Summer sellout?

Human rights in Queensland

Chris Richards

'People will call me conservative or right wing or the best Liberal Premier we've ever had, but I don't care There'll be no rushing at the gate on reform'

Wayne Goss 1989

'Take a cold shower' Labor Premier-elect Wayne Goss advised his parliamentary colleagues following their election victory on 2 December 1989.[1] In heeding this advice, the fervour held by some Labor parliamentarians for reform may have been unduly dampened. Critics now argue that the pace of legal, and social, reform sanctioned by the Goss Government has been slow.

With a majority of 54 of the 89 Legislative Assembly seats, the Queensland voters gave the ALP Government a resounding mandate to govern after its 32 years in opposition. Fitzgerald's corruption inquiry had reported five months earlier, and made wide-ranging recommendations to diminish the possibility of abuse of power by parliamentarians, public servants and police. Both the main contenders for office on 2 December — the ALP and the National Party — had endorsed the reform process set out in the Report. Within the first week of taking office, Police Minister, Terry Mackenroth, announced the closure of the notorious Special Branch of the police force, whose task it had been to collect and supply for government use, information about Queenslanders. By the end of the second week of Goss Government, six former National Party ministers had been summonsed to answer charges of rorting the public purse. As traditional and previously unassailable institutions and identities were challenged, expectations for profound changes to Queensland's legal and social systems rose. These expectations developed despite indications to the contrary. From the outset, Goss promised modest change based on economic growth:

> People will call me conservative or right wing or the best Liberal Premier we've ever had, but I don't care. There'll be no rushing at the gate on reform.[2]

This article seeks to illustrate some significant examples of the Goss Government's first term response to issues that impact on human rights. Discussion about this issue is timely. The Electoral and Administrative Reform Commission (EARC) currently predicts that its report about the protection of human rights and liberties will be completed by May 1993. The Parliamentary Electoral and Administrative Reform Committee will then consider and make recommendations about the need for legislative or administrative mechanisms to protect and enhance the human rights of Queensland citizens. These deliberations will be made at a time when there is a growing feeling within Queensland communities that, while the Goss Government is better than the previous National Party administration, it has not effected the social, economic and legal reform for which so many had hoped.[3]

The International Covenant on Civil and Political Rights (ICCPR) has been chosen as the framework for discussing these examples. This United Nations Covenant came into force in Australia on 13 November 1980. There are a host of other United Nations Covenants and Declarations to which Australia is a signatory that articulate human rights. The ICCPR has been chosen for three of its attributes. First, it is one of the three documents which, because they are universally applicable, have been consolidated into the *International Bill of Rights*. Second, it has formed the foundation for the set of rights selected for inclusion in the three attempts by Labor Governments at a Federal level to enact an Australian Bill of Rights.[4] Third, it has (to a more limited extent than a Bill of Rights) been recognised by Commonwealth legislation.[5]

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Enhancing rights

In areas for which the State Government has legislative responsibility, there are a number of ICCPR rights which have been enhanced in, or restored to, Queensland.

The right to self-determination

Spurred on by the prolific number of reports produced by EARC, Goss Government legislation that attempts to directly or indirectly promote an individual's right to self-determination is significant. Electoral reform at a parliamentary and local government level grappled with the need to ensure that the political party that governed had been elected by a majority of the people.[6] There had been a perception around Australia that the juggling of electoral boundaries (by gerrymander) had facilitated the continuing re-election of the Queensland National Party to State Government. Legislation has now been passed to limit the possibility of gerrymander, by requiring that an independent Commission be charged with the responsibility of conducting redistributions according to a set formula.

At the time the Goss Government came to power, there was no legislative requirement to ensure equality of votes in local authority elections. In 66 local authority regions which were divided into wards, the value of a vote in one ward was worth between 3 and 27.3 times a vote in another ward.[7] Legislation was enacted which required most local authorities who wished to maintain ward divisions, to ensure that the number of electors in each ward did not deviate from 10% of an average.[8]

Other initiatives which were introduced in the Goss Government's first term should enhance the ability of the public to participate in the development of legislative and policy initiatives that affect them. Information can now be obtained about the formulation and implementation of policy by the State Government, local governments and a range of government funded organisations.[9] The ICCPR accords each individual with the right and the opportunity to take part in the conduct of public affairs. More open access to information held and used by those who govern must promote this right.

