



Royal Commission into
Institutional Responses to
Child Sexual Abuse

Submission of Micah Projects Inc
to Issues Paper 6

Redress Schemes

supporting people

with the **Royal Commission** into
Institutional Responses to Child Sexual Abuse



HISTORICAL ABUSE NETWORK

FOR PEOPLE WHO EXPERIENCED ABUSE IN INSTITUTIONS,
FOSTER CARE & DETENTION.



Lotusplace

MICAH PROJECTS INC



**Breaking Social Isolation
Building Community**

30 June 2014

Royal Commission into Institutional Responses to Child Sexual Abuse
GPO Box 5283
Sydney NSW 2001

By email: solicitor@childabuseroyalcommission.gov.au

Dear Colleague

Issues Paper 6 – Redress Schemes

Thank you for the opportunity to provide this submission to the Royal Commission into Institutional Responses to Child Sexual Abuse.

Overview

Our view is that a redress scheme should be established as one measure to address or alleviate the impact of past and future child sexual abuse in institutional contexts on victims. We believe that this scheme should be:

- Developed having regard to human rights standards for victims of crime and victims of abuse of power
- Developed in response to the needs of survivors and flexible enough to deliver justice as negotiated by individual claimants;
- Developed to overcome the barriers that currently prevent people from seeking justice through the civil justice system;
- Developed to overcome the failings of previous redress schemes that have been established to provide redress to survivors in some states of Australia, in other countries and through internal redress schemes;
- Administered by a tribunal that is constituted by both legal and non-legal members (including from medical and social work backgrounds) who have particular expertise related to child sexual abuse and other related abuses experienced by adults who were in out of home care as children.
- Funded by the institutions that are connected to the abuse and administered independently of these institutions; that is both church, government and non-government organisations
- National or, in the alternative, identical schemes should be established in each state;
- Allows claims to be made at any time for both past, current and into the future
- Recognises that sexual abuse of children in an institutional setting occurs alongside a breach of a fiduciary relationships, ensures that institutions are liable for the

criminal actions of their employees or agents and provides guidance in relation to the calculation of damages;

- Complemented by other measures including funding of ongoing support services for survivors.

About Micah Projects

Micah Projects is a Queensland based not-for-profit organisation with a vision to create justice and respond to injustice at the personal, social, and structural levels in church, government, business and society. We provide a range of support and advocacy services to individuals and families.

Services delivered by Micah Projects are underpinned by the principles contained in the United Nations Universal Declaration of Human Rights.

Our experience working with survivors of child sexual abuse in institutional settings

Since its inception Micah Projects has worked in partnership with adults who were in out-of-home care as children who experienced significant abuse and are victims of crime. Micah Projects has worked with people to seek justice for the abuse and crimes that many experienced as children. Micah Projects' Lotus Place is a dedicated support service and resource centre for adults who were in out-of-home care and often referred to as Forgotten Australians and Former Child Migrants.

Micah Projects has supported many survivors of child sexual abuse as they have attempted to access justice – including through institutional redress schemes (including 'Towards Healing'; Salvation Army, Anglican and Uniting Church.) and by applications to the Queensland Government's redress scheme.¹ Our support has included assisting survivors to complete application forms, interacting with relevant institutions, both government and non-government, churches and agencies, advocacy, counselling, support management, access to housing and reconnection with family of origin, family support with children today.

Our submission is informed by the observations that we have made when supporting survivors to seek justice and the feedback given by 40 adults who were in out of home care as children. We have also spoken individually to a number of survivors about this submission and have included their views and comments throughout this submission.

The human rights of survivors of child sexual assault

The Australian Government has an obligation to ensure that any redress scheme developed to deliver justice to survivors of child sexual abuse is consistent with the human rights standards that are provided in the international treaties and other instruments that it has ratified or signed.²

Framing the response to child sexual abuse using human rights standards transforms people who have been abused in institutional settings from victims to survivors who are entitled to

¹ The Queensland government's redress scheme was established in 2007 in response to the Forde Inquiry.

² In particular the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the Convention on the Rights of the Child and the Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power.

access to justice, restitution, compensation and the assistance that is required to access those rights. Put another way, survivors are no longer objects of charity or sympathy – they are subjects who hold rights that they are capable of claiming.

