

Locking in Poverty

How Western Australia drives the poor, women and Aboriginal people to prison

WA Labor Discussion Paper

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WA
Labor

Executive Summary

The current policy for managing Western Australians who cannot pay fines has cost taxpayers millions of dollars, strained the prison system and has disproportionately affected the poor, especially women and Aboriginal people.

In Western Australia, fine defaulters may enter prison to clear a fine, if they have been unsuccessful in paying off the fine via a payment plan or completing a Community Service Order. The management of Community Service Orders was changed in early 2009, resulting in high rates of imprisonment of fine defaulters.

The State Government assumes that the prospect of going to prison will deter people from breaking the law and incurring fines in the first place. If so, the number of fine defaulters entering the prison system should have diminished.

Instead, this policy is driving an extra 1 100 people to prison a year, with significant economic and social costs.

This policy is not working. It is economically unsound, ineffective in enforcing fines payments and profoundly unfair.

- Every year since 2010, more than 1,100 fine defaulters have entered prison in Western Australia solely for the purpose of clearing fines.
- Fine defaulters in prison 'cut out' \$250 of fines a day, yet it costs \$345 per day to keep them in prison.
- The costs of imprisoning fine defaulters have blown out by 220 per cent since 2008.
- Last year, one in every three women who entered the prison system did so solely for the purposes of clearing fines.
- The number of Aboriginal women jailed for fine default has soared by 576 per cent since 2008.
- Between 2008 and 2013, the number of Aboriginal people incarcerated solely for fine default has increased from 101 to 590, a growth of more than 480 per cent.
- Between 2008-9 and 2012-13, the Department of Corrective Services budget has blown out by an average of 8.6 per cent a year. If this trend continues, this year's budget of \$870.25 million could blow out to \$945.1 million.

Issues for consideration

1. Increase funding to supervise fine defaulters serving community service orders
2. Conduct an independent review of the legislation and regulations governing Community Service Orders and fine default to assess the economic and social impact of the current system

This discussion paper was written for WA Labor by Paul Papalia CSC, MLA, Shadow Minister for Corrective Services and Member for Warnbro.

WA Labor welcomes comment and feedback on this discussion paper. Please send it to: Paul Papalia, PO Box 7387, Secret Harbour, WA 6173 or paul.papalia@mp.wa.gov.au by Friday 13 March 2015.

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Locking in Poverty

How Western Australia drives the poor, women and Aboriginal people to prison

Introduction

The number of Western Australians entering the prison system as a way of ‘cutting out’ or paying fines has soared in the term of the current State Government.

In 2008, adults going to prison to clear unpaid fines accounted for a total of only 194 receptions into the prison system. The following year the number more than tripled, to 666. Since 2010, at least 1,100 have entered the prison system for fine default every year.¹

Between 2008 and 2013, the growth rate of the Western Australian prison population has been more than double that of the growth in the State’s population.² One in every seven adults entering the State’s prisons in this timeframe did so for fine default alone. Alarming, one in three women who entered prison in 2013 did so just to pay off fines.³

Every offender who enters prison incurs a direct cost to the taxpayer, currently estimated by the Department of Corrective Services to be \$345 a day. There are also additional hidden costs associated with transporting fine defaulters to and from prison and the extensive negative impact on prisons of having to process such large numbers of extra prisoners often for only short periods of incarceration.⁴

Western Australia cannot afford to ignore the economic costs of punitive measures such as imprisoning fine defaulters. On 27 August 2014, international credit rating agency Moody’s followed in the steps of Standard & Poors in downgrading the State’s AAA credit rating. Moody’s identified the need for stronger fiscal resolve and new measures for reducing spending.⁵

Considering that people sent to prison for failing to pay fines represent such a sizeable component of the prison population growth, there is an obvious need to ask: is this policy worth the cost to the taxpayer?

This paper will examine the costs of imprisoning people solely for fine default in Western Australia, make an assessment of whether this policy works, and seek feedback on a range of issues.

