

Ms Jackie Morris
Committee Secretary
Legal and Constitutional Committee
Parliament House
CANBERRA ACT 2000

Dear Ms Morris

RE: Legal and Constitutional Committee Inquiry into the AusCheck Bill 2006

In response to your letter of 9 February 2007, I wish to provide the attached submission to the Legal and Constitutional Committee Inquiry into the AusCheck Bill 2006.

I note that in the Explanatory Memorandum to the AusCheck Bill 2006, as well as the other associated documentation, the prime concerns of the Bill are to ensure a nationally consistent approach to conducting background checks particularly for areas with a high national security profile, such as Maritime and Aviation Security Identification Cards, and the minimisation of duplication.

A growing number of Commonwealth agencies have an interest and an involvement in the matter of background checking, including ASIO, the AFP, DIAC, Auscheck and of course, CrimTrac. CrimTrac performs a crucial coordinating function in the provision of criminal history information to assist accredited agencies in their background checking assessments.

I believe this submission will provide the Committee with a good understanding of the role of CrimTrac in this important activity and the necessity of a coordinated and collegiate approach by all agencies involved.

Finally, concerning the confidentiality of submissions, I do not believe that there is any material in my submission that should be treated as confidential.

Yours sincerely

Ben McDevitt AM APM

21 February 2007

Attachments:

- A. Overview of CrimTrac.
 - B. *Accreditation Procedures to Access National Criminal History Record Checking Services.*
 - C. *Guide to National Criminal History Record Checking Services.*
 - D. Inter-Governmental Agreement for CrimTrac.
 - E. Copy of the Contract/MOU with accredited agencies.
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CrimTrac Overview

CrimTrac's Role in Background Checking

The CrimTrac Agency was established as an Executive Agency in July 2000 to:

1. implement the CrimTrac initiative comprising a new National Automated Fingerprint Identification System, a National DNA Criminal Investigation System, a National Child Sex Offender System, the provision of rapid access to national operational policing data and other emerging policing requirements across jurisdictions;
2. perform the administrative functions required to fulfil the objectives and obligations in the CrimTrac Inter-Governmental Agreement including assistance to the CrimTrac Board of Management.

As well as developing the new systems referred to above, CrimTrac took over the functions of the National Exchange of Policing Information (NEPI) which included providing the National Names Index (NNI) (a collection of operational policing information about persons of interest) for use by police in their day to day policing activities, and other legacy systems. It is the information from this system that is currently drawn upon for NCHRC checks. A fuller description of the systems that CrimTrac has developed and maintains is set out in Appendix A.

On establishment, CrimTrac also took over the role of providing national criminal history checks of individuals for and on behalf of Australian police services to a number of accredited third party agencies. Criminal history checks are principally undertaken to ensure that persons in positions of trust, specified fields of endeavour and/or to meet legislative requirements are adequately screened for criminal records. Pre-employment screening checks may be general in nature or targeted for particular kinds of occupations, such as national security rated positions and those working with children, young people and other vulnerable members of the community. Generally, legislation prescribes a criminal history check as a pre-requisite for employment in some or all of these fields.

The accredited agencies then perform their own assessment of the suitability of the persons for employment or volunteer work, using the criminal history and other information they have collected. Agencies do not access data directly from CrimTrac systems when using this facility.

In July 2000, thirteen agencies were accredited to receive criminal history checking services through CrimTrac, all from the government sector and with legislative provisions to require such checks (including DIMA at the time, ACS, AusPost, ATO, NSW Commission for Children and Young People, the Olympic Security Coordination Centre and APEC). In 2007, CrimTrac services 42 agencies (34 government agencies and 8 non-government entities engaged in support services to disabled, nursing agency, church, volunteering). The full list of current accredited agencies is provided in Attachment A. CrimTrac is currently devising a strategy aimed at facilitating the

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orderly accreditation of a further 42 non-government entities which have registered an interest over the coming months.