Survivors are victims of crime

We used the United Nations Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power ('the Declaration')³ as a framework for our submission relating to the civil justice system.⁴ The Declaration provides a statement of rights that are contained in other binding instruments, contextualised in consideration of the particular circumstances of victims of crime. We framed our submission using the Declaration to emphasise that sexual abuse of children is an abhorrent crime.

The Declaration provides, among other things that:

- Survivors are entitled to prompt redress, provided for in legislation, for the harm they have suffered;⁵
- Redress mechanisms should be expeditious, fair, inexpensive and accessible;⁶
- Survivors should be informed of their rights in seeking redress;⁷
- Mechanisms such as mediation, arbitration, customary justice and indigenous practices should be used where appropriate to facilitate conciliation and redress;⁸
- The establishment of national funds for compensation to victims should be encouraged;⁹
- Victims should receive material, medical, psychological and social assistance.¹⁰

Sexual abuse is a human rights violation

In addition to being a crime, sexual abuse of children is a human rights violation.¹¹

A person who has suffered a human rights violation has a right to an effective remedy.¹² An effective remedy can include restitution, rehabilitation, public apologies and memorials, guarantees of non-repetition and changes in relevant laws and practices, as well as bringing to justice the perpetrators of human rights violations.¹³ In order to seek an effective remedy a person must be able to seek “enforcement of their rights before national courts and tribunals.”¹⁴

Children are human rights holders

³ GA Res 40/34, UN GA 96th plen mtg, UN Doc A/RES/40/34 (29 November 1985).

⁴ Submission of Micah Projects to Issues Paper 5, Civil Litigation

⁵ Article 4.

⁶ Article 5.

⁷ Ibid.

⁸ Article 7.

⁹ Article 13.

¹⁰ Article 14.

¹¹ Including of Articles 7 and 9 of the International Covenant on Civil and Political Rights.

¹² See Article 2(3) of the International Covenant on Civil and Political Rights.

¹³ UN Human Rights Committee, General Comment 31

¹⁴ See, for example, CESCR, General Comment 9: The Domestic Application of the Covenant, UN E/C.12.1998/24.

Any response to child sexual abuse that occurs in any government, nongovernment or church institutional setting should also provide a mechanism for children to seek redress as a child or as an adult.

The Convention on the Rights of the Child (“the Convention”) provides a statement of the human rights standards that should be applied to any program or mechanism that is developed to benefit children. Australia ratified the Convention on 17 December 1990.

Of particular relevance, the Convention provides that State parties will take all appropriate measures to prevent the inducement or coercion of a child to engage in any unlawful sexual activity.¹⁵

The ability of children to access justice when their rights have been violated is a fundamental stand-alone right. Pursuant to the Convention, States are required to adopt appropriate and effective legislative and administrative procedures and other appropriate measures to provide children with fair, effective and prompt access to justice.¹⁶ Access to justice means the ability to obtain a just and timely remedy for human rights violations.¹⁷ It includes providing children with access to relevant information and to effective remedies to claim their rights, including through legal and other services.¹⁸

Accordingly, any redress mechanism developed to provide survivors of child sexual abuse with access to justice will need to incorporate measures to ensure that children are able to participate in the process as claimants and adults can participate from a historical experience

When respecting, protecting and fulfilling human rights more than recognition of the substantive rights is required. The State is also required to provide mechanisms, programs and services that enable survivors to access their rights.

Any scheme also needs to incorporate a strengthened approach to fiduciary care and abuse of power that occurs in government, nongovernment or church institution.

Developing a redress mechanism that is responsive to the needs and goals of survivors

The aim of any redress scheme must be to achieve justice as defined by individual survivors. Put another way, any redress mechanism should be flexible enough to allow different outcomes depending on the needs and goals of survivors.

In their report responding to child sexual abuse in Canadian institutions, the Law Commission of Canada said that they could not recommend one redress mechanism because the needs of survivors were so diverse. They went on to say that any response must be more comprehensive, more flexible and less formal than legal processes.¹⁹

¹⁵ Article 34.

¹⁶ Article 2 of the International Covenant on Civil and Political Rights and article 4 of the Convention on the Rights of the Child.

¹⁷ Access to Justice for Children, Report of the United Nations High Commissioner for Human Rights A/HRC/25/35, 16 December 2013.

