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department of disability,  
housing & community services

# A DISABILITY AND COMMUNITY SERVICES COMMISSIONER FOR THE ACT

## Discussion Paper

June 2005



building our city  
building our community

**ACT Government**

## **CONDUCT OF THIS CONSULTATION PROCESS**

KPMG National Social Policy Practice is conducting this consultation on behalf of the Department of Disability, Housing and Community Services, ACT Government.

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## **PURPOSE OF THIS DISCUSSION PAPER**

This discussion paper is intended to form the basis of consultation with the ACT community on the potential community services roles and responsibilities of a Disability and Community Services Commissioner. The Paper outlines the current arrangements in the ACT and arrangements that exist for similar Commissioners in other jurisdictions. It also provides an outline of the views that have already been put to the ACT Government on the role of the Commissioner in the ACT, and poses questions in relation to the definition, functions, complainants and powers of the Commissioner.

Further information will be included on our website at:

<http://www.dhcs.act.gov.au>

**Closing date for submissions: 25 July 2005**

# CONTENTS

<b>Foreword by the Minister for Disability, Housing and Community Services .....</b>	<b>1</b>
<b>1. Introduction</b>	
1.1 Background.....	2
1.2 Review of Statutory Oversight and Community Advocacy Agencies (FEMAG Report).....	3
1.3 ACTCOSS Response to the Report of the Review of Statutory Oversight and Community Advocacy Agencies.....	3
1.4 <i>The Right System for Rights Protection - ACT Government</i> Position Paper on the System of Statutory Oversight in the ACT.....	4
<b>2. Current Developments in Statutory Oversight in the ACT</b>	
2.1 Human Rights Commission.....	6
2.2 Commissioner for Children and Young People in the ACT .....	7
<b>3. Models in other Jurisdictions</b>	
3.1 New South Wales .....	9
3.2 South Australia .....	10
3.3 Northern Territory.....	11
3.4 Other Australian Jurisdictions.....	11
<b>4. A Disability and Community Services Commissioner for the ACT</b>	
4.1 Disability Services.....	12
4.2 Community Services .....	13
4.2(a) Definition of a ‘Community Service’ .....	13
4.2(b) Functions .....	15
4.2(c) Complainants .....	17
4.2(d) Powers.....	17
<b>5. References .....</b>	<b>19</b>

## FOREWORD BY THE MINISTER FOR DISABILITY, HOUSING AND COMMUNITY SERVICES

The ACT Government is committed to a strong and effective system of statutory oversight for the Canberra community. With this in mind, the Chief Minister announced in August 2004 that the government would reform the current system of individual oversight agencies and create a new Human Rights and Service Review Commission. The Government has since decided to name the agency, the Human Rights Commission. The details of the new Commission were included in *The Right System for Rights Protection - ACT Government Position Paper on the System of Statutory Oversight in the ACT*.

The Commission is to include the Human Rights Commissioner, Discrimination Commissioner and the Health Services Commissioner. The Government has also decided that there will be one commissioner with responsibility for both disability services and community services, to be called the Disability and Community Services Commissioner.

This Discussion Paper outlines the disability services role of the Disability and Community Services Commissioner, while seeking community views on the community services role of the Commissioner. The disability services functions of the Commissioner have already been the subject of community consultation, through the Disability Legislative Reform Working Group and have been responded to by the ACT Government in *The Right System for Rights Protection*.

The key questions posed in this Discussion Paper focus on how the scope of the Commissioner's community services responsibilities should be defined, what the community services functions of the Commissioner should be and what powers it should have. It also details current developments in statutory oversight in the ACT and models from other jurisdictions.

These are important questions which need to be answered in order for us to get the best possible outcome for consumers of community services in the ACT.

Comments and submissions are invited in relation to the questions posed in this Paper, and should be provided to the Department of Disability, Housing and Community Services by **25 July 2005**.

