



**Submission to the**  
**Australian Parliamentary Joint Committee on Human Rights**  
**Inquiry into Compulsory Income Management**  
**May 2024**

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## 1. INTRODUCTION

The Family Responsibilities Commission (**FRC**) appreciates the opportunity to contribute to the Parliamentary Joint Committee on Human Rights (**PJCHR**) Inquiry into Compulsory Income Management.

The FRC is a leading model of shared decision making and self-determination for First Nations people. It is the view of the FRC after 15 years of working with clients and their families that income management alone cannot rectify the complex issues of trauma, poverty, addiction, child abuse and neglect and domestic and family violence experienced in our First Nations communities. However, the flexible, client-centred, and nuanced model of income management implemented by the FRC can provide protection and stability for households in crisis; can be an effective catalyst to encourage behavioural change; and can be a helpful and effective tool for financial management. The Commission also submits that it is a model compatible with human rights.

The FRC cannot comment on the broader application of compulsory income management models in other areas of Australia. Being unique in the income management landscape, the Commission is in the privileged position of being able to report to the PJCHR on its operations, outcomes and learnings over 15 years which may provide some insight into possibilities for the future of income management in Australia.

## 2. RECOMMENDATIONS

It is against this background the FRC recommends:

1. The PJCHR endorse the FRC model of income management, with its complementary case management approach to clients, as one that is compatible with human rights.
2. The Australian Government continues to invest in the FRC and maintain its legislative and policy settings.
3. The Australian Government supports the FRC to administer its model of Voluntary Income Management to interested persons across Queensland and considers greater flexibility and autonomy to participants in deciding the percentage to be voluntarily quarantined.
4. The Australian Government continues to invest in support services, and employment and training opportunities, in the five remote communities the FRC operates, that are effective and responsive to the evolving needs and aspirations of community members.

## 3. ABOUT THE FRC

### 3.1 A leading model of self-determination

The 2022-23 financial year marked the fifteenth anniversary of the Queensland Parliament passing the *Family Responsibilities Commission Act 2008* (**FRC Act**) with bipartisan support. Since then, the FRC continues to demonstrate why it is arguably Queensland's leading model of shared decision-making and self-determination - one that is enshrined in legislation.

Through the FRC Act, powers and responsibilities of the Crown have been shared with First Nations people, so they are *not just advisers* to other decision-makers. They hold formal decision-making powers enabling them to respond to the needs of individuals and families in their own communities.

Currently, 39 Elders or respected Aboriginal people are appointed as Local Commissioners to serve in their own communities.



Figure 3.1 The FRC is a novel bi-cultural institution.

Since the appointment of Ms Tammy Williams, a Murri woman and barrister,<sup>1</sup> as FRC Commissioner and CEO in September 2019, **all FRC decision-makers<sup>2</sup> under the FRC Act are First Nations people.** The single exception is the Deputy Commissioner,<sup>3</sup> whose powers as a decision-maker can only be exercised upon delegation by the FRC Commissioner. One of the objects of the FRC Act is to support the restoration of local authority in FRC communities. The FRC puts local Elders and respected persons at the centre of efforts to support community members to address complex issues and empowers them to make decisions.

### 3.2 The suite of FRC triggers allows early intervention.

The communities of Aurukun, Coen, Doomadgee, Hope Vale and Mossman Gorge 'opted-in' to a higher standard to allow early community-based intervention by the FRC. This enables their own Elders and respected persons to act where community members are not meeting their basic responsibilities to their families and children.

The FRC Act sets out the statutory obligations of relevant Queensland Government departments to notify the FRC when a community member is not meeting pre-determined obligations in relation to school attendance, the safety and wellbeing of children, court convictions and domestic and family violence orders and social housing tenancy agreements.

The FRC applies a locally based and culturally relevant conferencing-style process delivered by a panel of Elders and respected community leaders appointed as Local Commissioners, which is overseen by a legally qualified Commissioner. Throughout 2023-24<sup>4</sup> the vast majority (84 per cent) of Commission decisions were made by three Local Commissioners constituting the panel. The purpose of a conference is to provide a forum for the community member and others who may have something useful to contribute, to discuss with the FRC why, and how, the person has come to be the subject of an agency notice. Conferences are held in a manner which facilitates early intervention, encourages community members to take personal responsibility for their actions and implement strategies to address inappropriate behaviour before it escalates.

### 3.3 The FRC is part of a linked service system to engage and empower individuals and their families to make positive and lasting change.

<sup>1</sup> Admitted to the Supreme Court of Queensland in 2002, and the High Court of Australia.

<sup>2</sup> Division 2 of the FRC Act sets out the requirements for using Local Commissioners to 'constitute the Commission' for conferences to hear and determine matters, including the power to make legally binding decisions pursuant to ss68 and 69 of the FRC Act.

<sup>3</sup> Rodney Curtin, Deputy Commissioner is also legally qualified, as a barrister, like the FRC Commissioner. He has more than 25 years' experience in the conduct of circuits in Cape York and Torres Strait regions.

<sup>4</sup> To 3 May 2024.

The FRC operates within a robust legal framework to assist clients and their families living in the welfare reform community areas to address complex behaviours. FRC conferences are designed to ensure that FRC Commissioners have all relevant information available to them, to give clients an opportunity to speak directly to local decision-makers. This process is aided by the powers the FRC Commissioner has to request relevant information from government agencies and community services, to ensure Local Commissioners can make informed decisions in the best interests and wellbeing of children, and the protection of vulnerable community members.<sup>5</sup> These aspects of the model mean that decisions are appropriately tailored to the circumstances of the individual or family, and the FRC can utilise its legislative powers to coordinate a multi-disciplinary approach as part of a linked service system.

Local Commissioners encourage individuals appearing before the Commission to take the necessary steps to make lasting changes to benefit their health, wellbeing, home and community life. This includes by facilitating the rebuilding of intra-community social norms and encouraging behavioural change through attaching reciprocity and communal obligations to welfare and other government payments. The FRC uses a graduated range of decision-making options, including referrals to support services to build the capabilities required to break the cycle of disadvantage and, in limited circumstances, income management.

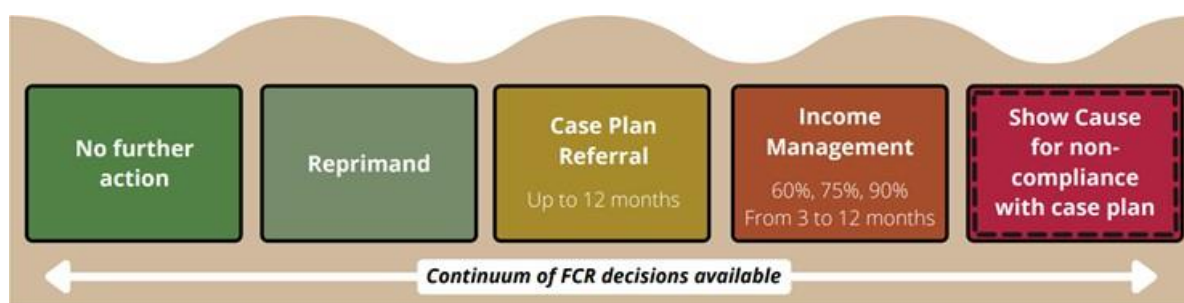


Figure 3.3 FRC decisions are graduated and tailored appropriately to an individual's circumstances.

Through case planning, referral, case management and monitoring, and information sharing, the FRC model enables multiple stakeholders to work holistically through a client-centred approach. During the 2022-23 reporting period the FRC made at conference 499 referrals for 354 clients to attend support services.<sup>6</sup> This is the second highest number of clients referred since the commencement of the Commission.

The FRC notes the continued willingness of clients to seek help to address underlying issues impacting their and/or family's wellbeing. Already in the current financial year - to 3 May 2024 - 411 referrals for 306 clients to attend support services, have been made so far.

At the end of the FRC's continuum of decisions is income management. See discussion below at paragraph 4 for further details on the Commission's unique income management model.

### 3.4 Intensive case management for clients with complex needs.

The FRC continues to adapt and evolve the Commission's operations to respond to the changing needs of our clients. This includes increased opportunities for client engagement outside of the conference setting, for example, through Intensive Case Management (ICM) to support community members and their families to address complex issues.

Data collected by the FRC provides insight into the complexity of the issues faced by many clients. Most FRC conferences respond to high levels of complexity in terms of client needs because most FRC clients suffer multiple and entrenched forms of disadvantage. There exists within these clients a cohort who experience extreme complex disadvantage and are also

<sup>5</sup> Sections 4 and 5 of the FRC Act, Main Objects and Principles for administering the Act.

<sup>6</sup> This is inclusive of Family Responsibilities Agreements and Orders.

resistant to intervention. In addition to the substantial work and preparation undertaken before every conference, the most complex matters represent higher demands of the FRC to respond. The FRC has experienced an increase in the percentage of conferences conducted that are considered complex<sup>7</sup> over the last three financial years, with approximately two-thirds of matters deemed complex conferences, up from just over half of all matters in 2020-21.