¹⁸ United Nations Common Approach to Justice for Children, page 4.

¹⁹ Law Commission of Canada, Restoring Dignity: Responding to Child Abuse in Canadian Institutions, 2000, page 304.

The diverse needs of survivors are well documented. In our submission relating to civil justice we discussed the need to ensure that the mechanism the survivor pursues to obtain redress has the potential to achieve the outcome that they are seeking. We identified some of the goals that survivors may have including ensuring that the perpetrator and the institution involved understand the consequences of their actions, to have the perpetrator removed from their position, to protect and warn others, to stop blaming themselves, to receive an apology, to be compensated, to have counselling costs paid for, to ensure the perpetrator is punished, to learn more about sexual abuse, to tell their story, to change the system and to heal.²⁰ Other commentators have identified these goals as common ‘needs’ articulated by survivors.²¹

Numerous redress schemes for survivors of child sexual abuse have been established in Australia and internationally. In Canada provincial governments have established diverse compensation schemes for children who suffered abuse or were neglected in State-funded and State-operated institutions.²² These redress packages vary in content, nature and process.²³

The Grandview Agreement is one redress scheme that was developed in Canada in consultation with survivors. This scheme is regularly used as an example of a scheme that was developed in consultation with survivors, in response to their needs. The scheme enabled survivors to access interim payments, counselling, financial compensation and also services such as having identification tattoos removed.²⁴ The Grandview Agreement was achieved through an out-of-court alternative dispute resolution process that involved negotiations between a provincial government (the relevant institution was State operated) and a survivor group.

The redress scheme that we are recommending would be flexible enough to respond to the different needs, abilities and expectations of survivors. It would allow for survivors to seek outcomes in addition to financial compensation such as apologies and counselling. As part of this mechanism we recommend including the ability for parties to opt into an alternative dispute resolution process and or formally choose to go through the civil courts, and for groups of survivors to pursue claims together.

It is essential that any redress scheme that is developed be designed to ensure that survivors are not re-traumatised by the process. In our submission relating to the civil litigation system we commented on the therapeutic potential of redress systems. It is also important to acknowledge that redress mechanisms have the potential to re-traumatise survivors through requiring them to re-live their abuse and, by forcing them to prove that the abuse

²⁰ Submission of Micah Projects to Issues Paper 5, Civil Litigation, page 16.

²¹ Law Commission of Canada, *Restoring Dignity: Responding to Child Abuse in Canadian Institutions*, 2000, page 304, also see Professor Reg Graycar and Jane Wangmann, Submission to the Senate Inquiry into Children in Institutional Care, page 2.

²² Schemes include: the British Columbia Jericho Individual Compensation Program 1995; 22 the new Brunswick Compensation Program; the Nova Scotia Compensation Program 1996; the Ontario Grandview Agreement Compensation Scheme 1994; the Ontario St John’s and St Joseph’s Helpline Agreement 1993; the States of Jersey Historic Abuse Redress Scheme.

²³ Reg Graycar and Jane Wagmann, ‘Redress Packages for institutional child abuse: Exploring the Grandview Agreement as a case study in ‘alternative’ dispute resolution’, Sydney Law School Research Paper No. 07/50.

²⁴ Ibid.

happened, assess only on individualised basis rather than on the overall evidence and trends of Inquiries by failing to provide adequate support and because key personnel involved in the resolution of the claim do not demonstrate an understanding of the seriousness and impact of child sexual abuse. Developing a redress scheme in consideration of survivor needs should help to ensure that the process does not cause further harm to survivors of institutional abuse, their families or their communities.²⁵

An independent, specialist tribunal

We recommend that an independent, special tribunal be established to deal with compensation claims made by survivors of child sexual abuse that occurred in connection with an institution. With careful design this tribunal could overcome the issues associated with the civil justice system, while ensuring the benefits of successfully making this type of claim are maintained.

We have previously identified numerous issues that prevent survivors from successfully using the civil justice system to seek redress.²⁶ Despite these issues, there are clear benefits to making a successful civil claim in court. These benefits include the control the survivor has over the process (for example choosing when to start proceedings, choosing legal representation and witnesses and playing an active role in proceedings), the ability to create a ‘public record’, the fact-finding capability of the process, the ability to hold perpetrators and those complicit in the abuse accountable for the damage that they have caused, larger amounts of compensation and a predictable and known process.²⁷ In designing a redress mechanism to deal with institutional child sexual abuse it is important to ensure that these characteristics are maintained. In addition it is important that the Tribunal has full access to records held by governments, churches, non-government agencies or authorities with no retractions of information from government departments.

