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SUBMISSION NO. 189
AUTHORISED: 22.6.05 *Adoptive*

Standing Committee on Family and Human Services
House of Representatives
Parliament House Canberra

SUBMISSION

COMMONWEALTH PARLIAMENTARY INQUIRY INTO ADOPTION OF CHILDREN FROM OVERSEAS

PREAMBLE

The Standing Committee on Family and Human Services is to be commended for instigating this long overdue inquiry. Although I find it regrettable that the call for this inquiry seemed to have come forth from concern for Australia's low birth rate rather than concern for the millions of children in the world who are deprived of parental care, I am optimistic that the outcome will be positive for the many children waiting for a secure and loving family.

The two terms of reference for the inquiry indicate that the Committee already has some insight into the problematic intercountry adoption system in Australia. It is my view that the problems in this adoption system are symptomatic of the difference in which Australia treats adoptive families, both local and intercountry, compared to biological families. As such my submission also refers to local adoption where relevant.

I would like to emphasise that, although I consider that examining inconsistencies between state and territorial systems may lead to an improved and uniform federal adoption system, as long as there is a systemic bias against adoption in Australia, there is real risk of ending up with a national uniform system that inhibits adoption even more than the present collection of loosely associated systems. I offer the following comments and recommendations on the assumption that this inquiry genuinely seeks to improve the adoption systems so that more needy children can join able and willing adoptive families in Australia.

My submission is based on my experiential, professional and academic qualifications as an adoptive mother, a community psychologist in adoption, and an adoption researcher in Western Australia (WA). Through my longstanding work in local and intercountry pre- and post adoption programs as a private practitioner and foundation member of Adoptions International of WA (AIWA), I have also acquired a reasonable level of knowledge and understanding of local, national and international adoption laws, policies and practices. I am currently the Assistant Principal Officer of AIWA and its representative on the national body, the Australian Council for Adoption.

FIRST TERM OF REFERENCE:

ANY INCONSISTENCIES BETWEEN STATE AND TERRITORY APPROVAL PROCESSES FOR OVERSEAS ADOPTIONS.

Each state and territory has a different set of eligibility and suitability criteria which vary in areas such as age of applicants; marital status and length of that status; gender; citizenship; age and status of children already in the family; competencies in parenting, culture and relationships; quality of support networks; physical and mental health; financial stability and standing in community. The subjective nature of the formal adoption systems becomes evident when adoption applicants, considered ineligible under WA criteria, move to other states and subsequently become adoptive parents.

Age

WA allows a maximum difference of 45 years between a single adoption applicant and his/her first prospective adopted child. In the case of a couple the maximum difference is 45 years between the youngest of the two and the first prospective adoptive child, and 50 years between the oldest and the child. In the case of 2nd or subsequent adoptions the maximum age differences increase 5 years.

If the applicants already have a child or children, who are not adopted, the maximum age differences remain 45 and 50 years, with the additional requirement that the to-be-adopted child be at least 12 months younger than the youngest child already in the family. If however, at least one of the children already in the family is an adopted child, the maximum age differences become 50 and 55. These age criteria clearly discriminate against prospective adoptive families with non-adopted children.

In regards to age of prospective adoptive children, the WA adoption authorities have clearly stated a preference for approving the intercountry adoptive placement of young healthy children, and discouraging the placement of older children and sibling groups citing questionable disruption statistics. As the latter children are more often the ones overseas countries are seeking intercountry adoption placements for, I decided to research the intercountry adoption disruption rates in WA and reported the findings in the AdoptWest issue of August 2003. I found an overall disruption rate of 1.9 percent (1 in 50) for both boys and girls. Although the disruption rates of children placed after the age of two years was found to increase from 0.5 to 7.7 percent, especially among girls, the increase is significantly less than the 16.6 percent stated by the adoption authorities. Examination of individual cases showed that adoption disruption was more related to inadequate post adoption placement support and lack of adoptive family preservation services than age of children. This challenges the prevailing bias against the adoptive placement of older children. A copy of the complete article can be read on www.adoptioniwau.org/article.pdf.

