Refugee Legal:

Submission to the Joint Standing Committee on Migration's inquiry into the review processes associated with visa cancellations made on criminal grounds.

Introduction – Refugee Legal

1. Refugee Legal (formerly the Refugee and Immigration Legal Centre) is a specialist community legal centre providing free legal assistance to asylum-seekers and disadvantaged migrants in Australia.[1] Since its inception over 30 years ago, Refugee Legal and its predecessors have assisted many thousands of asylum seekers and migrants in the community and in detention.

2. Refugee Legal specialises in all aspects of refugee and immigration law, policy and practice. We also play an active role in professional training, community education and policy development. We are a contractor under the Immigration Advice and Application Assistance Scheme (**IAAAS**) with the Department of Home Affairs (**the Department**) and a member of the peak Department-NGO Dialogue and the Department's Protection Processes Reference Group. Refugee Legal has substantial casework experience and is a regular contributor to the public policy debate on refugee and general migration matters.

3. We welcome the opportunity to make a submission to the Joint Standing Committee on Migration's inquiry into the review processes associated with visa cancellations made on criminal grounds (**the Inquiry**). The focus of our submissions and recommendations reflect our experience and expertise as briefly outlined above.

Outline of submissions

4. On review of the Inquiry's terms of reference we understand its purpose is to review the value of the existing merits review processes undertaken by the Administrative Appeals Tribunal (**AAT**) within the context of the entire character-related visa decision-making framework, including primary decisions by delegates of the Minister for Immigration and Border Protection (**the Minister**) and decisions made personally by the Minister, with a particular focus on identifying any inefficiencies within the AAT process. Noting the above, we submit as follows:

    (a) The consequences of a decision to cancel or refuse a visa can often be grave, and in many cases far outweigh the gravity of any previous criminal penalty. For this reason it is fundamental that the decision-making process afford persons subject to it a fair hearing of their case to mitigate the risk of an unjust decision;
    (b) Within the context of the entire character-related visa decision making framework, the AAT is critical to ensuring in practice that persons access a fair hearing of their case, and more generally, that an unjust decision is not made; and
    (c) The Department's primary character-related visa decision-making processes and the Minister's personal powers operate in some circumstances to not only deny people due process and a fair hearing of their case but also cause them and their families unwarranted hardship and uncertainty, and an unnecessary expense for the Australian taxpayer.

[1] Refugee Legal (Refugee and Immigration Legal Centre) is the amalgam of the Victorian office of the Refugee Advice and Casework Service (RACS) and the Victorian Immigration Advice and Rights Centre (VIARC) which merged on 1 July 1998. Refugee Legal brings with it the combined experience of both organisations. RACS was established in 1988 and VIARC commenced operations in 1989.

Defending the rights of refugees.
Refugee & Immigration Legal Centre Inc.
PO Box 1139
Level 6, 20 Otter Street
Collingwood, VIC 3066 Australia
T (03) 9413 0101
F (03) 9413 0144

Profound consequences

5. The consequences of an adverse character decision affecting a person's visa can often be grave and permanent. In many instances these consequences may far outweigh the adverse impact of any term of imprisonment that person may be serving or have already served. These consequences can include:

    - Where the person has been found to be owed protection in Australia:
        - indefinite detention in a locked immigration detention facility without any prospect of release; or
        - forced return to the country in relation to which they have been found by the Australian government to be at a real risk of serious human rights abuses[2]; and/or
    - Permanent separation from immediate family, including Australian citizen children and spouses;
    - Forced relocation of the person affected as well as their Australian citizen and permanent resident children and spouse, to a country where they may have no cultural or personal connection, including where they may not speak the local language, and where they may struggle to subsist; and
    - A permanent bar on returning to Australia.

6. It is essential that the legal framework governing character based visa decision-making under the *Migration Act 1958* (**the Migration Act**) operates with these extreme consequences in mind. These profound consequences demand those affected be afforded a fair hearing of their case to mitigate the otherwise very real risk of him or her being unjustly subject to these life-changing, and in some instances, life-threatening, consequences.