John Hargreaves MLA  
Minister for Disability, Housing and Community Services

June 2005

## 1. INTRODUCTION

### 1.1 Background

In April 2003, the ACT Government commissioned the Foundation for Effective Markets and Governance (FEMAG) to conduct a Review of Statutory Oversight and Community Advocacy Agencies. The Review looked at a broad range of statutory oversight and community advocacy bodies, taking a holistic view of the system so that it could make recommendations on improvements in the system as a whole. During the conduct of the Review, FEMAG consulted with over 200 individuals and 50 organisations, as well as attending a number of community fora.

In response to the FEMAG Report, the Government released, in August 2004, *The Right System for Rights Protection*, a position paper outlining new arrangements for the statutory oversight system in the ACT. The position paper committed the Government to establishing a Community Services Commissioner as part of the new Human Rights and Service Review Commission (now called the Human Rights Commission).

The Government's position paper stated that the Community Services Commissioner's role would be to "undertake monitoring and compliance activities and to investigate complaints about a broad range of community services not covered by existing arrangements." The paper noted that the scope of services to fall under these arrangements had not yet been determined, and would be the subject of further consultation.

The ACT Government has since decided that there will be a combined Disability and Community Services Commissioner. The provisions establishing the Commissioner are contained in the *Human Rights Commission Bill 2005*. The Bill includes the disability services components of the Commissioner's responsibilities, with the community services components to be added at a later date, after community consultation.

This discussion paper has been written to facilitate community consultation on the scope of the Commissioner's community services responsibilities. In doing so, it details current developments in statutory oversight in the ACT and describes models that have been adopted in other jurisdictions. It then identifies some key issues to be resolved in establishing the Commissioner and poses some questions to assist the community in providing its views to the ACT Government.

## **1.2 Review of Statutory Oversight and Community Advocacy Agencies (FEMAG Report) – October 2003**

The FEMAG Report confirmed the need identified in the ACT Health Review to consolidate the existing complaint bodies to ensure an optimum system for consumers and citizens, and to allow flexibility in the use of resources. The Report proposed options for a new structure for statutory oversight in the ACT that delivers better quality services to the community and to government.

The Report examined oversight functions with a view to determining if overlap and gaps currently exists between statutory oversight agencies or their legislative roles or functions, and if so, where there may be opportunities to improve structures for greater clarity of roles and responsibilities.

The Report noted that in consultations with stakeholders, respondents considered the term 'community services', as defined in the *Community and Health Services Complaints Act 1993* as 'a service for aged people or people with a disability' was under-defined. Respondents indicated that 'community services' should include a wider array of services that reflect more fully the services provided to the community - in particular, those not covered by existing complaint handling agencies.

The Report also noted comments received during consultations concerning the current major gap in coverage by complaint handling agencies of the broader range of community services provided in the ACT by non-government service providers. This raises some fundamental issues about accountability and the monitoring of such activities.

The Report identified current gaps in coverage by complaint handling agencies, which include services provided for youth, those provided under the Supported Assistance Accommodation Program (SAAP), child care, regional community services and educational services.

The FEMAG Report was received by the ACT Government in October 2003 and released for public comment in December 2003, until February 2004. The Government received thirteen submissions in relation to the Report.

## **1.3 ACTCOSS Response to the Report of the Review of Statutory Oversight and Community Advocacy Agencies - February 2004**

One of the most significant submissions received in response to the FEMAG Report, was that from the ACT Council of Social Service. The Council had been

integrally involved in the conduct of the Review, through conducting consultations on the original terms of reference, and through the community consultation process.

ACTCOSS highlighted during the consultations and in its Discussion Paper, that there is no current mechanism provided by legislation or in practice for complaints about the quality of non-government services provided in areas outside health, aged care and disability services.

ACTCOSS also stated that reform to the statutory oversight system should provide consumers of all community services with access to external complaints-handling processes, by establishing a high profile, comprehensive independent commissioner for community services, that could cover areas such as housing and youth services and should cover both government and non-government service providers.