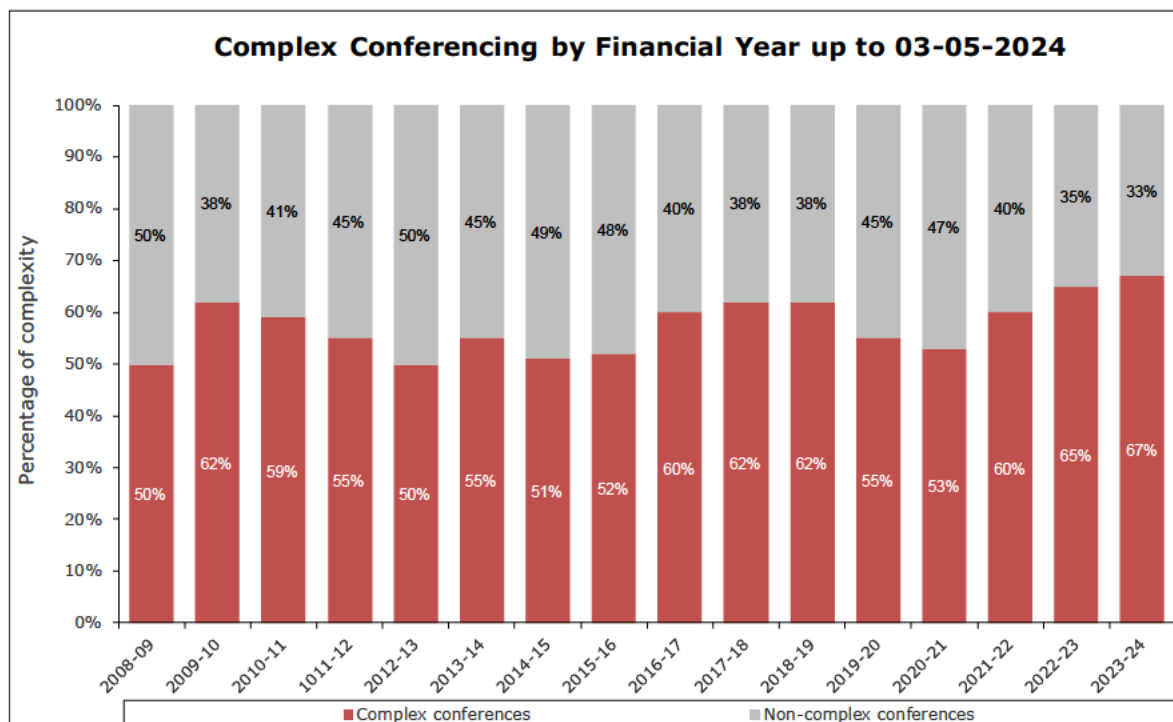


Figure 3.4 Complex conferencing by financial year to 3 May 2024.

The FRC’s Intensive Case Management (ICM) is a time and resource intensive response proportionate to the needs of highly vulnerable clients in need of targeted and coordinated support from a multi-disciplinary team of stakeholders. ICM is best utilised in cases where clients with a multitude of chronic needs and require several referrals to specialist providers. Often the client’s issues are interrelated and have a compounding effect on their vulnerability. In these circumstances the FRC can utilise its legislative framework (particularly its provisions that support information sharing amongst prescribed entities, in certain circumstances) to play an active case management role to coordinate a holistic approach to service delivery to the client.

*Case study:*

*Female client, mother of two children (one school-aged, the other an infant) attended conference in October 2023. The complexity of the matter necessitated the need for Commissioner Williams to preside over the conference with two Local Commissioners. The client experienced a range of vulnerabilities including child safety concerns, physical and mental health issues (including risks of self-harm and suicide), substance misuse, and a history of domestic and family violence. Male partner recently returned to the community from a period of incarceration. School-aged child had a history of irregular school attendance. Client agreed to be placed on a case plan with several referrals to specialist providers. The client and her partner further agreed to work with the Commission, and other providers and government agencies, as part of ICM towards achieving the case plan goal of the family being accepted into the [redacted] Centre for a three-month residential placement.*

<sup>7</sup> A conference is considered complex where there is more than one type of notice being considered, or multiple notices of the same type, e.g. multiple court advice notices.

*Between October 2023 and January 2024, the FRC worked with the client, her family and key stakeholders to overcome a myriad of challenges that risked achieving the case plan goal. These stakeholders included: the Department of Child Safety, Apunimpima, the principal of the local school, Queensland Health, Probation and Parole, the local Justice Group coordinator, the Courts, and the officer-in-charge of the local police. The FRC was able to play a pivotal role in coordinating a multi-disciplinary approach to support this family to achieve the case plan goals, by sharing information with certain stakeholders, as allowable under the FRC Act.*

*The client and her family were subsequently approved for admission to the [redacted] Centre for an initial three-month residential placement. Feedback from key stakeholders about this result recognised the value of having a coordinated approach to case management led by the FRC stating “this is the outcome we [the service provider] had wanted and it was what the family needed ... but it has been difficult to achieve this when working in isolation [from other providers]. It has needed someone like the FRC to pull this together.”*

ICM has proven to be a successful strategy building trusting and supporting relationships with both clients and service providers outside the more formal conference setting. The success of these approaches is inextricably linked to the training and professional development of the Commission’s Local Registry Coordinators and Local Commissioners, who represent a diverse range in age, gender, clan affiliation, knowledge, and experience.

Client and stakeholder feedback has been positive. Local Commissioners who are involved in the delivery of ICM also report that the more frequent and intensive interactions with clients outside of conference seemed to reinforce the supportive nature of FRC interventions, and increased clients’ willingness to access services and work towards their goals.

### 3.5 Increased levels of voluntary client engagement and personal agency.

The Commission is seeing a growing cohort of clients who self-refer and engage with the support of the FRC on an entirely voluntary basis for income management (VIM) and/or case plan referrals (VCPs). This is represented in the graph below.

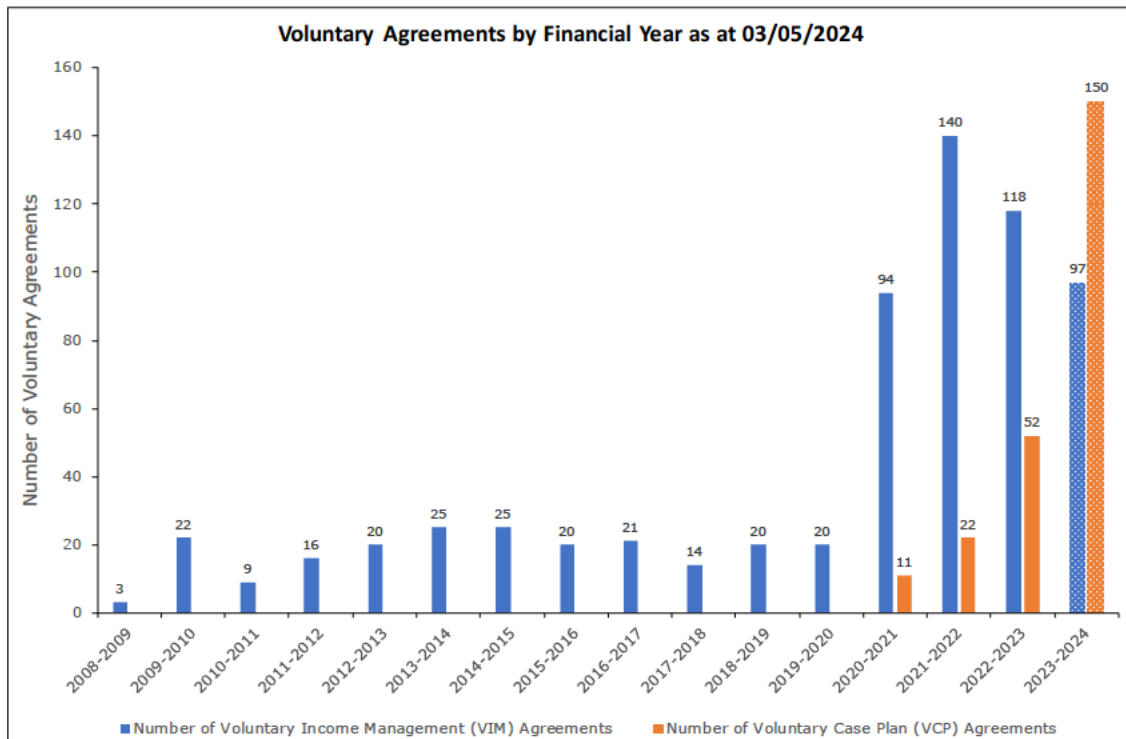


Figure 3.5 Number of voluntary agreements recorded as VIM and VCP.

In the current financial year (2023-24 year) to 3 May 2024, there have been a total of 247 voluntary engagements by community members. These engagements are made up of 97 voluntary income management (VIM) agreements and 150 voluntary case plans (VCPs) for referrals to support services. The number of 97 voluntary income management agreements represents almost double the number of conditional income management orders (51) for the same period.

