

**SUBMISSION: RESPONSE TO: REVIEW OF AUSTRALIAN CHARITIES AND NOT-FOR-PROFITS  
COMMISSION (ACNC) LEGISLATION**

Dear Sir,

I do not agree that the Charities Commission should seek to increase confidence in Australian charities. I also do not agree that the regulatory burden is inappropriate or should be reduced, nor that the Commission has been successful. Rather, as a 44-year-old man with cerebral palsy who was unilaterally delivered by the NSW Government (with the cooperation of the Commonwealth) into the hands of the charitable sector (against my wishes) by the roll-out of the National Disability Insurance Scheme (NDIS), I want more regulation, not less.

One had no choice but to sign up to the NDIS, because the NSW Government under Barry O'Farrell, Mike Baird and Gladys Berejiklian decided to completely 'wash their hands' of people with a disability and, outsource all services which used to be provided by the State Department of Disability, Ageing and Homecare to the non-government sector. There was a certain security in the guarantee of government provision; the government would not go away, it would not go broke (unless Parliament failed to pass the budget) and, the department was publicly accountable through a Minister, Parliament, and the Ombudsman.

As a regulator, the Commission cannot hope to have the same prominence or public credibility. What would add to credibility is a Parliamentary committee process where all churches and charities who were in receipt of public money had to publicly account for spending, just like any department of State. I suggested this to the NSW Government's enquiry into recall elections, but none of the reform proposals were advanced.<sup>1</sup>

It is particularly disturbing that governments at all levels and of all political hues seem to believe that no public good or service is beyond either privatisation or outsourcing to an NGO. In any discussion about concerns over the public's view of politicians and the value of democratic institutions, we should consider the potential relationship between the shedding of public assets and responsibilities by government and, the likelihood of the public asking: what is government for? If you cannot establish what the government is for, this weakens the argument to maintain the institutions.<sup>2</sup>

Certainly, on an individual basis, I have felt abandoned by both State and Commonwealth governments (of both political persuasions, even though I am Liberal in my politics), as the NDIS were rolled out like steamroller, crushing all before it and leaving chaos in its wake. Many people have raised questions about the capacity of the NDIS to deliver goods and services to people with

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<sup>1</sup> See my submission at [https://www.dpc.nsw.gov.au/\\_data/assets/pdf\\_file/0008/131120/06\\_Johnston.pdf](https://www.dpc.nsw.gov.au/_data/assets/pdf_file/0008/131120/06_Johnston.pdf) and the Final Report at [https://www.dpc.nsw.gov.au/\\_data/assets/pdf\\_file/0013/134221/Panel\\_of\\_Constitutional\\_Experts\\_-\\_Review\\_into\\_Recall\\_Elections.pdf](https://www.dpc.nsw.gov.au/_data/assets/pdf_file/0013/134221/Panel_of_Constitutional_Experts_-_Review_into_Recall_Elections.pdf) as at 15 February 2018

<sup>2</sup> Another article which makes these difficulties plain is: Nick Miller, *The question of democracy: is it winning or losing the global contest?* February 25 2018 - 12:15AM <http://www.smh.com.au/world/the-question-of-democracy-is-it-winning-or-losing-the-global-contest-20180223-p4z1fh.html> as at 25 February 2018

disabilities,<sup>3</sup> particularly given its reliance on the non-government sector to deliver the goods and services.<sup>4</sup>

The Charities Commission invariably gives this process a legitimacy. If there is a commission, then there is a legitimate place for charity. Even as a disabled man, who is part of the NDIS, I have come to increasingly question this logic; it is dubious on fiscal grounds, as governments lose billions in tax expenditures, due to charitable tax exemptions. I have written repeatedly about the flaws in this unjustifiable loss of public funds,<sup>5</sup> yet it is extremely hard to dislodge the ‘bunyip aristocracy’<sup>6</sup> of churches and other charities, even in the face of proven misbehaviour which sometimes amounts to criminal conduct.<sup>7</sup> It is not as if this is getting any better; even our veterans are being ripped off by