In the first stage of my longitudinal study on the wellbeing of intercountry adoptees in WA, undertaken in 1994, I found that in the 5 disruptions that had taken place in the first 20 years of intercountry adoption in WA, children's adverse pre-adoption experiences, rather than age at arrival, were important factors (Rosenwald, 1995. Edith Cowan University, Joondalup). The positive findings, in my and similar studies, that the intercountry adopted children are almost as well as their non-adopted peers in the general population seem to be ignored by the WA adoption authorities. I am currently undertaking the 2nd stage of this study as a PhD in Psychology research project and am expecting similar findings. Recent international meta-analytical

research on adoption outcomes has reconfirmed that intercountry adoption is a positive option for children of all ages. Children adopted between the ages of 1 to 2 years were found to more likely exhibit problem behaviours (Juffer, 2002, *Adoption: an option for child and family*; Leiden University, The Netherlands), and a child's older age at adoption was not the significant factor it is generally presented to be (van Ijzendoorn & Juffer, 2005, *Adoption and cognitive development: A meta-analytic comparison of adopted and non-adopted children's IQ and school performance*. Psychological Bulletin, 301(2) pp. 301-316). See www.adoptionresearch.nl for abstracts of these and other adoption research articles.

I recommend that nationally all age restrictions on applicants and children be removed, such as is the case in the ACT, allowing maximum flexibility in each individual case to meet children's needs, family willingness and ability, and country of origin requirements and needs.

Australian Citizenship, Migrants and Relatives

Migrants seem to be disadvantaged by adoption legislation in WA. Australian citizenship is a requirement for adoption applicants even though sponsorship for migration of an intercountry adopted child can also be applied for by permanent residents. To my knowledge no research has shown citizenship to have any influence on the parenting abilities of adoptive parents. I personally adopted children as a permanent resident in Australia, and do not consider it to have had any negative influence on my parenting of my birth, adopted and foster children. For migrants, such as myself, becoming an Australian citizen requires sacrificing many or all legal connections with their country of origin. This hardly fits in with the multicultural ideology and practices promoted in Australia.

The Australian citizenship requirement for adoption also discriminates against people who live in Australia on a working visa or other type of long term visa, and who wish to undertake an adoption while living in Australia. Australia's often negative and suspicious attitude towards the quality of adoption systems in other countries suggests that it considers itself to have a superior adoption system compared to other countries. If the interests of the to-be-adopted children are indeed considered paramount, it makes no sense to deny these residents access to Australia's presumably superior system of domicile and intercountry adoptions, unless Australia's real goal is to obstruct rather than facilitate adoption.

I recommend that Australian citizenship be removed as a requirement for adoption applicants.

Migrants who wish to adopt from their country of origin are often prevented from doing so because there is no existing program with Australia and/or WA. Many migrants have found it very frustrating to not be able to adopt needy children from their country of origin. This situation is predominantly caused by Australia's policy to refuse to work with any adoption programs in countries that do not have a bi-lateral agreement with Australia or are not a party to the Hague Convention on Intercountry Adoption (ICA), the exception being China, which came into operation in 1999, a year after Australia ratified the Hague ICA Convention.

The restriction on programs is not a requirement of the Hague ICA Convention and most other member countries do not have it. In fact, receiving countries in Europe that are party to the Hague ICA Convention have high rates of intercountry adoption from a large number of intercountry programs in non-ICA Convention countries. For example, in 2004, Spain received over 6,000 intercountry adoptees, many of whom came from non-ICA Convention countries. France had 4,079 intercountry adoptions from 77 countries, of which 67 percent came from non-Hague ICA Convention countries. Most of these adoptions were facilitated by 39 accredited non-government adoption agencies in France (see website of the French Foreign Affairs Department www.diplomatie.gouv.fr/mai/pdf/stat_adoption_2004.pdf). In 2003, Italy received 2,760 intercountry adoptees from 48 countries, facilitated by Italian government and non-government agencies. Many of the sending countries are not signatories to the Hague ICA Convention (see www.commissioneadozioni.it/site/files/RAPP1203.pdf of the Italian Central Adoption Authority). Another excellent source of information on intercountry adoption to Europe is the keynote address presented at the 8th Australian Adoption Conference in Adelaide on 20 April 2004 by Dr. Carmela Cavallo, President, Commission For Intercountry Adoption Italian Central Authority (see conference website <http://www.plevin.com.au/adoption2004/>). In contrast, in 2003/04, Australia finalised 370 intercountry adoptions from 12 countries, with 87 percent coming from 9 non-ICA Convention countries. In WA, applicants were even more restricted with 44 ICA finalisations from only 7 countries, with only 1 adoption coming from an ICA Convention country! Australia's assertion that it is only prepared to consider intercountry adoptions from countries that are parties to the Hague ICA Convention to meet necessary child protection standards against child trafficking, belies its own practices. It also suggests that it perceives European intercountry adoption practices to be suspect of child trafficking.

