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

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Submitted by: LawRight

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Dear Sir/Madam

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

Thank you for the opportunity to provide this submission to the Community Support and Services Committee's Inquiry into the Decriminalisation of Certain Public Offences, and Health and Welfare responses (**Inquiry**).

1. Background

LawRight is a not-for-profit, community-based legal organisation, which coordinates the provision of pro bono legal services to disadvantaged Queenslanders.

The Community Health Justice Partnerships program (**CHJP**) was established in 2002 by LawRight to provide free legal assistance and representation to people experiencing or at risk of homelessness and other vulnerabilities.

In the 2020/2021 financial year, LawRight:

- provided legal assistance in 1,329 matters for CHJP clients; and
- met with 548 vulnerable clients attending a community or health service in Brisbane or Cairns.

The clients assisted by the CHJP frequently experience multiple, intersecting forms of disadvantage connected to an experience of homelessness and housing instability, including mental illness, experiences of domestic violence, severe financial hardship, addiction, physical or intellectual disabilities and complex family backgrounds.

Many of our clients spend a disproportionate amount of time in public spaces. Experience drawn from our casework gives us direct insight into the impact of public space offences on vulnerable Queenslanders, most notably in relation to resolving fines and associated referrals to the State Penalties Enforcement Registry (**SPER**).

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LawRight's submissions will focus on the impact of the proposed legislative amendments on people experiencing or at risk of homelessness in the Greater Brisbane region, particularly people with a history of rough sleeping or living in public spaces. Our submissions have been informed by consultation with our client cohort.

Although a significant number of LawRight's clients identify as Aboriginal or Torres Strait Islander, LawRight's practice is not specifically situated to assist First Nations clients or communities. Similarly, although LawRight does assist some clients from regional and remote Queensland, our work primarily assists clients living in the Greater Brisbane region. These submissions therefore do not purport to address the Inquiry's terms of reference relating to the impact of the proposed legislative amendments on First Nations people and/or rural and remote communities.

2. Summary of LawRight's submission

LawRight's submission is primarily in response to the following terms of reference of the Inquiry:

a. changes to legislation and operational policing responses to decriminalise the public intoxication and begging offences in the *Summary Offences Act 2005* (Qld) (**Act**);
d. the health and social welfare-based responses to public intoxication and begging necessary to support legislative amendments, having regard to existing responses, such as diversion services;
g. the appropriateness of other police powers and offences to ensure community safety and public order arising from public intoxication and begging, particularly in the context of events where there may be significant alcohol consumption; and
i. the appropriateness of repealing the 'Urinating in a public place' offence under the *Summary Offences Act*.

In summary, having regard to its experience through its casework, LawRight submits the following in relation to the 'Urinating in a public place' offence under s 7 of the Act (**public urination offence**), the public intoxication offence under s 10 of the Act (**public intoxication offence**) and the begging offence under s 8 of the Act (**begging offence**) (together, **the Offences**):

- LawRight takes no strong position on whether the public urination offence and/or public intoxication offence should be decriminalised. Rather, LawRight submits that irrespective of whether or not these offences are decriminalised, the behaviours that these offences target should not in practice be used by the Queensland Police Service (**QPS**) or the court system in a way that negatively impacts people experiencing or at risk of homelessness; and
- LawRight submits that the begging offence should be decriminalised.

3. Impact of contact with the criminal justice system on people experiencing homelessness

In order to understand the potential impact of the Offences on people experiencing or at risk of homelessness, it is important to have an understanding of how this cohort is impacted by interactions with the criminal justice system.

It has been established in literature that "the homelessness–criminalisation link is a two-way relationship: people experiencing homelessness are at additional risk of coming into contact with the criminal justice system and justice system contact carries risks of creating or exacerbating homelessness".[1]

For our client cohort, the experience of being charged with low-level public offences is often inextricably and unavoidably linked to their experience of homelessness. The Offences in principle fall into this category. For example:

- people experiencing homelessness can be the subject of the public intoxication offence and/or the public urination offence by virtue of engaging in behaviour that most people would have the luxury of carrying out in the privacy of their own home;[2]
- people experiencing homelessness or financial vulnerabilities can be the subject of the begging offence by engaging in behaviour necessitated by their vulnerable financial position, which is frequently a consequence of other vulnerabilities or experiences of disadvantage; and
- people whose day-to-day lives are lived in public spaces are subject to significantly greater policing and police scrutiny than the broader population, particularly if they live with a visible disability or mental health symptoms.