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<sup>3</sup> See e.g.: *NDIS in crisis, say disability groups as complaints soar*, The Guardian, <https://www.theguardian.com/australia-news/2017/aug/26/ndis-in-crisis-say-disability-groups-as-complaints-soar>; see also Rick Morton, *HEALTH: Funding crisis looms as mentally ill robbed in NDIS shift*, The Australian, 17 April 2017, <https://www.theaustralian.com.au/national-affairs/health/funding-crisis-looms-as-mentally-ill-robbed-in-ndis-shift/news-story/425513cac046ad2f45fae74af8d17771>; see also Sherryn Groch, *Young people with high needs shut out of Canberra respite care under NDIS*, September 4 2017, The Canberra Times, <http://www.canberratimes.com.au/act-news/young-people-with-high-needs-shut-out-of-canberra-respite-care-under-ndis-20170830-gy74kc.html>; *What is happening to respite under the NDIS?* Third Sector, October 10, 2017 <https://thirdsector.com.au/134707-2/>; Nance Haxton, *NDIS payment system error leaves providers, participants unpaid for three weeks*, AM, Posted 8 Jul 2016, 12:46pm <http://www.abc.net.au/news/2016-07-08/ndis-payment-system-error/7579942>; see also *NDIS: market policies no answer to crisis in disability*, 3 December 2016, <https://www.solidarity.net.au/mag/back/2016/97/ndis-market-policies-no-answer-crisis-disability/>; see also Aaron Slater, *Disability support facing NDIS crisis*, *Australian politics*, 3 July 2017, Red Flag: A voice of resistance <https://redflag.org.au/node/5964> as at 19 February 2018

<sup>4</sup> And given this reliance (I would call it a distinct over-reliance) on the NGO sector, we should all be worried that the NSW Berejiklian Government cannot even be bothered to enact ‘follow the dollar’ legislation (see footnote 5, below), which give the State Auditor power to examine the books of any NGO given State funds, to ensure these monies were being expended correctly. The Public Accounts Committee (PAC) had recommend the reform (See: *Media release - Follow the dollar powers for the Auditor-General* <https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryOther/Transcript/8340/Media%20release%20-%20Follow%20the%20dollar%20powers%20for%20the%20Auditor-General.PDF>), and I had advocated for it in the same inquiry (See generally, *Submission 7* <https://www.parliament.nsw.gov.au/committees/DBAssets/InquirySubmission/Summary/48395/Submission%20No%207.pdf> and the Final Report into the *Efficiency and Effectiveness of the Audit Office of NSW* <https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryReport/ReportAcrobat/5507/Efficiency%20and%20effectiveness%20of%20the%20Audit%20Office%20o.pdf>). Despite all this clear advice from the most eminent of Committees in the NSW Parliament and, the continued advocacy of my local MP and former PAC Chair Jonathan O’Dea (See Jonathan O’Dea MP, *Media Release: Conference Supports ‘Follow the Dollar’ Auditing of Non-Government Organisations*, Friday, 12 April 2013, <https://www.jonathanodea.com.au/node/1098>) the State Government still refuses to act; as at 23 February 2018

<sup>5</sup> See generally, my submission to The House of Representatives Standing Committee on Economics, *Inquiry into Tax Deductibility*, <https://www.aph.gov.au/DocumentStore.ashx?id=00874c93-07f4-4b37-9403-c50fef481832&subId=407687>; also see the Committee’s Interim Report, until it lapsed due to a Federal election – Craig Laundry MP, *Report on the inquiry into tax deductibility*, House of Representatives Standing Committee on Economics, June 2017, Canberra, [27] – [53] [https://www.aph.gov.au/~media/02%20Parliamentary%20Business/24%20Committees/243%20Reps%20Committees/Economics/45p/Tax%20Deductibility/170615\\_Tax%20Deductibility\\_Final.pdf?la=en](https://www.aph.gov.au/~media/02%20Parliamentary%20Business/24%20Committees/243%20Reps%20Committees/Economics/45p/Tax%20Deductibility/170615_Tax%20Deductibility_Final.pdf?la=en) as at 19 February 2018

<sup>6</sup> Bunyip Aristocracy discussed at [https://en.wikipedia.org/wiki/Bunyip\\_aristocracy](https://en.wikipedia.org/wiki/Bunyip_aristocracy) as at 24 February 2018