AusCheck itself is in the process of becoming a CrimTrac accredited agency to receive criminal history information for the purposes of the issue of Maritime and Aviation Security Identification Cards. Essentially AusCheck will become an 'umbrella' agency for background checking in the aviation and maritime sectors, much the same as the NSW CCYP is an umbrella agency for the conduct of NSW Working with Children assessments of suitability for employment in that sector.

The National Criminal History Record Checking (NCHRC) process used by CrimTrac

The definition of background checking used in the AusCheck Bill currently before Parliament is as follows (clause 5):

'A background check in relation to an individual, is an assessment of information relating to one or more of the following:

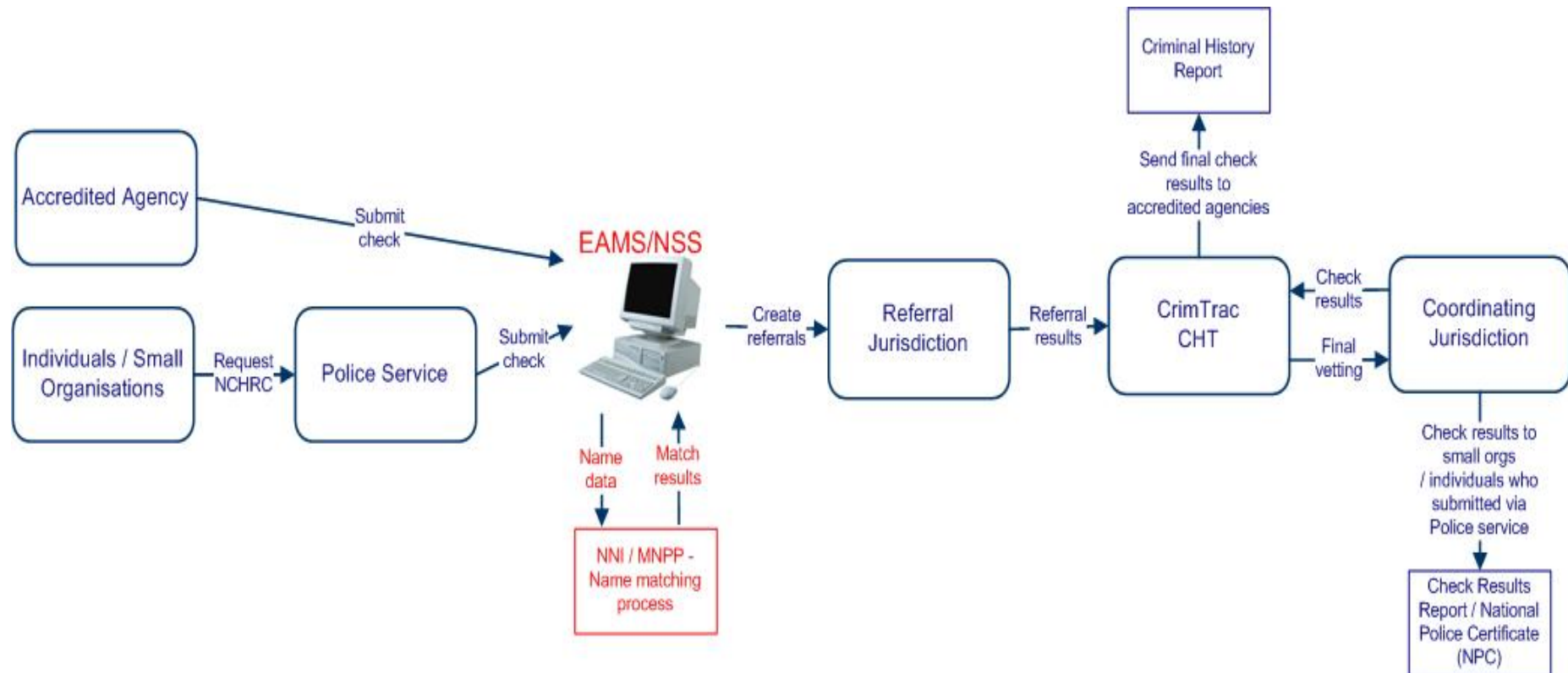
- a) the individual's criminal history;
- b) matters relevant to a security assessment of the individual;
- c) the individual's citizenship status, residency status or the individual's entitlement to work in Australia, including but not limited to, whether the person is an Australian citizen, a permanent resident or an unlawful non-citizen;
- d) such other matters as prescribed by the regulations.'