Individuals who are directly affected by government information or decisions can now hold the department or organisation accountable. Where inaccurate, incomplete, out-of-date or misleading personal information is held on file, the relevant individual can now apply to have the misinformation rectified.[10] An individual can now also require government departments and organisations to give written reasons for decisions that may affect him or her.[11]

The rights to hold opinions without interference and to freedom of expression

Two initiatives are particularly noteworthy. First, the Special Branch was closed in the first week of the Goss Government's term. The Chairman of the Criminal Justice Commission, Sir Max Bingham, presided over the destruction of many of the files held by the Branch.

Second, protection was introduced for public servants who wish to speak out to the Criminal Justice Commission about misconduct or maladministration by their colleagues. Superiors or colleagues who treat reporters adversely commit a criminal offence.[12]

The right of peaceful assembly

The ICCPR requires that no restrictions may be placed on the exercise of this right *other than those imposed in conformity with the law and which are necessary in a democratic society in the interests of national security or public safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others.* This right did not exist in Queensland when the Goss Government took office. As the President of the Queensland Council for Civil Liberties, Terry O'Gorman, explained:

> In September 1977, the then Premier (Joh Bjelke-Petersen) brought in an amendment to the Traffic Act without notice, as a result of which when persons were denied permits for a public assembly they could no longer appeal to the courts but, rather, their 'right' of appeal lay to the Police Commissioner.
>
> This legislation was introduced in 1977 with the then Premier making the now infamous comment that 'the day of the political street march is over'. The period 1977-1980 saw an unprecedented amount of conflict between ordinary citizens and the police when Queenslanders were arrested in huge numbers for peaceably protesting in situations where, in every other capital city, the police were actually assisting peaceful protests to occur.[13]

The Goss Government has facilitated a reinstatement of the ability of Queenslanders to engage in peaceful political protests. The courts, not the police, now decide disputes about the permissible limits of these protests.[14]

The right to protection of the law against arbitrary or unlawful interference with privacy, family or home

Two initiatives that fall under this heading are particularly noteworthy. Justices of the Peace have previously held significant power without obtaining training in the way to properly exercise their powers. Many members of the legal profession suspect that some Justices of the Peace rubber stamp requests by police for a warrant to enter someone's home. Such a warrant constitutes a substantial intrusion: police must be questioned about the facts which justify this intrusion. The introduction of a requirement that a Justice of the Peace who undertakes procedures, such as issuing warrants, must be appropriately trained to do so, has therefore been welcomed.[15]

The decriminalisation of homosexual activity between two consenting adults was effected by an amendment to the Criminal Code in December 1990.[16] What the Government gave to homosexuals with one hand, it partially took away with the other. Rather than legitimising homosexual activity, the preamble to the legislation clarifies Parliament's intention: 'Parliament neither condones nor condemns the acts which cease to be criminal because of this legislation'.

All people are equal before the law and are entitled without any discrimination to the equal protection of the law

> In this respect, the law shall prohibit any discrimination and guarantee to all persons equal and effective protection against discrimination on any ground such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.[17]

Initiatives during the Goss Government's first term that are relevant to the right to equal protection before the law, provide a mixed bag: some initiatives enhance human rights while others have the capacity to diminish rights.

The enactment of the *Anti-Discrimination Act* in December 1991 is a major development falling under this heading. President of the Queensland Council for Civil Liberties, Terry O'Gorman, summarised the reaction of the Council to the legislation in his 1992 President's Report:

> With the exception of a couple of major procedural objections which we made known quite clearly to the Government, we consider this

legislation to be a significant step forward in dealing with the multiplicity of issues which need to be addressed in the discrimination field.[18]

However, other legislative initiatives undertaken by the Goss Government, coupled with inaction in key areas of law reform and administration, call into question the performance of the Government in preserving and providing the right to equality before the law and a number of other rights set out in the ICCPR.

