Inquiry into the Decriminalisation of Certain Public Offences, and Health and Welfare Responses

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CRIMINALISATION of POVERTY and HOMELESSNESS in AUSTRALIA
An ARC Linkage Project
A NATIONAL STUDY

UQ DEATHS IN CUSTODY PROJECT

SUBMISSION TO THE INQUIRY INTO THE DECRIMINALISATION OF CERTAIN PUBLIC OFFENCES, AND HEALTH AND WELFARE RESPONSES

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Overview

I am a professor of law at the University of Queensland. I have researched public space offences in Queensland for over 20 years. In my view:

1. the offence of begging should be repealed;
2. the offence of public intoxication (and the related offence of consuming liquor in certain public places) should be repealed;
3. the offence of begging may not be compatible with human rights;
4. the offence of public intoxication may not be compatible with human rights;
5. examples of best practice diversion strategies are already operational, both within Queensland and elsewhere in Australia, which could be replicated;
6. the offence of public nuisance should be repealed, or amended to ensure that it is not used as an alternative to criminalise begging and public intoxication;
7. the offence of public urination should be repealed.

Projects

In this submission, I draw on research conducted in two research projects:

ARC National Study on the Criminalisation of Poverty and Homelessness in Australia ('the ARC study'):[1] Funded by the ARC Linkage Scheme, this was a collaborative research project involving four universities and 10 community legal centres from across Australia.[2] The Project investigated the impacts of criminalisation on people experiencing poverty and

[1] The chief investigators of the project are: Tamara Walsh (UQ); Thalia Anthony (UTS); Luke McNamara (UNSW); Julia Quilter (UoW). The research assistants for the project are: Jane Beilby (UQ LLB graduate); Lucy Cornwell (UQ LLB graduate); Sienna McInnes-Smith (UQ LLB graduate); Maddy Waldby (UQ LLB student).
[2] The study sites were: Adelaide, Brisbane, Canberra, Darwin, Hobart, Melbourne, Perth, Sydney, Townsville and Wollongong.

homelessness in all Australian states and territories. As part of that research, we conducted interviews with 164 people experiencing homelessness and 31 judicial officers.

UQ Deaths in Custody Project ('the UQDIC project'):[3] The UQ Deaths in Custody Project is a pro bono research project which I established in 2016. The aim of the Project is to make information about coroners' inquest findings on deaths in custody publicly available and searchable. The Project is staffed by a large team of student volunteers who have developed and continue to maintain a website providing information on every death in custody that is the subject of a publicly available coroner's report.

1. Repeal the offence of begging

In the ARC study, several judicial officers said that people experiencing homelessness are commonly charged with minor offences that should instead be dealt with by community or health services. Two judicial officers made the following remarks:

> 'Lots of the people that are homeless come into contact because of fairly **arcane laws** which continue to exist [such as] the beg alms offence'.

> 'There's a bloke that I frequently see in the list… he's utterly harmless but he keeps getting locked up time and again [for begging]. And he's utterly harmless… It's a bit of a **waste of police resources**, really. I'm not criticising the police. The law's there, but it's a pretty blunt instrument to deal with somebody who is no threat to anybody.'

Begging is essentially a **crime of survival**. Australian research has established a clear link between homelessness (particularly rough sleeping) and begging.[4] The vast majority of those who beg do so because they have no other way of obtaining the necessities of life. People experiencing homelessness report that they engage in begging as an alternative to stealing, and they describe the experience as humiliating and dangerous.

Several participants in the ARC study who had experienced homelessness said they had engaged in begging behaviour. They described the injustice of being punished for being destitute:

> 'I used to be picked on by the police a lot, back in the day because I used to be a beggar out in the street. And they used to give me a hard time a lot. They'd leave me alone sometimes and then other times they won't.'

> 'When you're homeless you're more prone to, for example, getting a fine for sitting and asking for money. Which, in that case, yes, a fine. But they're asking for money

[3] Visit https://deaths-in-custody.project.uq.edu.au/. I acknowledge the wonderful work of our recent most student leader, Lucy Cornwell.