> ***Case Study 1***
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> *Ali was resettled as a refugee by UNHCR to Australia as an unaccompanied minor from Iraq over thirty years ago. He grew up in Australia with his adopted Christian family and does not speak Arabic. He is now married with a wife and two infant children who are dependent on him. Ali's permanent visa was mandatorily cancelled following him being convicted of a series of offences involving dealing with stolen goods. He is currently held in immigration detention on Christmas Island. Due to the significant cost his wife and young children who live in Melbourne have not been able to visit him. In the event the cancellation of his visa is not revoked he faces being detained indefinitely on Christmas Island for the foreseeable future, or forced return to Iraq, a country where he would not only be at risk of being targeted and killed but also where he is unfamiliar with the culture and language and would not be able to subsist.*

Fair hearing

7. The Migration Act provides for a number of broad powers under which the Minister and his or her delegates may cancel or refuse a person's visa, or refuse to revoke a cancellation for reasons associated with that person criminal's offending and/or alleged criminal offending. Some of these provisions also provide for visa cancellation and refusal on character grounds in the absence of any criminal conviction by a court.[3] The Migration Act, together with the *Administrative Appeals Act 1975* (**the AAT Act**), also provide for persons subject to adverse character-based decisions under the Migration Act to access merits review by the AAT, in the event the earlier decision had not been made personally

[2] *Migration Act 1958*, s 197C. See: *BGM16 v Minister for Immigration and Border Protection* [2017] FCAFC 72 per Mortimer and Wigney JJ at [75]; and *DMH16 v Minister for Immigration and Border Protection* [2017] FCA 448 per North ACJ at [26].
[3] *Migration Act 1958,* ss 501(6); 500A; 116(1)(b); 116(1)(c); 116(1)(e); and 116(1)(g).

by the Minister.[4] Where the Minister intervenes and makes a personal decision no merits review is available for that decision.

8. The High Court has held that an essential element of any legal or administrative process in Australia that adversely affects a person's rights or interests is a real and meaningful opportunity for that person to present his or her case, be told the substance of the case to be answered and be given an opportunity of replying to it.[5] Most significantly, unlike at the AAT review stage, for the preceding primary stage at the Department persons are not afforded an oral hearing before the Minister's delegate prior to the decision being made. Instead, this first-instance process demands that all information and correspondence be provided in writing, in English, and the decision is made 'on the papers'. In our longstanding experience, we note that this means that some people affected are prevented from providing any form of meaningful evidence in support of their case. We have observed that the most common vulnerabilities preventing persons to respond in writing in these circumstances include:

    - Illiteracy; and/or
    - Insufficient English language skills; and/or
    - Mental and physical health reasons; and/or
    - Disability and acquired brain injuries; and/or
    - Inability, either through lack of financial capacity or due to the remote location of their detention, to access legal assistance; and/or
    - Inability to comprehend complex legal and evidentiary issues.

9. Critically, this denial of an oral hearing combined with the inability on behalf of many to provide the necessary written information and evidence in support of their case often leads to the delegate's decision being made without any proper understanding of their circumstances. In these instances that decision is liable to being unjust and entirely disproportionate to the consequences that follow.

10. Importantly, the legislation entitles review applicants at the AAT to appear before the Tribunal in-person to give evidence in-person, with the assistance of an interpreter where required. On this occasion the person has the opportunity to explain orally directly to the decision-maker why their visa should be restored and the serious and permanent implications for them and their families if it is not. He or she also has the opportunity to present any witnesses they might have to give evidence in support of his or her case, which might include a spouse or other close family. In this regard, the AAT exists as an essential safety-net for persons who do not have the capacity to meaningfully respond to the Department in sufficient detail and in written English.

11. It is important to note that the AAT's jurisdiction is an adversarial one where the Minister is represented in that process by his or her legal representatives. In this regard, at the hearing not only does the presiding Tribunal member(s) get the opportunity to question the person to explore any concerns they may have, including about their past offending and risk of recidivism, but so does the Minister through their legal representatives (which they generally do through cross-examination).

