

Decision and Statement of Reasons issued under the *Freedom of Information Act 1982*

Our reference:

FOI LEX 46123

Decision date:

3 April 2023

Applicant:

Oliver Smith

By email:

foi+request-9664-40c86243@righttoknow.org.au

Dear Mr Smith,

NOTICE OF DECISION AND STATEMENT OF REASONS

- I refer to correspondence received by the Department of Social Services (the Department) on 6 December 2022, in which you requested access under the Freedom of Information Act 1982 (FOI Act) to documents relating to the Cashless Debit Card.
- 2. The scope of your request is outlined at paragraphs 11 to 15 below.

Decision

- 3. The Department undertook a reasonable search of its records to identify documents falling within the scope of your request. Those searches did not identify specific reports or data. This is because the Department does not hold specific identifiable reports or data in relation to the information requested.
- 4. The Department does however, hold internal documents in relation to the Cashless Debit Card transition. While the purposes of those documents are broader than the subject matter of the FOI request, they capture aspects of the information you seek access to. The information is anecdotal and has not been independently verified by the Department.
- 5. On the basis of the above, five (5) documents have been identified to contain material falling within the scope of your request.
- 6. I have made a decision to **grant access in part** to those documents, subject to section 22 and subsection 47E(d) of the FOI Act.



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- 7. The documents identified are set out in **Appendix 1**, together with applicable exemption provisions. Where I have decided to grant access in part, I have provided access to an edited copy of the documents, modified by deletions in accordance with subsection 22(2) of the FOI Act.
- 8. The Department decided not to create a document in accordance with section 17 of the FOI Act. Instead, the Department has redacted any irrelevant material from the documents and provided access to the relevant material. Parts of that information are subject to an exemption from release under the FOI Act.
- 9. The reasons for my decision on access are set out below.

Authority to make decision

10. I am an officer authorised by the Secretary of the Department to make decisions about access to documents in the possession of the Department, in accordance with subsection 23(1) of the FOI Act.

Background

- 11. On 6 December 2022, the Department received correspondence from you, requesting access to:
 - "...information about the ending of the Cashless Debit Card program, in the following areas:

Ceduna and surrounding regions, South Australia East Kimberley region, Western Australia Goldfields region, Western Australia Bundaberg and Hervey Bay region, Queensland

For the period May 22, 2022 to the present.

I am seeking any reports or data, about:

Changes in the incidence of alcohol related crimes in areas where the cashless debit card was trialled.

Changes in the incidence of alcohol related hospitalisations and/or matters requiring medical attention in areas where the cashless debit card was trialled. Changes in the incidence of alcohol consumption in areas where the cashless debit card was trialled."

12. In your request, you stated that you "would be happy to have the department create a document consistent with section 17 of the Freedom of Information Act."



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- 13. On 7 December 2022, the Department informed you that it was unable to determine the precise scope of your request and sought clarification. On 8 December 2022, you clarified the scope of your request by confirming that the areas provided by you in your email of 6 December 2022, was for contextual information only.
- 14. On 12 December 2022, the Department acknowledged your request and sought your agreement to:
 - a) remove the following information from the scope of the request:
 - email addresses, signatures and mobile numbers of the Department's staff;
 and
 - ii. names of non-Senior Executive Service staff;(collectively, 'the personal information of staff')
 - an extension of time under section 15AA of the FOI Act to respond to your request.
- 15. On 13 December 2022, you responded, agreeing to the removal of all personal information of staff from the scope of your request.
- 16. On 20 December 2022, you agreed to the request for an extension of time under section 15AA of the FOI Act. As such, the due date for a decision on your request was 6 February 2023.
- 17. On 1 February 2023, the Department advised you it was required to undertake consultation with third parties under section 27A of the FOI Act. This had the effect of extending the processing period by a further 30 days. As such, the due date for a decision on your request was 6 March 2023.
- On 28 February 2023, the Department sought a 28-day extension of time from the Office of the Australian Information Commissioner (OAIC) under section 15AB of the FOI Act.
- 19. On 9 March 2023, the OAIC issued a decision granting the Department an extension of time under section 15AB of the FOI Act to 3 April 2023.
- 20. I have decided not to impose a charge in relation to this request, in accordance with Regulation 8 of the *Freedom of Information (Charges) Regulations 2019*.



