightly recognises the importance of built environment energy efficiency and the clear benefits from accelerating transition to the National Construction Code 2022. Western Australia has also agreed to in principle the *Trajectory for Low Energy Buildings – Existing Buildings*, which includes the implementation of minimum energy efficiency standards for rental properties.

The 2016 Bankwest Curtin Economics Centre *Energy Poverty in Western Australia* survey found that rental households were dramatically less likely to be insulated, meaning that those on low incomes were more likely to be using more power to regulate the temperature in their dwelling.³⁶

³⁵ Make Renting Fair WA (2019) [Minimum Standards](#)

³⁶ Bankwest Curtin Economics Centre. (2016). [Energy Poverty in Western Australia: A Comparative Analysis of Drivers and Effects](#) (Research Report no. 2/16)

Percentage of dwellings with insulation in Perth 2009/10 (per cent)



Source: ABS. Cat. No. 4656-5, BCEC (2016) *Energy Poverty in Western Australia*

The Public Interest Advocacy Centre of New South Wales investigated residents who had been or were at risk of having their energy disconnected or water restricted, finding that renters were far more likely to be vulnerable to disconnection. 67 per cent of those who were disconnected, 60 per cent of those who were notified and 52 per cent of those who had been worried about disconnection were renting, compared with 32 per cent of all NSW residents.³⁷

The lack of insulation and other energy efficiency measures in rental properties is fundamentally the result of the 'split incentive', where tenants get the benefit of lower energy bills, while property owners are the ones responsible for paying for it, and are unlikely to see any immediate benefit. In competitive rental markets they may be able to charge higher rents or they may see an improvement to the value of the property when they sell, but neither is guaranteed. Hence why it is necessary to mandate standards for landlords to meet in order to be able to rent out their properties.

Empowering renters to make better choices about the properties they rent can be achieved through the mandatory disclosure of relevant information (for instance, as occurs in the ACT). However, in a tight rental market where renters may have limited options to choose from, improved information will not be sufficient to achieve tangible outcomes. As such, mandatory minimum standards need to be established to ensure tenants are able to access liveable, quality housing options (as are being progressively introduced in Victoria, Queensland and the ACT).

³⁷ PIAC (2018) *Close to the Edge*, <https://piac.asn.au/wp-content/uploads/2018/11/PIAC-CTTE-Consolidated-Report-FINAL.pdf>

Water

Western Australia has been at the leading edge of climate change impacts in relation to water supply, with significant decreases in rainfall impacting on dam water levels in the seventies and another step-change in the nineties.³⁸

Climate modelling by CSIRO predicts the southwest of WA will see further decreases in rainfall and run-off, further increasing our reliance on alternative water sources, and further increasing the energy intensity of that supply.³⁹ Water Corporation has over time developed renewable energy generation to power its services, including Exmouth and Broome bore-fields, Leonora and Beenyup wastewater treatment, wind and solar farms in Mumbida and Greenough River that directly power desalination. Water supply provides an excellent opportunity for the use of renewable technologies, as there is the opportunity to flexibly use solar and wind energy as it is generated for desalination, recycling and pumping and use existing water storage options to respond to changes in demand.

The rising energy intensity of water treatment and supply will drive rising water costs, potentially increasing the burden of cost recovery placed onto lower income households. Low-income households spend a greater proportion of their weekly budgets on utilities and so are disproportionately impacted by rising prices and at increased risk of water hardship. Further, they are less likely to have access to water efficient appliances and more likely to be living in poor quality housing with leaky water supplies. State government water and concessions policy needs to ensure the supply of water as an essential service needed for drinking, cooking, bathing and cleaning is fair and affordable for all.

Transport

The provision of public transport has rightly been a fundamental component of the current State Government's vision for Western Australia. In order to encourage people to increase their use of public transport for commuting, we must ensure that it is affordable and accessible for everyone in our community.

A lack of affordable, accessible transport was reported as a barrier to gaining employment by 17 per cent of the participants in the *100 Families WA* study.⁴⁰ To address this, free travel for those on lower incomes should be investigated. Smart urban design and inclusive zoning (as below) could see increased density of low-income affordable housing located around transport nodes re-visioned as community hubs, increasing access to employment and services for those most in need.