[4] Alison Young and James Petty, 'On visible homelessness and the micro-aesthetics of public space' (2019) 52(4) ANZJC 444; Paula Hughes, 'The crime of begging: Punishing poverty in Australia' (2017) 30(5) Parity 32-33; Philip Lynch, 'Understanding and responding to begging' (2005) 29(2) MULR 518; Tamara Walsh, 'Defending begging offenders' (2004) 4(1) QUTLJJ 58; Michael Horn and Michelle Cooke, *A Question of Begging: A Study of the Extent and Nature of Begging in the City of Melbourne* (Hanover Welfare Services 2001).

> because they need toiletries, or they need a pair of clothes. Or, in my case, when **I asked for money it was because I didn't want to go into a shop and steal underwear.'**
>
> 'I do find that is ridiculous when you're dealing with somebody that's begging for money on the street, that you give them a $400 fine.'

Australian research has suggested that aggressive begging is extremely rare. People who beg most often do so in a passive manner, for example by sitting or sleeping next to a sign, or asking passers-by for money, and they are easily put off when refused.[5] Yet, the begging offence in Queensland is framed very broadly. No circumstance of aggravation, such as aggressive or threatening behaviour, is required for a person to be charged. Similar provisions have been declared invalid in other countries for being vague or 'overbroad'.[6]

The most recent statistics available suggest that between 100 and 200 people a year are charged with begging in Queensland.[7] This would suggest that a separate offence of begging is not warranted. If a person engages in begging that is aggressive or threatening, this can be dealt with using other offences such as assault or threatening behaviour.[8]

I support the repeal of the offence of begging, however I am concerned that police may use other powers to detain, or issue directions to, people who beg in a public place. If this occurs, the repeal of the begging offence may have unintended adverse consequences. Individuals may be charged with more serious offences, such as public nuisance, instead (see Part 6 below).

2. Repeal the offence of public intoxication (and the offence of consuming liquor in certain public places)

The offence of public intoxication is disproportionately enforced against people who spend long periods of time in public space, including people who are homeless and Aboriginal and/or Torres Strait Islander peoples. The ARC study found that many homeless participants had been charged with public drinking. They explained that they drank in public places because they **had nowhere else to go**, and that they used alcohol to **self-medicate for mental illness and depression**, 'to make you forget and numb it all'. Homeless participants in the ARC study emphasised that criminalising them for public intoxication **does not solve the problem**:

> 'I think there should be… a little bit of leeway because… these people have been under the influence of drugs and alcohol for the majority of their lives. So what's going to change? You're telling them to move on or they're going to get charged, they're just going to go do it somewhere else.'

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[5] Michael Horn and Michelle Cooke, *A Question of Begging: A Study of the Extent and Nature of Begging in the City of Melbourne* (Hanover Welfare Services 2001); Alison Young and James Petty, 'On visible homelessness and the micro-aesthetics of public space' (2019) 52(4) ANZJC 444.
[6] See further Tamara Walsh, 'Defending begging offenders' (2004) 4(1) QUTLJJ 58.
[7] Paula Hughes, 'The crime of begging: Punishing poverty in Australia' (2017) 30(5) Parity 32.
[8] *Criminal Code* s 359(1) (Threats).

Several of the judicial officers we interviewed agreed with this perspective:

> 'if they're intoxicated, they should be taken to a centre and treated with some compassion.'

Heavily intoxicated persons are placed at risk when they are held in police cells. As one of the homeless participants in the ARC study said:

> 'they take you into custody [for intoxication]… if you had a health problem... people who have diabetes, or prone to epilepsy, or these sorts of things, they weren't really properly medically screened when they were taken into [custody]. Sometimes they were denied their medications, and there had been a lot of problems and... even **deaths in custody** as a result of that.'

The UQDIC project has uncovered several deaths in custody where the deceased had been arrested for public intoxication or held in protective custody for intoxication. Most of these deaths in custody concerned Aboriginal and/or Torres Strait Islander peoples. Coroners have consistently recommended that intoxicated persons be taken to hospitals instead of being held in police cells because adequate monitoring and health care cannot be provided by police.