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Material taken into account

- 21. In accordance with subsection 26(1) of the FOI Act, my findings on any material question of fact, the material on which those findings were based and the reasons for my decision to grant partial access to a document follows.
- 22. I have taken the following into account in making my decision:
 - a) the terms of your request and as clarified;
 - b) the types of information and documents that are in the Department's possession;
 - c) the content of the documents that fall within the scope of your request;
 - consultation with the relevant business area on the documents falling within scope of your request;
 - e) the submissions of third parties consulted by the Department under section 27A of the FOI Act; and
 - f) courtesy consultation responses from other Commonwealth agencies.
- 23. I also particularly considered the following provisions of the FOI Act:
 - a) section 3 (objects general) and section 3A (objects information or documents otherwise accessible), which set out the objects of the FOI Act;
 - sections 11 (right of access) and 11A (Access to documents on request), which give the Australian community a legally enforceable right to access information held by the Government of the Commonwealth;
 - section 11B (public interest exemptions), to assess whether release of a conditionally exempt document was contrary to the public interest;
 - section 22 (access to edited copies with exempt or irrelevant matter deleted),
 which requires the release of exempt documents in an edited form in certain circumstances;
 - e) section 27A (consultation documents affecting personal privacy), which require consultation with third parties in certain circumstances;
 - f) section 47E (public interest conditional exemption certain operations of agencies) which provides for a conditional exemption in relation to operations of agencies.



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- 24. I have also had regard to the FOI Guidelines issued by the Australian Information Commissioner under section 93A of the FOI Act.
- 25. Full extracts of the provisions of the FOI Act that I have relied on are in Appendix 2.

Reasons for decision

26. I have decided to grant partial access to all five (5) documents. The reasons for my decision are set out below.

Conditional exemption - certain operations of agencies (subsection 47E(d))

- 27. I have found material in all 5 documents to be conditionally exempt from release under subsection 47E(d) of the FOI Act. My reasons follow.
- 28. Subsection 47E(d) provides for the conditional exemption of documents in circumstances where disclosure would, or could reasonably be expected to, have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.
- 29. The FOI Guidelines (paragraph [5.17]) explain that the use of the word 'could' in this qualification is less stringent than 'would', and requires analysis of the reasonable expectation, rather than certainty of an event, effect or damage occurring. It may be a reasonable expectation that an effect could occur in the future.
- 30. All 5 documents contain information which describes informal reports provided to the Department from individuals and third party organisations. Information was provided in a collaborative, cooperative and unencumbered way. Based on the information and the context in which it arises, it is reasonable to expect that a disclosure of that information, would or could, reasonably be expected to impact on the Commonwealth's ability to obtain the same or similar information in the future. A disclosure of this information may also jeopardise existing relationships with third parties, or adversely impact on the effectiveness of existing processes and activities. This could reasonably be expected to adversely impact the proper and efficient conduct of the operations of the Department.
- 31. I have had regard to the particular contents in all 5 documents, have considered advice from the relevant business area about why a disclosure of this information



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would or could, adversely impact the Department's operations and have also considered the views obtained in consultation processes.

- 32. Based on the above, I am satisfied that the material I have refused access to in all 5 documents is information exempt from release pursuant to subsection 47E(d) of the FOI Act.
- 33. As this is a conditional exemption, I am required to consider the public interest test.

Application of the public interest test – section 47E(d)

- 34. In finding that all 5 documents are conditionally exempt, I am required to consider whether it would be contrary to the public interest to give you access to these documents at this time.
- 35. Subsection 11A(5) of the FOI Act provides that an agency must give the person access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document would, on balance, be contrary to the public interest. This test requires me to weigh up factors for and against disclosure.
- 36. In order to assess whether release of the conditionally exempt material would be contrary to the public interest, I have considered that disclosure would promote the objects of the FOI Act by providing access to government held information and inform debate on matters of public importance.
- 37. I have also considered the following factors which do not favour disclosure:
 - a) disclosure could reasonably be expected to prejudice the Department's ability to obtain similar information in the same authentic way in the future. The Department relies on authentic, anecdotal reporting to effectively conduct its operations;
 - b) disclosure could reasonably be expected to adversely affect relationships with individuals and third party organisations that have provided reports to the Department;
 - disclosure could reasonably be expected to restrict future relationships being established for the purposes of obtaining reports on departmental programs or activities;
 - d) disclosure could reasonably be expected to unreasonably adversely impact a third party organisation in respect of its lawful business; and