Currently, seniors card-holders are able to travel for free on public transport during off-peak times. This arrangement should be expanded to other people in our community with the greatest need for

³⁸ CSIRO (2009) *Surface water yields in south-west Western Australia. A report to the Australian Government from the CSIRO South-West Western Australia Sustainable Yields Project*. CSIRO Water for a Healthy Country Flagship, Australia. Department of Water WA (2009) *Streamflow trends in south-west Western Australia*. Surface water hydrology series Report no. HY32, Perth WA.

³⁹ Silberstein, R. P., Aryal, S. K., Durrant, J., Pearcey, M., Braccia, M., Charles, S. P., Boniecka, L., Hodgson, G. A., Bari, M. A., Viney, N. R., and McFarlane, D. J. (2012) *Climate change and runoff in southwestern Australia*, J. Hydrol., 475, 441–455. Zhang, X.S., Amirthanathan, G.E., Bari, M.A., Laugesen, R.M., Shin, D., Kent, D.M., MacDonald, A.M., Turner, M.E. and Tuteja, N.K. (2016). *How streamflow has changed across Australia since the 1950s: evidence from the network of hydrologic reference stations*. Hydrol. Earth Syst. Sci., 20, 3947–3965

⁴⁰ 100 Families WA Baseline Report

free travel, such as those experiencing unemployment and those eligible for the recently established Asylum Seeker Hub concession. While these people have access to concessions, they often have the least income to be able to cover the cost of transport and have a greater need for it to be free.

Transportation is also a major driver of rising carbon emissions, and WA is no exception. It has become imperative that people shift away from heavy polluting vehicles towards cleaner alternatives, including electric vehicles and public transportation.

Western Australia also needs to start transitioning its public bus fleet to be fully electric. Electric buses have lower emissions than diesel and natural gas buses, even where charged on grids that rely on coal or natural gas.⁴¹ This transition could provide an opportunity to reduce carbon emissions in the short term, while WA transitions towards a decarbonised electricity supply. Electric buses have already been deployed in China and a number of American cities, with California having set a target of operating an entirely emissions free bus fleet by 2040.

Social and affordable housing

Access to safe, secure and affordable shelter is essential for people to be able to fully engage in our community. Stable tenancies are crucial to support positive outcomes in areas like health and wellbeing, education and employment. Conversely, insecurity and instability in housing creates the circumstances for increased hardship and entrenched disadvantage.

Median rents in Perth have been increasing since the end of 2018, with 2020 seeing a sizeable uptick. At the same time, the rental vacancy rate has been in freefall since 2017. Adding to this pressure, the COVID crisis saw a significant number of Western Australians returning home in 2020.

Housing costs have a disproportionate impact on those living on the lowest incomes. An examination of the ABS Survey of Income and Housing data reveals the substantial increase in the cost to income ratio for households on the lowest incomes since 2011-12, while those on the highest saw their cost to income ratio decline since 2007-08.⁴²

The Draft Strategy correctly identifies investment in social and affordable housing across Western Australia as a priority. Social housing is an essential form of community infrastructure. It is not only integral in addressing market failure, homelessness, mental and physical health,⁴³ but investing in its construction creates employment and much needed economic activity. Direct public investment is the single most cost-effective way to scale up the number of social housing dwellings, boosting jobs

⁴¹ Union of Concerned Scientists (2018) '[Study Finds Electric Buses are Cleaner in All Parts of Country](#),' Press Release

⁴² ACOSS/UNSW Poverty and Inequality Partnership (2020) '[Poverty, Property and Place: A geographic analysis of poverty after housing costs in Australia](#)', City Futures Research Centre & the Social Policy Research Centre

⁴³ Lisa Wood et al (2016) 'What are the health, social and economic benefits of providing public housing support to formerly homeless people?', AHURI Final Report No 265, Australian Housing and Urban Research Institute

and income.⁴⁴ Every dollar invested into social housing boosts GDP by an estimated \$1.30.⁴⁵ Sustained investment by the State Government in growing the social housing stock is required.

A focus is also needed on ensuring access to affordable rental housing for low-income working households who are not able to qualify for social housing, but do not have the level and reliability of income to qualify for affordable home ownership programs.

The more of their income that households must dedicate to covering housing costs, the less they will be able to spend on other essentials like food, energy and health. Quite simply, unaffordable rental is a drag on our economy, whereas improving affordability would have a stimulus effect on local spending. Unaffordable rental can also mean that any slight increases in rent can have a dramatic impact on a household's ability to stay in a property and maintain the important connections they have established throughout their local community.