Specialist tribunals have been established to deal with particular issues in other contexts. Tribunals established to deal with asbestos related claims provide a relevant example. The New South Wales Dust Diseases Tribunal was established by the *Dust Diseases Tribunal Act 1989* (NSW). It has exclusive jurisdiction to hear and determine claims for those who have been affected by dust disease – including claims made by dependents of people who have died from dust diseases. In recognition of the lapse of time between exposure to dust and the appearance of symptoms and diagnosis of a condition, there is no limitation period within which an action must be commenced.

²⁵ Law Commission of Canada, *Restoring Dignity: Responding to Child Abuse in Canadian Institutions*, 2000.

²⁶ Submission of Micah Projects to Issues Paper 5, Civil Litigation, page 16.

²⁷ Professor Reg Graycar and Jane Wangmann, Submission to the Senate Inquiry into Children in Institutional Care, page 8-9.

The Dust Diseases Tribunal was established in recognition of the inability of conventional courts to respond to dust related claims. Claims must be processed quickly because there is usually limited time between diagnosis and death of plaintiffs. Accordingly, the Dust Diseases Tribunal provides an example of a specialist tribunal that was set up to maximise the potential for people to access the type of justice that a court can provide and to overcome the impediments that plaintiffs were experiencing when making their claim in conventional courts.

In the same way, a tribunal could be established that deals exclusively with claims related to child sexual abuse, breaches of fiduciary care, and abuse of power in institutional/organisational settings. To overcome the issues that are inherent in the civil justice system this tribunal would have the following characteristics:

1. The tribunal would be constituted by legal and non-legal members (people with relevant medical and social work backgrounds) who have existing expertise related to child sexual abuse that occurs in connection with an institution;
2. It would be independent of any relevant institution;
3. Eligibility would be for all adults and young people who have experienced a breach of fiduciary care resulting in significant harm and are victims of crime and childhood sexual abuse
4. It would be a permanent feature of the justice system and there would be no limit on when a claim could be made;
5. It would be designed to ensure that claims are resolved quickly and cost effective, taking into consideration the age and health of applicants
6. Proceedings would be commenced by a simple application form that outlines, for response by the applicant, the elements that need to be proved to make a claim;
7. Claims would be processed quickly through a transparent process including an almost immediate interim hearing whereby interim orders for counselling and other immediate needs can be sought, parties can opt into an alternative dispute process and, if the matter is to proceed to a hearing issues in dispute can be settled and issues related to disclosure can be resolved. The matter would then progress quickly to a hearing;
8. The alternative dispute resolution process would encourage the negotiation of innovative settlements that meet the needs of individual survivors while still allowing for the outcome of the settlement to be recorded publicly;
9. Evidence that has been accepted in other proceedings (for example in relation to expert evidence about the impact of child sexual abuse that occurs in connection with institutions and in relation to the policies, procedures and conduct of relevant institutions) can be relied upon in future proceedings;²⁸
10. The tribunal would provide a public record for the outcome of claims of sexual abuse, breaches of fiduciary care and abuse of power in connection with institutions

²⁸ This is characteristic of the Dust Diseases Tribunal.

and allow for confidentiality only to protect the identity of survivors when they wish this to occur;

11. Outcomes that are aligned with individual survivor's needs would be available in addition to compensation payments.
12. Ensure that legal representation for victim/survivor is incorporated
13. The inclusion of a review process of decisions
14. That ex gratia payments be exempt from income tax, assessment of income for public housing for rental increases, repayments for welfare recipients and Medicare for the individual

Ireland provides an example of where a redress scheme has been developed outside the existing court processes while retaining some of the benefits of the civil litigation system. Following the Commission to Inquire into Child Abuse, (the Laffoy Commission) in Ireland,²⁹ a Residential Institutions Redress Board ("the Redress Board") was set up under the *Residential Institutions Act 2002*. The purpose of the Redress Board is to make awards to people who were sexually, physically or emotionally abused in institutions as children.³⁰