It is notable that only four years ago (2019-20), the FRC reported in its annual report that only 20 VIMs and no VCPs were entered into by community members.

The increase in voluntary engagements in recent years is consistent with a broader, and well-established trend identified by the Commission of an increased willingness by clients to take steps towards personal accountability. This is best illustrated by clients at conference entering into Family Responsibilities Agreements (FRAs) for a case plan and who are willing to accept a referral to a community support service for a period of between 3 to 12 months, as opposed to being ordered to do so, by the FRC. In the 2023-24 financial year to 3 May 2024, 75% of all referrals to support services were with the agreement of the client under an FRA.

### **3.6 Quality assurance and compliance measures to ensure quality decisions.**

The FRC has oversight mechanisms in place to ensure appropriateness and consistency of decision making that is proportionate to the needs of the client and in the best interest of children. The FRC Act enshrines natural justice<sup>8</sup> and avenues for review and appeal,<sup>9</sup> alongside ensuring that 'Aboriginal tradition' is considered when administering the Act.<sup>10</sup> There has never been any suggestion the FRC has acted outside its powers.

Throughout the 2023-24 financial year so far,<sup>11</sup> 888 conferences and hearings were held, with no appeals against the Commission's decisions by community members. Furthermore, as a public sector entity, there is an onus on the Commission, to act and make decisions in a way compatible with human rights as required by the *Human Rights Act 2019*. In the 2022-23 Annual Report, tabled March 2023 in the Queensland Parliament, the Commission declared its continued unblemished record of receiving no human rights complaints during the reporting period.

### **3.7 Features of an enhanced Income Management model fit-for-purpose for the needs of FRC communities.**

In a 2018 evaluation of the Cape York Income Management model by the Queensland University of Technology,<sup>12</sup> the final evaluation report found that:

***'On the whole, the review finds that the CYIM [Cape York Income Management] model has a number of unique characteristics that not only distinguish it from other Australian models but may provide the key to any successes that are attributed to it. These factors may offer useful lessons when considering any future rollout of the model, or similar models, in Cape York and elsewhere.'***

It is important to note that the FRC model of income management is **conditional**, rather than **compulsory**. It is acknowledged that there are a range very different measures broadly termed 'conditional welfare' both in Australia and internationally.<sup>13</sup> However, the FRC considers it is important to highlight the distinction between the **conditional nature of the FRC model**, and the **compulsory nature of other models** in Australia.

<sup>8</sup> s56(1)(a) of the FRC Act.

<sup>9</sup> Parts 9 and 11 of the FRC Act.

<sup>10</sup> s5(2)(c) of the FRC Act.

<sup>11</sup> To 3 May 2024.

<sup>12</sup> [Strategic Review of Cape York Income Management](#)

<sup>13</sup> See for example, Roche, S., Mendes, P., Marston, G., Peterie, M., Bielefeld, S., Staines, Z. and Humpage, L., 2021. How effective is conditional welfare support for enhancing child wellbeing? An examination of compulsory income management (welfare payment quarantining) in Australia. *Children and Youth Services Review*, 131, p.106254.

The genesis of the FRC's unique model of income management was a desire of the people of Cape York, and later Doomadgee, to rebuild social norms and tackle the structural issues contributing to passive welfare dependence.<sup>14</sup> A key tenet of the policy proposal to achieve this aim was to develop reformed incentives, and enabling supports, by making welfare payments **conditional** on certain social obligations being upheld. The social obligations were carefully chosen on the basis of three criteria:

- They reflect the values of the community.
- They relate to behaviour which, if allowed to continue, would have a negative impact on child wellbeing.
- The existing legislative and service delivery mechanisms aimed at addressing these dysfunctional behaviours are unable to realise the desired outcomes.<sup>15</sup>

The consequence of failing to meet these obligations was a loss of discretion over the spending of a certain proportion of welfare payments.

The conditional income management aspect of the FRC model was designed to be a lever for behaviour change, to move people along a continuum to greater personal responsibility. Accordingly, if an individual is supported to meet social obligations and demonstrates behaviour change, income management is no longer a necessary support or lever.

This can be contrasted with other models where income management is applied compulsorily, on the basis of location and payment type, regardless of behaviour or adherence to social norms. The features of the FRC's unique model are discussed in more detail below.

### **3.8 Voluntary and Conditional Income Management.**

Under the FRC Act, income management can either be voluntary (VIM), where community members can approach the FRC of their own accord, or by way of conditional income management (CIM).

Conditional income management (CIM) orders are only made by the FRC after the opportunity has been provided to attend a conference with Local Commissioners. At a conference, CIM can be implemented either by agreement, which is always the preferred option, or without agreement and by order of the Commission as a last resort, where it is reasonable, necessary, and proportionate in the circumstances.

VIM is becoming an increasingly popular tool for those wishing to get support to manage their money and ensure that household needs, and financial obligations are met, and to protect their payments from family demands. The FRC Act sets out a process under which a community member can voluntarily seek help from the Commission for a referral to a community support service (through voluntary case plan) and/or be subject to VIM. In these circumstances the FRC has not received notification from a relevant government agency alleging certain behaviours, and the community member would not otherwise be required to attend conference and be the subject of an FRC decision.

In the 2020-21 year, the number of CIMs and VIMs administered by the FRC, were equal. Since that time, the annual number of VIMs administered by the Commission, after a client has voluntarily entered into an income management agreement, has significantly outgrown the number of CIMs ordered by the FRC.<sup>16</sup> For instance, in 2022-23 there were 64 CIMs and 118 VIMs.

The FRC sees the increase in VIMs as an important measure of individuals taking greater personal responsibility. As at 3 May 2024, for those clients who are currently on income management only 24

<sup>14</sup> Cape York Institute, 2007. From Hand Out to Hand Up.

[https://web.archive.org/web/20080724085355/http://www.cyi.org.au/WEBSITE%20uploads/Welfare%20Reform%20Attachments/From%20Hand%20Out%20to%20Hand%20Up\\_Welfare%20Reform%20Report.pdf](https://web.archive.org/web/20080724085355/http://www.cyi.org.au/WEBSITE%20uploads/Welfare%20Reform%20Attachments/From%20Hand%20Out%20to%20Hand%20Up_Welfare%20Reform%20Report.pdf) p.7

<sup>15</sup> Cape York Institute, 2007. From Hand Out to Hand Up.

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<sup>16</sup> 2021-22: CIM 91 VIM 140, 2022-23: CIM 64 VIM 118, 2023-24 (to 9 May 2024): CIM 50 VIM 82.



per cent are currently subject to conditional income management orders (CIM) and 76 per cent have volunteered (VIM).

Despite the increasing awareness and popularity of VIM, the FRC contends that some element of compulsion remains necessary for the FRC to be effective.

The FRC model harnesses varying levels of client motivation for change. The main objects of the FRC Act include to help people resume *'primary responsibility'* for their own wellbeing.<sup>17</sup> All FRC engagements with clients seek to work appropriately with a person's level of intrinsic motivation to change, and to support and build that motivation and level of responsibility wherever possible.

Not all those who need support volunteer and self-refer from the outset. This is particularly true of First Nations people who have low levels of trust in government agencies and services, due to their history of oppression, disempowerment, and trauma. While it is well known that positive and lasting results most likely occur when a client becomes actively engaged and has high levels of volition, this does not mean that it is acceptable to do nothing for those suffering extreme and entrenched forms of disadvantage, who are at least willing to engage, especially when their problematic behaviour is adversely impacting others, including children. Nor does it mean that engaging those who are least willing to engage cannot be effective in leading to positive change, over time.

This belief underpins the FRC's theory of change.<sup>18</sup> It is supported by the Local Commissioners' personal experience over the last 15 years, and by data collected by the FRC.