Another significant issue raised by ACTCOSS, was the current weaknesses in internal complaints management processes for some community service providers. The Council recommended that there be a mechanism for the review and monitoring of internal complaints handling practices within service provider agencies.

ACTCOSS proposed a Commissioner with responsibility for the whole community services sector (including disability services), and highlighted the former NSW Community Services Commission as a model from which the ACT system could seek guidance.

#### **1.4 *The Right System for Rights Protection* ACT Government Position Paper on the System of Statutory Oversight in the ACT - August 2004**

The ACT Government's model for statutory oversight in the ACT establishes a new Human Rights and Service Review Commission (now the Human Rights Commission). The Commission will include the Human Rights Commissioner, Discrimination Commissioner, Health Services Commissioner, Disability Services Commissioner, and a Community Services Commissioner. The Government has since decided that the Disability Services Commissioner and Community Services Commissioner will be combined into one position.

The model allows for the Commission to receive complaints under all relevant legislation. There will be a President to manage its operation. Each Commissioner will exercise statutory functions and powers on behalf of the Commission, in their area of expertise to undertake monitoring, compliance and community education activities as well as the investigation of complaints.

The model also provides the flexibility to introduce additional responsibilities and Commissioners in the future, with relevant functions allocated to existing Commissioners or new appointees.

The ACT Ombudsman will remain separate to the Commission, with these services continuing to be provided by the Commonwealth Ombudsman. Under the Human Rights Commission model, Commissioners in the Commission, including the proposed Disability and Community Services Commissioner, are to be subject to the jurisdiction of the Ombudsman in regard to the review of their administrative processes.

There are no significant changes currently proposed to the structure of the Office of the Community Advocate (OCA), except for the proposed inclusion of the Official Visitors for Mental Health and Children and Young People within its responsibilities. The name of the Office will change to the Office of the Public Advocate.

## **2. CURRENT DEVELOPMENTS IN STATUTORY OVERSIGHT IN THE ACT**

### **2.1 Human Rights Commission**

The Government has committed to the inclusion of the Disability and Community Services Commissioner in the Human Rights Commission. This means that the Government has already made a range of decisions in relation to certain aspects of the Commissioner's status and operations, by virtue of its placement within the Commission.

Government has made the following decisions regarding the Human Rights Commission:

- It will not be subject to the direction of Government, except in relation to a direction from the Minister to conduct an inquiry;
- It will report to the Attorney-General;
- It will be subject to oversight by the ACT Ombudsman, in relation to its administrative processes;
- Joint investigations between Commissioners will be possible;
- It will have the power to conciliate complaints;
- A broad range of people may make a complaint;
- Complaints will be accepted in writing, and complainants may be assisted to put the complaint in writing;
- Own-motion and representative investigations may be undertaken;
- It will have the power to ask for information, documents and objects and require the attendance of people;
- It may provide third party reports;
- It may publish the details of non-complying entities;
- It will protect complainants against victimisation; and
- It will keep confidential certain aspects of its conciliation and complaints activities.

The Commission will be required to operate in a collegiate manner, with all Commissioners jointly making decisions regarding the Commission's activities.

## 2.2 Commissioner for Children and Young People in the ACT

The Government made a commitment, in its response to the *Territory as Parent - Review of the Safety of Children in Care in the ACT and of ACT Child Protection Management Report* ("Vardon Report"), to establish an independent Commissioner for Children and Young People. A position paper on possible models for a Commissioner for Children and Young People in the ACT was released for comment in September 2004 and consultation on the model for the Commissioner concluded on 10 December 2004.

Under the *Children and Young People Act 1999* a child is a person who is under 12 years of age and a young person is a person who is 12 years or age or older, but not yet an adult (18 years). The age range to 18 years defines the age of majority or adulthood in the ACT.