This definition locates CrimTrac clearly as a key initial component of the background checking process, as it holds the repository of combined criminal history information from the jurisdictional police services and manages the NCHRC process. It is important to note that at present the vast majority of criminal records information is owned by the states and territories and brokered by CrimTrac on behalf of the eight Australian police services. At present this process utilises the NNI and may move to use of the richer information from the Minimum Nationwide Person Profile, when this is fully rolled out across all police services by 2008. Please refer to Attachment A for a description of this new system.

A National Criminal History Record Check (NCHRC) involves:

- Searching a central index of names of persons of interest to police services (NNI), for potential matches with the name of the subject of the check;
- The relevant police service comparing name matches with its criminal history records to determine if the matched name is that of the subject of the check;
- Identifying and releasing any criminal history information (subject to relevant Commonwealth/State/Territory spent convictions/non-disclosure legislation and/or information release policies);
- Police issuing either a National Police Certificate to individual applicants or providing the results to an accredited agency/third party either directly or through CrimTrac.

The diagram below provides a visual explanation of the NCHRC process as it occurs at present



Accreditation of agencies

The accreditation criteria used by CrimTrac are approved by the CrimTrac Board of Management and are outlined in the CrimTrac document titled *Accreditation Procedures to Access National Criminal History Record Checking Services* (Attachment B). Details of the NCHRC process may be found in the *Guide to National Criminal History Record Checking Services* (Attachment C).

In summary, access to NCHRC services delivered by CrimTrac involves the following steps for accreditation:

- Provision of initial accreditation information and advice to the agency by CrimTrac;
- Agreement of the local police service to the agency accessing NCHRC services;
- Lodgement of a formal submission to CrimTrac and assessment by CrimTrac;
- Agreement by the remaining police services;
- Development of a suitable Informed Consent form;
- Establishment of a MOU/Contract with CrimTrac;
- Successful test of access mechanisms;
- Pre-commencement information session and informal on-site review by CrimTrac.

The *Guide to National Criminal History Record Checking Services* outlines the type of information that is included in an NCHRC, the limitations on disclosure, required disclosure, and the role of third parties such as accredited agencies.