I recommend that all Australian applicants be allowed to apply for intercountry adoption through government or licensed/ accredited agencies in their families' countries of origin

Under WA adoption legislation, people can not adopt relative children either locally or from overseas. In many, if not most cultures around the world, permanent kinship care for children in need of an alternative family is the cultural norm. In the case of relative children living in Australia the children can be, and are, placed in permanent kinship care across state boundaries. However, if the relative children live overseas and are not orphans, the prohibition of relative adoption, and consequently the denial of adoption visas, prevents the practice of permanent kinship care for these families. In the absence of any other permanent child entry visa into Australia, migrant families, and families with relatives living overseas, are greatly disadvantaged. The WA adoption authorities shift their responsibility of this situation to the Department of Immigration and Indigenous Affairs. The fact that a separate information sheet is available from the WA adoption authorities' website suggests that there is a significant local need in the area of relative intercountry adoption (see <http://community.wa.gov.au/NR/rdonlyres/75D20776-0EF3-4223-A9AA-539BDDEA8DAF/0/DCDGUIOverseasrelativeadoptionFactSheet2.pdf>)

Finally, Australia does not allow for the adoption of adoptable refugee children, the only party to the Hague ICA Convention to refuse to accept the recommendation of the 1994 UN Special Commission on the implementation of the Hague ICA Convention to include these children under the protective umbrella of this Convention.

The Australian imposed restrictions on which countries can be adopted from, and adoption of relative and refugee children, seem to make a mockery of the highly promoted principle of cultural and ethnic continuity included in the adoption legislation and/or policies of most, if not all, Australian states and territories.

I recommend that the restrictions on relative adoptions be removed

AND

that Australia removes its restriction on adoption of adoptable refugee children by Australian applicants.

Suitability to adopt

There are many inconsistencies within the approval processes of the different States and Territories of Australia. Again, the situation is such that adoption applicants can be found suitable for adoptive parenthood in one part of Australia, and not in another. This suggests that it is not about who you are as an applicant, but about where you live in Australia. The answers are however not in removing the differences *per se*, but about ensuring that the different adoption systems around Australia are fair and adoption-friendly without compromising the best interests of prospective adoptive children and their families.

Suitability is judged on a range of subjective measures such as the applicants' motives for adoption, their ability to show competence in areas such as adoptive parenthood, and willingness and ability to continue the prospective adopted child's cultural and ethnic heritage. Because of the subjective nature of these measures, how they are perceived and reported on is subject to the attitudes and mindset of the persons who assess, judge, report and decide whether the adoptive parenting abilities of the applicants are good enough. Although the assessment and approval process in adoption is presented as an objective one, I have come to the conclusion that it is impossible to categorically distinguish between those who make good enough and not good enough adoptive parents. The assessment and approval of applicants seem therefore in the end to become a subjective decision based on personal and environmental factors present in the lives of assessors and other significant decision makers. Attitude towards adoption and adoption applicants seems to play an important part in the decision making process. Viewing adoption as a possible fate worse than death, and adoption applicants as potential child traffickers, can hardly be considered a sound basis on which to judge people's suitability to become adoptive parents.

I recommend that all States and Territories in Australia be required to develop a positive adoption culture within its adoption authorities, and to ensure that all those providing pre- and post adoption services are well educated about all aspects of adoption, and have a balanced view about the pros and cons of adoption.

TERM OF REFERENCE 2

ANY INCONSISTENCIES BETWEEN THE BENEFITS AND ENTITLEMENTS PROVIDED TO FAMILIES WITH BIRTH CHILDREN AND THOSE PROVIDED TO FAMILIES WHO HAVE ADOPTED CHILDREN FROM OVERSEAS.

There are some real contradictions in the way adoption is viewed and treated in Australia. It generally only gets mentioned in either very positive or very negative ways. Rarely is it presented as just one of a range of family forms that make up Australian society. However, when it comes to family benefits and entitlements, the special issues that the nature of adoption brings to families, compared to giving birth, seemed to be completely ignored by government bodies, resulting in significant inequities.