The ACT Government considered the views expressed by children and young people during the consultations and views expressed in public submissions about the establishment of a Commissioner for Children and Young People.

The Government is committed to the introduction of amending legislation to establish the Commissioner as a member of the Human Rights Commission. This means that the Government has made some decisions about certain aspects of the Commissioner's functions.

These functions include to:

- promote improvements in the provision of services for children and young people;
- promote the participation of children and young people in decision-making and their rights;
- promote the rights of users of services for children and young people;
- exercise functions in relation to services for children and young people;
- encourage service providers to seek the participation of children and young people appropriate to their age and maturity;
- provide a discretionary power to establish advisory bodies with representation from children and young people, appropriate to their age and maturity and include representatives with experience or expertise in relation to services for children and young people;
- provide for people to complain about a service for children and young people where a service provider has provided or not provided a service for children and young people in accordance with a national or Territory standard of service delivery expected of a service provider, or as prescribed by regulation;

- provide for the investigation of complaints about provision of services for the protection of children; and
- provide powers for the Commission to refer matters about an individual to the Community Advocate.

Services for children and young people would be defined as services provided specifically for children and young people or their carers and would include services provided by the government, private sector and non-government sector.

### 3. MODELS IN OTHER JURISDICTIONS

#### 3.1 New South Wales

Prior to 2002, the NSW Community Services Commission (CSC) operated as an independent government watchdog for consumers of community services in New South Wales. In December 2002, the responsibility for the functions of the Community Services Commission was transferred to the NSW Ombudsman.

The primary role of the Ombudsman is to be an independent review body. The main functions of the office are administrative review, compliance review and legislative review including:

- reviewing compliance with the law and good practice (eg compliance with procedural fairness and good practice in investigations, use of police powers, controlled operations, auditing of telecommunication interception records);
- reviewing the handling of and response to allegations/complaints (eg about police, child protection and community services); and
- reviewing standards of service provision (eg provision of community services).

The role of the Ombudsman is not to replace or oppose decision-making by government or relevant agencies. Rather, the Ombudsman exists to assist agencies and persons within its jurisdiction to be aware of their responsibilities to the public, to act reasonably, and to ensure that they comply with the law and best practice in administration.

The NSW Ombudsman handles complaints of 'unreasonable conduct' of NSW Government departments (specifically the Department of Community Services and the Department of Ageing, Disability and Home Care) and non-Government services that receive funding from these departments in relation to services for:

- children and young people in care and their families and advocates;
- people with disabilities and their families and advocates;
- users of supported accommodation services;
- users of child care services;
- users of local neighbourhood centre services; and
- users of home and community care services (through a federal/state agreement).

Oversight of other community services, such as counselling and support and emergency relief services which are not funded by the NSW Government Departments mentioned above, are covered by the relevant Department or potentially by another Ombudsman, such as the Ombudsman for Electricity and Water.

### **3.2 South Australia**

In July 2004 legislation was passed by the South Australian Parliament to establish an independent Health and Community Services Complaints Commission to deal with complaints about health and community services across the public, private and non-government sectors. The Commission will have extensive powers to assess, investigate, conciliate, resolve and remedy individual complaints.

A community service is defined in the *Health and Community Services Complaints Act 2004* as a service for:

- the relief of poverty, social disadvantage, social distress or hardship;
- the provision of emergency relief or support; and
- the social advancement of disadvantaged groups.

The Commission will also deal with complaints about services for children and young people.

The following are examples of community services:

- a service that provides community support or care;
- a service for the provision of emergency accommodation or relief (including by the provision of emergency financial support), or for the provision of accommodation or support to the socially disadvantaged;
- a counselling, advice or community information or awareness service;
- a community advocacy, self-help or mutual aid service.

The definition of community services used in the Act is broad and intended to ensure the majority of complaints about a wide range of community services are covered under the Act and therefore come under the responsibility of the Health and Community Services Complaints Commission.

