QIFVLS

Queensland Indigenous Family Violence Legal Service

Submission to the Productivity Commission regarding the Draft Report of the Review of the National Agreement on Closing the Gap

30 October 2023

The Queensland Indigenous Family Violence Legal Service (QIFVLS) Submission regarding the Draft Report of the Productivity Commission's Review of the National Agreement on Closing the Gap (the Draft Report)

Executive Summary

Queensland Indigenous Family Violence Legal Service (QIFVLS) appreciates the opportunity to provide a submission regarding the Productivity Commission's Review of the National Agreement on Closing the Gap. As a member of the Coalition of Peak Aboriginal and Torres Strait Islander peak organisations (Coalition of Peaks), QIFVLS is dedicated to achieving the priority reforms and socio-economic targets outlined in the National Agreement on Closing The Gap (the CTG Agreement).

QIFVLS is dedicated to achieving Target 13 (ensuring families and households are safe and that domestic and family violence against Aboriginal and Torres Strait Islander women and children is reduced by at least 50% by 2031 as we progress towards 0), alongside the remaining and priority reforms.

Having been one of the organisations consulted prior to the development of the Draft Report, QIFVLS largely agrees with the observations, findings, and recommendations contained within the Productivity Commission's Draft Report. Our submission includes suggestions in response to the Commission's information requests.

We share the Commission's disappointment at the inertia of government agencies regarding compliance with the priority reforms. Our disappointment is borne out of a desire to take action to empower our communities. At QIFVLS, this reflects our desire to see a focus on Priority Reform 2 of the National Agreement.

We are mindful that positive steps towards closing the gap in outcomes will occur when there are strong partnerships between government and ACCOs. This is recognised in the Australian Policy Handbook which notes that, *"As networked decision-making becomes more familiar, policy is most likely to succeed when power is shared between ministers, agencies and community, combining local knowledge with the authority and resources of the state. Complex social challenges, for example, are explored best through approaches that recognise that community might lead, and governments follow."*[1]

Summary of QIFVLS submissions

QIFVLS offers the following feedback:

- Increased resourcing for government parties, ACCOs and people with lived experience to meaningfully contribute to policy partnerships.
- Priority Reform 4 is clarified and enhanced, enabling explicit reference to the Indigenous Data Sovereignty Principles and the concept of Indigenous Data Governance.
- Governments and ACCOs co-design standalone working groups to prepare implementation plans and annual reports.

[1] Althaus, Ball, Bridgman, Davis and Threlfall, *Australian Policy Handbook,* 7th ed, Routledge, 2023, page 191

- Consider establishing a standalone Aboriginal and Torres Strait Islander-led independent mechanism to ensure accountability. This body would stand alongside the independent mechanism under Clause 67 of the National Agreement.
- Secretaries of the Departments of the Prime Minister, Premier or Chief Minister should be tasked with driving jurisdiction-wide change.
- All jurisdictions should adopt a statement of compliance with the priority reforms when introducing new legislation into Parliament.