Table 1: Deaths in custody associated with charges for public intoxication/being taken into protective custody for intoxication

Initials of the deceased (State/Territory)	Indigenous status and gender	Circumstances of the death
M (Qld)	Indigenous man	Died in a police cell after a fall at the police station having been arrested for disorderly behaviour whilst intoxicated
MDL (Qld)	Male (race not specified)	Died in hospital after going into cardiac arrest in a police cell having been arrested for being drunk in a public place
HJM (Qld)	Male (race not specified)	Died in hospital after being found unresponsive in a police cell having been arrested for being drunk in a public place
DJP (WA)	Indigenous man	Died in a police cell from alcohol withdrawal having been arrested for failing to move on while intoxicated
MM (WA)	Indigenous woman	Died in a police cell having been arrested for 'street drinking'
TD (Vic)	Indigenous woman	Died as the result of a fall in a police cell having been detained for being drunk in a public place
MC (NT)	Indigenous man	Died after being taken into protective custody for intoxication
OK (NT)	Indigenous man	Died after being taken into protective custody for intoxication
RD (NT)	Indigenous man	Died after being taken into protective custody for intoxication
PRJ (NT)	Indigenous man	Died after being taken into protective custody for intoxication
TDB (NT)	Indigenous man	Died in a police cell having been taken into protective custody for intoxication
PJL (NT)	Indigenous man	Died in a police cell having been arrested for drinking alcohol in a public place
MTM (SA)	Male (race not specified)	Died in a police cell having been taken into protective custody for intoxication
RM (NSW)	Indigenous woman	Died in a police cell having been taken into protective custody for intoxication

I support the repeal of the offence of public intoxication, and the related offence of consuming liquor in certain public places (*Liquor Act 1992* (Qld) s 173B). Presently, Queensland is the only jurisdiction not to have implemented Recommendation 79 of the

Royal Commission into Aboriginal Deaths in Custody.[9] However, I am concerned that police may use other powers to arrest, detain, or issue directions to people who are intoxicated in a public place. If this occurs, the repeal of the offence of public intoxication may have unintended adverse consequences – individuals may be charged with more serious offences, such as public nuisance, instead (see Part 6 below).

3. Is the offence of begging compatible with the *Human Rights Act 2019* (Qld)?

The offence of begging may not be compatible with the right to equality before the law; the right to life; the freedom of expression; the rights of the child; and the right to liberty.

3.1 Equality before the law

A person who begs is simply asking a fellow member of the community for assistance. As a matter of logic, it is difficult to distinguish this from other requests for assistance such as that of a motorist who has been in an accident, or an individual who needs a coin for a shopping trolley or parking meter. When a South Australian court was required to grapple with this issue, it concluded that these situations are distinguishable from begging because a 'relationship [is] temporarily created by emergency or a commonly shared experience.'[10] Yet, it could likewise be argued that destitution is an emergency, and therefore that the request for assistance is reasonably justifiable. Since it is an individual's state of destitution that seems to provide the legal foundation for a begging charge, this may be incompatible with a person's right to equality before the law: a destitute person's requests for assistance are criminalised when other requests for assistance are not.

3.2 Right to life

The Canadian courts have concluded that the ability to provide oneself with the necessities of life falls within the ambit of the right to life.[11] Making begging a criminal offence discourages individuals from engaging in behaviour aimed at survival. Since all forms of begging are prohibited, it cannot be argued that the offence reasonably and justifiably limits this right. Therefore, it could be argued that the offence of begging is incompatible with the right to life.

3.3 Freedom of expression

The freedom of expression includes the right to 'seek, receive and impart ideas of all kinds'.[12] It has been concluded by some international courts that begging is a form of expression. The US District Court (New York) remarked:

> 'The simple request for money by a beggar or panhandler cannot but remind the passer-by that people in the city live in poverty and often lack the essentials for

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[9] 'That, in jurisdictions where drunkenness has not been decriminalised, governments should legislate to abolish the offence of public drunkenness.'
[10] *Begg v Daire* (1986) 40 SASR 375, 388.
[11] *Federated Anti-Poverty Groups of British Columbia v City of Vancouver* [2002] BCSC 105 [221].
[12] *Human Rights Act 2019* (Qld) s 21(2).