Current Policy

Western Australians who cannot afford to pay their fine are offered the options of repaying the fine via a payment plan or converting the fine to a Community Service Order (CSO).

Those who cannot or do not pay their court fine, or complete a CSO, will be issued with a Warrant of Commitment, arrested and imprisoned to pay off their fine. Changes to supervision of CSOs in early 2009 imposed rigorous compliance requirements with imprisonment in the event of breaching. These changes were followed by a steep rise in imprisonment of fine defaulters (see Table 1).

Fine defaulters enter the prison system to ‘cut out’ their fines at a notional rate of \$250 per day. This means by going to prison over the weekend, as is often the case, an individual can rid themselves of \$1,000 worth of fines (the part days of reception and release are counted as full days).

The State Government has defended the policy of imprisoning fine defaulters and has given no indication it recognises the issue as a problem or intends to act to reduce the rate.

Recently confronted with WA Labor calls for a “mature conversation about a policy that disproportionately affected the poor, especially Aboriginal people”⁶, Attorney General Michael Mischin was emphatic in his defence of the policy, saying, “Aboriginal people will not get fines if they do not break the law.”⁷

These comments were prompted after the death in August 2014 of a young Aboriginal woman in custody in South Hedland. She was incarcerated to pay off fines believed to be as little as \$1000. Her tragic story is a potent illustration of how this policy is deeply flawed.

Background

For a range of reasons, some fine defaulters do not have the capacity to pay out their fine, even with the benefit of a progressive payment option. Under the Barnett Government, there have been steep



increases in unavoidable household costs in recent years, reducing the flexibility available to low income households to meet unforeseen costs like fines.

For example, electricity costs have dramatically increased under the current State Government (77 per cent since 2008), as have water (90 per cent since 2008) and car registration costs (62 per cent since 2008). Many low-income households are also renters, so the impact of a tight rental market and consequent growth in rental costs has also contributed to squeezing the finances of fine defaulters.

In 2011, the Department of Corrective Services confirmed that 53 per cent of people on CSOs had alcohol and other drug problems.⁸ It is a reasonable assumption that the prevalence of drug and alcohol problems amongst fine defaulters who are subject to CSOs is at least as high as the general population on these orders. These people are also very likely to be confronting other challenges, such as a lack of transport (through licence loss or no public transport), unemployment or intermittent employment and housing stress.

Unsurprisingly, many fine defaulters have already compounded their original offence by failing to meet their court appearance obligations. Despite this, the system is also constrained in its efforts to enforce compliance with CSOs. Funding for supervising a fine defaulter on a CSO is currently set at \$43 a day but the daily cost of a fine defaulter in prison is \$345 a day.⁹

This system channels such people to an alternative process so poorly funded it is little more than a stepping stone to prison. The number of fine defaulters ultimately entering prison suggests that the option of a CSO does not work for a substantial number of offenders.

Enabling a fine defaulter to erase thousands of dollars via a very short prison sentence has the effect of making prison an appealing option. This is clearly an unintended consequence of changes to relevant legislation which came into effect in March 2008.

The Labor Government of the day introduced changes to fines enforcement legislation, including a provision enabling fine defaulters to 'cut out' outstanding fines concurrently. It is clear from Hansard records that the then-Government had intended the change to reduce or prevent unnecessary imprisonment

of people too impoverished to meet their fine obligations.¹⁰

The Labor Government did not have the opportunity to observe the impact of its legislative change. Parliament was prorogued on 22 July 2008, around four months after the legislation came into effect, and the Government lost office in September.

The current Government has had longer than six years to identify and fix the unintended outcomes of this legislation but has taken no action.

“Funding for supervising a fine defaulter on a Community Service Order is currently set at \$43 a day but the daily cost of a fine defaulter in prison is \$345 a day.”