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- e) disclosure could reasonably be expected to lead to a change in the Department's processes.
- 38. I am satisfied that I have not considered any of the listed irrelevant factors for consideration, as set out in subsection 11B(4) of the FOI Act.
- 39. As detailed above, the information I have found to be exempt relates to informal reports made to the Department concerning its functions and activities. Upholding the trust in and integrity of, the Department's feedback and consultation processes, even where they are anecdotal, is an essential element of the Department's ability to effectively engage with stakeholders and deliver on its functions. While there may be public interest in the general subject matter to which the request relates, there is greater public interest in ensuring the Department's functions are not unreasonably impaired; so that necessary services and programs can be delivered to the community and open and authentic reports and engagement takes place. It is also in the public interest that the Department is able to engage freely with stakeholders and in turn, that stakeholders can engage freely with the Department. The public would be adversely affected if those processes, activities or functions were diminished; as a result of reduced stakeholder engagement with, or flow of information to, the Commonwealth.
- 40. On balance, I consider the public interest factors against disclosure to be more persuasive than the public interest factors favouring disclosure. I am satisfied that the public interest is to withhold the exempt material.
- 41. Although I consider access to the exempt material is against the public interest, I am required by paragraph 22(2)(b) of the FOI Act to provide you with access to an edited copy of the documents if it is possible and reasonably practicable to do so.

Access to edited copies with exempt or irrelevant matter deleted (section 22)

- 42. The Department may refuse access to a document on the grounds that it is exempt. If so, the Department must consider whether it would be reasonably practicable to prepare an edited copy of the documents for release; that is, a copy with relevant deletions made under section 22 of the FOI Act.
- 43. As explained above, all 5 documents contain exempt information. I am of the view that these documents can be edited, so that they are provided to you with exempt material withheld. Accordingly, an edited copy of these documents has been prepared. The material that has been edited for release is marked within the documents with the applicable exemption provision, as well as at **Appendix 1**.



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44. As explained above, due to the scope of your request and the information held by the Department, all of the documents contain a substantial amount of information that falls outside of the scope of your request. As such, all documents have been edited in accordance with subparagraph 22(1)(a)(ii) of the FOI Act, to remove that irrelevant material.

Access to documents

45. The documents released to you in accordance with the FOI Act are enclosed.

Publication of information in accessed documents

- 46. The Information Publication Scheme requires the Department to publish information released in response to individual requests made under the FOI Act, except in specified circumstances.
- 47. I am of the view that details of your request should be made available on the Department's FOI Disclosure Log. As such, details of your request will be published on the Department's FOI Disclosure Log, which can be accessed at https://www.dss.gov.au/about-the-department/freedom-of-information/disclosure-log.
- 48. Please note that the Department does not publish details of FOI applicants, it only publishes details of the FOI request and the documents released in response to the request.

Your rights of review

- 49. Information about your rights to seek a review of this decision are at Attachment A.
- 50. Should you have any enquiries concerning this matter please do not hesitate to contact the FOI team by email at FOI@dss.gov.au.

Yours sincerely,

Patrick Hetherington
Chief Operating Officer

Department of Social Services

3 April 2023



Appendix 1

Schedule of documents

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Doc. No.	No. of pages	Date	Description	Access Decision	FOI Act provision
1	1	26/10/2022	Weekly dashboard	Partial Access	ss 22 and 47E
2	1	09/11/2022	Weekly dashboard	Partial Access	ss 22 and 47E
3	1	16/11/2022	Weekly dashboard	Partial Access	ss 22 and 47E
4	1	23/11/2022	Weekly dashboard	Partial Access	ss 22 and 47E
5	1	07/12/2022	Weekly dashboard	Partial Access	ss 22 and 47E



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Appendix 2

Schedule of relevant provisions used in making this decision

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Excerpts from the Freedom of Information Act 1982 (Cth)

3 Objects—general

- (1) The objects of this Act are to give the Australian community access to information held by the Government of the Commonwealth or the Government of Norfolk Island, by:
 - (a) requiring agencies to publish the information; and
 - (b) providing for a right of access to documents.
- (2) The Parliament intends, by these objects, to promote Australia's representative democracy by contributing towards the following:
 - (a) increasing public participation in Government processes, with a view to promoting better informed decision-making;
 - (b) increasing scrutiny, discussion, comment and review of the Government's activities.
- (3) The Parliament also intends, by these objects, to increase recognition that information held by the Government is to be managed for public purposes, and is a national resource.
- (4) The Parliament also intends that functions and powers given by this Act are to be performed and exercised, as far as possible, to facilitate and promote public access to information, promptly and at the lowest reasonable cost.