The South Australian model places responsibility for complaints about services for children and young people with the Health and Community Services Commissioner. The approach in the majority of other jurisdictions is a separate commissioner to deal with services for children and young people.

### **3.3 Northern Territory**

The Health and Community Services Complaints Commission is an independent statutory body, co-located within the Office of the Ombudsman for the Northern Territory.

The *Health and Community Services Complaints Act* defines community services as a service for aged people or a service for people with a disability, similar to the current Act in the ACT. The Northern Territory Act is currently under review.

### **3.4 Other Australian Jurisdictions**

Victoria, Western Australia, Queensland and Tasmania have no independent Commission dealing with community services complaints. Complaints concerning community services may be heard by the Ombudsman's office in each jurisdiction where they relate to administrative actions of government agencies.

## **4. A DISABILITY AND COMMUNITY SERVICES COMMISSIONER FOR THE ACT**

### **4.1 Disability Services**

The functions of the Commissioner relating to disability services have already been the subject of consultation, discussion and reporting through the Disability Legislative Reform Working Group and the Board of Inquiry into Disability Services. On the basis of these processes, the ACT Government has already made decisions in relation to the disability services functions of the Commissioner. These are outlined below.

As a member of the Human Rights Commission, the Commissioner will exercise functions and powers that enable him or her to undertake monitoring and compliance activities as well as supporting the investigation of complaints received in relation to disability services.

The Disability and Community Services Commissioner will carry out the functions of the Commission in relation to disability services. The main aspects of those functions will be to:

- monitor the quality of disability services;
- conduct inquiries and review issues relating to the quality of disability services;
- consider complaints by people with a disability and other people regarding the quality of a disability service;
- encourage and assist complainants and service providers, where possible, to resolve complaints through internal complaints handling processes;
- make recommendations to disability service providers to improve and rectify services, either in response to a complaint or as a result of monitoring or the Commissioner's own inquiries; and
- make recommendations to the Attorney-General and/or the relevant Minister, government agency or non-government organisation on improvements to services; and
- provide education, training and support to disability service providers and the public to promote the improvement of service quality.

Services to be monitored, and about which complaints may be made, may be funded and/or provided by either government or non-government organisations.

## 4.2 Community Services

In order to effectively develop the 'community services' functions of the Disability and Community Services Commissioner, there are a range of issues which need to be clarified. These issues include how a community service should be defined, the functions of the Commissioner, and the powers they should be able to exercise.

### 4.2(a) Definition of a 'Community Service'

There are many ways in which to define a community service. To date, the legislative definition in relation to complaints about community services has only included services for people with a disability and older people. In their submission to the ACT Government in response to the FEMAG Report, ACTCOSS noted that this definition is inadequate to address the needs of consumers of a broad range of community services in the ACT.

#### Q.1 How should 'community services' be defined in the legislation?

*The Right System for Rights Protection* indicated that the 'community services' functions of the Commissioner could cover the following services:

- public and community housing (for example, public housing rental assistance);
- homelessness services (for example, supported accommodation services);
- emergency relief services (for example, the provision of food and clothing to people living in poverty);
- generalist community services (for example, volunteering services); and
- counselling and support services (for example, relationship services).

Other specific service groups could be added to this list, including:

- Information and referral services;
- Advocacy and community legal services;
- Peak bodies;
- Self help and mutual aid groups; and
- Mediation services.

Alternatively, the target population could define the coverage of the Commissioner, similar to the South Australian legislation, and cover all services

for people experiencing disadvantage or hardship. This would focus the Commissioner's activities solely on people in this category.

**Q.2 Should the ACT develop a definition of community services similar to the South Australian model, or be more specific about exactly what types or groups of services are within the Commissioner's scope of responsibility?**

Another option would be to include either of the above service definitions and a broader range of services, than solely those for people in hardship, and widen the scope of community services to include:

- Sport and recreation services;
- Arts and culture services;
- Education services; and
- Faith-based groups.