Diminishing rights

The right to equality before the law

The failure of the State Government to provide adequate public expenditure for the provision of legal services has meant that people on low incomes in Queensland can no longer access their legal rights. Not only does this contravene a person's right to equality before the law, and the right to equality before the courts and tribunals, but it also calls into question the value to Queensland citizens of any of the rights outlined in the ICCPR. A legal right is of minimal value if it cannot be enforced. A number of individuals highly placed in our legal system would agree. In a recent public address, His Honour Justice Toohey observed at a conference:

> If, as a society, we base our affairs upon the existence of the rule of law, we carry a responsibility to provide for its enforcement. If rights can only be enforced by the rich, then they are not rights but assets, bought at a price. The rule of law then effectively becomes the privilege of the few.[19]

At the same conference, Federal Minister for Justice, Senator Michael Tate expressed similar sentiments.

These acknowledgments have not translated into policy. Facing a funding deficit of $10 million at the end of 1991-92, the Legal Aid Commission of Queensland has changed its guidelines to provide assistance primarily for criminal and family law custody cases. Civil cases in courts which have power to order costs will no longer be funded.

There are two problems with funding for the Commission's activities. Its primary funding source, the Commonwealth Government, provides stable funding linked to the CPI. Its second primary source — interest moneys from solicitors' trust accounts — has diminished with lower total deposits being held in solicitors' trust accounts and steady declines in interest rates. High levels of funding previously available from interest on these accounts is unlikely to re-occur. The third funding source — moneys from the State Government through consolidated revenue — has been virtually non-existent: less than $1 million was provided in 1990-91 (which was less than 3% of the Commission's income).

The solution to the legal aid crisis, can be provided by adequate levels of State Government funding. According to the Commission's President:

> I believe the provision of these services is an important and central function of government. This should be recognised, and the Commission provided with stable, on-going funding as other central functions of government are.[20]

The guarantee of equal and effective protection against discrimination

Annie Holden, a doctorate student from Griffith University, recently wrote:

> The achievements of the Goss Labor Government on indigenous issues amount to an easy justice. Where there have been savings to be made or where the cost is only marginal, social justice objectives have been met. Where a substantial re-allocation of values or resources is at stake, the Goss Government has not acted.[21]

She pointed out that there have been some welcome shifts in the approach of the Queensland Government to indigenous policy and administration, including the development of a more culturally appropriate built environment; greater recognition of the existence of and entitlements to consultation with indigenous people; and a more conscious policy of self-reliance in the delivery of services.

However, she also points to the *Aboriginal Land Act* 1991 and the *Torres Strait Islander Land Act* 1991 as instances of the discriminatory effect of failure by government to commit monetary resources to assisting dispossessed indigenous people.

Failure to accord land rights to Aboriginal people and Torres Strait Islanders has now been recognised by the High Court as unacceptably discriminatory:

> Whatever the justification advanced in earlier days for refusing the rights and interest in land of the indigenous inhabitants of settled colonies, an unjust and discriminatory doctrine of that kind can no longer be accepted.[22]

However, very little of the land to which indigenous people could lay claim will be capable of acquisition under the legislation. Take the *Aboriginal Land Act* as an example. Certain land is deemed *transferable land*: land granted to Aboriginal people without the need for a claim to be made. The remaining type of land which can be transferred to Aboriginal people is termed *claimable land*. The land can be granted contingent upon a successful claim. The land which can be claimed is limited to certain types of available Crown Land in which no person other than the Crown holds an interest. By contrast, corresponding Commonwealth legislation applicable to the Northern Territory allows Land Trusts to become grantees of land and to acquire *estates and interests of other persons in land* as and when practicable.[23]

Ms Holden explains the significance of this:

> In Queensland there is very little vacant crown land which can be made available for claim. Thus, funds with which to acquire lands (such as pastoral leases) and for other economic development activities were regarded by Aboriginal and Islander groups as a minimum requirement in any land rights reform in Queensland. . . . Furthermore, in the lead up to the enactment of the Land Act in 1991, the Goss Government rejected an offer by Federal Minister, Robert Tickner, to match the State Government dollar for dollar on a statutory land acquisition fund.[24]

Mandating rehabilitation of offenders

Article 15 of the ICCPR directs that a penalty that is heavier than the one applicable at the time when a criminal offence was committed cannot be imposed on an offender. Article 10(3) states: 'The penitentiary system shall comprise treatment of prisoners the essential aim of which shall be their reformation and social rehabilitation'.

Both Articles are offended by indefinite sentences, which can be imposed under the new *Penalties and Sentences Act*.[25] An indefinite sentence under this new legislation will amount to preventive detention. It can be imposed on those who have been convicted of armed robbery, attempted armed robbery or robbery in company, provided that violence against another has occurred or was attempted. It can also be imposed on those convicted of rape and specified carnal knowledge offences.