> survival. Even the beggar sitting in Grand Central Station with a tin cup at his feet conveys the message that he and others like him are in need. While often disturbing and sometimes alarmingly graphic, **begging is unmistakably informative and persuasive speech**.'[13]

The Supreme Court of British Columbia (Canada) similarly concluded:

> 'the act of panhandling is a form of expression, which not only helps by way of donations, but also delivers the message of poor people's plight.'[14]

Individuals have a right to communicate to their fellow community members that they are destitute and in need of assistance. Therefore, it could be argued that the offence of begging is incompatible with the freedom of expression.

3.4 Rights of the child

All children in Queensland have a right to protection. Criminalising a child for engaging in a survival-related activity cannot be considered protective. Since all forms of begging are prohibited – and children as well as adults can be charged with this offence – it cannot be argued that the offence reasonably and justifiably limits this right.

3.5 Right to liberty

Individuals have a liberty interest in communicating freely with one another, absent any threatening or offensive behaviour. Depriving individuals of the opportunity to speak with their fellow community members limits their right to liberty. As one court in the United States (Massachusetts) remarked, prohibitions on begging prevent individuals from 'engag[ing] with fellow human beings in the hope of receiving aid and compassion.'[15] The distinction between begging and other forms of unsolicited communication between individuals is arbitrary. Therefore, it could be argued that the offence of begging is incompatible with the right to liberty.

4. Is the offence of public intoxication compatible with the *Human Rights Act 2019* (Qld)?

The offence of public intoxication may not be compatible with the right to equality before the law; the cultural rights of Aboriginal and Torres Strait Islander peoples; and the right to liberty.

Homeless participants in the ARC study said that they were charged with public intoxication, while housed individuals could drink freely in parks and other public spaces, or at home, without police interference. They said:

> 'People that have got no home, they've got nowhere else… **Where else do they go to drink?** They can't afford a drink at a pub. That's where I'm coming from, that's the

[13] *Young v New York City Transit Authority* 729 F Supp 341 (SDNY 1990) 352.
[14] *Federated Anti-Poverty Groups of British Columbia v City of Vancouver* [2002] BCSC 105 [200].
[15] *Benefit v Cambridge* 424 Mass 918 (1997) 926.

> reason why I'm getting stung so much is because I've got no home… because I've got no home I'll just drink on the street and then get busted.'
>
> 'there'll be days when you do want to have a cold beer, but you can't go out the back of your house and light the barbie, can you? So you just have a cold beer and then the next minute unfortunately a police officer sees you and then next minute you're in trouble.'
>
> 'We drink in a public place because we've got no place to go.'

According to homeless participants in the ARC study, Aboriginal and/or Torres Strait Islander peoples were more likely to be charged with public intoxication because they frequently socialise in public places.

> 'family all meet in the park… **It's a traditional thing.** You wouldn't understand. Black fella thing. We all meet at one place.'
>
> 'Sometimes when people get together, that's why when they in the past people to get together for a large corroboree, and that's why they're singing, dancing and that's why the different tribes come together, sit in the park and drink and get along.'
>
> 'Fined us for public drinking… we weren't causing any problems… **I've seen some white people drink as well in public and they don't get harassed.** Sometimes Aboriginals seem to get harassed more than the white people. So I sometimes wonder what's going on. It's a bit sad. They really need a safe place where they can go and have a drink…'

The judicial officers we interviewed in the ARC study agreed that by granting wide discretionary powers to police, offences like public intoxication could operate in a discriminatory fashion:

> 'By being given the powers they actually have, which are very generous, it means that the Aboriginals, mentally ill, etc, those in the bottom rungs, are heavily policed.'
>
> 'It is, on one analysis, **discriminatory on racial grounds** simply because the vast majority of people who would be drinking in public would be Indigenous, and they would also be homeless.'

It could be argued that differential policing of the offence of public intoxication is incompatible with the right to equality before the law, and may breach the cultural rights of Aboriginal and/or Torres Strait Islander peoples to meet together and socialise on country.

5. Examples of best practice diversion strategies

In the ARC study, we heard positive stories regarding some effective diversionary strategies already in operation.