High rental returns also fuel the concentration of property in the hands of investors, pushing up the cost of owning a home, which both limits discretionary spending within the domestic economy and exposes it to the vagaries of the boom and bust cycle of property speculation. A more efficient and effective rental market capable of delivering affordable housing to all Western Australians would in turn support a more productive and inclusive society.

Through strategic land use and investment, the State Government can seek to address the failure of the market to provide housing that is affordable for low-income workers. By partnering with local governments and community housing providers, they can support models that secure long-term affordability outcomes that enable workers to live in and near the communities in which they work.

We recommend that the Draft Strategy propose partnerships between the State Government, local government and community housing organisations to develop low-income worker rental housing.

As part of the 2021-22 State Budget, the McGowan Government announced the largest one-off investment into social housing in Western Australia's history.⁴⁶ This investment acts as a circuit-breaker that halts the decline of social housing stock in our state. With access to trades and materials under considerable constraints as a result of the current construction boom, this package sensibly includes a focus on refurbishing existing properties to a liveable standard, spot purchasing and innovative methods for the delivery of housing stock.

In order to embed the delivery of social housing into our planning and infrastructure systems, it is also necessary to implement inclusionary zoning. Mandating the inclusion of affordable dwellings in any new residential development is a powerful and effective tool routinely used in other cities around the world with similar housing systems to deliver more social and affordable rental housing. It provides a cost effective mechanism for governments to meet their social housing targets by

⁴⁴ Julie Lawson, Hal Pawson, Laurence Troy, Ryan van den Nouweland, Carrie Hamilton (2018) Social housing as infrastructure: an investment pathway, AUHRI Final Report No 306, Australian Housing and Urban Research Institute

⁴⁵ KPMG (2012) [Social Housing Investment Review](#)

⁴⁶ Hon Mark McGowan MLA and Hon John Carey MLA (2021) ['\\$875 million to significantly boost social housing in WA.'](#) Media Statements

leveraging public investment in infrastructure and the private benefit generated when property values are uplifted by rezoning.

Since 2005, the South Australian Government has had a target of 15 per cent affordable housing for significant development sites. Though there have been some issues around the consistency of its enforcement, it has seen 17 per cent of total dwelling approvals in major new residential development areas from 2005 to 2015 being dedicated affordable homes, including social and affordable rental housing. In England and Scotland, the general expectation is for 20–40 per cent of new housing developments to be affordable housing, and in the United States, more than 500 cities have inclusionary planning schemes. New South Wales introduced voluntary planning incentives to increase affordable supply, but between 2009 and 2017 the affordable homes created by these incentives made up less than one per cent of Sydney’s housing supply.

Mandatory affordable housing requirements deliver a much higher proportion of affordable homes than voluntary schemes over the long term, with these requirements treated like any other planning obligations that need to be factored into development costs prior to land acquisition.⁴⁷ Applying inclusionary zoning rules to all developments as a matter of principle (as we see in other jurisdictions and developed economies worldwide) circumvents the current political barriers to the development of social housing often referred to as NIMBY-ism (not-in-my-back-yard). Imagined Futures, St Pats community support centre in Fremantle and WACOSS have partnered to re-imagine housing and promote a message in the south metro community that welcomes people into our neighbourhoods, saying “yes in my back yard.”⁴⁸

We recommend that the Draft Strategy propose that inclusionary zoning policies and targets for new developments be incorporated into the WA Planning Framework.

The Draft Strategy is also correct in identifying the need to accelerate the review of the Residential Tenancies Act 1987 to ensure provisions provide greater security of tenure for tenants, including facilitating engagement in longer-term leases.

The landlord/tenant relationship is an inherently inequitable one, but this is compounded by the disempowerment of renters under the current legislation. The limited protections and rights granted to renters are substantially undermined by the precedence yielded to the interests of landlords.

The current system creates a deeply paternalistic relationship, where one party to the arrangement exercises a degree of control over the personal life of the other party that is rare in commercial arrangements outside of the labour market. Landlords are able to dictate, amongst other things, whether a tenant has pets or not, how many pictures they can hang, how secure the property is, even whether the tenant can make minor energy efficiency improvements.