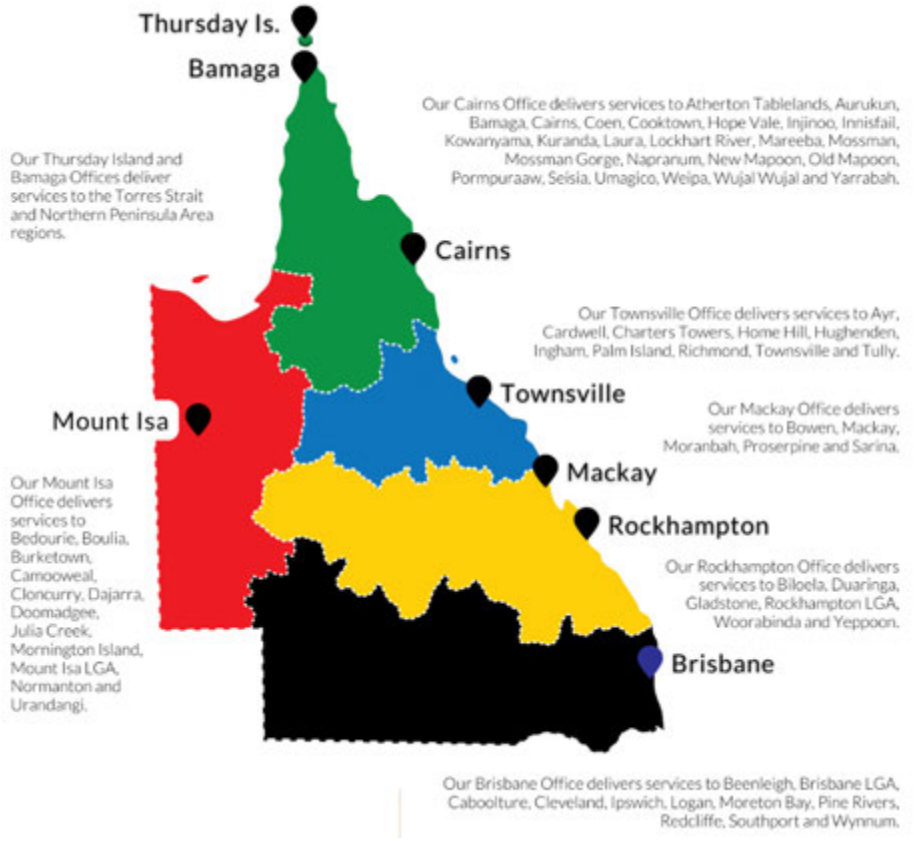
About QIFVLS

QIFVLS is a not-for-profit legal service formed under the Family Violence Prevention Legal Services Program ('FVPLSP') through the Department of Prime Minster and Cabinet's Indigenous Advancement Strategy ('IAS'). FVPLSP fills a recognised gap in access to culturally appropriate legal services for Aboriginal and Torres Strait Islander victims of family and domestic violence and sexual assault.

QIFVLS is one of sixteen (16) Family Violence Prevention Legal Services ('FVPLSs') across Australia and one of the thirteen (13) FVPLSs that is a member of the National Family Violence Prevention Legal Service ('NFVPLS') Forum. We are one of two Aboriginal and Torres Strait Islander community-controlled family violence prevention legal service providers in Queensland.

QIFVLS is exclusively dedicated to providing legal and non-legal support services to assist Aboriginal and Torres Strait Islander victims/survivors of family violence and sexual assault with a breadth and scope of services which stretch to the outer islands of the Torres Strait, neighbouring Papua New Guinea. Together with its legal services, QIFVLS can be distinguished from other legal assistance providers through its advantage in providing unique, specialised, culturally safe and holistic assistance from the front-end via a wrap-around model that embraces early intervention and prevention. We advocate this model in supporting access to justice and keeping victim-survivors of family violence safe.

QIFVLS services 90+ communities across Queensland including the Outer Islands of the Torres Strait, neighbouring Papua New Guinea and provides services in the areas of domestic and family violence; family law; child protection; sexual assault and Victims Assist Queensland (VAQ) applications. QIFVLS supports its clients through all stages of the legal process: from legal advice to representation throughout court proceedings. In addition, QIFVLS responds and addresses our clients' non-legal needs through our integrated non-therapeutic case management process, which is addressed through the identified role of the Case Management Officer. QIFVLS as a practice, provides a holistic service response to our clients' needs: addressing legal need and addressing non-legal needs, that have in most cases, brought our clients into contact with the justice system in the first place.