Case Study 2

Upon arriving in Australia as a teenager Ali was identified as having a learning disability. He dropped out of school not long after and has never been proficient in reading and writing. He was first notified of the cancellation of his visa while he was in a correctional facility in Victoria but not long after he

[4] *Migration Act 1958,* s 500.
[5] *Kioa v West* [1985] HCA 159 CLR 550 per Mason J at 582.

was moved to the immigration detention centre on Christmas Island. Luckily, before the 28 day period expired his wife was able to send a request to the Department requesting revocation of the visa cancellation decision. However, his wife's English is limited and there was not much time so she didn't include any information about Ali's background or her and the children. Subsequently, a delegate made a decision on the papers not to revoke the cancellation. His wife then helped him apply to the AAT where he was invited to appear at a hearing before the Tribunal with his wife. There he and his wife gave evidence about their personal circumstances. His local church pastor also gave evidence in his support. Ali was asked a number of questions by the Tribunal member and cross examined by the Minister's lawyers about the circumstances of his previous offending. On the basis of that oral evidence and his limited criminal history the AAT set aside the delegate's decision and Ali's visa was restored.

The AAT

12. The AAT is mandated under statute to provide a mechanism of review that: is accessible; is fair, just, economical, informal and quick; and is proportionate to the importance and complexity of the matter; and promotes public trust and confidence in the decision-making of the Tribunal.[6] One of the primary policy drivers for the establishment of the AAT was to improve the quality of administrative decision-making by officers of the Australian Government. This aim has been said to be achieved in part due to the availability of review of Government decisions leading to the relevant departments of state to introduce procedures and systems which lead to more acceptable and justifiable decision-making to reduce the incidence of applications for review.[7]

13. The AAT is legally obligated to undertake its review of the primary decision "on the merits and must make the legally correct decision or, where there can be more than one [legally] correct decision, the preferable decision".[8] In this regard, Tribunal members are prohibited by law from making decisions based on their own moral or ideological beliefs or opinions. The law that binds the decision-making of the AAT consists of: primary legislation, as enacted by the Legislature; secondary or delegate legislation as made by the Executive; and case law as made by the Judiciary. AAT decisions are subject to judicial review and if a court finds the Tribunal did not make a decision that conformed with law, it would generally quash the Tribunal decision and remit the matter back to it to reconsider according to law.

14. Reviews of character-based decisions performed by the AAT are subject to strict codes of procedure specified in the Migration Act and the AAT Act. These codes of procedure provide for a fair hearing of a person's matter and accord due process in the making of the decision. As discussed above, unlike for decisions by the Minister and his or her delegates, the AAT has a statutory right to afford the person concerned an oral hearing for their case.

Personal powers of the Minister

15. The Minister has a broad range of non-compellable non-delegable personal decision-making powers to intervene in character related decision-making processes. These intervention powers have the effect of over-ruling any previous decision by his or her delegate or the AAT.[9] These personal powers were inserted in the Migration Act by the

[6] *Administrative Appeals Tribunal Act 1975*, s 2A.
[7] The Hon. Justice Garry Downes AM, Former President of the Administrative Appeals Tribunal, *Structure, Power and Duties of the Administrative Appeals Tribunal of Australia*, Bangkok, 21 February 2006, at [44].
[8] Administrative Appeals Tribunal (Cth), About the AAT, What We Do, Functions and Powers, Review of Decisions, available at: http://www.aat.gov.au/about-the-aat/what-we-do [accessed 4 May 2018].
[9] *Migration Act 1958,* ss 500A(1); 500A(3); 501(3); 501A(2); 501A(3); 501B(2); 501BA(2); and 501C(4).

Migration Amendment (Character and General Visa Cancellation) Act 2014 that came into effect on 11 December 2014. Importantly, these personal powers of the Minister:

- do not afford the person affected with an oral hearing to explain their case;
- are not required to comply with the rules of natural justice or a statutory code of procedure unlike the AAT and his or her delegates;
- are exempt from any form of review other than judicial review by the Federal Court of Australia (**the Federal Court**);
- are subject to only one precondition on the exercise of the power, the Minister believes that it is in the "national interest" for him or her to intervene; and
- can be made at any time during the process, including subsequent or prior to the delegate and AAT's decisions.

16. As stated above, personal decisions by the Minister are exempt under the legislation from complying with the rules of natural justice. Natural justice is a cornerstone principle in the Australian legal system and a presumed part of all governmental decision-making that affects a person's rights or interests, including their personal liberty, status, livelihood, and proprietary rights.[10] Further, despite judicial authority in the immigration context stating that the Minister is in some instances generally bound by the rules of common law procedural fairness in the making of his or her personal decisions, the due process afforded to persons affected by such decisions is generally of a far more limited form.[11] Additionally, although persons adversely affected by personal decisions by the Minister are entitled to seek judicial review in the Federal Court of Australia, because on judicial review the Court is limited to considering only whether the Minister made a legal error, even where the person affected is successful in court the consequence is the matter is remitted back to the Minister for reconsideration within the same restrictive framework with limited avenues for a fair hearing of his or her case.