A meaningful rebalancing of the rights afforded under the *Residential Tenancies Act* is necessary in order to produce a fair and equitable rental system. With the numbers of renters growing, as well as the length of time people are likely to be in rental properties, it is essential that this relationship is

⁴⁷ Nicole Gurrán, Catherine Gilbert, Kenneth Gibb, Ryan van den Nouwelant, Amity James and Peter Phibbs (2018) ‘Supporting affordable housing supply: inclusionary planning in new and renewing communities’, *AHURI Final Report No. 297*, Australian Housing and Urban Research Institute

⁴⁸ Imagined Housing Project (2018). <https://stpats.com.au/imaginedhousing/>

reformed to be more in keeping with community standards and expectations about our right to be safe and secure at home.

Abolishing 'no-grounds' terminations is fundamental to creating a more equitable rental framework. While it remains possible for a tenant to be evicted without a demonstrable cause, the ability of tenants to exercise their rights is significantly diminished. As a result, this is one of the key reforms that needs to occur in order to support other much-needed improvement to the rights of renters as part of this review process. 'No-grounds' terminations should be replaced with a list of prescribed reasonable grounds for eviction, which would provide landlords with adequate rights and protections. It is crucial that this list is exhaustive and not too broad in scope, in order to also provide adequate protections for renters. The legislation must recognise that a tenant's basic right to shelter and security takes precedence over a landlord's discretion to terminate a lease.

Further, it is difficult for tenants to challenge increases in rent. This is both because tenants fear that landlords will mark their attempts to do so against them, potentially leading to their eviction, and due to asymmetry of information – market data is far more readily accessible for landlords and property managers than tenants.

Limiting rental increases, therefore, is absolutely essential. In the case of periodic tenancies, rental increases should be limited to no more frequently than two year intervals. In the case of fixed term tenancies, landlords should not be permitted to increase rent. Rental increases should be no more than the Consumer Price Index (CPI).

Discriminatory provisions in the *Residential Tenancies Act* also need to be removed to ensure that public housing tenants are entitled to the same rights and protections as renters in the private market.

As identified by the WA Equal Opportunity Commission, public housing tenants in many cases are "subject to a harsher regime than tenants in the private market."⁴⁹ The Commission notes the ways in which this is enabled by the RTA, with the use of section 75A in particular applying "a stricter standard to public housing tenants than non-public housing tenants." The Commission also notes that under section 75A, public housing tenants are denied the statutory protections to notice which other tenants are entitled to by the RTA.

With public housing tenants at significant risk of homelessness should they be evicted, it is manifestly unjust to subject them to such a punitive approach. Public housing tenants deserve the same level of basic rights and protections as any other renter, if not more as they may be navigating the system while dealing with the impacts of poverty, illness, trauma and other challenges.

We recommend accelerating reform of the Residential Tenancies Acts to provide greater fairness and security of tenure.

In conjunction with the recommendations above, a vacant residential property charge should be introduced to ensure the most efficient use of housing stock by discouraging investors and

⁴⁹ Equal Opportunity Commission (2013) *A Better Way*, www.eoc.wa.gov.au/docs/default-source/publications/Reports-and-reviews/a-better-way-report.pdf

developers leaving dwellings empty. This is particularly important during the current period of significantly high rental pressures.

In 2017, the Victorian State Government introduced a vacant residential property tax in the inner and middle ring of Melbourne to reduce the high number of houses and apartments being left vacant. Levied at a rate of 1 per cent of the property's capital improved value, it is anticipated the tax will raise \$80 million over the next four years.

The proposed Vacant Residential Property Tax would be levied on dwellings that are vacant for more than a total of 6 months in a calendar year, with exemptions for deceased estates, properties under renovation and those temporarily overseas.

We recommend the Draft Strategy propose the introduction of a Vacant Residential Property Tax.

Simply by virtue of owning significant swathes of land, rezoning decisions by government can generate unearned value and gains for already wealthy landowners and developers. As part of the 2021/22 Victorian Budget, the Andrews Labor Government has announced that it will introduce a windfall gains levy of up to 50 per cent for windfalls above \$500,000.⁵⁰ Creating a charge on changes in allowable land use that result in unearned windfall gains is an efficient and equitable revenue measure that should also be adopted in Western Australia.

We recommend the Draft Strategy propose the introduction of a windfall gains charge.

Health and social services

There is growing recognition of how health is intertwined with and shaped by a range of social, economic, cultural, and environmental factors. Our education, employment, and social support operate to either strengthen or undermine the health of communities. The connection between poverty and wellbeing is clear, with people living in higher socio-economic areas experiencing better morbidity and mortality rates than those from disadvantaged communities.