**Q.3 Should a broad definition of community services be adopted, to include services for those people experiencing hardship, as well as a range of generalist services for the community?**

There has also been some concern expressed about the governance and conduct of some incorporated associations, and the current lack of mechanisms for members of such associations to seek assistance or complain about the manner in which they are managed.

One response to such concerns, would be to enable the Commissioner to take complaints about all incorporated associations, regardless of whether they provide services to the community or not.

**Q.4 Should complaints about all incorporated associations be included in the coverage of the Disability and Community Services Commissioner?**

If the coverage of the Disability and Community Services Commissioner is defined either by specific service groups or by a target population, the above lists of groups and populations may not cover all the agencies expected to be the responsibility of the Commissioner.

For instance, the current ACT *Community and Health Services Complaints Act 1993*, includes an extensive, but specific list of services covered by that Act in relation to disability services, including:

*Home help; personal care; home maintenance or modification; food services; respite care; transport; assessment or referral of support needs; education, training and skill development; information services; coordination, case management and brokerage; recreation; advocacy; community access; accommodation support; rehabilitation; employment services.*

**Q.5 Are there any gaps in the lists above, which should specifically be included in the definition?**

Many of the services listed above may be provided as part of responses to major emergencies in the ACT. At such times, services are provided in an abnormal environment, raising the question of whether service providers can be held to the same standard when they are delivering services in an emergency situation as when services are provided under “normal” circumstances.

**Q.6 Are there any circumstances in which community services should be exempt from oversight by the Commissioner?**

Many of the organisations included in the list above have not previously been subject to statutory oversight mechanisms and may not have considered the implications of such a process being applied to their activities. In establishing the new system, it will be important to consider the impact on these agencies of the new statutory oversight system.

**Q.7 Are there any implications (legal, financial, educational etc) for those services not currently subject to statutory oversight, if they were to be included within the coverage of the Disability and Community Services Commissioner?**

The contemporary community services sector comprises organisations which are established under various legislative arrangements. These include incorporated associations, companies, co-operatives, unincorporated groups and those created under their own legislation, such as religious and service organisations.

**Q.8 Should the manner in which organisations are legally established impact on whether they are defined as community organisations?**

**4.2(b) Functions**

*The Right System for Rights Protection* indicated that the main functions of the Commissioner relating to community services could be to:

- monitor the quality of community services;
- conduct inquiries and review issues relating to the quality of community services;
- investigate complaints by people accessing community services and other people regarding the quality of a community service;
- encourage and assist complainants and service providers, where possible, to resolve complaints through internal complaints handling processes;
- make recommendations to community service providers to improve and rectify services, either in response to a complaint or as a result of monitoring or the Commissioner's own inquiries;
- make recommendations to the Attorney-General and/or the relevant Minister, government agency or non-government organisation on improvements to services; and
- provide education, training and support to community service providers and the public to promote the improvement of service quality.

**Q.9 What should be the functions of the Disability and Community Services Commissioner?**

If it is accepted that one of the central functions of the Disability and Community Services Commissioner is to monitor quality, then it is important to discuss what might be the benchmarks of quality service provision or organisational performance. In some parts of the community sector, such as mental health and disability services, there are agreed national standards, whereas in other areas, the benchmarks may not be as clear or are non-existent.

If the coverage of the Commissioner is to include all incorporated associations, and further if it includes faith-based agencies, then the benchmark of adherence to their respective constitutions and objects may be the appropriate benchmark.

**Q.10 What should be the measure of quality services or organisations?**

There are many ways in which service provision and organisational performance can be monitored, including through client surveys, interviews, public consultations, peer reviews, performance audits and relationships with professional bodies. Such monitoring could occur annually, biannually or on a rolling three or five year program.