The Redress Board is wholly independent and chaired by a judge. Applications are made in writing using a prescribed form that helps applicants to establish that they qualify for the scheme. Applications can be settled 'by agreement' or at a hearing. Interim awards can also be sought. A panel of 2-3 board members conduct hearings, witnesses can be called and awards of money can be made. Awards are assessed according to a prescribed formula embedded in legislation. If an award is accepted the person accepting the award is required to agree in writing to give up any right to bring a claim in damages in respect of the abuse and injuries covered by the award. The Residential Institutions Redress Review Committee hears reviews of Redress Board decisions. The Committee can uphold, increase or decrease the amount of the award.

Creating a public record

The South African Truth and Justice Commission provides an example of the development of a public record for human rights abuses.³¹ The Register of Reconciliation is a website that records people's experiences of Apartheid as well as their regret in failing to prevent human rights abuses and their commitment to reconciliation. The Law Commission of Canada recommended that a similar register be established in Canada for survivors of institutional child sexual abuse.³²

We recommend establishing a website to publically record the outcomes of claims made to the specialist tribunal. This website could give individuals who were complicit in the abuse an opportunity to apologise or acknowledge their role in the abuse regardless of the fact that the institutions rather than individuals will be responsible for responding to claims.

²⁹ See <http://www.justice.gov.za/Trc/ror/index.htm>.

³⁰ See <http://www.rirb.ie/default.asp>.

³¹ See <http://www.justice.gov.za/Trc/ror/index.htm>.

³² Law Commission of Canada, *Restoring Dignity: Responding to Child Abuse in Canadian Institutions*, 2000.

Failings of other similar redress schemes

We believe that the redress schemes that have been established in Australia to compensate survivors of institutional child abuse have been limited to the extent to which survivors feel that justice was delivered. The particular issues that we have observed include:

1. The schemes established in Queensland, Western Australia and Tasmania were limited in time meaning that people missed out on making an application; the pace of the application process was in itself distressing
2. Payments were based on a set amount determined by the policy of the government to be distributed rather than an amount in response to the claim and the damages incurred and the harm suffered.
3. Payments have been made ex gratia without any admission of liability;
4. State redress schemes have been positioned within government departments rather than in a legal or justice system, resulting in no findings of liability and damage and no corresponding public record;
5. The lack of a national approach has meant that where the abuse occurred is relevant in determining whether a survivor has access to a redress scheme; there is lack of consistency across the Nation.
6. Internal schemes within churches or out of court settlements with organisations, schools, churches or government have resulted in inconsistent and secretive approaches.
7. Confidentiality clauses that are often contained in agreements that result from internal redress schemes have meant that it is difficult for survivors or their supporters to know whether they have achieved a 'fair' settlement;
8. No redress scheme that has been established in Australia has genuinely attempted to deliver justice to survivors of child sexual abuse that occurred in connection with a government, nongovernment or church institution.
9. No penalty, accountability or public record of the breach of fiduciary care, negligence or covering up of abuse and crimes to children

Many of the problems that we have identified above were also reported to the Senate Standing Committees on Legal and Constitutional Affairs ("the Committee") during the Review of Government Compensation Payments.³³ In particular, submitters were critical of the time limits for making claims, the amount of compensation available under the schemes, the limits on eligibility for compensation and the application process.³⁴

In its report the Committee expressed concern about the lack of consistency under state redress schemes. It said that a consistent and transparent approach to determining quantum

³³ 6 December 2010, Chapter 2, at http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Legal_and_Constitutional_Affairs/Completed_inquiries/2010-13/govtcomp/report/index.

³⁴ Ibid.

of compensation would be beneficial. Similarly, the application of consistent eligibility criteria would mean that people in all states would be included in the scheme. The Committee encouraged the Australian Government to work with the state and territory governments to deliver consistent redress schemes.³⁵

The tribunal that we are recommending will overcome the issues with the relevant redress schemes that have existed in Australia.

Calculating damages

There is considerable disparity between views about how damages should be calculated.³⁶ In relation to calculating damages in cases relating to institutional child sexual abuse the Law Commission of Canada commented that:

“Attempting to achieve consistency by putting a monetary value on the different kinds or degrees of abuse can dehumanize survivors by subjecting them to formula or tables for compensation that do not really reflect their unique experience.”