As demonstrated by the above map QIFVLS is mainly an outreach service where our teams go into rural and remote communities to meet with clients. QIFVLS services over 90+ Aboriginal and Torres Strait Islander communities throughout Queensland. Recognising that Queensland is nearly five (5) times the size of Japan; seven (7) times the size of Great Britain and two and a half (2.5) times the size of Texas[2], QIFVLS has eight (8) offices in Queensland –

(1) a service delivery office in addition to its Head Office located in Cairns, responsible for servicing Cape York communities, Cooktown; Atherton Tablelands, Innisfail, and Yarrabah (and communities in between);
(2) a service delivery office in Bamaga responsible for servicing Cape York communities as far north as Bamaga and Umagico;
(3) a service delivery office on Thursday Island responsible for servicing communities stretching to the Outer Islands of the Torres Strait, neighbouring Papua New Guinea;
(4) a service delivery office in Townsville responsible for servicing Townsville, Palm Island, Charters Towers, Richmond, and Hughenden (and communities in between);
(5) a service delivery office in Mackay responsible for servicing Mackay and Sarina (and communities in between);
(6) a service delivery office in Rockhampton responsible for servicing Rockhampton, Woorabinda, Mt Morgan, Biloela (and communities in between);
(7) a service delivery office in Mount Isa responsible for servicing Mount Isa, the Gulf of Carpentaria communities, as far south as Bedourie and across to Julia Creek (and communities in between);
(8) a service delivery office in Brisbane responsible for servicing the Brisbane local government area.

[2] https://www.qld.gov.au/about/about-queensland/statistics-facts/facts

Family violence as the cornerstone

We are witness to the shameful statistics revealing that 3 in 5 First Nations women have experienced physical or sexual violence[3]. This speaks to the crisis we witness as a family violence prevention legal service daily across our offices in Queensland.

Queensland Government data also reveals that at least 60% of all Aboriginal and Torres Strait Islander children in youth detention have experienced or been impacted by domestic and family violence[4]. If we consider the issue of child wellbeing, it should be noted that family violence was identified by the Australian Institute of Health and Welfare (AIHW) as the primary driver of children being placed into the child protection system with 88% of First Nations children in care having experienced family violence[5].

This sadly informs QIFVLS' experience that family violence is the cornerstone or intersection, that links an Aboriginal and Torres Strait Islander person's connection to the child protection system, the youth justice system, adult criminal justice system, housing and/or homelessness, health and the family law system.

We find that these 'connectors' are further compounded or exacerbated for those living in regional, rural, and remote parts of Australia, where there are restrictions on the availability of actual on the ground services to assist a victim-survivor escaping a violent relationship[6] (i.e., domestic violence support services and shelters; actual police presence within a community).

In contrast to siloed government responses which have long been the standard practice, QIFVLS advocates for uniform, holistic and consistent strategies that will improve responses in the family violence, policing and criminal justice, child protection system, housing and corrective services. This approach aligns with achieving reductions in the Justice targets (Targets 10, 11, 12 and 13) of the National Agreement on Closing the Gap as well as meeting the overarching objectives of the 4 priority reform areas.

Effectiveness of policy partnerships

In terms of adequate support structures when engaging in policy partnerships, we believe further steps could be taken to enhance resourcing concerns faced by Aboriginal and Torres Strait Islander Community-Controlled Organisations (ACCOs). Resourcing and power imbalances reflect the challenges faced in meeting Priority Reform 2. Within the Justice Policy Partnership (JPP), we note that ACCOs with limited resources have consistently raised difficulties meeting deadlines and time constraints.

The lack of resources, particularly funding, leaves community-controlled organisations at a disadvantage in contrast to government agencies. This creates a disparity when attempting to progress partnerships between community-controlled organisations and government agencies.

We note that requests for feedback from government agencies to community-controlled organisations can also overlook the unique reporting structures in diverse community-controlled organisations together with the reality that managers and CEOs of community-controlled organisations are themselves constrained by time, resourcing, and capacity constraints.

[3] Australian Human Rights Commission (2020), *Wiyi Yani U Thangani Report*, https://humanrights.gov.au/sites/default/files/document/publication/ahrc_wiyi_yani_u_thangani_report_2020.pdf, page 44
[4] https://www.cyjma.qld.gov.au/resources/dcsyw/youth-justice/reform/youth-justice-report.pdf
[5] Australian Institute of Health and Welfare (2019), *Family, domestic and sexual violence in Australia: continuing the national story, https://www.aihw.gov.au/getmedia/b0037b2d-a651-4abf-9f7b-00a85e3de528/aihw-fdv3-FDSV-in-Australia-2019.pdf.aspx?inline=true*
[6] Australian Institute of Health and Welfare (2016-17), *Alcohol and other drug use in regional; and remote Australia: consumption, harms, and access to treatment* 2016-17. Cat.no. HSE 212. Canberra.