<sup>7</sup> See e.g.: Michael Evans, Patrick Begley, *EXCLUSIVE: NSW Government scraps ‘follow the dollar’ reform despite Sharobeem, Ella cases*, July 24 2017, <http://www.smh.com.au/nsw/nsw-government-scraps-follow-the-dollar-reform-despite-sharobeem-ella-cases-20170723-gxgzqj.html>; see also Patrick Begley, *EXCLUSIVE: Glen Ella*

the charity set up in their name,<sup>8</sup> while it is alleged that the Catholic Church failed to fully disclose its assets and wealth to the McClelland Royal Commission.<sup>9</sup>

Why should anyone trust any of these institutions ever again? As far as I am concerned, Archbishop Fisher's rather limp defence of the church and its finances, which appeared in the Sydney Morning Herald<sup>10</sup> answers nothing. No amount of good deeds can make up for what has been done, not only by the Church, but by many other allegedly benevolent bodies. I've been both a recipient of services and a member of a charitable board; what has sometimes passed for client service is appalling,<sup>11</sup> while the approach to governance can be far less than robust.<sup>12</sup>

Giving more functions to the NGO sector allows government itself to become more remote from the people it supposedly governs. In my view, as expressed in a submission to the Senate Standing Committee on Community Affairs, if it's good enough to chase welfare recipients over debts under the so-called *Robo-debt* scheme, it is good enough to ask whether we are really getting value from all the subsidies and tax exemptions granted to churches and charities, given they are now the gatekeepers of so much (formerly) government dispensed welfare and employment services schemes.<sup>13</sup>

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*kids' charity 'misappropriated \$20 million', says NSW government*, July 22 2017, <http://www.smh.com.au/nsw/glen-ella-kids-charity-misappropriated-20-million-says-nsw-government-20170721-gxfzp3.html>; see also Michael Evans, Farid Farid, *EXCLUSIVE: Revealed: Sharobeem family sent \$500,000 to relative in Egypt after ICAC grilling*, July 9 2017, <http://www.smh.com.au/nsw/revealed-sharobeem-family-sent-500000-to-relative-in-egypt-after-icac-grilling-20170621-gwve6n.html> as at 19 February 2018

<sup>8</sup> See generally, *Report of the Inquiry under the Charitable Fundraising Act 1991 into The Returned Services League of Australia (New South Wales Branch), RSL Welfare And Benevolent Institution, RSL Lifecare Ltd*, January 2018, NSW Government [https://www.finance.nsw.gov.au/sites/default/files/inquiry\\_report\\_cfa.pdf](https://www.finance.nsw.gov.au/sites/default/files/inquiry_report_cfa.pdf) as at 20 February 2018

<sup>9</sup> See e.g.: Ben Schneiders, Royce Millar, Chris Vedelago, *With \$30b in wealth, why is the Catholic Church struggling to pay for justice?* February 11 2018 <http://www.smh.com.au/national/with-30b-in-wealth-why-is-the-catholic-church-struggling-to-pay-for-justice-20180208-p4yzra.html>; see also Royce Millar, Ben Schneiders, Chris Vedelago, *INVESTIGATION: Catholic Church's massive wealth revealed*, February 12 2018 <http://www.smh.com.au/national/catholic-church-s-massive-wealth-revealed-20180209-p4yzus.html>; see also Ben Schneiders, Chris Vedelago, Royce Millar, *INVESTIGATION: How we revealed the Catholic Church's wealth*, February 11 2018 <http://www.smh.com.au/national/how-we-revealed-the-catholic-churchs-wealth-20180208-p4yzsj.html> as at 20 February 2018

<sup>10</sup> See Archbishop Anthony Fisher, *OPINION: Where will relentless campaign leave the most needy?* February 12 2018 <http://www.smh.com.au/national/where-will-relentless-campaign-leave-the-most-needy-20180212-p4z00n.html> as at 20 February 2018

<sup>11</sup> The Disability Employment Services sector is a classic example of needy people herded into third rate NGOs and obliged to use their employment services; see e.g.: my submission to the McClure Review of the Welfare System at <https://engage.dss.gov.au/wp-content/uploads/2016/06/Welfare-review-1.pdf>; see also my submission to the Review of VET at <https://submissions.education.gov.au/Forms/Quality-of-Assessment-in-VET-submissions/Documents/ADJ%20Consultancy%20Services.pdf> and [http://www.pc.gov.au/data/assets/pdf\\_file/0005/209750/subpfr356-human-services-identifying-reform-attachment2.pdf](http://www.pc.gov.au/data/assets/pdf_file/0005/209750/subpfr356-human-services-identifying-reform-attachment2.pdf) as at 21 February 2018

<sup>12</sup> See generally my submission to Treasury's Review of the Governance of the Charitable Sector at <https://static.treasury.gov.au/uploads/sites/1/2017/06/Johnston-Adam.pdf>. This is the public variant of another submission which a NSW Parliamentary Committee looking into the outsourcing of public services to the NGO sector, was unwilling to publish. Refer to Confidential 1.