Townsville's (Reverend Charles Harris) **Diversionary Centre**[16] ('Grindal') was praised by participants as a safe place for people to go to recover from intoxication. The Centre provides accommodation and other support services, and is an alternative to police custody for people who need protection, but do not require, or have been turned away by, medical services. Participants said the Diversion Centre operates a bus service to transport people from the streets to the Centre, and runs rehabilitative and treatment programs (such as 'Breaking the Cycle'). Homeless participants said:

> 'The diversionary centre is a safe place for homeless people… you've got the women's side, then you've got the men's side but we all come together to eat in one big kitchen. **It's a safe haven.** There's no drinking there though… diversionary centre has programs available… they take you fishing and all that if you do the program.'
>
> 'I had a good sleep last night at Grindal and a warm bed.'
>
> '[They need] more beds at the Diversion Centre… They should have more things like that lady that they have now with that programme over at Diversion, Breaking the Cycle, and all that. Try to get everyone off the street plus slow down the alcohol at least and try to wean them off it.'
>
> 'I think Diversionary centre is **the best place**.'
>
> 'police do a good thing when they take people to the diversionary centre which is a **safe place** for homeless people.'

Participants in the ARC study said that community patrols run by Aboriginal and/or Torres Strait organisations also provided an effective alternative to the criminalisation of intoxicated people. Blagg and Anthony have noted that Indigenous community patrols represent the 'longest running form of Indigenous, community owned and designed harm prevention initiative in Australia'.[17] They first arose in the 1980s following the recommendations of the Royal Commission into Aboriginal Deaths in Custody.[18] They perform a 'counter-policing' role, that is, they attempt to minimise intervention by police and instead draw on the community itself to provide an alternative form of intervention.[19] Importantly, community patrols are characterised by their lack of 'coercive powers' – they focus on enhancing community safety and welfare by providing services such as transportation to safe places, connecting people with support services and safeguarding against homelessness, substance abuse and domestic and family violence.[20]

One example of community patrols that was mentioned in the ARC study was the work of **Larrakia Nation** in the Northern Territory.[21] They provide a community patrol service as part of their outreach activities, seven days a week between 5pm and 2am. Larrakia Nation's

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[16] https://yumba-meta.com.au/about/program/reverend-charles-harris-diversionary-centre/
[17] Harry Blagg and Thalia Anthony, *Decolonising Criminology: Imagining Justice in a Postcolonial World,* 2019, 280.
[18] Harry Blagg and Thalia Anthony, *Decolonising Criminology: Imagining Justice in a Postcolonial World,* 2019, 279.
[19] Amanda Porter, 'Decolonizing policing: Indigenous patrols, counter-policing and safety' (2016) 20(4) Theoretical Criminology 548, 551, 559.
[20] Harry Blagg and Thalia Anthony, *Decolonising Criminology: Imagining Justice in a Postcolonial World,* 2019, 282.
[21] http://larrakia.com/.

services were described as culturally aware, practical and non-judgemental. Homeless participants in Darwin said:

> 'They're [Larrakia Nation are] probably the only decent ones you get running around. They're still limited to what they can do and what they can't do which is sad. But they seem to be doing more for the community and half of them are all volunteers.'
>
> 'Larrakia Nation should play more of a role.'

One judicial officer in the ARC study mentioned night patrols and agreed they provide an invaluable service:

> 'I saw the night patrol pick up someone the other afternoon when I was out walking near [redacted]. It was really great to see the way that they dealt with that guy.'

6. Amending, or repealing, the offence of public nuisance

There is a real risk that by repealing the 'minor' offences of begging and public intoxication, individuals will be charged with different offences, that attract a more serious penalty, for the same behaviours. For example, people may be charged with public nuisance for behaviours associated with destitution and homelessness. Individuals might also be charged with failing to follow a police direction (such as a move-on direction), or obstructing or assaulting a police officer.