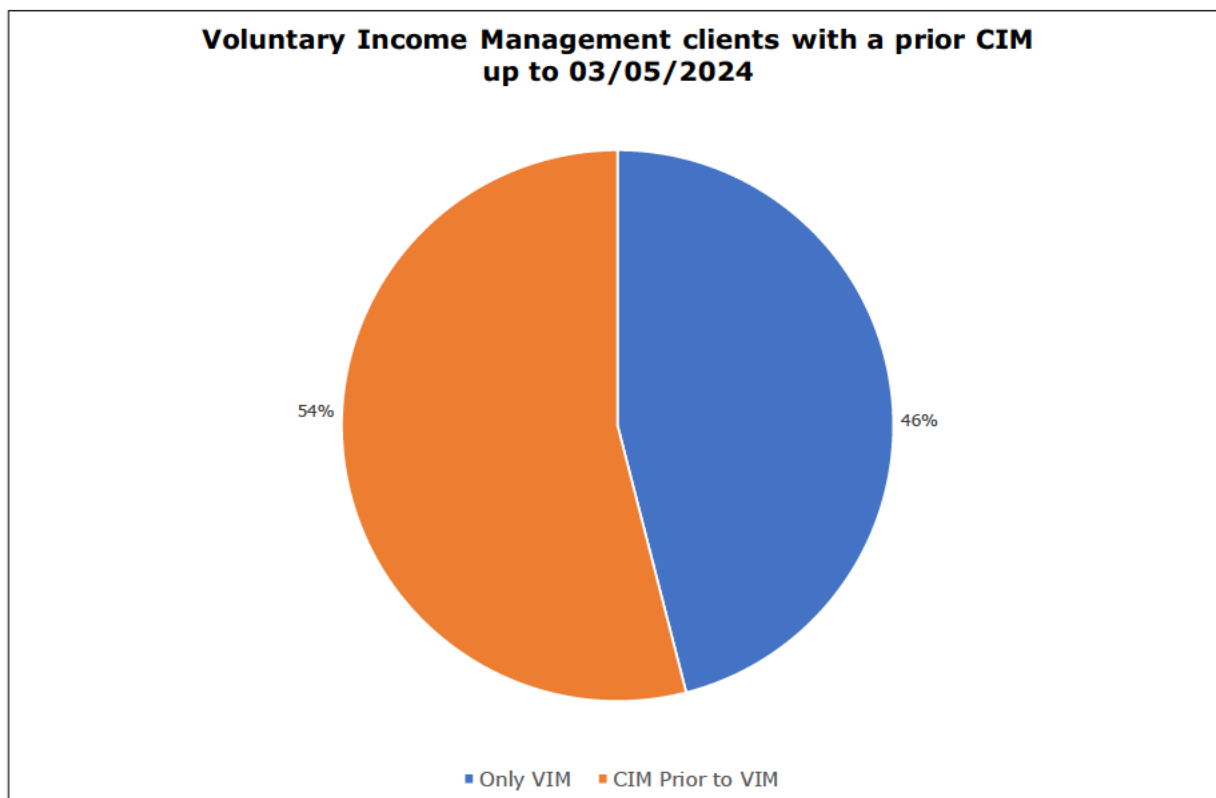


Figure 3.4 VIM clients with a prior CIM.

The pie chart above shows that of all voluntary income management clients, up to 3 May 2024,<sup>19</sup> **over half** have previously been subject to a CIM. This demonstrates that having been previously on CIM is not a barrier to entering into a VIM agreement. In fact, this data shows that over time, and with access to ongoing support from the FRC and/or appropriate community support services, clients may develop self-awareness and recognise the benefits – for themselves and/or loved ones – of

<sup>17</sup> s4 of the FRC Act.

<sup>18</sup> Published in 'The FRC: A Model of Self-Determination. An Operational Analysis of the Family Responsibilities Commission from 2008 to 2022' p.61

<sup>19</sup> Data is from 17 March 2021, when the Cashless Debit Card technology was introduced in FRC communities, to 3 May 2024.

income management as a financial management tool. This then leads to some clients, taking additional steps of their own accord, to continue their progression towards improvement and achieving their personal goals – by voluntarily seeking a further period of income management (VIM) after their CIM expires.<sup>20</sup>

Accordingly, the FRC submits that along with a voluntary option, at least some element of compulsion may be necessary in quite extreme circumstances, where clients show limited insights into their behaviours, and such behaviour may present a risk to children and/or vulnerable community members. Having the benefit of operating for over 15 years and gaining the trust of community members as being a reliable, respected, and trusted presence in their lives, the FRC's Local Commissioners have witnessed first-hand, how conditional income management can be a positive lever to set people along the continuum toward greater personal responsibility and individual agency. These observations are consistent with Commission data reported throughout this submission.

### **3.9 Flexible and proportionate income-management on a conditional basis.**

The FRC applies VIM and CIM at either 60, 75 or 90 per cent of a person's eligible welfare payments depending on their circumstances. This flexibility allows income management to be used as a temporary support mechanism. For example, a parent experiencing domestic violence and pressure from a spouse to provide cash, may be income managed at 75 per cent to provide a measure of stability and protection for children and other vulnerable members of the household. A client who is at the extreme end of anti-social behaviour may be income managed at 90 per cent in the hope that this can be scaled-back over time if behavioural change occurs, or if pre-determined goals, such as increased school attendance, are met.

An interested community member could apply for a VIM at 60 per cent, as a way of budgeting and making sure rent and bills are paid, but still having access to a significant proportion of their payments as cash. These examples demonstrate how income management can be used as a scaffolded support in a range of individual circumstances.

Since the introduction of the Cashless Debit Card (CDC) (now SmartCard) technology in FRC communities the Commission has been keeping data on the reasons clients give for wishing to end or amend VIMs. In the 2021-22 year and 2022-23 year the most common reason for wishing to end or amend a VIM was to have access to more cash.<sup>21</sup> The following is a list of the most common reasons for clients wanting to end their VIM agreements:

- *"I would like to be able to share my money with my family."*
- *"I want more access to my money."*
- *"I would like to have access to more money over Christmas."*
- *"I would like to be able to send cash to my children, especially when they are at boarding school."*
- *"I require more access to my money to pay for funeral costs."*
- *"Travelling out of community especially for medical reasons and need more access to cash."*
- *"I would like to access more cash to buy a car/motorbike etc."*

The FRC sees merit in offering clients on VIM a greater range of options for the percentage of income to be managed on their SmartCard. For example, instead of being limited to the existing income management percentages (i.e., 65% 70% and 90%) the Australian Government should allow FRC clients to nominate a smaller amount of their income, such as 30%, to be quarantined on their SmartCard throughout the duration of the VIM agreement. This may still provide clients with a useful financial management tool, while leaving them with more cash to spend on discretionary items and household expenses in accordance their own budgets. The FRC considers this a transitional strategy

<sup>20</sup> VIM clients can choose their own IM settings i.e. the period of IM, from three to 12 months, and percentage of income quarantined - 60, 75 or 90 per cent. The FRC Act also sets out the process in which VIM clients can request to end or amend their income management arrangements.

<sup>21</sup> 77 per cent and 84 per cent respectively.

for many of its clients, to support their natural progression from income management, towards greater personal responsibility by allowing for a high degree of agency over their financial affairs, while still providing the benefits of the SmartCard, over a smaller portion of their money.

### **3.10 Time-limited conditions apply to income management.**

All income management arrangements under the FRC Act are time limited. CIMs and VIMs can be made for durations of 3, 6, 9 or a maximum of 12 months, and automatically expire at the end of the income management period.<sup>22</sup> After the expiry of an income management order or agreement, a new arrangement can be entered into only if the relevant criteria, or conditions, for CIM or VIM are met.

### **3.11 Clients can apply to amend or end income management.**

The FRC's income management model also has an inbuilt mechanism for review. Part 9 of the FRC Act provides for clients to apply to have their income management agreement or order amended, or ended.

A client can apply to have their CIM order amended, either by the proportion of income being managed, or the duration of the order, or both. Alternatively, the person can apply to have the order ended. Decisions to end or amend CIM orders are determined at a hearing conducted by FRC Commissioners, where the person has had an opportunity to demonstrate that their circumstances have changed.

A VIM arrangement can be removed or amended whenever a client chooses, unless the FRC Commissioner is satisfied that doing so would be detrimental to the interests, rights and wellbeing of children or other vulnerable persons.

The mechanism set out in the FRC Act to apply to amend or end agreements or orders is efficient, accessible, and fair. Many clients applying to amend or end their income management arrangements do so by coming in person to FRC offices in their communities where they are assisted by FRC Local Registry Coordinators, and don't need to access email, fax or even phone, all of which can be problematic for some clients in our remote First Nations communities.

In the 2023-24 financial year, to 3 May 2024, the average length of time it took the Commission to decide applications to amend or end VIMs was less than 4 days.<sup>23</sup> The average length of time from receipt of application to when the FRC made its decision on CIMs was 12.5 days during the same reporting period.

The FRC understands this can be contrasted with other models, where blanket income management can only be removed after a successful application for an exemption. These processes can be cumbersome and are not necessarily timely or user-friendly for First Nations people, where English is not their first language. In addition, decisions regarding exemption are made by departmental officers who are geographically and culturally removed from the day to day lives of the applicant. This process does not provide the same individualised, flexible, and efficient process that the FRC approach allows.

The FRC has recently received client feedback in Aurukun and Coen that they prefer to manage their money through a VIM, administered by the FRC, supported by a local agent of Services Australia and trusted community resources such as the O-Hub (Opportunity Hub), rather than a bank. This is because banks no longer have a physical presence (nor customer service relationship) in many remote communities, whereas the FRC has a consistent and supportive presence, and works in tandem with culturally competent specialist support services.

### **3.12 Complementary referrals to support services.**

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<sup>22</sup> s68 and 69 of the FRC Act.