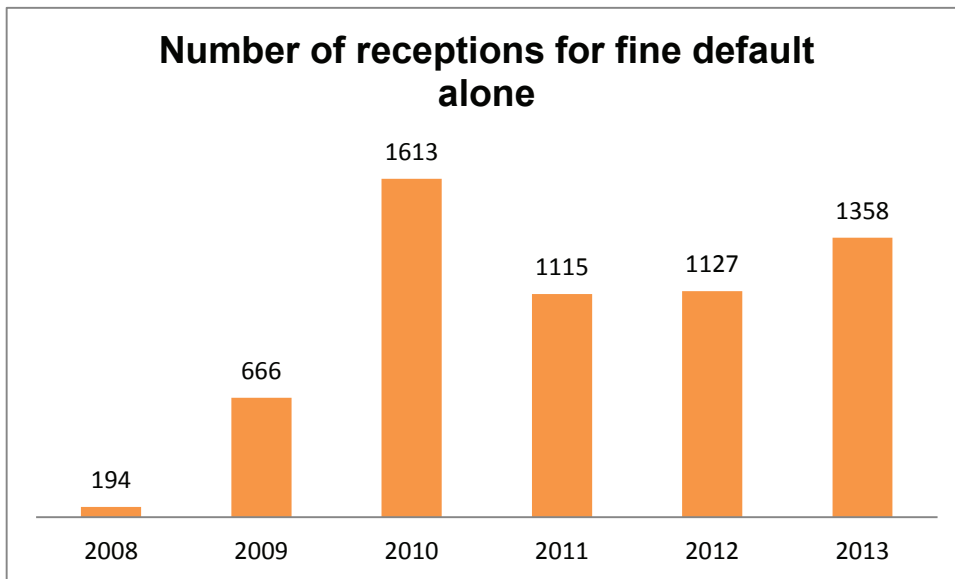
Since the March 2008 legislative change, there has been another policy development change which appears to have had a direct and much greater impact on numbers of fine defaulters entering prison.

A significant change to the management of CSOs was implemented in early 2009 and explained to the WA Parliament in June that year.

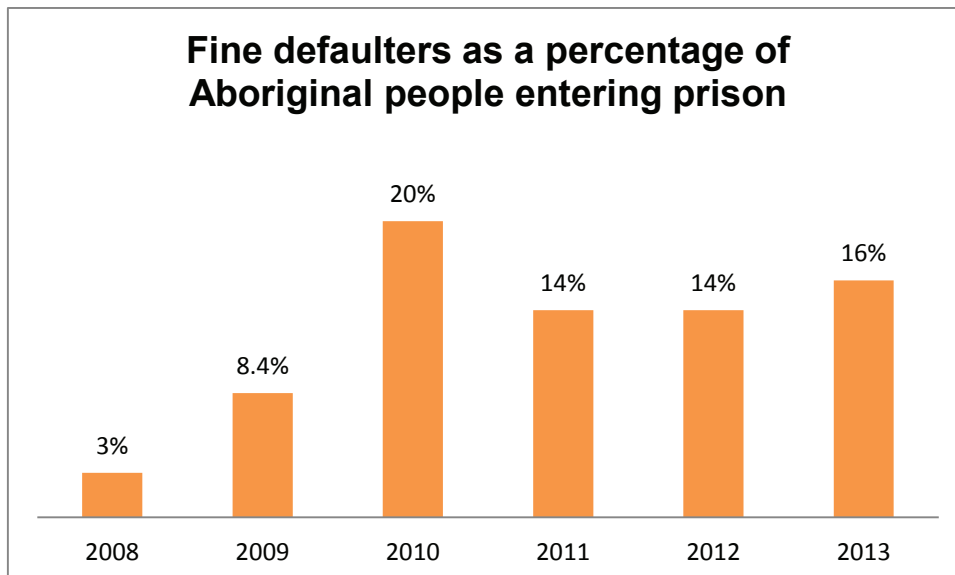
It involved imposing strict conditions on breaching of orders, which resulted in people being “sent back to court for re-sentencing” if they missed community work on two occasions.¹¹ The missed work days did not have to be consecutive and it was made clear that if an individual missed three days they would “automatically be breached”.¹² The rapid and dramatic increase in numbers of people entering prison solely for fine default coincided with the implementation of this policy.