11 Right of access

- (1) Subject to this Act, every person has a legally enforceable right to obtain access in accordance with this Act to:
 - (a) a document of an agency, other than an exempt document; or
 - (b) an official document of a Minister, other than an exempt document.
- (2) Subject to this Act, a person's right of access is not affected by:
 - (a) any reasons the person gives for seeking access; or
 - (b) the agency's or Minister's belief as to what are his or her reasons for seeking access.

11A Access to documents on request

Scope

- (1) This section applies if:
 - (a) a request is made by a person, in accordance with subsection 15(2), to an agency or Minister for access to:
 - (i) a document of the agency; or
 - (ii) an official document of the Minister: and
 - (b) any charge that, under the regulations, is required to be paid before access is given has been paid.
- (2) This section applies subject to this Act.



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Note: Other provisions of this Act are relevant to decisions about access to documents, for example the following:

section 12 (documents otherwise available); section 13 (documents in national institutions); section 15A (personnel records); (a) (b)

(d)section 22 (access to edited copies with exempt or irrelevant matter deleted).

Mandatory access—general rule

The agency or Minister must give the person access to the document in accordance with this Act, subject to this section.

Exemptions and conditional exemptions

The agency or Minister is not required by this Act to give the person access to the document at a particular time if, at that time, the document is an exempt (4)document.

Note: Access may be given to an exempt document apart from under this Act. whether or not in response to a request (see section 3A (objects-information or documents otherwise accessible)).

The agency or Minister must give the person access to the document if it is conditionally exempt at a particular time unless (in the circumstances) access to the document at that time would, on balance, be contrary to the public interest.

Note 1: Division 3 of Part IV provides for when a document is conditionally exempt.

Note 2:A conditionally exempt document is an exempt document if access to the document would, on balance, be contrary to the public interest (see section 31B (exempt documents for the purposes of Part IV)).

Note 3: Section 11B deals with when it is contrary to the public interest to give a person access to the document.

- Despite subsection (5), the agency or Minister is not required to give access to the document at a particular time if, at that time, the document is both:
 - (a) a conditionally exempt document; and
 - (b) an exempt document:
 - (i) under Division 2 of Part IV (exemptions); or
 - (ii) within the meaning of paragraph (b) or (c) of the definition of exempt document in subsection 4(1).

11B Public interest exemptions — factors

Scope

- (1)This section applies for the purposes of working out whether access to a conditionally exempt document would, on balance, be contrary to the public interest under subsection 11A(5).
- (2)This section does not limit subsection 11A(5).

Factors favouring access

- Factors favouring access to the document in the public interest include whether access to the document would do any of the following: (3)
 - promote the objects of this Act (including all the matters set out in (a) sections 3 and 3A);
 - (b) Inform debate on a matter of public importance;
 - (c) promote effective oversight of public expenditure:
 - (d) allow a person to access his or her own personal information.



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Irrelevant factors

- (4) The following factors must not be taken into account in deciding whether access to the document would, on balance, be contrary to the public interest:
 - (a) access to the document could result in embarrassment to the Commonwealth Government, or cause a loss of confidence in the Commonwealth Government;
 - (b) access to the document could result in any person misinterpreting or misunderstanding the document;
 - (c) the author of the document was (or is) of high seniority in the agency to which the request for access to the document was made;
 - (d) access to the document could result in confusion or unnecessary debate.

Guidelines

(5) In working out whether access to the document would, on balance, be contrary to the public interest, an agency or Minister must have regard to any guidelines issued by the Information Commissioner for the purposes of this subsection under section 93A.

15 Requests for access (as related to the requirements for requests)

Persons may request access

(1) Subject to section 15A, a person who wishes to obtain access to a document of an agency or an official document of a Minister may request access to the document.