<sup>23</sup> 3.93 days

Another important aspect of the FRC model is case plans and referrals to support services. The FRC through its legislative framework plays an important role in coordinating an otherwise fragmented service delivery system for its clients. Income management orders and agreements are usually accompanied by case plan referrals. In this way, the FRC can coordinate and monitor the sequence of support a client receives and where appropriate, share information, as part of a linked service system.

An agreement or order for income management may be accompanied by a case plan referral to MPower, for financial literacy and budgeting support. Additional case plans may also be put in place for social and emotional wellbeing, parenting, addiction, or job training and readiness support where these are available.

The FRC has an ongoing case management and monitoring role where case plans are put in place. This function is set out in the FRC Act and, through information sharing provisions also in the Act, seeks regular updates on the engagement and progress of clients, and intervention actions of service providers. As noted, the FRC continues to strengthen its Intensive Case Management (ICM) framework to closely coordinate support for clients with complex issues.

The FRC also has an ongoing 'check-in' process for clients on income management, whereby clients are contacted one month after a CIM or a VIM is issued to check whether clients have received their SmartCard, whether the card is working and whether they require any further support. Checks are then conducted on a quarterly basis depending on the length of the income management agreement or order.

The FRC has a special and long-standing partnership with the O-Hubs (Opportunity Hubs), which provide the MPower program in the FRC's Cape York communities.<sup>24</sup> MPower aims to empower individuals and families of Cape York to improve their financial literacy and money management. FRC has been given access to O-Hubs' analysis of MPower data and permission to share it in this submission. The analysis shows extremely promising trends when comparing FRC clients to other MPower members (i.e., community members who have been otherwise referred by another service, or who attend the program on their own accord).

Overall analysis of MPower data<sup>25</sup> shows that **FRC clients are more likely to engage in budgeting and financial coaching activities** than other MPower members.

For example:

- In all four years from 2020-2023, FRC clients were more likely to participate in coaching.
- In 2023, FRC clients were almost twice as likely to complete Money Management Tool sessions, education sessions that increase banking, saving and payment knowledge.

The analysis also shows strong participation rates for FRC referred clients:<sup>26</sup>

- There is a strong participation rate during FRC case plans to MPower supports, with 68% attendance seen throughout the duration of clients' case plans.
- Where the FRC case plan was by voluntary agreement, FRC clients demonstrated a positive attendance rate of 62%. Interestingly, the attendance rates of clients continued to increase in circumstances where they were referred by a FRC case plan made at conference as a 'Decision by Agreement' (64% attendance rate) or a 'Decision by Order' (72% attendance rate). This demonstrates a positive relationship between the FRC and its clients, and **shows relatively high levels of compliance with the Commission's decisions by clients**, even in cases where those decisions are mandated by order.

O-Hub's data also shows a strong retention rate of FRC referred clients who remain engaged with MPower following completion of their case plan.

- For those FRC clients who were active during their case plan, 76 per cent continued to access support *after the cessation* of their case plan.

<sup>24</sup> O-Hub does not operate in Doomadgee.

<sup>25</sup> Over the period from 1 January 2014 to 29 February 2024.

<sup>26</sup> Analysis was conducted on the 558 completed case plans from 1 January 2014 to 29 February 2024.

- FRC clients were more likely to return if they were initially mandated to attend under an order – 79 per cent of those who were under an order returned, in comparison to 55 per cent of those on a voluntary case plan.

Additionally, FRC clients who were on income management (whether CIM or VIM) were more likely to attend MPower during the term of their case plan. In particular:

- 73 per cent of FRC's clients who were on a form of income management attended MPower during their case plan, compared with 61 per cent who were not on income management.
- It was also identified those on CIM were more likely to attend MPower for supports during their case plan – 77 per cent on CIM attended MPower, in comparison to 68 per cent on VIM.
- FRC clients, in general, demonstrate a strong willingness to continue engage with MPower supports following the completion of their case plan – ranging between 77 per cent of clients (those on IM) and 74 percent of clients (those not on IM) continued MPower after their case plan expired.
- More than one-third (37%) of unique clients who have entered into income management arrangements with the FRC, have later signed up to Cape York Partnership's (CYP) web-based application, Pama Platform.

The Pama Platform supports its users to develop their capabilities to complete budgets to manage their finances, create resumes, store important documents and save through locked Opportunity Accounts.<sup>27</sup> It also features an incentives initiative which offers real financial rewards for reaching savings goals, and earn points and rewards for completing tasks on the platform (i.e. 100 points for a detailed budget), for participating in Pama community challenges, and for opening to Opportunity Accounts. These points can be redeemed for rewards such as Pama t-shirts and Opportunity Account credit. To date, FRC clients have accumulated almost 55,000 points, which equates to almost \$30,000 in financial rewards.

One the most notable examples to-date is a client who opened a Bayan Opportunity Account in March 2022 whilst on an FRC case plan, with MPower support. **To date, she has contributed more than \$14,000 towards home ownership.** Additionally, she was able to avail of the matched savings incentive on offer in 2022, whereby Pama matched her first \$2,000 in contributions with an additional \$2,000.

These examples are included to demonstrate the real and continuing evolution of the program logic of the Welfare Reform program (see fig.5.1 below) and show that incentives to move people along the continuum of personal responsibility can begin with an element of compulsion and end with extremely positive rewards.

### 3.13 Practical application of CDC/SmartCard in remote communities.

The introduction of the Cashless Debit Card (CDC) in Cape York in March 2021 had no impact on the FRC's operations or decision-making. For clients of the FRC, it simply meant transitioning from one card (the BasicsCard) to another (CDC).

The FRC is not a participant in the 'CDC program' in the same way as the other CDC trial sites. The FRC has always had its own income management model enshrined in legislation, and the BasicsCard, and then the Cashless Debit Card, and now the SmartCard, have simply been the mechanism through which FRC decisions or agreements for income management have been enacted. For the FRC, transitioning from the BasicsCard to the CDC and SmartCard has been akin to simply moving to a superior product with greater capabilities.

There is no question that the transition from the BasicsCard to the CDC and SmartCard has been transformative for those in FRC communities.

In Doomadgee for example, there were only two merchants that accepted BasicsCard, the petrol

<sup>27</sup> <https://capeyorkpartnership.org.au/our-partnership/o-hub/opportunity-products/#pama>

station and the local supermarket (in addition to the Local Police Station, where car registration can be paid). Doomadgee residents often need to travel to their nearest larger centre, Mt Isa, approximately 5 hours drive away, and even go as far as Townsville or Cairns to access goods and services, and for health and schooling needs. The CDC/SmartCard has exponentially increased the number of places where clients can use their card. People on income management no longer must look around to find retailers in bigger centres that accept BasicsCard; instead, they now can use the card anywhere that has an EFTPOS terminal. The ability to shop online, and engage in e-commerce, has also provided economic benefits for clients. As an online consumer, clients now have access to a wider range of goods and services, and shop around for better deals.

Clients report that there was previously some negative stigma attached to the BasicsCard, or the 'Green Card' as it was known colloquially. Because the CDC/SmartCard looks like a 'normal' debit card, the stigma has disappeared. Family, friends, and retailers no longer know whether or not an individual is on income management just by looking at their card.

As these examples demonstrate, the superior technology of the CDC/SmartCard has meant a far greater degree of financial self-determination for those on income management.

### **3.14 The FRC's model of income management works.**

The PJCHR has sought submissions on whether compulsory income management has been successful in achieving its stated aims. The FRC contends this specific model is well on the way to achieving the aims set out in the FRC Act, those sought by the enhanced income management regime set out in the *Social Security (Administration) Act 1999* (Cth), and those aspects of the original Cape York Welfare Reform Program that are within the FRC's sphere of influence.

The FRC's operations are guided primarily by the objects of the FRC Act.<sup>28</sup> They are to:

- Support the restoration of socially responsible standards of behaviour and local authority in welfare reform community areas, and
- Help people in welfare reform community areas to resume primary responsibility for the wellbeing of their community and the individuals and families of the community.

These objects align with those set out in Part 3B of the *Social Security (Administration) Act 1999* providing for income management,<sup>29</sup> which include the reduction of immediate hardship, to encourage socially responsible behaviour, including in relation to the care and education of children, and to improve the level of protection afforded to welfare recipients and their families.

The FRC, and indeed income management, can deliver on some, but not all aspects of the change required. A holistic and consistent approach is needed to tackle extreme and entrenched disadvantage. In its 2022 Operational Analysis,<sup>30</sup> the FRC considered the original program logic of the Cape York Welfare Reform Program, which aspects the FRC was able to influence, and the FRC data that could be used to assess change.

Figure 3.14.1 below shows that the FRC has a key role to play in the behavioural change elements of the program logic including:

- Increasing participation in opportunities and responding to drivers and conditions.
- Individuals and families gaining respite from daily living problems and see potential for better lives.
- Individuals and families are motivated to take greater personal responsibility and begin to raise expectations of themselves and their families.

<sup>28</sup> Subsections 4(1)(a) and (b) of the FRC Act.

<sup>29</sup> s123TB of the *Social Security (Administration) Act 1999*.