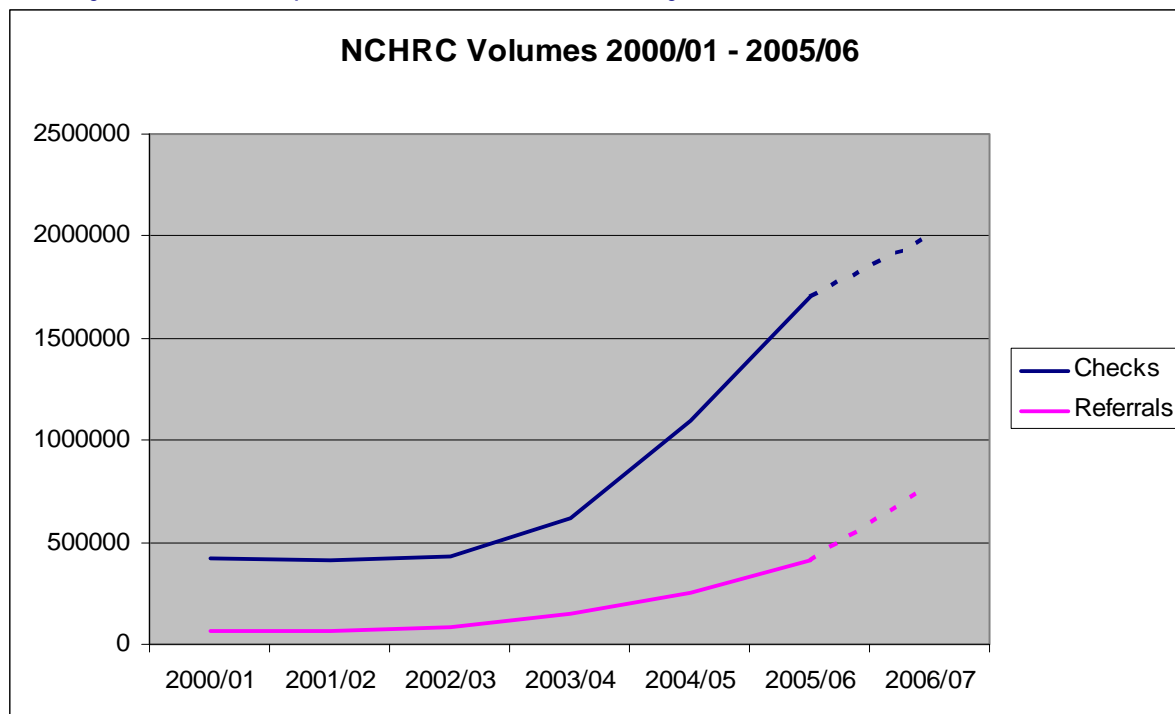
The third party agency is responsible for obtaining the individual's consent, recording it in an acceptable format and storing the criminal history information securely. Once a check has been completed, the disclosable criminal history information will be released to the relevant accredited agency. Third parties are required to observe the Information Privacy Principles (or National Privacy Principles in the case of private sector agencies) and in particular ensure that the information is:

- stored securely and is safe from unauthorised access
- used only for the purpose for which it was sought; and
- not disclosed to any other party without the prior written agreement of CrimTrac and, where required to do so under law, following consultation with CrimTrac.

These conditions are incorporated into the standard form of agreement (either MoU or contract) under which CrimTrac delivers NCHRC services to accredited agencies.

Metrics

The number of NCHRC checks undertaken by CrimTrac has grown significantly in recent years, and is expected to reach 2million this year:



Checks submitted for processing by month for the financial year 2006-07 to December 2006 are:

Jul 06	172,066
Aug 06	192,338
Sep 06	175,709
Oct 06	177,768
Nov 06	176,217
Dec 06	139,574
Total	1,033,672

Actual revenue for 2004-05 was \$25.4 million, increasing to \$33.5 million for 2005-06. Budgeted revenue for 2006-07 was \$31.1 million and projected revenue for 2006-07 is now \$34.0 million. This represents the main source of revenue for the CrimTrac agency.

Commercial (not-for-profit) principles are applied to the costing and pricing structure of all CrimTrac service lines (including the full costing of services). The pricing and funding structure must be sustainable and must consider the future capital investment requirements of the agency, and associated risk where applicable.

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Prices	
Category	From 1 July 2006 (excl GST)
Volunteer	\$5.15
Government	\$20.60
Individual	\$20.60
Non-Government	\$25.75

Volunteer check pricing is heavily subsidised. This recognises the social importance of volunteers and encourages this client group to obtain a check. The higher price of a non-government check recognises additional effort associated with the need to comply with legal and audit requirements when providing services to this user group.

Issues

The AusCheck Bill is designed to establish the regulatory framework for the issuing of identity cards for employment in the aviation and maritime sectors (the AusCheck Scheme) and a centralised agency, AusCheck, to manage the required background checking process. The Bill provides the legislative underpinning for the activities of this agency, as recommended by the Wheeler inquiry into *Airport Security and Policing Review* to enable it to replace the 188 separate agencies/entities that have issued ASICs and MSICs up to now. The key driver for its establishment is the national security imperative to protect the aviation and maritime sectors from terrorist threats and attack. Consequently, the broad range of information that is able to be collected for this purpose (set out in cl.5 (a),(b) and (c) of the Bill) has general support in Parliament.