Requirements for request

- (2) The request must:
 - (a) be in writing; and
 - (aa) state that the request is an application for the purposes of this Act;
 - (b) provide such information concerning the document as is reasonably necessary to enable a responsible officer of the agency, or the Minister, to identify it; and
 - (c) give details of how notices under this Act may be sent to the applicant (for example, by providing an electronic address to which notices may be sent by electronic communication).
- (2A) The request must be sent to the agency or Minister. The request may be sent in any of the following ways:
 - delivery to an officer of the agency, or a member of the staff of the Minister, at the address of any central or regional office of the agency or Minister specified in a current telephone directory;
 - (b) postage by pre-paid post to an address mentioned in paragraph (a);
 - (c) sending by electronic communication to an electronic address specified by the agency or Minister.

22 Access to edited copies with exempt or irrelevant matter deleted

Scope

- (1) This section applies if:
 - (a) an agency or Minister decides:
 - (i) to refuse to give access to an exempt document; or
 - (ii) that to give access to a document would disclose information that would reasonably be regarded as irrelevant to the request for access; and



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- (b) it is possible for the agency or Minister to prepare a copy (an edited copy) of the document, modified by deletions, ensuring that:
 - (i) access to the edited copy would be required to be given under section 11A (access to documents on request); and
 - (ii) the edited copy would not disclose any information that would reasonably be regarded as irrelevant to the request; and
- (c) it is reasonably practicable for the agency or Minister to prepare the edited copy, having regard to:
 - (i) the nature and extent of the modification; and
 - (ii) the resources available to modify the document; and
- (d) it is not apparent (from the request or from consultation with the applicant) that the applicant would decline access to the edited copy.

Access to edited copy

- (2) The agency or Minister must:
 - (a) prepare the edited copy as mentioned in paragraph (1)(b); and
 - (b) give the applicant access to the edited copy.

Notice to applicant

- (3) The agency or Minister must give the applicant notice in writing:
 - (a) that the edited copy has been prepared; and
 - (b) of the grounds for the deletions; and
 - (c) if any matter deleted is exempt matter—that the matter deleted is exempt matter because of a specified provision of this Act.
- (4) Section 26 (reasons for decision) does not apply to the decision to refuse access to the whole document unless the applicant requests the agency or Minister to give the applicant a notice in writing in accordance with that section.

23 Decisions to be made by authorised persons

- (1) Subject to subsection (2), a decision in respect of a request made to an agency may be made, on behalf of the agency, by the responsible Minister or the principal officer of the agency or, subject to the regulations, by an officer of the agency acting within the scope of authority exercisable by him or her in accordance with arrangements approved by the responsible Minister or the principal officer of the agency.
- (2) A decision in respect of a request made to a court, or made to a tribunal, authority or body that is specified in Appendix 1, may be made on behalf of that court, tribunal, authority or body by the principal officer of that court, tribunal, authority or body or, subject to the regulations, by an officer of that court, tribunal, authority or body acting within the scope of authority exercisable by him or her in accordance with arrangements approved by the principal officer of that court, tribunal, authority or body.

47E Public interest conditional exemptions—certain operations of agencies

A document is conditionally exempt if its disclosure under this Act would, or could reasonably be expected to, do any of the following:

- (a) prejudice the effectiveness of procedures or methods for the conduct of tests, examinations or audits by an agency;
- (b) prejudice the attainment of the objects of particular tests, examinations or audits conducted or to be conducted by an agency;
- (c) have a substantial adverse effect on the management or assessment of personnel by the Commonwealth, by Norfolk Island or by an agency;



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(d) have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.

Note: Access must generally be given to a conditionally exempt document unless it would be contrary to the public interest (see section 11A).

Goldfields • \$47E(0) Kalgoorlie are advising that crime rates are increasing and there is more drinking in the street. There is not direct evidence that this is linked to the CDC. Region update as at 26 October 2022 Bundaberg and Hervey Bay \$22 (out of scope) Ceduna • \$22 (out of scope) East Kimberley S22 (out of scope) s22 (out of scope) s22 (out of scope) advise no direct linkage S47E(d) Ceduna reported an increase in drinking and antisocial s22 (out of scope) CDC transition weekly dashboard as at 26 October 2022 Engagement state(a) to the CDC within this statistics22 (out or scos22 (out of scope) behaviour \$22 (out of scope) F Key insights and issues s22 (out of scope) General issues • \$22 (out of scope) s22 (out of scope) s22 (out of scope) s22 (out of scope) s22 (out of scope) \$22 (out of scope)