17. Finally, it is noted that the only precondition on the Minister exercising his or her personal powers in this regard is that he or she believes it to be in the "national interest" to do so. The High Court has held that this term is one which it is difficult to give a precise content[12], and described it as "a discretionary value judgment to be made by reference to undefined factual matters, confined only 'in so far as the subject matter and the scope and purpose of the statutory enactments may enable ... given reasons to be [pronounced] definitely extraneous to any object the legislature could have had in view'".[13] In this regard, we submit that the personal powers of the Minister are liable to being exercised by the Minister according to his or her personal or political whim. It is Refugee Legal's experience that "public interest" powers in the migration context have been characterised by arbitrary, inconsistent and unpredictable outcomes. Decisions lack ordinary standards of transparency and accountability under the rule of law, and are routinely devoid of rhyme or reason.

18. In this respect, people who are the subject of personal decisions by the Minister are at a much higher risk of being denied a fair hearing than those eligible to access the AAT. This denial and exposure to a heightened risk of an unjust outcome cannot be more significant given the dire consequences these people face.

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[10] See: *Kioa v West* [1985] HCA 159 CLR 550 per Mason J at 582.
[11] See: *Taulahi v Minister for Immigration and Border Protection* [2016] FCAFC 177.
[12] *Osland v Secretary, Department of Justice* [2008] HCA 37 at [57] per Gleeson CJ, Gummow, Heydon and Kiefel JJ.
[13] *O'Sullivan v Farrer* [1989] HCA 61; (1989) 168 CLR 210 at 216 per Mason CJ, Brennan, Dawson and Gaurdon JJ; [1989] HCA 61, quoting *Water Conservation and Irrigation Commission (NSW) v Browning* [1947] HCA 21; (1947) 74 CLR 492 at 505. See also *Osland v Secretary, Department of Justice (No 2)* [2010] HCA 24; (2010) 241 CLR 320 at 329-330 [13]- [14] per French CJ, Gummow and Bell JJ.

Uncertainty and inefficiency

Personal decisions by the Minister

19. It is submitted that the nature and presence of the Minister's personal powers to intervene in character-related visa decision making processes can lead to significant uncertainty and inefficiency for the jurisdiction. Due to the Minister's personal powers permitting him or her to intervene at any time, persons subject to character-related visa cancellation processes have no certainty as to:

    - who will make the decision, the Minister, a delegate, or the AAT;
    - what the decision-making process will be, including whether they will be given an oral hearing to explain their case; and
    - how long the process will take.

20. Further, the legislation does not provide a time limit on when the Minister may make this 'over-riding' decision. This could be many years after the person affected had his or her case considered by a delegate, and also after they have had their case heard by the AAT, and after a considerable expense to the Australian taxpayer and any pro bono legal assistance providers has been incurred in respect of those processes. In this regard the Minister's personal powers can in some instances represent a level of unnecessary duplication within the process. Further, this ongoing uncertainty also has a significantly detrimental effect on the person and their family given the dire consequences and unpredictability of the Minister's intervention powers.

Case Study 3

Upon the cancellation of his visa being revoked Ali was released from immigration detention and transferred back to Melbourne where he resumed living with his wife and children. He also obtained a well-paid job through his friend from church and was feeling good that he was again supporting his wife and children. Early morning, around 9 months after the AAT made its decision, Australian Border Force officers came to his house and informed him that his visa had been cancelled by the Minister and that he was to be re-detained. Following this he was handcuffed and transported to a detention centre in Melbourne before being transferred to another immigration detention centre in regional Western Australia. His wife called a lawyer to ask for assistance and they advised her that Ali could apply to the Federal Court for judicial review of the Minister's decision but that could initially cost around $10,000, and even if they were successful the Minister would only be required to make the decision again so the prospects of having his visa restored were very low.