<sup>13</sup> Refer to Confidential 2, in particular, *Submission to Committees*, 8-9.

I do not think we are getting value for money, either as taxpayers or service recipients. The outsourcing of services feels disturbingly close to an outsourcing of my citizenship as well. Many of the formerly public services, such as NSW Homecare dealt with needs so intimate and personal, one almost felt that having such things “put out to market” rendered me (the client) as something close to cattle in a sale yard. Even, if you put the most positive light on it, governments like to talk about their stakeholders, clients, and customers, but interestingly, rarely citizens. The cynical might say that citizenship is not more widely used, because the current Federal Parliament is dogged by constitutional anomalies on the issue. Citizenship is used on Australia Day, naturalisation ceremonies, and whenever civic duties are mentioned, like paying taxes or voting.

Citizenship, as it might bind governments to directly deliver goods and services to the citizenry, be held directly accountable for it by the parliaments of Australia, and not pass the responsibility on to NGO middlemen, is rarely (if ever) discussed in contemporary politics.<sup>14</sup> At the same time, it is harder and harder to hold governments to account for goods or services not delivered, when bureaucrats tell you to ‘go to the (non-government) service provider or the sub-contractor’. This

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<sup>14</sup> By contrast, Sir Robert Menzies, founder of the Liberal Party and Australia’s longest serving Prime Minister readily articulated the state’s duty to the citizen. In his comments on *Freedom From Want*, during his *Forgotten People* broadcasts, Sir Robert said:

*The country has great and imperative obligations to the weak, the sick, the unfortunate. It must give to them all the sustenance and support it can. We look forward to social and unemployment insurances, to improved health services, to a wiser control of our economy to avert if possible all booms and slumps which tend to convert labour into a commodity, to a better distribution of wealth, to a keener sense of social justice and social responsibility. We not only look forward to these things; we shall demand and obtain them. To every good citizen the State owes not only a chance in life but a self-respecting life.* (SOURCE: Petro Georgiou, *Menzies, Liberalism And Social Justice*, Sir Robert Menzies Lecture Trust, 1999 Lecture (1999), 3, quoting as at 13 March 2012, quoting Robert Menzies in a 1942 radio broadcast (citation omitted) <http://www.menzieslecture.org/1999.html>; the source is: Robert Menzies, *The Forgotten People: Chapter 5 - Freedom from Want*, 10 July 1942, The Menzies Foundation, Menzies Virtual Museum <http://menziesvirtualmuseum.org.au/transcripts/the-forgotten-people/63-chapter-5-freedom-from-want>)

Reflecting on Sir Robert’s words is essential. They speak to a state with purpose and, definite duties to Her Majesty’s subjects (citizens) which is sadly lacking today. Meanwhile, counsel against outsourcing the provision of public goods and services to charity also comes from a well-known man, but from a distinctly different political perspective. Oscar Wilde said:

*But (charity) is not a solution: it is an aggravation of the difficulty. The proper aim is to try and reconstruct society on such a basis that poverty will be impossible. And the altruistic virtues have really prevented the carrying out of this aim. Just as the worst slave-owners were those who were kind to their slaves, and so prevented the horror of the system being (realised) by those who suffered from it, and understood by those who contemplated it...Charity degrades and (demoralises)...Charity creates a multitude of sins.* Oscar Wilde, “*The Soul of Man Under Socialism.*” - Quotation taken from <http://abetterworldisprobable.wordpress.com/2012/01/01/oscar-wilde-on-the-problems-of-charity/> as at 26 December 2013; Oscar Wilde, *The Soul of Man Under Socialism*, (1891), <http://www.marxists.org/reference/archive/wilde-oscar/soul-man/index.htm> as at 26 December 2013.