The court must be satisfied that the convicted person is a *serious danger to the community*. In coming to this conclusion,

the court must be satisfied to *a high degree of probability* — it cannot be satisfied beyond reasonable doubt, as it is making a future prediction about the defendant's dangerousness.

When it imposes an indefinite sentence, a court must also impose a *nominal* sentence: the sentence it would have imposed if it had not imposed an indefinite sentence. Within six months after half the time in the nominal sentence has been served, the indefinite sentence must be reviewed. Subsequent reviews must take place within two years of the last review. The reviewing court must order the defendant to serve the nominal sentence, not the indefinite sentence, unless it is satisfied that the defendant is still a serious danger to the community.

In essence, this form of sentencing allows a court to order that a convicted person be indefinitely detained for an offence which the court thinks he or she may commit in the future. It flies in the face of traditional sentencing principles which require defendants to be sentenced for the offences which they actually commit; not those which they might commit.[26]

In addition, this form of sentencing has the potential to discriminate against Aboriginal defendants. Aboriginal people comprise a mere 2.4% of Queensland's total population. They are grossly over-represented in the prison system. They are also over-represented in the categories of offences for which indefinite sentencing can be considered: on 30 June 1991, 19.83% of all prisoners whose most serious charge concerned sexual assaults and related offences, and 7.8% of prisoners whose most serious charge concerned robbery and extortion, were Aborigines or Torres Strait Islanders.[27]

The legislation does not recognise rehabilitation programs for defendants placed under indefinite sentence. As these defendants have been adjudged a serious risk to the community, access to programs such as anger and violence management may decrease this perceived risk. The Government should not turn its back on those who have been ordered to serve an indefinite prison sentence without equipping them with some means to assist them to fulfil the appropriate criteria that will lead to their release. To do so, offends civil liberties of the prisoner without benefiting the community that the initiative purports to protect.

The right to protection of the law against arbitrary or unlawful interference with privacy

The thrust of this Article of the ICCPR is to protect individuals from arbitrary State intrusion into their lives. In the United States, this right to privacy, and its protection, have been interpreted as broad enough to encompass a woman's decision about whether or not to have an abortion. It is the decision that it protected: there is no right to abortion on demand. However, in order to protect a woman's right to make an abortion decision, State laws which make abortion a crime are invalid.[28]

Unless the health of a woman is endangered by a pregnancy, a woman who obtains an abortion in Queensland, and the doctor who performs it, are guilty of a criminal offence.[29] Applying the interpretation adopted in the United States, the maintenance of these abortion offences offends the ICCPR right to privacy and its protection.

Access to safe, hygienic abortion in Queensland is limited. Abortions are not readily available through public hospitals. Only four clinics — two in Brisbane, and part-time clinics operating in Rockhampton and Townsville — perform abortion procedures on request. While two Goss Ministers have publicly stated that no woman would be charged with the offence of procuring an abortion while the Queensland Labor Party remained in office, the fact is that the act of procuring an abortion is still a crime which can attract a long prison sentence. In addition, the fear of prosecution must dampen the enthusiasm of doctors establishing privately run abortion clinics even though demand for such services is high and presently available services are scarce. Queensland women have visibly and vocally campaigned for abortion on demand. Despite well-attended public rallies; 20 000 signatories petitioning to repeal those laws which criminalise abortion; three requests by ALP conferences to put the issue on the agenda; and a survey providing uncontrovertible evidence that the majority of Queensland people support abortion decriminalisation, the Goss Government has failed to give any commitment to extend to women abortion rights.

The right to recognition everywhere as a person before the law

This article of the ICCPR could be relevant to community organisations representing environmental issues, who have sought a legislative right to present environmental concerns in relevant legal proceedings and have these concerns considered and determined by courts and tribunals.

In October 1989, Queensland conservation groups presented a 101 point 'Log of Claims' to all political parties standing in the election held in December 1989. The Labor Party gave first-term-in-government commitments to 94 of these points. The remaining seven points received the Party's qualified support. This Log of Claims was signed by Wayne Goss. By August 1992, the Goss Government had fully implemented only 18% of the Log of Claims of the points which the ALP fully supported: 47% have not been acted upon.[30]

Clause 2.4 of the Log of Claims committed the Government to give legal standing to community groups and individuals in its environmental legislative initiatives. The Government has subsequently declined to do this. It also required legal aid to be provided to bona fide community groups seeking to represent the public interest in environmental cases. While guidelines for legal aid have been amended to allow legal aid to be granted in such cases, it has been almost impossible to obtain such grants.