People experiencing or at risk of homelessness who come into contact with the criminal justice system face significant additional risks that may perpetuate or exacerbate their experience of vulnerability. The impacts of being charged with low-level offences (like the Offences under consideration in this Inquiry) can include:[3]

- if a fine is imposed on a person with no capacity to pay, then this will often be referred to SPER, leading to a significant debt, which is likely to entrench financial hardship;
- potentially being refused bail, for example due to not having an identifiable residential address that can be used as a bail address;
- in the event that bail is granted, this will often carry conditions that are difficult to practically comply with (like curfews and reporting to police), increasing the risk that bail will be breached;
- if the person is banned in certain locations as a result of bail conditions or banning orders issued by the police, they may be isolated from health and support services, friends, family and other support networks;
- if the person needs to appear in court they may face practical difficulties in attending, resulting in further charges for failure to attend court. Alternatively, they may face inappropriate penalties imposed by a Magistrate who may not have a full and holistic picture of the offender's circumstances.

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[1] Julia Quilter, Luke McNamara, Tamara Walsh and Thalia Anthony, 'Homelessness and Contact with the Criminal Justice System: Insights from Specialist Lawyers and Allied Professionals in Australia' (2020) 10(1) *International Journal for Crime, Justice and Social Democracy* 111, 126.

[2] Julia Quilter, Luke McNamara, Tamara Walsh and Thalia Anthony, 'Homelessness and Contact with the Criminal Justice System: Insights from Specialist Lawyers and Allied Professionals in Australia' (2020) 10(1) *International Journal for Crime, Justice and Social Democracy* 111, 114.

[3] See generally, Julia Quilter, Luke McNamara, Tamara Walsh and Thalia Anthony, 'Homelessness and Contact with the Criminal Justice System: Insights from Specialist Lawyers and Allied Professionals in Australia' (2020) 10(1) *International Journal for Crime, Justice and Social Democracy* 111; Julia Quilter, Luke McNamra, Tamara Walsh and Thalia Anthony, Homelessness and Contact with the Criminal Justice System: Insights from Magistrates in Australia (2020) 30 *Journal of Judicial Administration* 64.

The above consequences are further exacerbated by the difficulty in obtaining free legal representation for the Offences, given most community legal centres (including LawRight) are not funded to provide representation or ongoing assistance for criminal matters. As charges relating to the Offences are typically heard in the Magistrates Court and have a comparatively low maximum penalty, people who are accused of these offences are generally ineligible for grants of legal aid.[4]

The above consequences demonstrate that being charged with offences can compound poverty, increase the risk of further contact with the criminal justice system, and exacerbate the risk of homelessness.

Additionally, these types of charges can have ongoing employment and financial impacts on offenders who are required to apply for a Working With Children check (a 'Blue Card') to pursue study or employment. Under s221 of the *Working with Children (Risk Management and Screening) Act 2000*, these types of minor offences should generally carry a presumption of suitability for a Blue Card unless the case is determined to be 'exceptional'. However, experience drawn from our casework demonstrates that clients are routinely issued negative Blue Card notices for these offences (many of which are historic, and do not involve children or childcare). The issuing of a negative Blue Card notice can prohibit the applicant from pursuing work or study opportunities and create significant life disruptions. Although these notices can be appealed and reviewed both internally with Blue Card Services and through QCAT, our casework demonstrates that even when this review process is successful it can regularly take up to three years to resolve, during which time the applicant is unable to pursue their chosen career or study.

4. Impact of fines on people experiencing homelessness

The public urination and public intoxication offences each carry a maximum penalty of a fine. The public begging offence has a maximum penalty of either a fine or 6 months of imprisonment. Therefore, in order to understand the potential impact of the Offences on people experiencing or at risk of homelessness, it is important to have a background understanding of the interaction between fines and this demographic.

The connection between fines enforcement and poverty is well established.[5] Many CHJP clients have fines being collected by SPER. People experiencing personal hardship and poverty are both more likely to receive these types of fines and are less able to resolve the resulting debt that accrues.