Maternity Payment

Maternity payment has been available to families for 26 weeks after the birth of their child. Recently this age restriction has been raised to two years for adoptive families. The Payment can only be made available once. Although the changed time limit is an improvement, the restrictions still in place continue to create inequity for most adoptive families in various ways.

Firstly, in the case of local adoption, birth parents, who are considering adoption but first try to parent the child themselves, receive the maternity payment. In this case the payment is an important resource for the birthparents to help them try and raise the child. Should they decide after some time to place the child for adoption after all, the maternity payment is no longer available to the adoptive parents because it can only be paid once. I believe this is acceptable to adoptive parents as it gives them the reassurance the birth parents did have, and take, the opportunity to try to raise the child themselves.

If the birth parents decide to place the child for adoption from birth and the child is placed in pre-adoptive foster care, in WA, the maternity payment is claimed by the pre-adoptive foster carer. Again the adoptive parents will not be eligible to claim the payment, even if the child was placed with them before the age of 26 weeks, as it is already paid to the foster carer. This practice raises questions about the purpose of the maternity payment. There is no doubt that pre-adoptive foster carers provide an essential and valuable service. However, they already receive financial remuneration from the State Government for the service they provide, as well as financial support with any additional furniture and clothing they require to care for the pre-adoptive child. If this financial remuneration and support is considered insufficient, is it right that the Federal Government is made to supplement inadequate State Government payment of foster carers by way of the maternity payment? Would it not be more equitable towards the prospective adoptive parents of the child if the State Government is made to meet its full responsibility of adequate payment to foster carers and the maternity payment is left for the adoptive parents?

I recommend that the maternity payment only be made available to the birth parents or the permanent alternative parent(s) of the child.

In the case of intercountry adoption, it is pretty certain that the maternity payment has not been paid to anybody prior to the child's arrival in the adoptive family. In this case however, the age limit placed on the child severely limits the accessibility for intercountry adoptive parents. Even if the age is increased to two years, many intercountry adoptive families will miss out. Considering that most of the children in overseas countries waiting for an adoptive family are older than 2 years and there is a chronic need for families in Australia to open their homes to these children, it is essential that there be no restrictions on the age of the arriving children. Families who adopt older children have just as much need for the financial assistance the maternity payment brings, as families who adopt the younger children. An example where an older age criterion is already in place is the Baby Bonus tax relief package for families. That benefit continues to be available until children turn 5 years, suggesting that the Federal Government is well aware of the value of providing support to families with children beyond infancy.

I recommend that there be no restrictions to the maternity payment based on the age of the intercountry adopted child at arrival in Australia.

Baby Bonus

The tax relief for families available in the form of the Baby Bonus is available to families until the child is 5 years, regardless whether a child is adopted or not. It is unclear whether the Federal Government has limited the tax relief to the first 5 years only, because the first 5 years of life are seen as particularly costly for families, or because 5 years was considered long enough. If the latter is the case, it seems reasonable to suggest that in the case of adoption the 5 years are calculated from the time the adopted child joins the adoptive family.

I recommend that the 5-year Baby Bonus be calculated from the time the adopted child joins the adoptive family.

Fees, Charges and Tax Concessions

Due to the user-pay system adopted by Australian government departments, and other costs incurred during the adoption process, adoption applicants, especially intercountry adoption applicants, pay a range of fees and charges until the adoption is finalised and the adopted child has been granted Australian citizenship. Whereas many of the costs of becoming a parent through birth are subsidised by the Federal and State Governments in one form or another, when children join families through intercountry adoption, Federal and State Governments charge the adoptive parents various fees throughout the adoption process. This undoubtedly serves as a deterrent for a number of otherwise suitable adoptive parents. In most other receiving countries, adoption receives government support in the form of subsidised adoption processes and tax concessions. Not so in Australia.

I recommend that the Federal Government subsidises adoption costs and allows tax concessions for all adoption related expenses.

Unpaid and Paid Maternity and Paternity Leave

Workplace Relations legislation spells out that adoptive parents have the right to up to 12 months unpaid adoption leave as long as the adopted child is under the age of 5 years at the time of arrival. As the WA adoption authorities require at least one of the adoptive parents to take a minimum of 12 months off work following the arrival of a newly adopted child, the age criterion discriminates against families whose adopted children after the age of 5 years. Worse still, it may prevent families from adopting older children.