Clause 2.11 commits the Government to establishing alternative dispute resolution forums for environmental disputes. No such mechanism has been established specifically for environmental disputes. As a consequence, environmental groups are still excluded from the determination of legal issues impacting upon the environment.

Ensuring that ICCPR rights are enforced

Unquestionably, people living in Queensland have witnessed significant enhancements to their rights concerning their relationship with and participation in government. The accountability of Parliament and government departments to the people has also been strengthened. The significance of these initiatives cannot be down-played. State Parliament is the custodian of human rights in a wide range of areas: it can both grant and remove human rights through the legislation it passes. It is imperative that it be open, accessible and accountable to the people who are affected by its decisions.

However, this article presents a number of significant examples of failure by the Goss Government to maximise or accord ICCPR rights despite voluble requests from sections of the public to do so. Most of these examples concern sections

of the community who are relatively disadvantaged: the unemployed and lower income workers; Aboriginal people and Torres Strait Islanders; women; and prisoners. Three of these examples concern legislative initiatives which have failed to realise ICCPR ideals. Why, when Australia is a signatory to the ICCPR, does this occur?

The ICCPR is persuasive, but not binding, on State governments when formulating and assenting to legislation. It is the Commonwealth (as signatory) and not the States, who will be answerable to the International Human Rights Committee, if State legislation transgresses the ICCPR.[31]

The ICCPR could be used by courts to interpret State legislation[32] and (it appears) common law.[33] However, if State law clearly offends an ICCPR right, nothing compels a State government to remove offensive legislation or case law. In addition, nothing compels a State government to ensure that the legislation that it passes does not offend ICCPR rights: the ICCPR does not provide enforceable legislative standards to protect the civil and political rights it describes.

A Bill of Rights can perform this role. For instance, a Bill can be framed to override existing and future legislation that is inconsistent with one or more of the rights provided for in the Bill. In the short term, a Bill of Rights would provide a statement by the Goss Government to its commitment to human rights. In the long term, it would help ensure that future Queensland governments preserve human rights and freedoms: a welcomed and necessary insurance policy to prevent the excesses experienced under previous Queensland governments.

EARC is currently preparing a report which will consider whether a Bill of Rights should be enacted in Queensland, and, if so, whether it should override present and/or future legislation inconsistent with the Bill.[34] If a Bill of Rights is recommended, extensive public education may be required. Each time a Bill of Rights has been canvassed in Australia, it has met significant (and sometimes hysterical) opposition. The weight of this public opposition, coupled with its capacity to fetter legislative discretion by requiring compliance with set human rights, may make the Goss Government resistant to a Bill. Individuals and community organisations concerned about cases where government policy and legislation does not live up to Australia's human rights obligations have yet to publically address a Bill of Rights as a possible solution of their concerns. They have yet to say to the Goss Government: 'If you are truly committed to social justice, you will support a Bill of Rights'. Attention to the issue is needed now — support and public examination of a Bill of Rights may be decisive to its introduction.