The offence of public nuisance is framed widely to include 'disorderly' behaviour.[22] The High Court held in *Coleman v Power* that offences that criminalise offensive or disorderly behaviour should be construed narrowly. Otherwise, they may be unconstitutional because they are not reasonably adapted to the achievement of a legitimate purpose.[23] The High Court said that to be proportionate to the achievement of the legitimate purpose of 'public order', offensive behaviour offences (like public nuisance) should be directed towards behaviours that are 'abusive', 'violent', 'intimidating', 'threatening' or 'riotous'.[24]

My research has shown that public nuisance is not policed, or indeed interpreted by the lower courts, in a manner that is consistent with the High Court's comments in *Coleman v Power*.[25] Often, people receive a public nuisance charge merely for swearing in public, or for swearing at a police officer, despite the fact that three judges of the High Court in *Coleman v Power* explicitly said that this should not ordinarily occur.[26] Other behaviours that frequently result in public nuisance charges include behaviours associated with mental

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[22] *Summary Offences Act 2005* (Qld) s 6(2)(a)(i).
[23] *Coleman v Power* (2005) 220 CLR 1, 32, 33, 98, 112-3.
[24] *Coleman v Power* (2005) 220 CLR 1, 22, 24, 73, 99, 121. See further Tamara Walsh, 'The impact of *Coleman v Power* on the policing, defence and sentencing of public nuisance cases in Queensland' (2006) 30(1) MULR 191.
[25] Tamara Walsh, 'Public nuisance, gender and race' (2017) 26(3) GLR 334.
[26] *Coleman v Power* (2005) 220 CLR 1, 68, 79.

illness or distress, such as yelling and minor property damage, and behaviours associated with homelessness.[27]

People experiencing homelessness who participated in the ARC study confirmed this. Homeless participants from Queensland said:

> 'It's the same thing over and over, public nuisance. $75, $75 fine. And we're getting picked up for, like every day for it. Haven't they other things better to do?... They just keep giving us tickets to go to court, court, court, court, court all the time.'
>
> 'When they're drunk, cops just pick them up, because when they're drunk they charge them for public nuisance… sometimes don't remember that they were charged, because the police charged them while they were drunk…'
>
> 'Police charge people for public nuisance when they're only sleeping in the park.'
>
> 'Me and my family had an argument last night. The police came and locked us up for public nuisance… Yelling. Just yelling at each other.'
>
> 'Public nuisance. While they're still asleep?... then you come along and pick them up. We're taking you to a watch house for being drunk, four or five hours. That's not right… they go to court for drunkenness, disorderly. So, the judge gives them a fine. They come again and they do the same thing. The police do the same thing. Come there and pick them up again.'
>
> 'Some of the judges nicely say to us, public nuisance? "No, you're all right, just walk out... I'm sick of public nuisance".'

The judicial officers we interviewed agreed that 'language is often a trigger' for a charge:

> 'We have one guy in drug court who's on an order but he had a public nuisance because he was walking round the street swearing. And he wasn't drunk or anything. Aboriginal man. And the police came up to him and told him to stop swearing and he didn't, so they've charged him with public nuisance.'

Several judicial officers said that public nuisance-type behaviour should not ordinarily be the subject of a criminal charge:

> 'I think there are charges where they should be kept out of the system. I think those public nuisance-type offences where there is no physical harm or threat and people just mouthing off in the street because they're intoxicated. **I don't think those matters should come before a court**.'

Whilst the offence of public nuisance is used appropriately on some occasions – for example, to protect vulnerable people from frightening behaviour such as stalking – it is my

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[27] Tamara Walsh, 'The impact of *Coleman v Power* on the policing, defence and sentencing of public nuisance cases in Queensland' (2006) 30(1) MULR 191, 203-204.

view that **the offence of public nuisance could be repealed**. Behaviour such as stalking, threatening behaviour and assault are more appropriately regulated under other provisions.

If the public nuisance offence is retained, it should be amended to reflect the threshold for offensiveness set by the High Court in *Coleman v Power.* This could be done by:

- removing the word 'disorderly' from s 6(2)(a);
- decriminalising offensive language by:
    - repealing s 6(3)(a); or
    - removing the words 'offensive', 'obscene' and 'indecent' from s 3(a).

7. Repealing the offence of urinating in a public place

Anecdotal evidence suggests that people who are homeless and young people are often charged with urinating in public in situations where no reasonable alternative was available to them. This was confirmed by participants in the ARC study, some of whom said they had been charged because '**you need to pee somewhere**.'

It is my view that only sexualised forms of wilful exposure should be criminalised. Since wilful exposure is prohibited already (at s9 of the *Summary Offences Act 2005* (Qld)), I see no place for a separate offence of public urination.

Thank you for the opportunity to make a submission to the Inquiry.

Prof Tamara Walsh
August 2022