There are several issues which are important from the CrimTrac perspective to be brought to the attention of the Committee in its consideration of this Bill.

1. Purposes of the AusCheck Scheme

Clause 8(1) specifies the purpose of the AusCheck Scheme is primarily to meet the background checking requirements of the *Aviation Transport Security Act 2004* and the *Maritime Transport and Offshore Facilities Security Act 2003*, and the scheme may be expanded to other purposes as prescribed by regulations (8(c)). In his speech in reply, the Attorney-General gave examples of other areas that might be included in the AusCheck scheme such as 'the aged' and 'children'. These are not of national security interest, and would be unlikely to require an ASIO check.

They are also areas already covered by well established arrangements through the NCHRC service that CrimTrac currently provides. If AusCheck were to move into these areas this could duplicate service that already works well. Based on robust protocols, accreditation allows for quick turnaround times. There is a need to be mindful that we do not add additional layers of administration if this is not necessary.

It is also noted that purposes listed under clause 8(2) relate to activities for which there is a head of power in the Commonwealth Constitution. The two areas of aged care and care of children do not have specific heads of power under the Commonwealth Constitution.

2. Vulnerabilities in the current national criminal history checking system

There are technical issues that give rise to vulnerabilities in the current national criminal history checking system. National criminal history checking is currently supported by a computerised system that has limited functionality and ability to deal with increasing workloads.

The whole process also depends on a labour-intensive, inefficient and paper-based referral process which relies heavily on the use of facsimile transmissions and courier services to transfer the criminal history information. For example, the existing ten-working day service level is often not met due to the increasing demand for checks and the nature of the existing jurisdictional arrangements. This places at risk those clients seeking to engage people at short notice in vulnerable positions, such as emergency foster care, where timing is critical with regards to the safety and security of individuals. Constant complaints are received by industry sectors demanding that check processing times be improved for safety and efficiency purposes.

The current process, moreover, simply delivers a fixed point-in-time check which is only reliable on the day of issue and creates undue risk for organisations which issue an authorisation notice/card. The recent government decision relating to increased scrutiny for the aviation/maritime sector agreed that continuous monitoring should be undertaken as a minimum requirement.

The ever increasing incidence in identity theft and fabrication within the community encourages and allows criminal behaviour to circumvent the checking process. The fundamental deficiency is the reliance on limited biodata, comprising name, date of birth and gender, as the sole mechanism for determining if the person the subject of the check is a "person of interest" and has a criminal record.

CrimTrac is taking a number of steps to address these deficiencies, through upgrading the IT system and business process to meet the community expectations through:

- building a more robust system which fully automates the electronic transfer of criminal history information;
- reforming the business arrangements for the NCHRC service for all jurisdictions;
- consideration of introducing an optional more stringent biometric check (fingerprints) to effectively eliminate the issue of ID fraud, and
- introducing a continuous monitoring capability based on fingerprints.

3. The potential benefits of introducing a more stringent, and continuous, checking capability based on a fingerprint

The introduction of fingerprint-based checking is integral to continuous monitoring and there is growing impetus to introduce a fingerprint-based check from several

sources to counter the increasing prevalence of identity fraud and the requirement from key sectors, such as aviation, to move from point-in-time checks to continuous checks.

The 2005 Wheeler Report identified that the current system for issuing and holding an Aviation Security Identification Card (ASIC) carries many vulnerabilities including:

- “fraudulent identification may be used to enable an applicant to avoid scrutiny of his or her identity and past background”; and
- “biometrics such as fingerprints are not incorporated into ASICs”.

The Wheeler Report also stated that:

“an applicant for an ASIC must be willing to undergo a potentially intrusive background check. The applicant must also be ready to present strong proof of identification. In addition to standard identification certificates, a verifiable work history should be required, and fingerprinting (or other biometric technologies) should be part of the process of applying for an ASIC. The system used for aviation should also be applied in the maritime sector and possibly to improvements in other areas, such as land transport.”