Vulnerable Queenslanders are more likely to receive fines

Separate reviews of our casework over the past decade showed an average debt with SPER between $4,000 - $8,000 per client. In addition to our casework, we have released multiple reports and discussion papers that outline the impact fines can have on people experiencing homelessness or poverty.[6] We have made submissions to

[4] See Legal Aid Queensland guidelines in relation to criminal law: https://www.legalaid.qld.gov.au/Find-legal-information/Publications-and-resources/Factsheets/Can-I-get-legal-aid#toc-criminal-law-2

[5] See Walsh, Tamara (2011) *Homelessness and the law.* Federation Press.

[6] See Queensland Public Interest Law Clearing House Incorporated (**QPILCH**), *Homeless Persons' Legal Clinic Discussion Paper: Responding to homelessness and disadvantage in the fines enforcement process in Queensland* (July 2013), QPILCH, *The fines enforcement regime in Queensland for people experiencing homelessness: Options for change* (May, 2011).

Government[7] and participated in an implementation group[8] related to these issues.

Collection rates cited by SPER may provide an inference that vulnerable people are over-represented in certain debt pools. This is consistent with our experience: in many instances, a person's experience of hardship and poverty increases the likelihood that a person may be issued a fine. As outlined in section 3 above, the behaviours that the Offences address are examples of a whole range of behaviours or circumstances that are criminalised, and that are also inextricably linked to a person's experience of poverty and hardship..

The impact of fines imposed on a person experiencing poverty and hardship as a result of the Offences should not be considered in a vacuum. Rather it must be acknowledged that these fines can increase that person's overall vulnerability to incurring significant SPER debts, which can inhibit their recovery from homelessness.

Vulnerable Queenslanders are less able to resolve SPER fines

SPER debts have a significant, negative impact on our clients. Often fines and infringements are part of a cycle where people incur penalties at times of crisis or as a result of chronic disadvantage. As people cannot pay, they are driven further into debt and greater involvement with the criminal justice system through the sanctions and enforcement costs that follow.

The size of the debts limits the options offered by SPER, many of which are inappropriate for a person at risk of homelessness surviving on a Centrelink benefit. Due to the size of these debts, the instalment plans offered are commonly unaffordable, pushing clients into further disadvantage. Some clients report sleeping rough after entering into unaffordable instalment plans. Others report going without food or falling behind in rent payments. Many clients have not engaged with SPER because their debt seems insurmountable or they do not dispute these types of fines.

5. The begging offence

For completeness and ease of reference, s 8(1) of the Act creates the begging offence, and provides:

> *(1) A person must not –*
> *(a) beg for money or goods in a public place; or*
> *(b) cause, procure or encourage a child to beg for money or goods in a public place; or*
> *(c) solicit donations of money or goods in a public place.*
>
> *Maximum penalty – 10 penalty units or 6 months imprisonment.*

[7] Submission to the Transport and Public Works Committee's Inquiry into the operation of toll roads in Queensland (August 2018); Submission in response to the *State Penalties Enforcement Amendment Bill 2017* (Qld) (March 2017), both available at https://www.lawright.org.au/submissions/.

[8] See Community Legal Centres Queensland Inc and QPILCH, *Work and development orders: Response to consultation paper* (July, 2016).

A review of our recent casework did not identify a single incident where a person sought assistance with a begging offence or where a begging offence was listed on a SPER fine history.

LawRight notes that QPS' submission to the Inquiry dated 8 July 2022 (**QPS Submission**) provides that:[9]

- 44 individuals were charged with a total of 74 counts of the begging offence in Queensland in 2020-2021; ;[10]
- These figures continue a trend where the number of people charged with this offence in Queensland has gradually and consistently decreased over the previous four financial years;[11]
- 15 infringement notices were issued by QPS for the aspect of the public begging offence under s 8(1)(a) of the Act in Queensland in 2020-2021, attracting a fine of 1 penalty unit or $143; and
- 3 infringement notices were issued by QPS for the aspect of the public begging offence under s 8(1)(c) of the Act in Queensland in 2020-2021, attracting a fine of 1 penalty unit or $143.

There is also research to indicate that the most commonly imposed penalty for begging in Queensland between 2009 to 2015 was a monetary order that required an offender to pay a fine as punishment.[12] LawRight is not aware of any publicly available information that shows the outcome of charges made in relation to the begging offence in more recent years.