Staff recruitment and retention
Community-controlled organisations with service delivery obligations in regional, rural, and remote communities face dilemmas around staff retention and recruitment. It is important for us to state that quite often community-controlled organisations are competing with the deeper resources of government agencies for staff/human resources. From our standpoint, this emphasises the necessity of meeting the sector-strengthening elements in the National Agreement on Closing the Gap (the Agreement).

Priority Reform 3
The process of transforming mainstream institutions represents a paradigm shift for the public sector. At its core, Priority Reform 3 involves a relinquishing of power. This can be at odds with government institutions which see themselves as trustees or guardians of publicly owned resources.

Priority Reform 3 is deeply significant, but our impression is that its impact is understated (or misunderstood) in terms of what Government needs to do to transform the way it does business. The deeply engrained bureaucratic approach and systems of government are not conducive to the transformational reform as outlined in the priority reforms, thus emphasising the importance of realising Priority Reform 3.

Building accountability
Priority Reform 2 is key to building the capabilities of the community-controlled sector. Dedication by government parties towards Priority Reform 2 would enable ACCOs to effectively advocate on behalf of and better deliver services to Aboriginal and Torres Strait Islander peoples.

The Draft Report raised the option of expanding the scope of the Independent Mechanism (the Mechanism), currently provided for under Clause 67 of the Agreement. If the decision is made to expand the scope of the Independent Mechanism, this may play a role in building accountability from the perspective of the JPP. While procedures and outlines are yet to be established, a future expanded Independent Mechanism could consult and receive information from all JPP stakeholders before finalising a report to parliament with recommendations.

Whether the JPP and policy partnerships are the right mechanism to address change
Our observation is that the JPP currently doesn't have the power to prevent governments from making decisions that are contrary to Targets 10 & 11 of the Agreement. We have seen this up close in Queensland with the Queensland governments responses to youth justice issues. When governments make knee-jerk responses to incidents without the input of the JPP, this serves to dilute the impact and effectiveness of the JPP. In addition, it serves to undermine the authority, trust, and faith in the JPP's ability to effect change. This reinforces the current limitations regarding accountability.

On the other hand, we must not lose sight of the potential of the JPP, when considering that it has been the first of the five policy partnerships to be formed. The value of reviews and evaluations, such as this review being undertaken by the Productivity Commission, are that we can utilise the opportunities to improve and enhance the way we do business.

Positive aspects of the JPP are that it provides for—

- Work across sectors in a manner reflecting the intersectionality of issues faced by many Aboriginal and Torres Strait Islander peoples who are or have been incarcerated.
- Facilitates robust and open discussion.
- Provides for the elevation of policy proposals for early engagement.
- A blueprint upon which to enable genuine partnership between government agencies and community-controlled organisations.
- An opportunity for relationship building and can enable a genuine exchange of ideas such that government agencies and community-controlled organisations can enrich each other respectively.
- A breeding ground for innovation in developing proactive responses and specific measures to address the underlying causes of offending.

In that regard, other policy partnerships can reflect on the progress of the JPP with a view to improving their effectiveness.

Shifting service delivery to Aboriginal and Torres Strait Islander community-controlled organisations

To enable the sustainability of ACCOs, we believe that compliance with Priority Reform 2 of the Agreement also requires resourcing and investment into capacity-building. This includes professional training and leadership courses for staff in community-controlled organisations –

- from a service delivery perspective; and
- from a policy/legislative reform perspective - enhancing the expertise of policy officers within ACCOs who regularly engage with government agencies.

The four priority reforms are all interconnected and for that reason, they provide an opportunity to attain genuine reform in a way that can see communities achieve self-determination.