The Government's intention in changing the rules for supervising CSO breaches was increasing compliance. Unfortunately, as with the amendment to fines enforcement legislation made in early 2008, there has been little, if any, monitoring of the actual impact of this change.

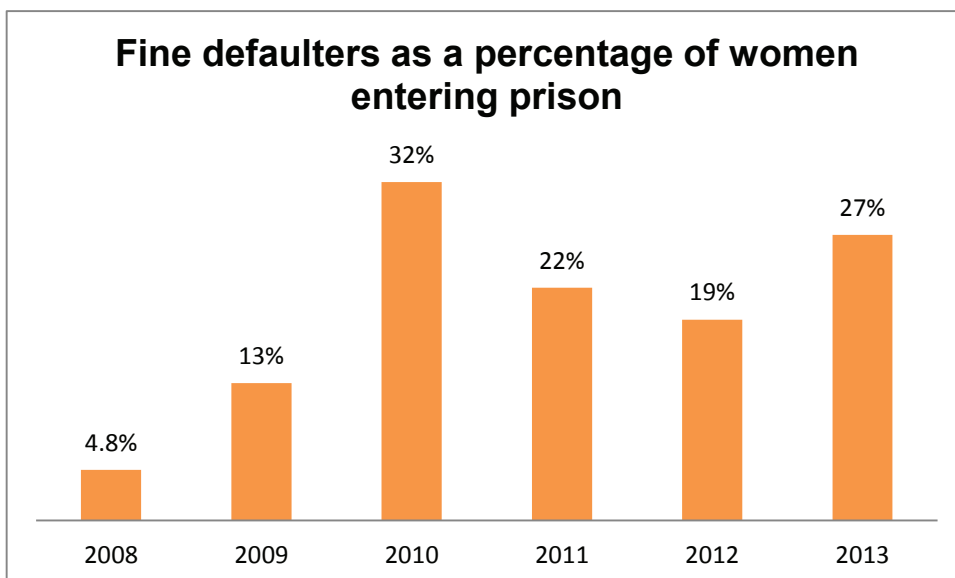
A direct consequence of the change to management of CSOs has been a surge in the imprisonment of the poor, particularly women and Aboriginal people.



Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014.



Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014.



Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014.



The Problem

Budget Blowouts and Growth in Debt

The number of people entering prison under a Warrant of Commitment to 'cut out' fines grew from 194 in 2008 to 1358 in 2013. Since the 2010 calendar year, when this figure first exceeded 1,100 (peaking at a record 1,613 that year), it has not dropped below the 1,100 threshold in any twelve-month period.¹³

Table 1: Fines owed by jailed fine defaulters compared to total outstanding fines

Calendar Year	Number of receptions for fine defaults alone	Total debt owed by fine defaulters who go to prison	Total outstanding fines on Registry	Imprisoned fine defaulters debt as a percentage of total
2008	194	\$3.5m	\$230.7m	1.5%
2009	666	\$13.5m	\$245.5m	5.4%
2010	1613	\$7.2m	\$249.7m	2.8%
2011	1115	\$12.2m	\$257.6m	4.7%
2012	1127	\$14.4m	\$259.4m	5.5%
2013	1358	\$13.8m	\$285.0m	4.8%

Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014, and Question on Notice No 2749, 13 August 2014.

The total amount of unpaid fines which were 'cut out' by those entering prison under the current State Government – money which will never be paid – is \$64.6 million. This figure is higher than what the nominal daily rate suggests because multiple fines can be cleared concurrently.