The most recent Australasian Police Ministers' Council (APMC) meeting considered the proposals of the COAG Working Party conducting the Review of the regulation of the Private Security Industry in Australia. Two pertinent recommendations were that:

- “all jurisdictions agree to introduce mandatory fingerprinting at time of application for the purposes of verifying the identity of the applicant” (rec 8); and
- every jurisdiction agrees to undertake as a minimum national criminal history checks on licence applicants at time of application and then local criminal history checks every day for the duration of the licence” (rec 15).

The strong technical advice from our preliminary work around options for continuous checking is that implementation of a continuous checking capability not linked to fingerprints, while not unachievable, would entail a significant additional burden to police jurisdictions.

A second COAG sponsored working party, established to address The Inter-jurisdictional Exchange of Criminal History Information for People Working with Children recently submitted its final report to the COAG Secretariat. The report recommends, inter alia, that:

“future work could be undertaken to explore options to address identified vulnerabilities in the current criminal history background checking process. Inherent vulnerabilities include reliance on a name-based check, the single “point-in-time” nature of the current clearance process and the lack of exchange of criminal history information with relevant overseas jurisdictions, particularly New Zealand and the United Kingdom. This future work could include development of a capability to introduce a fingerprint-based check (as is the overseas trend) which would serve the dual purposes of achieving positive identification in a climate of prevalent identity fraud and theft, and set a platform for a continuous checking regime”.

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It is important to note that implementation of an initial continuous fingerprint-based checking capability would take at least some 18 to 24 months to develop. This lead time may fall short of stakeholder expectations.

Appendix A

CrimTrac Systems

The CrimTrac initiative was announced by the Prime Minister in the 1998 Federal election campaign as a key element of the Coalition's policy, a Safer and Stronger Australia. The Australian Government provided \$50 million to establish CrimTrac to "allow police forces across Australia to share information to solve crimes and catch criminals". In July 2000, the CrimTrac Inter-Governmental Agreement (IGA) was signed by the Australian Minister for Justice and Customs and state and territory police ministers. CrimTrac became an executive agency of the Attorney-General's portfolio in July 2000.

CrimTrac contributes to Australian law enforcement by developing, delivering and maintaining modern high-quality electronic police information and investigative tools. The agency achieves this by nurturing a cooperative, collaborative partnership with all police services and the broader law enforcement community as stakeholders.

CrimTrac assists Australian police services to take advantage of opportunities opened up by forensic science, information technology and communications advances.

The agency supports policing through providing information and investigative tools to:

- provide faster suspect identification
- assist police in clearing the innocent
- shorten investigation times so more crimes can be investigated, and
- result in higher crime clearance rates.

In addition, CrimTrac provides national police record checking services to accredited agencies to assist in pre-employment probity checking. The National criminal history checking service is a key area of business for the CrimTrac agency and generator of 95% of our income, now that the initial \$50million capital injection has been expended.

CrimTrac's Inter-Governmental Agreement requires us to deliver four new systems to improve information sharing for police:

- a new National Automated Fingerprint Identification System;
- a National Criminal Investigation DNA Database;
- a National Child Sex Offender System; and
- the provision of rapid access to national operational policing data.

Three of these systems are now well established, while the fourth has undergone a successful trial and is now being rolled out nationally.

CrimTrac's new vision statement, endorsed by the Australasian Police Ministers' Council in November 2006, is to take a leadership role in generating national approaches to information sharing solutions for law enforcement agencies, for a safer Australia.

CrimTrac's Information Systems

1. National Automated Fingerprint Identification System (NAFIS)

NAFIS comprises a database and data matching subsystem providing police services with the ability to manage fingerprint person records and resolve major and minor crime nationally.

Fingerprints, palm prints and basic demographic information obtained from an individual by the various police services (commonly referred to as Tenprint data). Tenprint records are maintained by jurisdictions where the data originated until a court order is issued for the removal of the data (images and demographic information).

There are two types of records held on NAFIS related to crime cases; unsolved crime images against which jurisdictions can nominate to search new or existing tenprint records against, and solved crime cases which are kept for reference and auditing purposes.