References

1. ABC Radio, 4 December 1989; and see also *Australian*, 4.12.89, p.5.
2. *Australian*, 4.12.89, p.1.
3. (1992) 11 *Social Alternatives*, July edition pp.2-42.
4. The (Murphy) *Human Rights Bill* 1973; The (Evans) *Australian Bill of Rights Bill* 1984; and The (Bowen) *Australian Bill of Rights Bill* 1985.
5. See Schedule 2, *Human Rights and Equal Opportunity Act* 1986.
6. *Electoral Act* 1992.
7. Electoral and Administrative Review Commission (EARC) *Report on the Local Authority Electoral System of Queensland*, September 1990, Go-Print, Brisbane, 1990 at p.34.
8. *Local Authorities (1991 Elections) Act* 1990 Section 3.5(b) permits a 20% deviation in shires of less than 10 000 enrolled electors.
9. *Freedom of Information Act* 1992, passed one month before the end of the Goss Government's first term.
10. Part 4, *Freedom of Information Act* 1992
11. *Judicial Review Act* 1991.
12. *Whistleblowers (Interim Protection and Miscellaneous Amendment Act)* 1990.
13. (1992) 9(2) *Queensland Council for Civil Liberties Newsletter*, p.8.
14. *Peaceful Assembly Act* 1992.
15. *Justices of the Peace and Commissioners for Declarations Act* 1991.
16. The *Criminal Code* and *Another Act Amendment Act* 1990.
17. Article 26 International Covenant on Civil and Political Rights (ICCPR).
18. Reproduced in (1992) 9(2) *Queensland Council for Civil Liberties Newsletter*, December, p.2.
19. *Broad Factors affecting Legal Aid in the '90's*, Paper delivered at the Conference 'Legal Aid, Legal Access', Sydney, February, 1992.
20. The information concerning Legal Aid was obtained from the Legal Aid Commission of Queensland *Annual Report 1991-92* at pp.3, 11 and 38. The President's comment appears on p.3. The Commissions's income for 1990-91 was $31 178 23. The State Government provided $900 809. While the State Government provided $4 871 000 in 1992, this amount was predominantly provided for the absorption of the Public Defenders' Office into the Legal Aid Office. Statistics can be read on page 38 of the *Annual Report 1991-92*.
21. Holden, A., *Easy Justice: The Performance of the Goss Labor Government on Aboriginal and Islander Issues*, (1992) *11 Social Alternatives*, pp.25-28, at 25.
22. per Brennan, J. in *Mabo v Queensland* (1992) 66 ALJR 408 at 422. Mason CJ and McHugh, J agreed with Brennan, J.
23. *Aboriginal Land Rights (Northern Territory) Act*, 1976 s.5(1)(c).
24. Holden, A., above, p.27.
25. Part 10. The Act was assented to on 24 November. It was not passed in the Goss Government's first term. However, the concept has been the subject of heated and protracted debate and opposition throughout its formulation during 1991 and 1992. It has been included for this reason.
26. *Veen v R* (1978-79) 143 CLR 458.
27. Calculated from statistics obtained from the Corrective Services Commission Consulting Service, compiled from the 30 June 1991, Prison Census.
28. *Roe v Wade* 35 L Ed 2d 147; *Leigh v Olson* 497 F.Supp 1340; *Word v Poelker* 495 F 2d 1349; *Doe v Bellin Memorial Hospital* 479 F 2d 756.
29. Sections 224, 225 and 226 *Criminal Code*.
30. *Green Challenge Log of Claims — What has the Government delivered?* prepared and sent to Premier Goss in August 1992 by Wildlife Preservation Society of Queensland.
31. Article 41 and the First Optional Protocol which Australia acceded to on 29 September 1991, ATS 1991 No 39; Triggs G., 'Australia's Ratification of the International Covenant on Civil and Political Rights: Endorsement or Repudiation?' (1982) 31 *International and Comparative Law Quarterly*, April, p.278 at 284-90.
32. *R v Home Secretary; Ex-Parte Brind* (1991) 1 AC 696, in particular at pp 747-48.
33. *Jago v District Court of New South Wales* (1988) 12 NSW LR 558 per Kirby, P at p.569. In the High Court decision in *Dietrich v R* which was delivered on 13 November 1992, Toohey, J accorded authority to Kirby P's finding in *Jago* (at p.67 of the unreported judgment). Mason CJ and McHugh J in their joint judgment noted, without endorsing, Kirby P's approach, but observed that it was a common sense approach (at p.10 of the unreported judgment). Dawson, J said that the approach was not clearly established (at p.55).
34. The issue was canvassed in the EARC Issues Paper *Review of the Preservation and Enhancment of Individual Rights and Freedoms*, June 1992, Go-Print, Brisbane, on pp.132-36. In response to the Issues Paper EARC received 253 submissions. The time for submissions is now closed. The current estimate for the release of the report is May 1993.

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The editors of the June issue of the *Alternative Law Journal* want to examine the changes which have resulted or will result from the election of the Kennett Government in Victoria and the Court Government in Western Australia, and from the outcome of the federal election. If interested in contributing an article, brief or comment please contact the editors through the Editorial Co-ordinator, Liz Boulton, tel (03) 565 3362, fax (03) 565 5305.