**Q.11 What process of review should the Commissioner undertake to monitor quality service provision or organisational performance?**

As mentioned above, a significant issue raised by ACTCOSS, was the current weaknesses in internal complaints management processes for some community service providers. The Council recommended that there be a mechanism for the review and monitoring of internal complaints handling practices within service provider agencies.

**Q.12 Should the Commissioner have a specific focus on reviewing and monitoring the internal complaints handling processes of those organisations over which it has coverage?**

**Q.13 Are there any additional functions not listed that should be considered in the scope of the Commissioner?**

**4.2(c) *Complainants***

While most complaints systems focus on the ability of the consumer of a service, to complain about that service, there is an increasingly prevalent trend which expands the categories of people who are able to complain about service delivery.

Other than the consumer themselves, examples of other people who might lodge a complain could include carers, advocates, guardians, family members or general community members with a concern about the service.

**Q.14 What categories of people should be able to lodge a complaint with the Disability and Community Services Commissioner?**

*4.2(d) Powers*

As discussed above, the Human Rights Commission will have a range of powers, which will be exercised variously by its President and Commissioners, including the Disability and Community Services Commissioner. Some of these powers include:

- the power to conciliate complaints;
- own-motion and representative investigations;
- the power to ask for information, documents and objects and require the attendance of people;
- that it may publish the details of non-complying entities;
- the protection of complainants against victimisation; and
- keeping confidential certain aspects of its conciliation and complaints activities.

**Q.15 Will the Disability and Community Services Commissioner require any specific powers which are not currently proposed for the Human Rights Commission, in order to undertake its work?**

## 5. REFERENCES

### **Report of the ACT Health Review**

<http://health.act.gov.au/c/health?a=sendfile&ft=p&fid=1083912925&sid=>

### **Government Response to the Report of the ACT Health Review**

<http://health.act.gov.au/c/health?a=sendfile&ft=p&fid=1083912990&sid=>

### **Report of the Review of Statutory Oversight and Community Advocacy Agencies**

[http://www.dhcs.act.gov.au/pubs/Final\\_Report\\_03-10-0311.rtf](http://www.dhcs.act.gov.au/pubs/Final_Report_03-10-0311.rtf)

### ***The Right System for Rights Protection* ACT Government Position Paper on the System of Statutory Oversight in the ACT**

[http://www.dhcs.act.gov.au/pubs/RSRP\\_contents7.pdf](http://www.dhcs.act.gov.au/pubs/RSRP_contents7.pdf)

### ***Review of the Safety of Children in Care in the ACT and of ACT Child Protection Management, related reports and Government Responses***

[http://www.cmd.act.gov.au/child\\_protection\\_review/](http://www.cmd.act.gov.au/child_protection_review/)

### ***ACTCOSS Response to the Report of the Review of Statutory Oversight and Community Advocacy Agencies***

<http://www.actcoss.org.au/publications/submissions.html#subconsumer>

### ***ACT Human Rights Commission Bill 2005***

[http://www.legislation.act.gov.au/b/db\\_16458/default.asp](http://www.legislation.act.gov.au/b/db_16458/default.asp)

### ***ACT Community and Health Services Complaints Act 1993***

<http://www.legislation.act.gov.au/a/1993-96/current/pdf/1993-96.pdf>

### ***NSW Community Services (Complaints, Reviews and Monitoring) Act 1993***

<http://www.legislation.nsw.gov.au>

### ***NT Health and Community Services Complaints Act 1998***

[http://notes.nt.gov.au/dcm/legislat/legislat.nsf/d989974724db65b1482561cf0017cbd2/5ed885d4ce0150c669256d5500072bda/\\$FILE/Reph016.pdf](http://notes.nt.gov.au/dcm/legislat/legislat.nsf/d989974724db65b1482561cf0017cbd2/5ed885d4ce0150c669256d5500072bda/$FILE/Reph016.pdf)

### ***SA Health and Community Services Complaints Act 2004***

<http://www.parliament.sa.gov.au/Catalog/legislation/Acts/h/2004.22.un.htm>