s47E(d) also reported an increase in alcohol-fuelled injuries, with an increase in stabbings reported. Local MIZEG reported an increase in gambling, street drinking and other antisocial behaviour including DV and school non-attendance. WIZEG were clear that there has been a significant influx of cash from royalty payments which likely contributed to the situation. The department attended the Ceduna Service Collaboration meeting, reported double the reported to have had a rise in call outs number of admissions for alcohol-related injuries in October. \$22 (out of scope) 847E(0) Feedback from this group included: relating to alcohol-fuelled violence. Bundaberg and Hervey Bay \$22 (out of scope) Ceduna \$22 (out of scope) s22 (out of scope) s22 (out of scope) East Kimberley Goldfields s22 (out of scope) Feedback around increased antisocial behaviour has generally noted that the individuals were known to $\frac{847E(0)}{1}$, but that behaviours or issue have individuals were known to \$47E(i) , but that behaviours or issue have magnified (e.g. a person who is frequently intoxicated is now more intoxicated). General issues Anecdotal feedback has been received from stakeholders in Ceduna, Goldfields and EK reporting increased alcohol-related behaviours, consessed CDC transition weekly dashboard as at 9 November 2022 Key insights and issues s22 (out of scope) s22 (out of scope) \$22 (out of scope) 22 (out of scope) s22 (out of scope) s22 (out of scope) 22 (out of scope) s22 (out of scope)

have reported a minor increase in anti-social behaviours, with intoxication and fighting in smaller communities on the outskirts of BHB being observed. However, given the smaller proportion of the population on the CDC in these areas, it is not possible to attribute these behaviours to former CDC participants. we were advised that drug or alcohol related emergency admissions at Ceduna Hospital in October had doubled, and the number of admissions in November already exceeds November 2021, \$22 (out of \$cope) Region update as at 16 November 2022 Bundaberg and Hervey Bay \$22 (out of scope) East Kimberley S22 (out of scope) Goldfields S22 (out of scope) At the weeklys 47E(d) s22 (out of scope) s22 (out of scope) Feedback around increased antisocial behaviour has generally noted that the individuals were known to arrefor have interested is now more intoxicated is now more intoxicated is now more intoxicated. CDC transition weekly dashboard as at 16 November 2022 Key insights and issues s22 (out of scope) General issues \$22 (out of scope) s22 (out of scope) rs22 (out of scope) s22 (out of scope) s22 (out of scope) s22 (out of scope) s22 (out of scope)

\$47E(0) advised that in recent weeks there has been an increase in public intoxication, violent crimes, family violence and associated alcohol consumption, self-harm and hard Emergency Department recorded double the number of admissions for alroho related injuries in October. Health providers noted the average admissions for November have already exceeded double the usual number of admissions. No definite link to the CDC has been held a special meeting to focus on a response to reports of increased various reasons for the increase of people in town, including funerals and medical appointments at the hospital \$22 (out or soppe) liquor purchases. It is not clear if this increase is as a result of the CDC as royalty payments have also been made in the community. \$22 (out of scope) street drinking and anti-social behaviour. Stakeholders identified Region update as at 23 November 2022 On Monday, 21 November, the s47E(d) s22 (out of scope) Bundaberg and Hervey Bay • \$22 (out of scope) East Kimberley S22 (out of scope) s22 (out of scope) s22 (out of scope) Feedback continues to be received about reported increases in street drinking, antisocial behaviour and increased alcohol-related hospital admissions in Ceduna, the East Kimberley and the Goldfields. \$22 (out of scope) CDC transition weekly dashboard as at 23 November 2022 Data not for public release Key insights and issues General issues \$22 (out of scope) s22 (out of scope) est (ont or scobe)

Region update as at 7 December 2022 ceduna s22 (out of scope) Bundaberg and Hervey Bay \$22 (out of scope) Goldfields S22 (out of scope) East Kimberley
S22 (out of scope) s22 (out of scope) s22 (out of scope) reported that there are rising incidents of crime perpetrated by children, however it is noted that there are seasonal spikes of this behaviour and it is \$22(out of \$cope).

Services have Across Ceduna, East Kimberley and the Goldfields, reports of increasing anti-social behaviour and increasing numbers of people entering the communities continue to be raised by service providers and stakeholders noted more public alcohol consumption, fightling and violence, and an increase in the use of poker machines and alcohol sales. \$22 (out of Scope) Community and Stakeholder Engagement Data not for public release Key insights and issues . \$22 (out of scope) CDC transition weekly dashboard as at 7 December s22 (out of scope) s22 (out of scope)