- Currently 3.7 million fingerprint records ('fingerprint cards') are stored on NAFIS.
- Approximately 270,000 person to person searches are conducted on NAFIS per annum.
- Approximately 420,000 unsolved latent images (related to crime cases) are stored on NAFIS
- On average 19,000 people to crime scene identifications are made each year.

The National Automated Fingerprint Identification System, NAFIS, has been operational nationally since April 2001.

2. National Criminal Investigation DNA Database (NCIDD)

NCIDD contains deoxyribonucleic acid (DNA) profile information from all participating jurisdictions. The NCIDD itself does not hold DNA samples. The profile information is drawn from samples collected at crime scenes, from convicted offenders and from suspects. In some circumstances, volunteers may be compared with other profiles on the database. The database provides Australian police and forensic scientists with a powerful investigative tool which automatically crosses jurisdictional boundaries.

It enables police and forensic scientists to:

- continually and automatically compare DNA profile information from crime scenes with profile information of convicted offenders throughout Australia, immediately identifying potential suspects where matches occur;

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- compare DNA profile information from convicted offenders, and where legislation allows, suspects, with profiles from unsolved crime scenes for which they may not previously have been suspects; and
- match DNA profile information from two or more unsolved crime scenes, thereby linking seemingly unrelated police investigations.

While some States and Territories already have their own DNA databases, CrimTrac's national DNA database allows the fight against crime to be taken Australia-wide.

CrimTrac's DNA database operates in accordance with relevant Commonwealth, State and Territory legislation governing the matching of DNA profiles. Profiles are added and removed from the NCIDD in accordance with jurisdictional legislative requirements.

The DNA database contains no personal information, as defined by the Australian Commonwealth Privacy Act 1988. Only State and Territory forensic laboratories supplying the DNA profiles know the identities of the profiles' providers. When a sample profile is matched to a crime scene profile on the database, the CrimTrac Agency does not have access to identity details. The police of one jurisdiction must contact the police of another jurisdiction to obtain the identity of the person who has supplied the sample, or to obtain the details of the crime scene a profile originated from.

3. The **CrimTrac Police Reference System (CPRS)** is a major development program to enhance law enforcement in Australia by implementing the 'provision of rapid access to national operational policing data'. It encompasses the following:

Minimum Nation-wide Person Profile (MNPP)

The MNPP project will provide Australian police agencies with the most advanced and comprehensive information on persons of interest. It will allow every police officer to have instant access to national policing information on persons of interest.

The information on the (CPRS) MNPP is that which police have identified as necessary to share for operational police to deal with persons of interest.

- There are basically eleven (11) categories of information held on the CPRS which consists of persons of interest that have: Warnings, Warrants, Offence History, Firearms; Orders (Defendant/protected persons), Bail information; or is an unidentified person/body, a missing person, an escapee; or are on the ANCOR system.
- There is also a 'watch house' photograph of the offender where this is available.

Australian National Child Sex Offender Register (ANCOR)

The Australian National Child Offender Register's (ANCOR) current functionality enables police to register, case-manage and share information with other jurisdictions about persons subject to child protection registration.

When ANCOR was launched it had functionality to allow a jurisdiction to undertake the registration and case management of persons subject to registration and included some basic mapping tools. Upgrades and releases since the launch are completing the application in accordance with the priority of user requirements. There have been twelve releases of functionality since the system was launched in September 2004.

5. The current 'legacy' systems

The existing systems maintained by CrimTrac are mainly mainframe based systems that will, over time, be decommissioned as new systems are introduced under the CrimTrac Police Reference System (CPRS) Development Programme. The existing PRS consists of the following systems:

National Names Index (NNI)

The NNI comprises multi-jurisdictional data on criminal histories, missing persons, warrants, domestic violence orders, adverse firearms history and other information on persons of interest to police. The system provides vital information to police by flagging information on those persons who may not be known on local jurisdictional databases but who have a record or history in other states or territories.