The average term of imprisonment for fine default is 4.24 days.¹⁴ As the number of fine defaulters being jailed has increased over the past six years, so has the daily cost of keeping a prisoner in custody. Fine defaulters cost the prison system \$751,023 in 2008, growing by 220 per cent to reach \$2.4 million last year.

The direct cost to the prison system of imprisoning fine defaulters is calculated by multiplying the total number of days served by fine defaulters in a year by the daily cost per adult prisoner for each year. For example, the daily cost of keeping an adult prisoner was \$334 in 2013-14,¹⁵ resulting in an annual cost of \$2.4 million.

Table 2: Costs to the State Government of jailing fine defaulters

Calendar Year	Daily cost of custody	Total sentenced days for fine defaults alone	Total cost of fine default alone
2008	\$273	2,751	\$751,023
2009	\$263	3,745	\$984,935
2010	\$292	8,484	\$2.47m
2011	\$291	6,131	\$1.78m
2012	\$317	6,243	\$1.97m
2013	\$334	7,193	\$2.40m

Source: Tabled paper no LA2746, WA Legislative Assembly, 13 August 2014. Note that daily custody costs are calculated from Department of Corrective Services annual reports and are financial year costs.



There are also extra hidden costs associated with transporting fine defaulters to and from prison and, of course, the extensive negative impact on prisons of having to process such large numbers of extra prisoners. The State Government has been incapable of providing detail of how many fine defaulters have been transported to and from prison or what cost that transportation incurred.¹⁶ This is a significant administrative failure, as there are anecdotal reports of aircraft charters having been used to transfer Aboriginal fine defaulters from remote communities to prison for the purposes of ‘cutting out’ fines over short periods of time.

“Since the Barnett Government took office, the total amount of outstanding fines owed by fine defaulters who end up in prison has never exceeded 5.5 per cent of the overall outstanding debt.”

Even in the absence of these additional costs, the headline costs associated with processing and putting fine defaulters into prison confirm the serious impact the policy is having on the State Budget.

The Department of Corrective Services is struggling to keep its costs under control, with its Budget blowing out every year since 2008-9. Between 2008-9 and 2012-13, its budget has blown out by an average of 8.6 per cent a year. If this trend continues, this year’s budget of \$870.25 million could blow out to \$945.1 million.

The State Government assumes that the prospect of going to prison will deter people from breaking the law and incurring fines in the first place. If this policy was working, the number of fine defaulters entering the prison system in Western Australia should have diminished. The fact that the number remains stubbornly high suggests the policy is a failure.

The most damning statistic to illustrate the futility of imprisoning fine defaulters is the relatively small proportion of overall outstanding fines for which those who are imprisoned are responsible. Since the Barnett Government took office, the total amount of outstanding fines owed by fine defaulters who end up in prison has never exceeded 5.5 per cent of the overall outstanding debt.

It appears the vast majority of outstanding debt is owed by corporate or other fine defaulters who are capable of avoiding both paying fines and imprisonment. The names of some of these debtors can be seen on the State Government’s “name and shame” Fines Enforcement Register, which lists outstanding debtors who have not entered into an agreement to pay their fines. Some debtors owe as much as \$248,490.

The other obvious fact to be gleaned from Table 1 is that overall fine default has grown every year under the current Government despite the huge increase in imprisonment of fine defaulters at the low end of the economic spectrum. There has been a 23.5 per cent growth in total outstanding debt listed by the Fines Enforcement Registry in the past six years.

This fact exposes as hollow rhetoric the oft-touted argument that punishing fine defaulters by sending them to prison is addressing the problem of outstanding fines.

Impact on Aboriginal people

Western Australia has the highest rate of Aboriginal imprisonment, compared to non-Aboriginal imprisonment, in the country. The disproportionate representation of Aboriginal people in Western Australia’s prison system is widely acknowledged as a serious and long-standing problem.

That a minority – only 3.5 per cent of the State’s population¹⁷ – should comprise 40 per cent of the adult prison muster¹⁸ is a striking statistic. Aboriginal Western Australians are 20 times more likely to be imprisoned than their non-Aboriginal fellow citizens.¹⁹

The impact of the Government’s fine enforcement policy may go some way to explaining why the issue has remained so intractable.