As an example, we have community members in Townsville and Cairns who want to be able to give back to their communities through a range of activities, including community-led night patrol services. Other community members would like to develop youth programs and youth camps to provide the sort of opportunities for growth and connection that have been denied to children today. In many instances, the efforts of these community members have been foiled due to a range of factors, including the inability to attain a Blue Card (Qld Working with Children Check) because of offences committed up to 20 years ago, prior to their rehabilitation. This is a situation where considerations around shifting service delivery to ACCOs can include legislative reform and creative tweaks or amendments to enable show-cause provisions or waivers enabling services to be provided.

Indigenous data sovereignty and Priority Reform 4

From our perspective, the gap between Priority Reform 4 and the understanding of ACCOs regarding Indigenous Data Sovereignty Principles (IDSPs) could be due to the following factors:

- The National Agreement is not explicit regarding Indigenous-owned data and Indigenous Data Governance. This leads to confusion around the inclusion of IDSPs. We suggest that the National Agreement could benefit from a revision of Priority Reform 4, explicitly referencing IDSPs.
- There is no reference or linkage within Priority Reform 4 to Indigenous Data Governance.
- The tenor of the National Agreement. References to Priority Reform 4 are heavily influenced by the need to see concrete action in relation to Priority Reform 3. An emphasis is placed on how governments can share data and assist ACCOs to analyse and collect data.
- In contrast, Indigenous Data Sovereignty Principles represent an extension through a focus on Indigenous ownership of data.
    - In this regard, we note that the Draft Report refers to the structure of the Mayi Kuwayu survey as an example of Indigenous Data Governance.

The Draft Report notes the overall lack of large-scale change in the way governments share data, undertake data-related activities or interact with Aboriginal and Torres Strait Islander people on data-related issues. In our view, this highlights the need for enhancements to Priority Reform 4 in order to facilitate increased access to data.

Characteristics of the organisation to lead data development
We support the Draft Report's recommendation an organisation with dedicated resourcing and staffing to lead data development. We believe this would elevate the significance of Priority Reform 4 whilst also facilitating easier coordination across jurisdictions. We are mindful that that such an organisation or entity will need to

bridge the current divide between the adoption of Indigenous data sovereignty principles as understood by ACCOs on the one hand, and government agencies' understanding of Priority Reform 4.

From the grassroots justice perspective and via hearing concerns from community members, we are aware that governments and government agencies still operate on the basis that they are the owners of data relating to Aboriginal and Torres Strait Islander peoples and programs. This then links with the issue of the devolution of power/ control underpinning priority reform 3 (referred to above).

An organisation or entity prioritising Indigenous data sovereignty principles would provide an opportunity to encourage data sharing agreements and foster a cultural shift whereby data is utilised not just from a negative/deficit perspective concerning what is wrong, but focus on a positive/growth perspective, examining how individual communities can use data to better deliver services, empower communities and attain self-determination.

Among the characteristics and requirements of such an organisation, we suggest that the proposed organisation should:

- Aid against the appropriation of cultural intellectual priority.
    - Having had the opportunity to attend various stakeholder forums, we note that a common refrain from community is the development of ideas and solutions by community members which are rejected by government authorities, only for community members to later learn that their ideas and suggestions have been adopted by government agencies with little or no attribution or credit.
- Encourage government agencies' sharing of data (page 57)
- Enable room for Indigenous Data Governance.
    - As it stands, the measures and reforms in the National Agreement cannot be classed as Indigenous Data Governance as it is a joint agreement.
- Listen to the requests from individual communities for disaggregated data and analysis. Reflecting the ISDPs, disaggregated data allows for individualised and community-specific data. From our perspective, this supports community-led decision-making and self-determination.
- Provide oversight over the level of support and funding that government agencies are providing ACCOs and other non-government service providers to collect and regularly report on data and information.

Quality of implementation plans and annual reports

We note that the Draft Report addressed the manner in which implementation plans and annual reports are prepared. Our suggestions on how implementation plans might be improved are drawn from our experience in Queensland.