21. Adding to this uncertainty is that the only precondition on the Minister exercising his or her personal powers is that he or she believes it to be in the "national interest". The High Court has held that this term cannot be given a confined meaning and 'what is in the national interest is largely a political question'.[14] The High Court has further held "[w]hen we reach the area of ministerial policy giving effect to the general public interest, we enter the political field. In that field a Minister or a Cabinet may determine general policy or the interests of the general public free of procedural constraints.[15] In this regard, the personal powers of the Minister are liable to being exercised by the Minister according to his or her personal or political whim. It is submitted that these decisions lack ordinary standards of transparency and accountability under the rule of law, and are routinely devoid of rhyme or reason.

[14] *Plaintiff S156/2013 v Minister for Immigration and Border Protection* (2014) 254 CLR 28, per French CJ, Hayne, Crennan, Kiefel, Bell and Keane JJ at 46 [40].
[15] *O'Shea* (1987) 163 CLR 378 per Brennan J at 411.

22. It must be noted that as an alternative to intervening, in the event the Minister does not agree with a particular decision of the AAT it is open to him or her to seek judicial review of that decision. This judicial scrutiny further ensures that, where the AAT is found to have made a legal error, the risk of further errors of the same kind are mitigated. This also assists to increase the quality and efficiency of the AAT's decision-making and also the certainty of outcomes for persons affected. Further, in the event the government does not agree with the legal criteria applied by the AAT or manner in which the relevant legislation has been construed by the courts, it may introduce government-sponsored amendments to the primary legislation in Parliament or make delegated legislation where appropriate (such as regulations, instruments and Ministerial Directions). Such processes are entirely consistent with the rule of law and good governance under a constitutional democracy.

23. It is submitted that the Minister's use of his or her personal powers in this context can also lead to a significant burden on the courts. Only the Federal Court has jurisdiction to hear an application for judicial review of a personal decision by the Minister. This differs from applications for judicial review of decisions by the AAT which must first be heard by the lower Federal Circuit Court of Australia (**FCC**). In recent years there has been a significant increase in applications in the Federal Court for judicial review of personal decisions by the Minister. This has lead to further delays for not only these applicants but also other litigants at that Federal appellant level.

Extended periods in immigration detention

24. It is submitted that the current character-related visa cancellation processes undertaken by delegates of the Minister are leading to unnecessary and extended periods of immigration detention.

25. Unlike for the AAT which is legally bound to finalise its review of a character-based visa decision within 84 days[16], there are no such time limits applicable decisions made personally by the Minister or by his or her delegates. It is our experience that the Department often takes a significant period of time to make the primary decision, particularly for cases concerning requests to revoke a mandatory cancellation of a visa.[17] In these circumstances the visa is usually cancelled while the person is in criminal detention serving a term of imprisonment, at which time the person is given 28 days to make a formal request to the Department for the decision to be revoked. However, it is our observation that the subsequent decision by the Department does not generally occur before the person's prison sentence ends. Following this, when they finally due for release from criminal detention because they remain an unlawful non-citizen they are transferred to an immigration detention facility. We further observe that it is also often a considerable time after this when the Department finally makes the decision whether to revoke or not revoke the cancellation decision. This can be sometimes years after the ground for mandatory cancellation arose, and a significant time after the person lodged their formal request with the Department for revocation.

26. Information published by the Australian government's National Commission of Audit in 2014 estimated the annual cost of detaining one person in immigration detention was $239,000.[18]

27. It is submitted that in these instances this extended and unnecessary delay not only leads to a significant and unnecessary financial burden on the Australian taxpayer but can lead

[16] *Migration Act 1958*, Part 9, s 500(6L).
[17] under Section 501CA of the *Migration Act 1958*.
[18] National Commission of Audit, *Towards Responsible Government, The Report of the National Commission of Audit, Phase One*, February 2014, available at: http://www.ncoa.gov.au/report/docs/phase_one_report.pdf [accessed 10 May 2018].

to unnecessary extended periods of immigration detention and hardship lead to untold hardship for those who ultimately have their visas restored, and their families.