The begging offence should be repealed

LawRight submits that the begging offence should be repealed from the Act for the following reasons.

First, unlike the public intoxication and public urination offences, the begging offence targets behaviour that it is inextricably linked with poverty and homelessness.[13] There is a wealth of research and literature that shows that begging is a last-resort activity engaged in by people to supplement inadequate income and meet basic subsistence needs, and that people who engage in begging find it humiliating.[14] Some research has shown that if people did not engage in begging, they would instead engage in other criminal behaviours to supplement inadequate income and meet basic subsistence needs, like stealing, prostitution, or drug dealing.[15]

[9] QPS submission, page 3.
[10] QPS submission, Attachment 1.
[11] Ibid
[12] Paula Hughes, "The crime of begging: Punishing poverty in Australia" (2017) 30(5) *Parity* 32–33, 33.
[13] See for example, Tamara Walsh, 'Defending Begging Offenders' (2004) Queensland 4(1) *University of Technology Law and Justice Journal* 58, 59; Tamara Walsh, "Who is the 'public' in 'public space'? A Queensland perspective on poverty, homelessness and vagrancy" (2004) 29(2) *Alternative Law Journal* 18; PILCH Homeless Persons' Legal Clinic Victoria, 'We want change: Calling for the abolition of the criminal offence of begging' (November 2010); Philip Lynch, "Understanding and Responding to Begging" 29(2) *Melbourne University Law Review* 518.
[14] Tamara Walsh, "Who is the 'public' in 'public space'? A Queensland perspective on poverty, homelessness and vagrancy" (2004) 29(2) *Alternative Law Journal* 18.
[15] Tamara Walsh, 'Defending Begging Offenders' (2004) Queensland 4(1) *University of Technology Law and Justice Journal* 58, 59; Tamara Walsh, "Who is the 'public' in 'public space'? A Queensland

Second, notwithstanding the comment in the QPS submission that there may be situations where QPS would need to ensure community safety and public order arising from public begging,[16] it is difficult to see how begging behaviour in and of itself can create a risk to community safety or public order. LawRight acknowledges that there may be rare situations where there is behaviour other than begging involved, like child abuse or threatened assault, which QPS and the justice system require tools to address.

For example, LawRightrefers to the legislative provisions and offences noted in the QPS submission, including:[17]

- public nuisance under s 6 of the Act. Use of this offence would be appropriate in situations where the begging is accompanied by behaviour that becomes disorderly, offensive, threatening or violent, as per the element of public nuisance in s 6(2)(a) of the Act;
- referral to a suspected child abuse and neglect team under Chapter 5A, Part 3 of the *Child Protection Act 1999* (Qld). This would be appropriate in certain situations where the behaviour dealt with under s 8(1)(b) of the Act, (that is, causing, procuring or encouraging a child to beg for money or goods), occurs;
- assault offences under Chapter 30 of the *Criminal Code 1899* (Qld);
- demanding property with menaces with intent to steal, under s 414 of the *Criminal Code 1899* (Qld).

LawRight submits that where only the behaviour of begging itself is involved, it is difficult to see how there could be public safety or public order risk that would justify QPS charging someone with an offence.

The combination of:

- the inherent nature of the behaviour that the begging offence targets is inextricably linked with poverty and homelessness;
- the lack of any risk that begging behaviour in and of itself poses to community safety or public order;
- the impact of contact with the criminal justice system on people experiencing homelessness as outlined at section 3 of these submissions; and
- the impact of fines on people experiencing homelessness or other forms of disadvantage as outlined at section 4 of these submissions,

means that, in LawRight's submission, the criminalisation of begging is:

- unjust;
- not justified by considerations of public safety or order;
- not justified by considerations of economic public utility, given it is unrealistic to expect to recover a fine imposed on a person that has no capacity to pay it;
- does not address the underlying causes of begging behaviour, and indeed exacerbates the experience of disadvantage of persons engaging in begging behaviour; and

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perspective on poverty, homelessness and vagrancy" (2004) 29(2) *Alternative Law Journal* 18; PILCH Homeless Persons' Legal Clinic Victoria, 'We want change: Calling for the abolition of the criminal offence of begging' (November 2010), 5.