<sup>30</sup> 'The FRC: A Model of Self-Determination. An Operational Analysis of the Family Responsibilities Commission from 2008 to 2022'

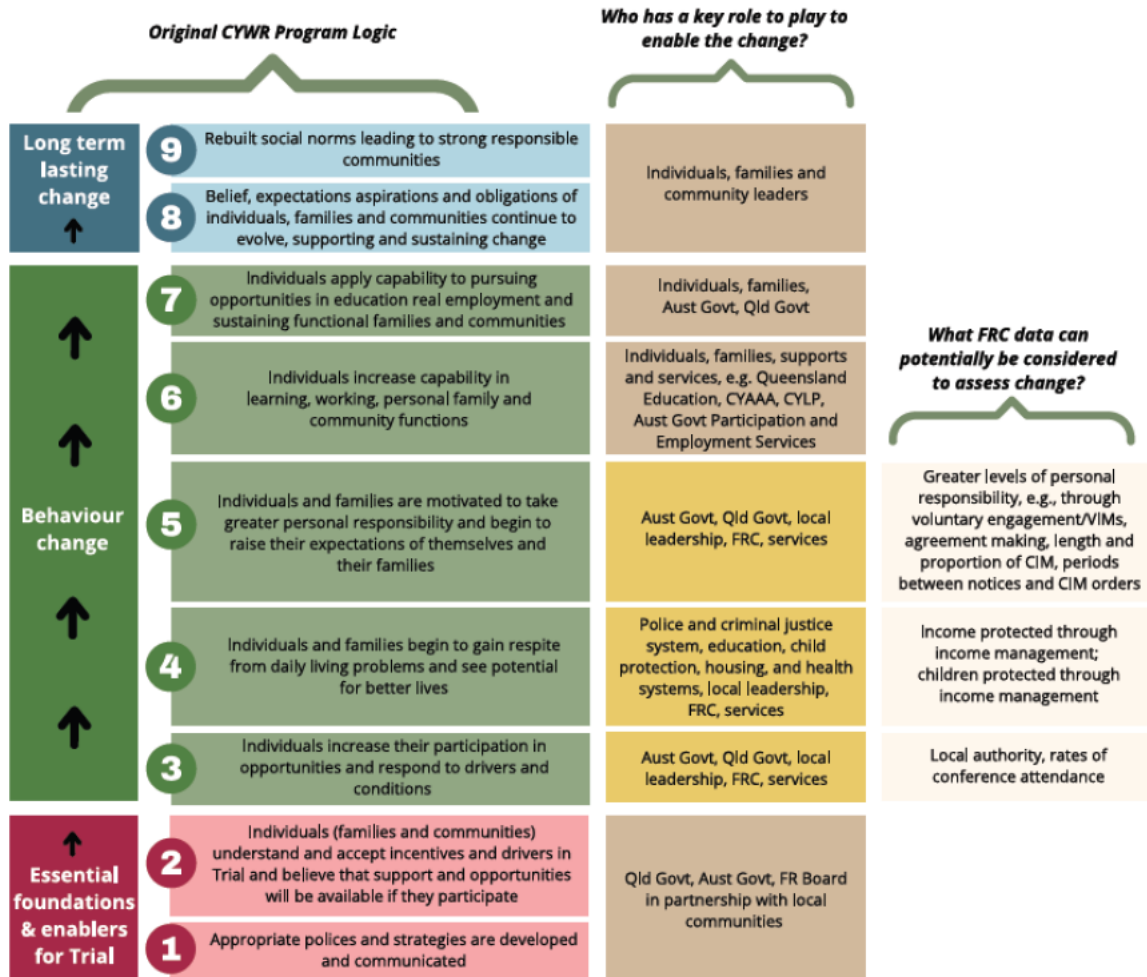


Figure 3.14.1 CYWR Program Logic showing FRC Role and FRC Data

FRC data shows that clients are seeing increased periods of respite, the strength of mandated decisions by the FRC are decreasing, levels of personal responsibility are increasing, and where it is necessary as a last resort, income management is protecting a large number of children across FRC communities.

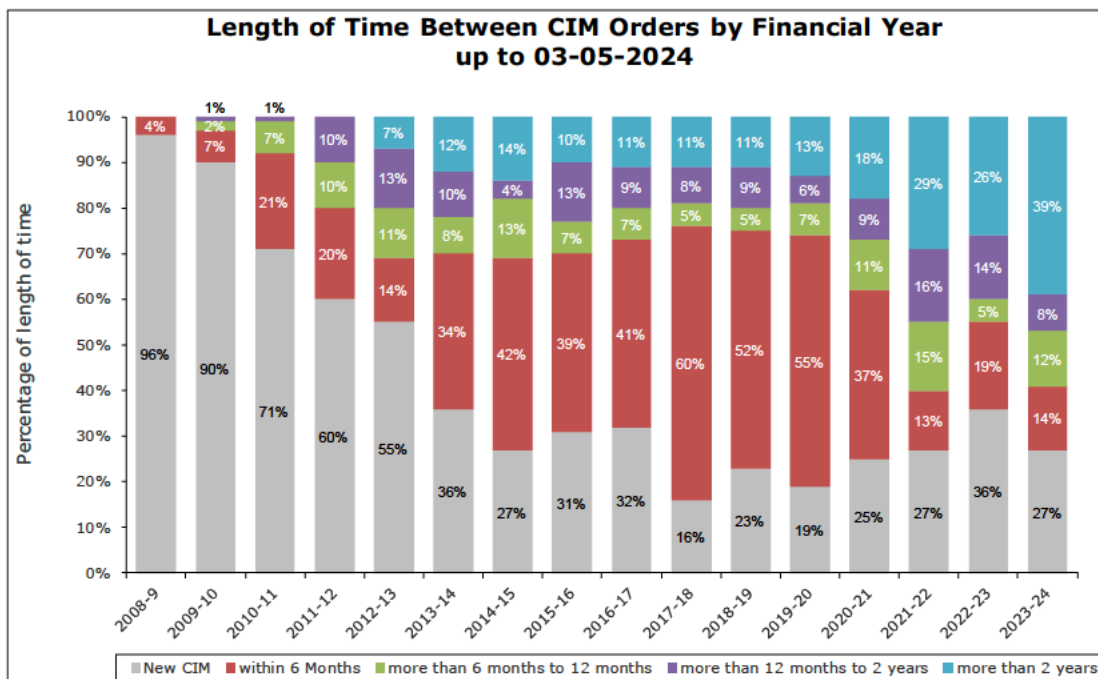


Figure 3.14.2 Length of Time Between CIM Orders by Financial Year

**FAMILY RESPONSIBILITIES COMMISSION**  
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FRC data over the life of the Commission has tracked the length of time between CIM decisions for individual clients. Figure 3.14.2 above shows that the proportion of clients who have had longer periods between CIM orders is increasing. The 2023-24 financial year to 3 May 2024 is showing a greater percentage in the 'more than two years' category compared to other financial years. This is suggestive of increased periods of respite between crisis points, and personal responsibility increasing.

From 1 July 2023 to 3 May 2024, there has been a total of 51 CIMs relating to 51 clients. The statistical information regarding this cohort demonstrates the FRC's continued use of CIM is proportionate to the client's circumstances and that CIM is used to encourage personal responsibility with terms and percentages of CIM orders and agreements adjusted according to the client's progress or lack thereof.

During the 2023-24 reporting period up to 3 May 2024, 37 per cent of CIM orders and agreements quarantined 60% of a client's welfare payment, 39 per cent quarantined 75% and 24 per cent quarantined 90%. During the same period 84 per cent were for a period of 6 months, with the remaining 16 per cent for a duration of 3 months. The 'strength' of these mandated decisions is proportionate and has decreased over the life of the Commission.