In my view, Menzies and Wilde viewed together expose a debate more policy seem incapable of conducting. It is not just a case of can charity deliver goods or services to people, nor one of simple efficacy, but *should* some public services ever leave the state sphere? This is a view one has not always held, but as I age and have more experience with the NGO sector, my doubts over the sector’s capacity, integrity and transparency grow.

raises an array of issues about confidentiality, commercial-in-confidence and, intellectually property issues, as well as highlighting the problem for democracy. Governments should never be allowed to use the NGO service providers to eschew ultimate administrative, parliamentary, or political responsibility, for the delivery of public goods and services.

Again, unless you are doing ground-breaking research, building a battleship, or dealing with some other element of national security, it is to be wondered why such concepts as confidentiality, commercial-in-confidence and, intellectually property constraints, should have any place being applied elsewhere in government contracting. In my own experience, it can take months to establish why a good or service was not delivered, as governments and NGO contractors alike shroud their 'stuff-ups' under any or all of the three headings of *all-too-convenient* secrecy.<sup>15</sup> This should not occur, with public money, the delivery public services (regardless of who actually delivers them) or, assuring the well-being of potentially vulnerable or needy *citizens*; the language used being very deliberate on my part.

What you also learn from the cooperation between governments and the charitable sector, is just how lowly you rate as a client/customer, in a web of contracts and meaningless memoranda, which will affect your life significantly but over which you have no control. This was brought home to me when complaining to the Commonwealth Employment Department about the closure of an employment program, into which I had committed several months applying to, gathering, and/or writing a vast array of documents, as well as working closely with my then NGO employment agent. It was a considerable investment of my time and, thought the employer (the ACT Government, in alleged cooperation with a range of NGO employment placement agents, including mine) should be held accountable for renegeing on the process. I was infuriated at the cancelation. The Commonwealth's letter of explanation did not really soothe me, when it said:

It is important that employers are not discouraged from seeking to employ people with disability by requiring them to be penalized if their fluctuating business concerns cause them to cease a planned recruitment process.<sup>16</sup>

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<sup>15</sup> For example, see my submission to the Queensland Productivity Authority on Medical and Disability Aids, noting the Appendix, which is a submission to the national Productivity Commission (from page 8 onwards) where I outline the difficulties of tracking down a lost order with a company then known as PQ Lifestyles, where neither the company or the Federal Government wanted to admit to their poor planning, poor contract execution, arising from neither doing any real research/due diligence, on what was required to maintain service continuity. I had to make an FOI application to reveal any of this; [http://www.qca.org.au/getattachment/2fc8db1a-9c27-43c1-9547-8bc40979c8d3/Adam-Johnston-\(Oct-13\).aspx](http://www.qca.org.au/getattachment/2fc8db1a-9c27-43c1-9547-8bc40979c8d3/Adam-Johnston-(Oct-13).aspx) as at 23 February 2018

<sup>16</sup> This comes from a letter [dated 24 November 2006] from Alison Durbin (Assistant Secretary, Disability Employment Services Branch), on behalf of the then Minister for Employment [the Hon Sharman Stone]. Ms. Durbin wrote:

The MOUs are designed to articulate the available services required by each employer to assist them hire people with disability. Legal contracts are not used because it would be unlikely that employers would risk facing penalty in the case that they had to defer or stop a recruitment process.

It is important that employers are not discouraged from seeking to employ people with disability by requiring them to be penalized if their fluctuating business concerns cause them to cease a

Funny then that there is a very different rule for an unemployed person, disabled or otherwise, who fails to participate fully in an employment program. This just continues the rule of hypocritical exceptionalism that implicitly applies to the NGO sector, with the tacit approval of all parties at all levels of Government. Ultimately, I am convinced that parliamentary *control* and *sovereignty* must be reasserted and, people encouraged to exercise a more expansive citizenship which is not afraid to guillotine members of the bunyip aristocracy of charity as often as may be required.

If the Charities Commission is to be of any value, it needs to have Royal Commission powers, analyse and challenge outsourcing decisions of government, and give citizens a space to demand the retention of public services (I had no choice with the NDIS; it was an NGO service provider, or nothing and, however much I might want to, one can't yet surrender one's disability<sup>17</sup>).