Whereas paid maternity/paternity leave is an integral part of many employment awards and workplace agreements, adoption leave is not, or is only available at a lower rate. These inequities need to be addressed urgently to ensure adopted children and their families enjoy the same entitlements as birth families.

I recommend that any restrictions on maternity/paternity leave, based on a child's adoptive status and age, be removed immediately.

Permanent residence visa for adopted children and other Federal Government charges

Intercountry and domicile adopted children can only gain entrance into Australia by means of the adoption visa issued by the Commonwealth Department of Immigration and Indigenous Affairs (DIMIA). The cost of this special visa, currently \$1,245, and other Federal Government charges add significantly to the costs incurred by adoptive families. The Commonwealth Government should abolish these "taxes" on adoption, thus giving practical support to intercountry adoption and removing the impression it seeks to make money out of adoption.

I recommend that the adoption visa fee be abolished immediately and other Federal Government charges be subsidised.

Australian citizenship and domicile adoption

A child born outside Australia to an Australian citizen who resides overseas can from immediately until their 25th birthday, be registered as an Australian citizen by descent. A child born outside Australia and formally adopted by an Australian citizen residing overseas does not enjoy the same speedy entitlement. The child only "may be eligible to apply for the grant of citizenship". This significant restriction suggests that these domicile adoptions are viewed negatively by the Australian Authorities. Evidence shows however that domicile adoption is a positive form of adoption for the child, the child's country of birth, the adoptive parents and possibly the child's birth family. Firstly, the child spends at least the first part of his or her adoptive life in the country of origin, thus minimising cultural disruption. Secondly, the adoption authorities in the child's country of origin play the key roles of assessing and approving the prospective adoptive parents, and monitoring the placement. Thirdly, by living in the child's country of origin for at least 12 months, and usually much longer, the adoptive parents gain valuable insight and knowledge about the child's country and culture of origin and possibly the child's family of origin. Finally, the potential of developing and maintaining links with the child's family of origin, or open

adoption, are enhanced in domicile adoption. Open adoption is now the preferred form of adoption in Australia, but is still rarely available in intercountry adoption. The increased possibility of it happening in domicile adoption should therefore be seen as one of the greatest advantages of domicile adoption.

The proposed requirement that an adoption visa be acquired before a grant of Australian citizenship can be issued to the domicile adopted child seems nothing more than an outrageous attempt at increasing government revenue and barriers to adoption. Any suggestions that this policy change will protect domicile adopted children from child traffickers is nonsense. Children will only be protected from child traffickers by the rigorous assessment of the child's adoptable status and the adoption applicants' suitability to adopt by the adoption authorities or its accredited agents in the child's country of origin. This seems to be happening in most, if not all domicile adoption cases. If the visa changes are only based on Australia automatically suspecting the quality of adoption services in other countries to be inferior, it increases the risk of being seen as prejudiced and disrespectful. Such negative attitudes within Australian adoption authorities are likely to make countries more reluctant to place their children for intercountry adoption in Australia.

I recommend that for Australian citizens and permanent residents, their domicile adopted children enjoy the same immediate entitlement to Australian Citizenship as the children born to them while overseas without first having to acquire an adoption visa.

Equal Opportunity

Any person in WA can reasonably expect to be protected against discrimination under the State's Equal Opportunity legislation. In adoption however, this entitlement has been severely restricted for adoption applicants since 2001, when approval for adoption was exempted from the protection of Equal Opportunity legislation. Together with the heightened vulnerability of adoption applicants, caused by lack of choice in service providers, it is clear that compared to prospective birth parents, prospective adoptive parents in WA suffer significant disadvantages.

There also seems to be a lack of gender equality in access to adoption. It is my understanding that to date no single male has thus far been able to achieve a non-relative adoption in WA. Single females in WA are however regularly approved for adoption. We must seriously question whether this situation represents reluctance by single males to apply for adoption or if there is an actual bias against them in the application and approval process. In the small number of cases of single males I have worked with over the years, it seems to be a combination of these two factors, with the latter factor leading to the first. It would be sad indeed if the motives of our unmarried sons are viewed with even more suspicion than those of our husbands.

I recommend that legislative protection against discrimination in adoption be restored and maintained, if necessary on a national level.