National Firearms Licensing and Registration System (NFLRS)

The system holds information on past and current firearm licence holders, licensed firearm dealers, and registered, lost and stolen firearms.

National Vehicles Of Interest system (NVOI)

The NVOI system records stolen, recovered, wanted and suspect vehicle details. It is also able to access details regarding vehicle registration and driver licensing through links to national roads and transport authorities' data held on the National Exchange of Vehicle and Driver Identification System (NEVDIS) provided by AustRoads.

Telephone Directory Service (TDS)

The TDS databases have provided a cost-effective method to conduct a search on names, telephone numbers and addresses. This has enabled police to identify names and addresses allocated to particular telephone numbers, verify the address of detained suspects, and clarify the details of callers to police emergency telephone operators.

6. **CrimTrac Accredited Agencies at 21 December 2006**

COMMONWEALTH AGENCIES

1. AUSTRALIAN CUSTOMS SERVICE
2. AUSTRALIA POST
3. AUSTRALIAN SPORTS COMMISSION
4. AUSTRALIAN TAXATION OFFICE
5. CENTRELINK
6. CHILD SUPPORT AGENCY
7. DEPARTMENT OF FINANCE AND ADMINISTRATION
8. DEPARTMENT OF IMMIGRATION AND CITIZENSHIP
9. DEPARTMENT OF THE TREASURY

STATE/TERRITORY AGENCIES

10. ACT DEPARTMENT OF EDUCATION & TRAINING
11. CATHOLIC COMMISSION FOR EMPLOYMENT RELATIONS
12. NSW COMMISSION FOR CHILDREN AND YOUNG PEOPLE
13. NSW DEPARTMENT OF EDUCATION & TRAINING
14. NSW DEPARTMENT OF HEALTH
15. NSW DEPARTMENT OF THE ARTS, SPORT & RECREATION
16. NSW MINISTRY OF TRANSPORT
17. NSW RURAL FIRE SERVICE
18. NSW STATE EMERGENCY SERVICE
19. WORKCOVER NSW
20. MELBOURNE 2007 WORLD SWIMMING CHAMPIONSHIPS CORPORATION
21. VIC BUSINESS LICENSING AUTHORITY
22. VIC DEPARTMENT OF EDUCATION & TRAINING
23. VIC DEPARTMENT OF HUMAN SERVICES
24. VIC DEPARTMENT OF JUSTICE - WORKING WITH CHILDREN CHECK UNIT
25. VICTORIAN INSTITUTE OF TEACHING
26. SA DEPARTMENT OF EDUCATION & CHILDREN'S SERVICES
27. SA DEPARTMENT FOR FAMILIES AND COMMUNITIES
28. TEACHERS REGISTRATION BOARD OF SOUTH AUSTRALIA
29. WA DEPARTMENT OF THE ATTORNEY GENERAL
30. WA DEPARTMENT FOR COMMUNITY DEVELOPMENT
31. WA DEPARTMENT FOR COMMUNITY DEVELOPMENT - WORKING WITH CHILDREN SCREENING UNIT
32. WA DEPARTMENT OF CORRECTIVE SERVICES
33. WA DEPARTMENT OF EDUCATION & TRAINING
34. WA DEPARTMENT OF HEALTH

NON-GOVERNMENT ENTITIES

35. MONASH VOLUNTEER RESOURCE CENTRE (VIC)
36. VICTORIAN YMCA INC (VIC)
37. ANGLICARE SA INC (SA)
38. CATHOLIC CHURCH ENDOWMENT SOCIETY, ARCHDIOCESE OF ADELAIDE (SA)
39. COMMUNITY SUPPORT INC & SA IN HOME CARE INC (SA)
40. NASANSB PTY LTD & ASEPS PTY LTD (T/A NURSING AGENCY AUSTRALIA) (SA)
41. NURSING CARE SERVICES PTY LTD (T/A ORIGIN HEALTH CARE) (SA)
42. UNITING CHURCH IN AUSTRALIA, SA SYNOD (SA)