[16] QPS submission, page 8.

[17] QPS submission, page 8.

- having regard to the above, is overall an ineffective and inappropriate solution.

Rather, a more effective response to begging than criminalisation is to address the underlying causes of social disadvantage, and by creating other opportunities than begging to address financial hardship. More broadly, this can be achieved through investment in social and health welfare responses, whereas on an individual scale this can be achieved through referrals to appropriate social and health service providers.

If the begging offence is decriminalised

LawRight notes that the QPS Submission provides that in the absence of the public begging offence, if behaviour that is the subject of s 8(1)(a) or 8(1)(b) of the Act occurs, 'police could use move-on powers to control the behaviour or, with the person's consent, consider the suitability of commencing a police referral to a suitable service provider'.

In relation to the possibility of using move-on powers, LawRight notes that move-on powers can also have a negative impact on people experiencing homelessness, for example by further disrupting their stability and by potentially causing isolation from networks (support service networks or family and friend networks) in a certain area.[18] LawRight submits that these impacts should be considered by QPS officers when determining whether to move on a person who is begging. Such impacts could be detailed in internal QPS policy and training for all QPS officers.

LawRight submits that in relation to begging behaviour, QPS should continue to have the power to, and should in practice be encouraged to, commence a police referral to a suitable social and/or health service provider in order to attempt to address the underlying issues causing the person to be financially vulnerable enough to be engaging in begging behaviour.

6. The public intoxication offence

LawRight's impression is that its CHJP clients are not generally being charged with the public intoxication offence. This impression is based on:

- LawRight's experience in conducting legal services to people experiencing or at risk of homelessness utilising an outreach model;
- a review of 53 individual fine histories that list any unpaid fines being collected by SPER, including unpaid fines off the Offences; and
- an informal consultation with a number of CHJP clients and other people with lived experience of rough sleeping.

Based on the above, it appears to LawRight that the QPS, at least in the Greater Brisbane region, has generally been exercising its discretion effectively in relation to the public intoxication offence, ensuring that the offence is not unnecessarily used to target people experiencing homelessness.

LawRight acknowledges that it may be necessary for QPS and the justice system to have tools to deal with public intoxication. These tools could look like:

[18] For more detail, see Monica Taylor and Tamara Walsh, "Nowhere to go: the impact of police Move-on powers on homeless people in Queensland" (2006).

- continuing to have a public intoxication as an offence, and continuing to have alternative police powers to deal with public intoxication; or
- decriminalising the public intoxication offence but having other police powers (like power to detain or move on) in situations where this is needed for public or individual safety.

Based on our direct casework in the past number of years and our impression that CHJP clients are not being charged with the public intoxication offence, LawRight is not in a position to comment on which of these legislative approaches would be the most effective overall. LawRight acknowledges that the behaviour that the public intoxication offence targets has relevant application to individuals who are *not* experiencing homelessness, a risk of homelessness, or other forms of disadvantage.

LawRight submits that if public intoxication continues to remain an offence, measures should be taken to ensure that QPS officers and the justice system exercise discretion to ensure that the public intoxication offence is not used to negatively impact people that are experiencing or at risk of homelessness or suffering other forms of disadvantage. LawRight recommends that such measures include training of QPS officers across all of Queensland, including in rural, regional, and remote areas, in relation to experiences of homelessness and disadvantage; and further strengthening partnerships between QPS and organisations that support people experiencing or at risk of homelessness, or experiencing other vulnerabilities.

On the other hand, LawRight submits that if the public intoxication offence is repealed, similar training and partnership measures should be implemented to ensure that QPS do not instead negatively impact vulnerable Queenslanders by charging them with more serious offences or using alternative police powers. For example, LawRight notes the experience of other jurisdictions in Australia where notwithstanding decriminalisation, it is common for police to detain people from disadvantaged groups in police cells as a result of public intoxication. LawRight submits that such an approach is not an effective or just response to addressing public intoxication behaviour in relation to people experiencing or at risk of homelessness or other forms of vulnerability.