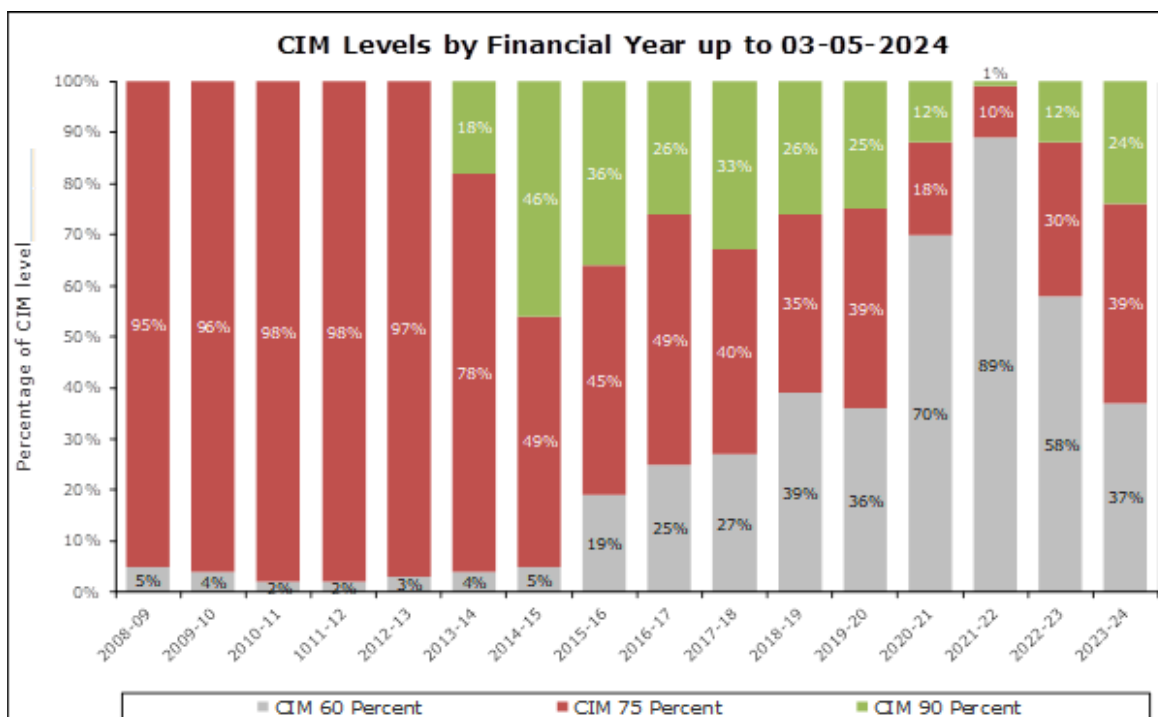


Figure 3.14.3 CIM Levels by Financial Year.

Another key measure of effectiveness and proportionality for the FRC is that where income management is used as a last resort, that a substantial number of children being protected, by ensuring that their payments are being spent on basics such as food, bills, and rent. In 2023-24 up to 3 May 2024, for the 51 clients who had a CIM order, 99 children were in their care.

#### 4.0 COMPATIBILITY WITH HUMAN RIGHTS

The FRC does not dispute that all forms of compulsory income management limit several human rights. The FRC submits, however, that its model of **conditional and voluntary income management** can be distinguished from other models, whereby the former models are applied on a compulsory and generic basis, notwithstanding individual circumstances. The FRC limits human rights only to the extent that is reasonable, necessary, and proportionate to individual circumstances,



for a limited period (of no more than 12 months) upon which the income management arrangement automatically expires.

The Australian Human Rights Commission has stated on previous occasions<sup>31</sup> that its preferred features of an income management measure are:

- An approach that enables participants to voluntarily opt-in to the scheme, rather than an automatic quarantining model (which relies upon individual applications for exemptions).
- An approach that utilises income management as a 'last resort' strategy, particularly for targeted risk areas such as child protection (that is supported by case management and support services); and
- Measures that are applied for a defined period and in a manner proportionate to the context.<sup>32</sup>

Noticeably these features are consistent with elements of the FRC model.

The FRC also notes that the PJCHR has previously raised concerns that the limits on human rights associated with the blanket application of compulsory income management is not a proportionate limitation. The PJCHR has acknowledged the contrasting approach in the FRC model, where the individual's circumstances are taken into account. However, there was a remaining concern by the then Committee that some element of the FRC's income management remained compulsory.<sup>33</sup>

FRC respectfully submits that the features of **conditional and voluntary** income management inherent in the FRC model satisfy the elements proposed by the AHRC. There are additional facets of the FRC model which further support the rights of FRC clients and their families, including children and vulnerable family or kinship members, which demonstrate the Commission's human rights credentials.

#### **4.1 Local authority and developing personal responsibility.**

The FRC is an independent quasi-judicial body. As noted, it is a novel bi-cultural institution which gives decision-making powers to First Nations people in their local communities. Decisions are made by Elders or respected people within the community who are of good standing.<sup>34</sup> The Family Responsibilities Commissioner must be legally trained, have an appropriate understanding of the history and culture of First Nations people, and appropriate experience in mediation or alternative dispute resolution.<sup>35</sup> The FRC Commissioner must also ensure that the Local Commissioners receive regular and appropriate training.<sup>36</sup> The FRC Act also enshrines the requirement to take Aboriginal tradition and Torres Strait Islander custom into account in the administration of the Act.<sup>37</sup>

This can be contrasted with other models in Australia that work on an administrative policy setting, where there is little, to no, discretion or apply on a case-by-case basis. The discretion to consider applications to exit income management sits with the Secretary of the Department of Social Services, who is removed from the communities, and must make decisions without the benefit of deep knowledge of the person and their community, and relevant cultural considerations.

The Commission works on the basis that all community members are more than capable to go about their lives and meet their social obligations as valued members of the community in which they live.

The FRC can only intervene, should certain conditions be met. The FRC Act sets out the circumstances of when, and how, the Commission can intervene in a community member's life. The

<sup>31</sup> See for example, Australian Human Rights Commission, Aboriginal and Torres Strait Islander Social Justice Commissioner, submission to the Senate inquiry into the *Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019*, October 2019 which is also has elements consistent with the Parliamentary Joint Committee on Human Rights: Guide to Human Rights, June 2015.

<sup>32</sup> Ibid Australian Human Rights Commission submission 2019.

<sup>33</sup> For example, Parliamentary Joint Committee on Human Rights.

<sup>34</sup> The FRC Act has strict eligibility requirements to become a Local Commissioner, see s18 and 20 of the FRC Act.

<sup>35</sup> s17 of the FRC Act.

<sup>36</sup> s22(1)(b) of the FRC Act.

<sup>37</sup> s5(c) of the FRC Act.

Commission, overseen by the legal qualified FRC Commissioner,<sup>38</sup> then carefully ‘triages’ or determines the priority of matters that should proceed to conference. The Commission may decide that a less intrusive interaction with the client is justified, in the first instance, such as encouraging the person to resolve matters through their own support systems or providing information and making recommendations on how to access community resources.

As illustrated below in figure 4.1 **over half of all the Commission’s decisions (62%)** are made with some form of agreement with the client (voluntary income management, voluntary case plan and decision by agreement for a conditional case plan). This highlights the careful and proportionate manner in which the FRC Commissioner (and/or Deputy Commissioner) and Local Commissioners consider the circumstances of each client and their family.

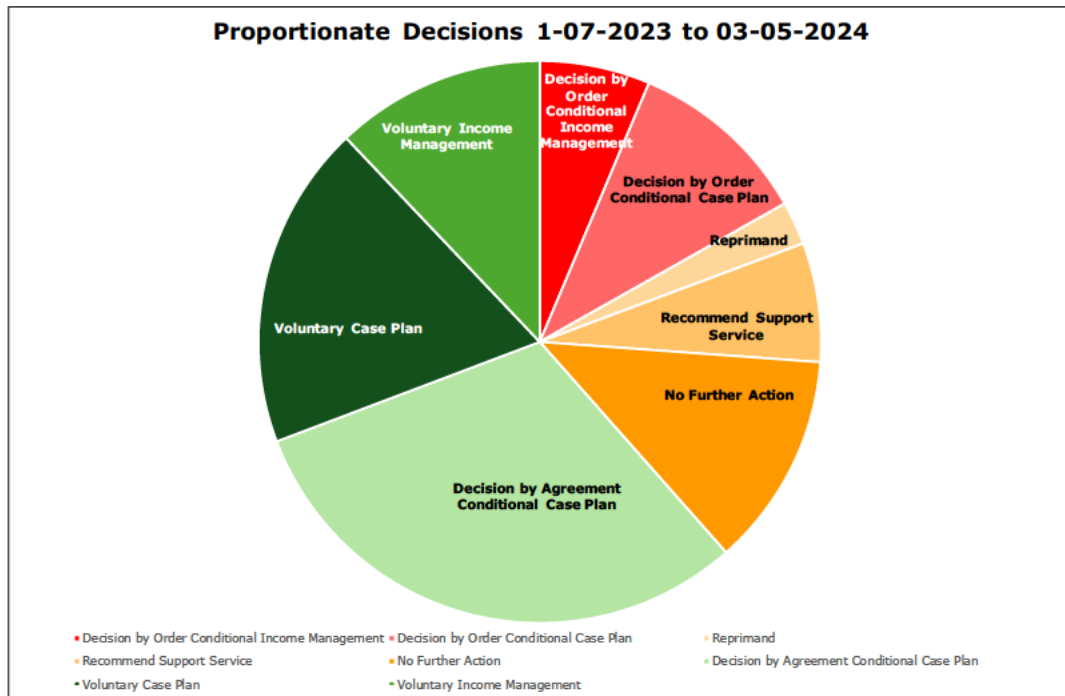


Figure 4.1 FRC decisions are proportionate to client circumstances.