On the other hand, there is significant criticism of redress schemes that provide no criteria for how awards are calculated and no disclosure of amounts that are paid.

Accordingly, our view is that the tribunal should be left to determine the amount of compensation to be paid on a case-by-case basis. However, the legislation that establishes the tribunal should provide some guidance for how compensation is to be calculated including for example providing a list of ‘heads of damages.’ Legislation could also clarify that the purpose of the compensation payment is to recognise the damage that was caused to the survivor in order to clarify that compensation will never be able to return a survivor to the position that they were in prior to the abuse.³⁷ The way that the tribunal calculates compensation should be recorded, as should the amount that is paid. A scheme should not (as the Irish Redress Scheme states)

- a) address any issue of fault of negligence arising out of evidence given in an application to the Scheme
- b) make a finding of fact relating to fault or negligence

Where an applicant clearly demonstrates fault and negligence it is critical that this be considered in assessing damages to ensure that the scheme is reaching its objectives of a just response. The commission has already heard from victim/survivors how important it is for accountability of the institutions government, church and nongovernment to be held publically accountable as part of a just response.

Widespread support for the establishment of an independent redress scheme

³⁵ Ibid.

³⁶ For example see the summary of submissions contained in the Senate Standing Committees on Legal and Constitutional Affairs ‘Review of Government Compensation Payments’, 6 December 2010, Chapter 2 at http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Legal_and_Constitutional_Affairs/Completed_inquiries/2010-13/govtcomp/report/index.

³⁷ See Seetal Suga ‘The meaning of compensation in institutional abuse programs’ (2002) 17 *Journal of Law and Social Policy*.

We believe that there is widespread support for the establishment of an independent redress scheme. As Brisbane Archbishop Phillip Aspinall has told the Royal Commission:

“It would be much quicker and simpler for us if that (a uniform, mandatory compensation scheme) were imposed on us from outside. (Dioceses) would simply be given a determination by a statutory body and...be forced to deal with it.”³⁸

In a similar vein, James Condon told the Royal Commission that:

“There’s got to be a point in the process where we ask the question...how can we help you to move forward? What do we need to do to help you in the healing process?”³⁹

George Pell also told the Royal Commission about his experiences that have led him to form the view that there should be an independent assessment of complaints made by victims of abuse.⁴⁰

Funding

We acknowledge that the question of who will fund the establishment of an independent tribunal is a vexed one. We note that in Ireland the Redress Board was funded by the State with contributions from relevant religious organisations. One outcome of the Royal Commission will be to identify the religious and other organisations that have been responsible for allowing repeated instances of child sexual abuse to occur. We suggest that the tribunal be established through contributions from these institutions and that any settlement arrived upon or award of damages made as a result of a claim include a component to be paid to the tribunal to contribute towards its ongoing operation. Naturally, any compensation payments will be paid directly by the relevant institution.

The legislation establishing the redress scheme provides an opportunity to overcome barriers that have prevented survivors from accessing justice

In our submission relating to the civil justice system we said that legislative change is required. We said that we would support the development and adoption of model or uniform legislation across all jurisdictions. This legislation could establish an independent tribunal and could also ensure that:

1. People making claims that relate to child sexual abuse are exempt from the application of limitation periods;
2. Institutions can be held to be vicariously liable for crimes committed by their employees and agents;
3. Institutions can be vicariously liable for the breach of fiduciary relationships and there is recognition of the non-economic loss that results from this type of breach;
4. Placing the burden of proof on institutions and requiring institutions to produce all relevant documentation that they hold that is relevant to the claim;

³⁸ Statement to the Royal Commission into Institutional Responses to Child Sexual Abuse, 13 November, 2013

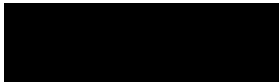
³⁹ Public Hearing – Case Study 10 (Day 70), page 7400.

⁴⁰ Statement in the Sydney Morning Herald, 10 March, 2014

5. There is recognition that child sexual abuse is an abhorrent crime and is a human rights violation.
6. In reviewing settlements all previous settlements are taken into consideration.

Thank you again for the opportunity to provide you with this submission.

Yours faithfully



Karyn Walsh
Coordinator