Access to providers of pre- and post adoption services

Consumers of reproductive technologies and prospective parents who give birth in Australia have access to a wide range of service providers and the freedom to choose their preferred service providers. In adoption, Australia allows virtually no choice of service provider. Some states and territories have non-government agencies licensed to only provide local adoption placement services. Since the recent closure of the only licensed and accredited non-government intercountry adoption agency in Australia, the Australians Aiding Children Adoption Agency in South Australia, Australia allows no choice of service provider in intercountry adoption. All intercountry adoption applicants must go through the designated government department in their state or territory. In states where there are no licensed and accredited non-government adoption agencies at all, such as WA, both local and intercountry adoption placement services can legally only be provided by the government. Restricting adoption placement services exclusively to only one authorised provider thus deprives those seeking adoption services the choice of service provider. More significantly, in addition to lack of choice, this monopoly leaves clients fully dependent on the attitudes towards adoption held by the single service provider, and makes them vulnerable to becoming victims of abuse of power. If the single adoption service provider is also the State adoption authorities that is responsible for monitoring adoption service provision, as is the case in WA, a serious conflict of interest situation arises, providing little recourse for dissatisfied or wronged clients, be they parties to an adoption or individuals and non-government organisations providing adoption services.

The general complaint by the States and Territories adoption authorities, that their service delivery and activation of new available intercountry adoption programs are hampered by insufficient resources, is in stark contrast to their reluctance to license and accredit non-government organisations for the provision of intercountry adoption services. In SA the only existing agency has been closed. In WA only one NGO, Adoptions International of WA (AIWA), has applied for a licence and accreditation. AIWA has lodged 2 applications process over a period of almost 10 years and is still waiting for a final decision. No further applications will be possible since WA changed its adoption law in 2003. Adoption statistics in receiving and sending countries and states around the world generally show that systems inclusive of licensed and accredited intercountry adoption agencies have more effective adoption service provision and higher rates of intercountry adoptions than Australia. The global trend of increase in the number of licensed and accredited agencies is supported by the Hague ICA Convention. Why then is Australia so averse to harnessing the positive energy of dedicated non-government organisations? Is it because the Australian decision makers do not consider adoption to be a positive option for children deprived of parental care, and consequently do not wish to see more children join Australian families through intercountry adoption?

In WA, people interested in intercountry adoption feel discouraged by the adoption authorities' statement that there are few children in overseas countries waiting for a permanent family. Other deterrents are exaggeration by the Adoption Authorities of disruption figures, limitation of active adoption programs and an apparent increase in rejection of applicants for spurious reasons. In regards to relationship building with active and new ICA programs in the overseas countries, the WA adoption authorities does not appear to have sent any representatives to any of the intercountry adoption countries it works with for at least 10 years. The low and slow rate of allocations to WA from certain countries may well be a reflection of this lack of goodwill. The non-government intercountry adoption community in WA on the other hand has, over the

years, sponsored visits by representatives from most of the adoption agencies or authorities in the active overseas programs, the most recent one being the representatives from Ethiopia last year. But even this important post adoption service is being curtailed by the WA adoption authorities through the prohibition of having any contact with the adoption authorities and licensed agencies in the overseas countries, unless approved by the WA adoption authorities. Prevention of child trafficking is given as primary reason for the restriction, suggesting that this is a serious problem in WA. However, to this day I am not aware of there ever having been a substantiated case of child trafficking in intercountry adoption in WA.

Government sponsorship for the delivery of pre- and post intercountry adoption services by individuals and organisations in the non-government sector in WA is restricted and exclusive. In fact, as the only specialist in post intercountry adoption services in the WA non-government sector, I can categorically state that the WA adoption authorities' acknowledgment of the need for, and support for post intercountry adoption services is totally inadequate, at times even obstructive.

I recommend that a national system and body, responsible for licensing and accreditation of non-government adoption agencies around Australia, be established

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that thus authorised non-government agencies AS WELL AS State and Territory Government adoption services be equally monitored and held accountable for the delivery of quality and equitable adoption services by this national body.

I trust that the Committee will give serious consideration to the points raised above and will act as quickly as possible to remove the identified inconsistencies in adoption processes and family benefits and entitlements. Should the Committee decide to hold a public hearing in Perth, I would be happy to speak to my submission.

Signed:

Trudy Rosenwald

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