#### 4.2 Self-determination and operating environment conditions.

In the AHRC’s submission to the Senate inquiry into the *Social Security (Administration) Amendment (Income Management to Cashless Debit Card Transition) Bill 2019*, The Aboriginal and Torres Strait Islander Social Justice Commissioner, June Oscar AO, made the following comments in her closing remarks:

*The Commission supports a community-driven approach, that if a community chose to introduce income management measures, there is participation in decision-making based on free, prior, and informed consent and good faith. Community governance structures and processes should be developed with the aim of empowering community members to take control of their own identified issues and aspirations.*

The establishment of the FRC was the result of approximately two years of consultations with the participating communities, and a collaborative and bi-partisan effort across the Queensland and Australian Governments prior to the introduction of the *Family Responsibilities Commission Bill 2008* in the Queensland Parliament.

Over the life of the FRC’s fifteen-year history it has been the subject of:

<sup>38</sup> Or Deputy Commissioner acting on delegation to perform the FRC Commissioner’s functions.

- Three Queensland Government led consultation process each year in 2011, 2012 and 2013 in the Cape York Welfare Reform (CYWR) communities to inform the Queensland Cabinet and elicit a decision on whether the CYWR trial and FRC should be extended.
- Four independent evaluative exercises undertaken:
  - 2010 KPMG Implementation Review of the Family Responsibilities Commission
  - 2012 Cape York Welfare Reform Evaluation
  - 2018 Queensland University of Technology (QUT) Strategic Evaluation of Cape York Income Management
  - 2014 Health Outcomes International (HOI) Evaluation of Cape York Wellbeing Centres provides some valuable evidence regarding outcomes for FRC referred clients.
- Fifteen annual reports tabled in the Queensland Parliament and published on the Commission's website,
- Sixty-one quarterly reports detailing the Commission's operations have been prepared by the FRC Commissioner and submitted to the Family Responsibilities Board (**FRB**) pursuant to section 144 FRC Act. These quarterly reports are later published on the Commission's website.<sup>39</sup>
- Annual appearances before the relevant Queensland Parliamentary Committee charged with oversight responsibility for the FRC Act; and
- Involved in multiple parliamentary (Commonwealth and State) inquiries.

Since 24 June 2021<sup>40</sup> the FRC remains the subject of a Queensland Government *Future Directions* review which will determine the future of the FRC. This review included broad community-based consultation by external consultants between April to June 2022 in the five FRC communities of Aurukun, Coen, Doomadgee, Mossman Gorge and Hope Vale. The outcome of the *Future Directions* review remains unknown.

In February 2024 the Secretary of the Department of Social Services (DSS) informed the FRC and the Family Responsibilities Board (**FRB**) of the department's intention to undertake community consultations in each of the five FRC communities to inform the future of enhanced Income Management (eIM). These consultations are due to commence soon.

The FRC recognises the importance of continued parliamentary and executive oversight of the Commission's execution of its powers and functions. However, the ongoing nature of consultations and reviews has created a perpetual state of operational uncertainty for the Commission, and its authorising environment. When short-term funding and appointments of key personnel is tied to the outcome of periodic reviews and evaluations, it has been the Commission's experience that such uncertainty makes it difficult for the executive management to strategically plan, recruit and retain staff, as well as invest in necessary upgrades to critical infrastructure such as information technology.

In its submission to the Queensland Government's *Future Directions* review titled: *The FRC: A model of Self-Determination – an operational analysis of the Family Responsibilities Commission from 2008 to 2022*, the Commission stated at page 115 '[t]he very high level of uncertainty and lack of forward momentum has had adverse impacts on the FRC – strategically, operationally, and psychologically. The FRC is not aware of any other statutory body that has experienced the levels of uncertainty over such an extended period.'

Despite this uncertainty, the FRC's bona fides as a model aimed at ensuring equal enjoyment of human rights has been consistently confirmed. For example, the FRC worked closely throughout 2022-23 with the Australian Government and Australian Parliament to ensure that the new enhanced Income Management (eIM) arrangements contained in the *Social Security (Administration)*

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<sup>39</sup> The FRC is currently reviewing its data and working on quarterly reports number 62 (October to December 2023) and number 63 (January to March 2024). These reports together with quarterly report number 64 (April to June 2024) will form the basis of the 16<sup>th</sup> annual report of the Commission's operations for the 2023-24 financial year.

<sup>40</sup> When the then Minister Crawford wrote to the Family Responsibilities Commission to announce his intention 'over the next twelve months' to conduct a Future Directions Review of the FRC.

*Amendment (Repeal of Cashless Debit Card and Other Measures) Bill* were fit-for-purpose for communities operating as part of the FRC model.

The legislative amendments preserved the FRC's independence as a statutory body under the FRC Act empowered to make agile and highly nuanced decisions. Indeed, the Explanatory Memorandum to the Bill noted the compatibility of the FRC model with human rights and the right to self-determination pursuant to Article 1 of the International Covenant on Economic, Social and Cultural Rights.

The FRC respectfully submits that the evidence presented in this submission shows that the FRC is a holistic model, including income management, which is compatible with human rights. An endorsement of the FRC in this way, may ameliorate some of the challenges faced as a result of the continuing uncertainty of its operating environment.

## **5.0 FINDINGS**

The FRC aims to ensure the equal enjoyment of human rights to health, safety, food, education, housing, employment, and freedom from violence, especially for children and other vulnerable people in FRC communities. It is against this background, and the FRC's 15 years of experience and evidence base, that the Commission make the following findings relevant to ensuring an effective and proportionate income management model, remains fit for purpose, for the needs of community members.

### **5.1 Voluntary *and* conditional forms of income management are needed.**

The FRC submits that both voluntary *and* conditional income management, applied with a high degree of flexibility, are necessary. The element of conditional income management is important to incentivise those suffering extreme and entrenched disadvantage to seek support, and to protect the rights of children and other vulnerable community members.

### **5.2 Complementary referrals enable behavioural change.**

Much of the success of the FRC model can be attributed to the robust legal framework in which it operates. This means the FRC can utilise its legislative powers to coordinate a multi-disciplinary approach. Through case planning, referrals, case management and monitoring, and information sharing, the FRC model enables multiple stakeholders to work holistically through a client-centred approach.

Client demand for support services continues to grow. Co-design and delivery of services will need to evolve at the pace of community members, whose needs and aspirations evolve from requiring basic interventionalist, and emergency supports, to resources that enable increased personal agency and, economic empowerment as originally predicted in the Cape York Welfare Reform's program logic (see fig. 3.14.1). This will require continued investment by both the Australian and Queensland governments in evidence-based services to support the continuum of behavioural change of community members and income management participants.

### **5.3 Re-establishing local authority and fostering personal agency.**

Data cited throughout this submission paints a picture of evolution over the past 15 years since the establishment of the Commission. The pace of this change has been determined by our clients: resulting in the FRC '*moving at the speed of trust*'.

Although the FRC's legislative parameters have remained relatively fixed, the Commission's decisions have evolved, and the way in which the FRC engages with its clients has also evolved. The evolution of the Commission's operations has occurred because the needs and aspirations of our clients have evolved.

Yet, what has anchored the FRC model amongst the waves of change and uncertainty – also caused by external factors such as COVID-19 and alterations to government policies and priorities, has been the Commission's stable and enduring leadership of its community-based Local Commissioners. Appointed because on their cultural authority, relevant knowledge, and expertise, it is not surprising,

that respected relationships have developed, over time, between the FRC's Local Commissioners and staff and many of its clients. Consequently, FRC's decisions and approaches to case management, can have greater meaning and impact, when the Commission can draw upon its longitudinal knowledge of client circumstances and their behavioural-change journey to date. This respect for the Commission and its work, may also explain why O-HUB data cited in this submission (see above at paragraph 3.12) shows a relatively high rate of compliance by clients of Commission decisions, including orders.

All FRC personnel, including Local Commissioners, are bound by confidentiality provisions set out in the FRC Act. This provides further reassurance to clients of the professional standards they can expect of all Commission officials when performing their statutory duties.

## **6.0 CONCLUSION**

The FRC is a leading model of self-determination, committed to furthering the opportunities for First Nations people and particularly children and vulnerable people to enjoy their human rights in parity with other Australians.

The FRC enjoys the privileged position of operating within a legislative framework which enshrines local authority and shared decision making as paramount.

The implementation of the unique FRC model in five First Nations communities over 15 years has provided a body of evidence which shows that to be effective and income management model requires –

- Elements of voluntary and conditional management with VIM applied flexibly and tailored to individual circumstances.
- Need complementary referrals and case management that can hold both individuals and service providers to account and has capacity to provide intensive support.
- Need support services that are effective and available.

For this reason, the FRC recommends that:

1. The PJCHR endorse the FRC model of income management, with its complementary case management approach to clients, as one that is compatible with human rights.
2. The Australian Government continues to invest in the FRC and maintain its legislative and policy settings.
3. The Australian Government supports the FRC to administer its model of voluntary income management to interested persons across Queensland and considers greater flexibility and autonomy to participants in deciding the percentage to be voluntarily quarantined.
4. The Australian Government continues to invest in support services, and employment and training opportunities, in the five remote communities the FRC operates, that are effective and responsive to the evolving needs and aspirations of community members.

**Submitted by:**

Tammy Williams, FRC Commissioner