A deeper understanding of the social determinants of health requires a more nuanced approach to ensuring improved health outcomes, beyond biology, physiology and traditional medical models. Ensuring healthy lives and promoting wellbeing for people of all ages is crucial to creating inclusive communities. Elevated community health and resilience has far-reaching benefits for wider populations.

The recommendations of the State Government's *Sustainable Health Review* continue to provide the opportunity to shift our focus towards person-centred, community-based health services where people's health needs are responded to in the context of their whole lives. The *SHR* also has a heavy emphasis on prevention, which is supported by the community services sector. The Review's Final Report sets out directions for the WA health system that would see integrated systems delivering truly connected and consumer-centric care, with an emphasis on prevention and community care

⁵⁰ <https://www.premier.vic.gov.au/contributing-fair-share-stronger-victoria>

keeping people healthy. There are significant opportunities to deliver better health outcomes by strengthening the linkages and referral pathways between health services and other social services.

The review recommends introducing a community development approach that links people accessing primary care into their local community, based on the *Compassionate Frome Project* in the UK. The success of that project came about through supported connections that ensured that community services and community engagement opportunities were available and accessible to those in need.

The Sustainable Health Review also makes it clear that investing in mental health is critical to our ability to improve health, wellbeing and sustainability outcomes, acknowledging that our whole system requires sustained, holistic and transformational reform. Within the WA Government and the health and social services sectors, there is growing recognition of the need to partner to address complex factors that affect people’s health and wellbeing. This year, WACOSS has been working with the Information and System Performance Directorate from the Department of Health to map the alignment between the Sustainable Health Review’s strategies and recommendations with the WA Outcomes Measurement Framework, showing the importance of addressing the social determinants of health and wellbeing.



The WA Government’s 10-year Mental Health, Alcohol and Other Drugs Plan, based on modelled demand, indicates that the greatest increases must occur for community support and prevention. By investing in prevention and community support services, demand on the hospital system can be avoided, the social determinants of health can be better addressed, and earlier support can more easily be provided in those regional areas where clinical services are harder to deliver.

According to the WA Association of Mental Health (WAAMH), adaptive actions by WA's community mental health services have meant that people experiencing mental health issues have been cared for in their own homes, and stayed away from emergency departments. This reduced demand on critical services during the crisis, but meant demand for community-based services has soared, as new clients reach out for support due to increased anxiety and uncertainty due to the pandemic.⁵¹

WA's mental health system continues to direct the majority of spending to hospital beds and inpatient services, reinforcing old and expensive structures. We need a dramatic shift to prevent mental health issues from developing or worsening, and provide equitable access to holistic, recovery-focussed community support which keeps people living well in their own homes and jobs, connected to loved ones in the community (resulting in less admissions to hospitals).⁵²

Justice and public safety

As recognised in the Draft Strategy, continually investing in building and expanding prisons is highly inefficient and ineffective. Choosing to continually expand and build more prisons is both socially and economically irresponsible. WA needs to break away from the current approach, which is doing little to genuinely make communities safer, and focus instead on addressing the causes of crime through early intervention and prevention.

While some investment is necessary to ensure our prisons meet a humane standard that protect the basic rights and dignity of people being detained; in order to increase community safety, we must instead utilise diversion, rehabilitation, and community sentencing options that contribute to reductions in offending behaviour and are ultimately more cost effective.

This is also true for our state's continually expanding police force. These investments often take place in the absence of any evidence that they are needed or will be effective in ensuring community safety, and instead see a significant increase in pressure on both the courts and LegalAid, and the prison and corrections population. Increased policing increases the number of people entering the justice system; without necessarily preventing the underlying causes of crime.

The current approach to justice and community safety is leading to high rates of imprisonment and recidivism, and resulting in the overrepresentation of Aboriginal people in our justice system. In fact, the overrepresentation of Aboriginal and Torres Strait Islander people in the WA justice system is the most disproportionate rate of incarceration in the entire country, and one of the highest disproportionate rates of incarceration the world.

Instead, we need to take a Social Reinvestment Approach to justice. This kind of approach is evidence based, and responds to the underlying causes of offending, reducing both crime and costs, and supporting the social and economic development of disadvantaged communities. The social causes of crime are complex, and a one-size-fits-all approach does not work. Creating healthier families, safer communities, and implementing smart justice approaches requires both cross government and cross sector collaboration and reform; and empowered communities leading local solutions.⁵³

⁵¹ WAAMH (2020) [Crucial role of WA's mental health community support in spotlight as part of new campaign](#)

⁵² Ibid.