We suggest having a dedicated and sufficiently resourced group drawn from government and ACCOs, charged with preparing implementation plans and annual reports. From a Queensland perspective, policy officers from the Queensland Aboriginal and Torres Strait Islander Coalition of peak Aboriginal and Torres Strait Islander Community Controlled Organisations (QATSIC) have partnered with senior policy officers from the Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts (DTATSIPCA) to prepare the CTG Implementation Plan. A significant hurdle we observe has been the lack of resourcing for both sets of partnering parties.

Additionally, from our perspective, it has felt that DTATSIPCA have been expected to conduct the entirety of the work from the government end of proceedings when ideally, the implementation plans should be a whole-of-government effort with significant input from all government agencies from the start. We suggest this could look like a government and ACCO working group including QATSIC, DTATSIPCA policy officers and representatives from Queensland's Department of Premier and Cabinet (DPC) and Queensland Treasury (QT) at the very least.

The above reflects that we have experienced what looks like a siloed operation with DTATSIPCA expected to carry the lion's share of the work on behalf of the government. Including DPC and QT from the early stages would demonstrate the government's intent, authority and dedication. Additionally, our experience has been that gaining input from DPC and QT at an early stage is necessary, considering the importance of funding, sector strengthening and the distribution of finite resources.

Annual reports
We agree that with the suggestion contained within the Draft Report that each government agency be required to include information about Closing the Gap in their annual reports. This would go towards providing an important means of ensuring that every agency is dedicating a substantial effort towards implementing the Priority Reforms and tracking the outcomes it achieves for Aboriginal and Torres Strait Islander peoples[7].

Importantly we agree that government agencies' statements on CTG should be a complement to, and not a replacement of the government's overall CTG annual reports and implementation plans.

Independent mechanism in the broader landscape

A role for Aboriginal and Torres Strait Islander bodies holding governments to account
We understand that the lack of progress in developing an independent mechanism provides an opportunity to reconsider the role of the independent mechanism, including the Productivity Commission's suggestion of an expanded role for the independent mechanism.

On one hand, we agree and see benefits in extending the scope of an independent body that can hold governments to account. On the other hand, we also wish to highlight that the level and scale of reform required under Priority Reform 3 is of a nature that requires a complete paradigm shift across government and within society. We can see examples of this in Queensland's Independent Commission of Inquiry into QPS responses to incidents of domestic and family violence. Her Honour Judge Richards' final report, *A Call for Change,* highlighted the significant and deep-seated culture of racism and misogyny within the Queensland Police Service and although outlining 78 recommendations for reform, it was notable that Judge Richards expressed doubt about whether genuine reform could take place.[8]

While we want to see transformation immediately in relation to Priority Reform 3 (alongside the other priority reforms), we understand this will take time. In that regard, it could alternatively be argued that having an independent mechanism dedicated solely to Priority Reform 3 is a necessity.

Alternative suggestion
Alongside a specific independent mechanism for Priority Reform 3, we could investigate establishing an additional Aboriginal and Torres Strait Islander-led independent mechanism specifically focused on building and ensuring accountability. A standalone independent mechanism could play a role in reviewing CTG implementation plans and annual reports for instance. It may possibly provide an efficiency of service as a standalone body as opposed to an expanded body. We accept that much of this discussion will turn on the resourcing and investment governments devote to establishing or expanding such a body.
Regardless of whether the independent mechanism has an expanded scope or if a new standalone independent body is established, we would support the feature whereby the independent mechanism does not engage in program delivery and does not administer funding or programs, so that it is never in a position of needing to pass judgment on its own actions or inaction.

[7] https://www.pc.gov.au/inquiries/current/closing-the-gap-review/draft page 80
[8] 'A Call for Change', Final Report, Commission of Inquiry into Queensland Police Service responses to domestic and family violence, 2022, https://www.qpsdfvinquiry.qld.gov.au/about/assets/commission-of-inquiry-dpsdfv-report.pdf

Potential features of independent mechanism

We agree with the potential features of an independent mechanism outlined in page 73 of the Draft Report. We believe it would be ideal for the independent mechanism to have a legislative basis guaranteeing its ongoing existence and power behind its functions, enabling it to hold government to account. Ideally, the legislative provisions would:

a) enshrine its independence;
b) guaranteed funding and
c) allow powers to compel government agencies to provide information.