Irrespective of whether the public intoxication offence is repealed, LawRight submits the following should be the primary response to dealing with public intoxication behaviour in relation to people experiencing or at risk of homelessness, or experiencing other vulnerabilities. To address the immediate needs of individuals, the focus should be on transporting the person to a safe location where the person can recover from intoxication. LawRight commends that this approach is already embedded in the QPS Operational Procedures Manual.[19] Having regard to the needs of people suffering homelessness who do not have access to a safe space to recover, LawRight would support further investment in safe spaces for immediate recovery across all of Queensland. To address the longer-term needs of individuals, LawRight supports stronger integration and referral systems between QPS, safe spaces and other health and social support services, to allow individuals to be referred to critical services after sobering up. These non-punitive avenues should be the focus both in policy and in practice, unless absolutely necessary for individual and/or public safety.

The above submissions are important when one considers the impact of contact with the criminal justice system on people experiencing homelessness as outlined at section 3 of

[19] See QPS Operational Procedures Manual, s 16.6.3.

these submissions, and the impact of fines on people experiencing homelessness or other forms of disadvantage as outlined at section 4 of these submissions.

7. The public urination offence

LawRight's consultations and a review of our case files indicate that CHJP clients are generally not being charged with the public urination offence. This suggests that based on LawRight's experience (where LawRight is not purporting to comment on the experience of demographics that LawRight does not specialise in assisting), the QPS in the Greater Brisbane region has generally been exercising its discretion effectively in relation to the public intoxication offence, to ensure that the offence is not used to target people experiencing homelessness.

LawRight acknowledges that it may be necessary for QPS and the justice system to have tools to deal with public urination where the act of public urination is being undertaken by a person who is not suffering homelessness or disadvantage. LawRight also acknowledges that there may be situations where an act of public urination causes safety concerns or is offensive, where it may be appropriate to use the public urination offence or a more serious offence to address that behaviour. Based on these facts, LawRight's direct casework in the past number of years and our impression that CHJP clients are not being charged with the public urination offence, LawRight is not in a position to comment on whether the public urination offence should remain an offence under the Act.

However, LawRight submits that if public urination continues to remain an offence, measures should be taken to ensure that QPS officers and the justice system exercise discretion to ensure that the public urination offence is not used to negatively impact people who are experiencing homelessness, at risk of homelessness or suffering other forms of disadvantage. This is important when one considers the impact of contact with the criminal justice system on people experiencing homelessness as outlined at section 3 of these submissions, and the impact of fines on people experiencing homelessness or other forms of disadvantage as outlined at section 4 of these submissions. Further, it is unjust to criminalise a person experiencing homelessness for undertaking an essential act in circumstances where the person has no access to toilets.

LawRight recommends that such measures to ensure appropriate use of discretion include training of QPS officers across all of Queensland, including in rural, regional, and remote areas, in relation to experiences of homelessness and disadvantage; and further strengthened partnerships between QPS and organisations which support people experiencing or at risk of homelessness, or experiencing other vulnerabilities.

On the other hand, LawRight submits that if the public intoxication offence is repealed, similar training and partnership measures should be used to ensure that QPS do not instead negatively impact people experiencing homelessness, at risk of homelessness or suffering other forms of disadvantage by charging them with more serious offences, like indecent acts[20] or wilful exposure[21] or using alternative police powers.

Irrespective of whether or not the public intoxication offence is repealed, LawRight encourages QPS to use referrals to health and social support services as the primary

[20] *Criminal Code 1899* (Qld), s 227.
[21] *Criminal Code 1899* (Qld), s 227.

policing response to public urination undertaken by a person suffering from homelessness or other relevant disadvantage which is linked to the behaviour. LawRight also supports further investment in accessible public toilets, and access to affordable private and social housing that is accessible to vulnerable Queenslanders.

8. Policy and training

Finally, to improve QPS' responses to the behaviour addressed by all of the Offences, irrespective of whether or not they are decriminalised, LawRight fully supports and encourages:

- further training for all QPS officers, including in rural, regional, and remote areas, in relation to experiences of homelessness and disadvantage; and
- further strengthened partnerships between QPS and organisations which support people experiencing or at risk of homelessness, or experiencing other vulnerabilities. LawRight is aware that QPS has good relationships with some of these organisations in the Greater Brisbane Region. It encourages this approach to be further strengthened in the Greater Brisbane and this approach to be followed in all parts of Queensland, including rural, regional and remote areas.

Thank you for considering these submissions.

Yours faithfully

Stephen Grace
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Community Health Justice Partnerships