⁵³ Social Reinvestment WA (2021) [Raising the Minimum Age of Criminal Responsibility](#)

It is very welcome to see the recognition of the Olabud Doogethu Project⁵⁴ as an example in the Draft Strategy. Located in Halls Creek, is Social Reinvestment WA's first Justice Reinvestment trial site. Halls Creek has faced high rates of crime and significant community concern about the future of their youth. In response, Olabud Doogethu was formed - heeding to the knowledge and ideas of 11 Aboriginal communities (Balgo, Billiluna, Mulan, Nicholson Block, Red Hill, Ringer Soak, Warmun, Yardgee, Yiyili, Mardiwah Loop and Halls Creek). Designed by and employing Aboriginal people, this initiative aims to build community capacity and leadership by reducing juvenile offences and supporting families, achieving a brighter future for the next generation in Halls Creek. It is backed by Social Reinvestment WA, Department of Youth and Community Development and the Halls Creek Shire.

As part of this need to reduce juvenile offences, Olabud Doogethu introduced the Youth Engagement Night Officers (YENOs) to help to get young people off the streets, going out during the night and early hours of the morning. Taking down the names of these kids, they follow up during the day to support the parents. They aim to encourage these kids to go home and do the right thing, but not to take a punitive approach. The YENOs remained operational throughout the entirety of the COVID-19 pandemic. The stability and reliability of this framework can be credited with the success of the Halls Creek response. The YENO strategy has seen a substantial reduction in offences, as well as an overall decrease in kids out and about at night. These results demonstrate the validity of the justice reinvestment philosophy behind Olabud Doogethu and Social Reinvestment WA.

A justice reinvestment approach has been recommended by the Australian Law Reform Commission in order to address the overrepresentation of Aboriginal people in the justice system.⁵⁵ By addressing the causes of crime and intervening early to prevent offending from occurring in the first place, better outcomes can be achieved for community safety than through a focus on punishment and incarceration.

In comparison, criminal justice interventions are far more expensive, with it costing nearly nine times as much to incarcerate a child than to support them in the community with other interventions.⁵⁶ Further, detention and exposure to the criminal justice system causes long-term harm to children. Many studies have shown that detention is detrimental to a child's psychological health and mental wellbeing both in the short and long term. Detention also disrupts children's education and social development, as well as exposing them to other children and young people who may encourage anti-social and offending behaviour. Our juvenile detention system also fails to effectively rehabilitate and reintegrate young people, as is demonstrated by its high recidivism rates, with 55% of children in Banksia Hill in 2019/2020 having been imprisoned previously.⁵⁷

⁵⁴ Olabud Doogethu – Smart Justice in the Heart of Kimberley <https://olabuddoogethu.org.au/>

⁵⁵ Australian Law Reform Commission (2018) *Pathways to Justice – Inquiry into the Incarceration Rate of Aboriginal and Torres Strait Islander People*, ALCR Report 133

⁵⁶ The Government of Western Australia, 'Western Australia State Budget 2020-21, Budget Paper, No. 2, Budget Statements Volume 2', Perth, WA, The Government of Western Australia, <https://www.ourstatebudget.wa.gov.au/2020-21/budget-papers/bp2/2020-21-wa-state-budget-bp2-vol2.pdf>

⁵⁷ Department of Justice, 'Annual Report, 2019/20', *The Department of Justice*, WA, The Government of Western Australia, 2020, https://www.wa.gov.au/sites/default/files/2020-09/Department-of-Justice-Annual-Report-2019-2020_0.pdf;

While it is beyond the scope of the Draft Strategy, Western Australia needs raise the minimum age of criminal responsibility to 14 years, ending the imprisonment of children under that age.

We recommend the Draft Strategy propose partnering with local communities to co-design new justice reinvestment sites.

* * *

If you would like to discuss this submission further, please contact the WACOSS Senior Policy Officer Graham Hansen at graham@wacoss.org.au or 6381 5300.

Yours sincerely,

A handwritten signature in black ink that reads "L. Giolitto". The signature is written in a cursive, flowing style.

Louise Giolitto
Chief Executive Officer
WACOSS