Where has the Charities Commission been on all these issues? Furthermore, I don't see anything in the remit of the Commission that would stop another McClelland-style commission reoccurring. This needs to be addressed – never mind public confidence in charities, worry about public safety and the stewardship of public funds. This too I said to Justice McClelland and stand by every word.<sup>18</sup> Equally, this review should ensure that there are no Statute of Limitations issues around any of the Commission's work. It should be able to investigate any charity at any time over any complaint, with no regard as to a matter's currency. This would be aided if the burden of proof was reversed, taking account of the vulnerabilities of many clients (citizens) in the NGO sector and, their oft reluctance to make complaints.

In conclusion, the Commission needs to:

1. Consider whether charitable status is really needed anywhere in Australia, or if it is just a ruse for many corporate entities to avoid tax liabilities?
2. Whether the same can be said of philanthropy and, if the overly-favourable tax treatment should continue? In my view, the answer is no, in most cases. My only exception, medical research, is made on the basis that it has the power to permanently improve people's lives by curing their diseases. As for the long list of other activities which allegedly constitute public goods worthy of charitable status, one is highly sceptical;
3. If charity has a place, it is to end human suffering, not merely to care for those who may be suffering. If a charity sees care as an end in itself, then it should be regarded as having failed and not receive any special legal dispensations. This is one of the reasons I detest the NDIS. It accepts disability as a given and, then proposes to 'care' for those with 'significant needs'

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planned recruitment process.

Taken from, my submission to the Senate Standing Committees on Education and Employment (References Committee), *The administration and purchasing of Disability Employment Services in Australia*, [2 of 68], [58 of 68] <http://www.apf.gov.au/DocumentStore.ashx?id=a6fa4e6a-eb31-49de-bb0f-c9f11849c86c> as at 23 February 2018

<sup>17</sup> Perhaps if Australian policy makers spent more money on medical research science instead of subsidising grand charitable edifices in perpetuity, then I would likely be closer to realising that ambition; see my recommendations on significantly culling the number of activities and institutions which could attract charitable status to the Lavarch Review (and concentrating available resources on research) at [https://static.treasury.gov.au/uploads/sites/1/2017/06/001\\_Adam\\_Johnston.pdf](https://static.treasury.gov.au/uploads/sites/1/2017/06/001_Adam_Johnston.pdf) as at 22 February 2018

<sup>18</sup> See generally, Confidential 3

very bureaucratically (to an extent far more intrusive than the old State Department) and rather badly;

4. Undertake a cost-benefit analysis to assess the true cost to State and Federal budgets of charitable tax breaks;
5. Consider whether it is ever legitimate for charities to have an advocacy role. While some may claim it is essential,<sup>19</sup> I think it confuses the notion of citizenship, further accentuating the distance between the government and the governed. The parliaments, the courts and various law reform commissions are places you can go to advocate. Whether a body that is not a real person, does not vote, likely does not pay tax and, may (or may not) have a clearly defined and active membership base, are all things that should be considered when you ask: should it be able to advocate? Equally, is there a mechanism for the membership to tell the leadership of a charity what they want advocacy on, and a mechanism that successfully holds leaders to account for that? All the advocates who delivered me an NDIS, whether I wanted it not, are not doing me a service by their advocacy. As stated, I would much prefer more resources go to research science, as argued in an abstract and poster at a recent conference.<sup>20</sup>
6. Advise Government to legislatively extinguish any times limits on when a complaint may be lodged and reverse the burden of proof in a complainant's favour

Yours faithfully,

Adam Johnston

25 February 2018

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<sup>19</sup> See e.g.: Charities Unite to Warn of Legislative Threat to Philanthropy and Charities' Advocacy 27 Nov, 2017 <https://acfid.asn.au/media-releases/charities-unite-warn-legislative-threat-philanthropy-and-charities-advocacy> as at 23 February 2018

<sup>20</sup> See Neuroscience and Society: Ethical, Legal & Clinical Implications of Neuroscience Research — 14-15 September 2017, Sydney, Australia - Abstracts: Posters, *From Citizen to Charity Case: Has Contracted Welfare Breached the Sovereign's Duty to Her Subjects?* › Adam Johnston — Macquarie University Law School [http://neuroethicsconference.org.au/?page\\_id=166#posters](http://neuroethicsconference.org.au/?page_id=166#posters) as 24 February 2018