Our concern though is that should an independent mechanism be established, it is a possibility that its functions may be amalgamated or consumed within the functions of a Human Rights Commission or an Ombudsman for cost-saving purposes. Whilst a body such as the Human Rights Commission would provide much needed expertise, we posit that this would defeat the purposes of the Independent Mechanism's independence and furthermore signal the level of significance governments attach to the independent mechanism.

Designating a senior leader or leadership group to drive jurisdiction-wide change

We support the Productivity Commission's recommendation for a senior leader or leadership group with a wide span of influence to promote and embed changes to public sector systems and culture. From a Queensland perspective, our concern is that the Department of Treaty, Aboriginal and Torres Strait Islander Partnerships, Communities and the Arts (DTATSIPCA) does not have sufficient influence within Government.

In that regard, we believe that secretaries of the Departments of the Prime Minister, Premier or Chief Minister would hold the largest influence and have the positional authority to drive change within the public sector across all jurisdictions. What they lack regarding deep knowledge of Aboriginal and Torres Strait Islander perspectives can be compensated through their power and influence within government.

Sector-specific accountability mechanisms

From a justice-perspective in Queensland, there is great room for improvement in accountability mechanisms. For example, Queensland is yet to fully implement its requirements under the *Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (OPCAT). Implementing these requirements would greatly improve oversight of youth detention facilities. This is an issue dear to our organisation and clients, given that:

- Queensland's youth justice changes will see greater numbers of Aboriginal and Torres Strait Islander children in detention; and
- Queensland is planning on constructing two new youth detention centres.

Police oversight in Queensland

Queensland's Independent Commission of Inquiry into QPS responses to incidents of domestic and family violence highlighted failings in the system of police oversight. Recommendation 68 of the Commission of Inquiry's final report, *A Call for Change,* called for the Queensland Government to establish a Police Integrity Unit. This independent oversight unit would be a separate unit of Queensland's Crime and Corruption Commission. The recommendation, made in November 2022, required establishment of the Police Integrity Unit within 18 months

(by roughly May 2024).[9] So far, our understanding is that this has been resisted by the Queensland Police Union and sections of the Queensland Police Service.

Cabinet and legislative accountability

Upon the introduction of legislation in all Australian jurisdictions, we advocate for the adoption of statements of compliance (or other similar statements of compatibility) with the priority reforms in the National Agreement. In Queensland, legislation must comply with fundamental legislative principles (FLPs) defined in the *Legislative Standards Act 1992 (QLD).* The FLPs require legislation to have sufficient regard to the rights and liberties of individuals and to the institution of Parliament.

Similarly to the FLPs, all bills introduced into Queensland's Legislative Assembly since 1 January 2020, must be accompanied by a Statement of Compatibility in line with section 38 of the *Human Rights Act 2019 (QLD).* The Statement of Compatibility must set out whether, in the opinion of the Member who has introduced the Bill, the Bill is compatible or incompatible with the human rights set out under the *Human Rights Act.*

Following this example, we recommend that a similar mechanism is adopted in all Australian jurisdictions such that all bills introduced into Parliament must be accompanied by a statement outlining how the Bill sufficiently complies with the four priority reforms contained within the National Agreement.

Conclusion

We take this opportunity to thank the Productivity Commission for considering our submissions. We trust that you appreciate our viewpoint as both an Aboriginal and Torres Strait Islander Community Controlled Organisation and a Family Violence Prevention Legal Service.

We look forward to being involved in future consultations that will contribute to strengthened partnerships and empowered communities as we move towards Closing the Gap.

[9] 'A Call for Change', Final Report, Commission of Inquiry into Queensland Police Service responses to domestic and family violence, 2022, https://www.qpsdfvinquiry.qld.gov.au/about/assets/commission-of-inquiry-dpsdfv-report.pdf, page 30