Case Study 4

In 2014, Andrew, a citizen of Canada, was convicted of offences related to cannabis cultivation and sentenced to 6 months imprisonment with a 6 months suspended sentence. Shortly before this his fiancée, Lisa, who he had been living with in Melbourne, had discovered she was pregnant. However, her due date was not until a month after Andrew's release date and despite everything that had happened they remained very committed to each other and were excited about starting a family. One month before Andrew was due to be released he received a letter from the Department informing him that his visa had been mandatory cancelled and that he had 28 days in which to request that this decision be revoked. Andrew contacted his criminal lawyer who referred him to a specialist immigration lawyer. They assisted him to quickly prepare a comprehensive written response as well as medical evidence about the pregnancy. As a surprise to Andrew on the day of his release from prison he met with Australian Border Force officials who transferred him to Villawood Immigration Detention Centre in Sydney. Andrew and his immigration lawyer attempted on a number of occasions to contact the Department to ascertain the status of his request for revocation, but were each time told that his case would be considered in due course. Subsequently, Lisa gave birth to their child in his absence and there were medical complications for her during the birth and she was hospitalised for a number of weeks. Subsequently, around 10 months after Andrew was transferred to Villawood a delegate of the Minister made a decision to revoke the cancellation of his visa.

Access to justice

28. As we have noted above, in our experience the people who are affected by character-based visa decisions are amongst the most vulnerable, particularly given they often lack capacity to advocate for themselves or access appropriate legal assistance. We contend that the risk of an unjust outcome on this basis is further heightened by: the recognised significant complexity of the legal and policy frameworks governing character-based decisions; and the strict non-extendable deadlines imposed by the legislation where a failure to comply can lead to a negative decision without any further opportunity (including a bar on accessing to merits review by the AAT).

29. Persons undergoing these character-related decision-making processes are not eligible for government-funded assistance. For this reason, and due to the particular vulnerabilities affecting many of them, a significant number are forced to try to advocate for themselves and this can lead to final decisions being made without the decision-maker being made aware of essential information that might have altered the course of the decision. Additionally, without representation these people are often inappropriately forced to rely on other immigration detainees and prisoners to assist them to prepare written information as well as on staff at the detention facility to send and receive essential and time critical written correspondence on their behalf. We are aware of instances where these staff have failed to send correspondence on time or notify the person concerned, leading to the case being dismissed without any further opportunity. In some instances, this can mean not only a negative decision but a bar on accessing review by the AAT. In these circumstances there is no other option but a lengthy judicial review process that for many would have limited prospects of success.

30. This absence of legal assistance and inappropriate reliance on staff in immigration and correctional facilities leads to further unnecessary expense borne by the taxpayer as cases that would otherwise be successful are delayed further and those affected are subjected to further periods in immigration detention. More importantly these significant barriers to justice can ultimately lead to unjust outcomes and exposure of those affected,

including Australian citizen and permanent resident spouses and children, to those serious consequences detailed previously.

Criminal justice system

31. We observe that it is not uncommon in criminal matters for courts to order that criminal sentences incorporate a parole period or a community corrections/supervision order post completion of the prison sentence. However, in the circumstances of a person affected by a character-based visa cancellation or refusal, when that person is released from prison he or she is detained an immigration detention facility. In this regard, the relevant period of court ordered supervision in the community cannot be complied with. We are also aware of instances where a Court had found that a community based corrections order was the more appropriate penalty on conviction over a custodial sentence but was reluctantly forced to order a term of imprisonment because the person did not hold a visa and would not be eligible to satisfy the requirements of the community corrections order.

32. We submit that these inconsistencies between the character-related visa cancellation framework and the criminal justice system is entirely inappropriate and needs to be addressed.

Conclusion

33. In reference to the Inquiry's terms of reference we conclude as follows:

- The consequences of character-related visa decisions can be profound and in many cases far outweigh the gravity of any previous criminal penalty. For this reason, it is absolutely fundamental that such decision-making processes afford persons subject to it a fair hearing of their case to mitigate the risk of an unjust decision;
- The AAT is absolutely critical to ensuring that persons access a fair hearing of their case, and more generally, that an unjust decision does not eventuate;
- The particular vulnerabilities of those people affected further demand that these decision-making processes afford the participants a fair hearing of their case, and in particular an oral hearing before the decision-maker who ultimately decides their fate; and
- The Department's primary decision-making processes and the Minister's personal powers operate in some circumstances to not only deny people due process and a fair hearing of their case but also to cause them and their families unwarranted hardship and uncertainty, and also unnecessary financial burden on the Australian taxpayer.

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Refugee & Immigration Legal Centre Inc.
ABN 94 806 293 897

PO Box 1139
Level 6, 20 Otter Street
Collingwood, VIC 3066 Australia
T (03) 9413 0101
F (03) 9413 0144
www.rilc.org.au