Historical analysis of Aboriginal incarceration shows fine default has played a significant part in high rates of imprisonment in the past. More than 20 years ago, the Royal Commission into Aboriginal Deaths in Custody reported that imprisonment for fine default as a proportion of total sentencing dropped from 50 to 30 per cent in one financial year after new fines legislation (and an associated moratorium) was introduced in early 1995.²⁰



More recently in New South Wales, the introduction of a policy in 2006 to refer unpaid fines to the State Debt Recovery Office saw a sharp rise in the number of people imprisoned for driving when their licence was suspended or disqualified.

“Since 2010, one in every six Aboriginal people going to prison were there to pay off fines.”

The policy was determined to be particularly iniquitous for disadvantaged groups especially Aboriginal people.²¹ Having identified the impact of the original policy, the NSW government responded in 2012 with measures including the introduction of a system of Work and Development Orders (WDOs), similar to CSOs. There has been an apparent decline in the number of Aboriginal people imprisoned for licence-related matters under the WDO system although it is too early to determine if the effect will be durable.²²

In Western Australia, as the number of fine defaulters being imprisoned has escalated, the number of Aboriginal people jailed for fine default has grown by more than 480 per cent. Since 2010, one in every six Aboriginal people going to prison were there to pay off fines.

In prisons, the proportion of Aboriginal fine defaulters has averaged 42 per cent, which slightly exceeds the rate of overall Aboriginal imprisonment. However, the much larger number of fine defaulters going to prison has meant that an average of 550 Aboriginal fine defaulters were imprisoned annually over the past four years.

Table 3: Aboriginal people imprisoned for fine defaulting

Calendar Year	Total Aboriginal receptions	Aboriginal fine defaulters	Fine default as percentage of Aboriginal receptions
2008	3,235	101	3%
2009	3,251	276	8.4%
2010	3,158	633	20%
2011	3,272	470	14%
2012	3,641	520	14%
2013	3,644	590	16%

Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014.

Impact on women

The number of adult women prisoners in Western Australian prisons has always been significantly lower than the male prison population.

Despite this, there has been a disturbing trend of growth in female prisoner numbers since 2008. When the Barnett Government came to office in late 2008, the number of women held in the State’s women’s prison was 172. A recent count at the prison indicated there were 309 women, a growth in muster of 79 per cent.²³

The most recent report by the independent Inspector of Custodial Services on Western Australian women’s prisons found them to be in “a state of preventable crisis”.²⁴ It confirmed that “women have had to make do with the unwanted leftovers of the male estate” and that “women at Bandyup have continued to be forced to sleep on the floor” some three years after the last report warned this should not happen.²⁵ The problem has compelled the State Government to consider additional capital expenditure to accommodate women at another prison in the metropolitan area.²⁶

With massive overcrowding in the women’s prison estate, it is important to analyse the impact on the system of record numbers of women imprisoned solely for fine default.



Table 4: Women imprisoned for fine defaulting

Calendar Year	Total receptions Women	Women fine defaulters	Fine default as percentage of female receptions
2008	916	44	4.8%
2009	962	129	13%
2010	1,091	354	32%
2011	1,009	231	22%
2012	1,174	233	19%
2013	1,313	358	27%

Source: Legislative Assembly Tabled Papers No LA1832 and LA2746, 18 February 2014 and 16 September 2014.

In 2013, almost one third of all women entering the prison system in Western Australia were sent there solely for fine default. It is a striking statistic that almost two-thirds of these women were Aboriginal.

Disturbingly, the number of Aboriginal women going to jail for fine default has soared by 576 per cent under the Barnett Government, from 33 in 2008 to 223 in 2013 (see Table 5).

The social impact of these women being imprisoned has been identified by initial findings of a recent Curtin University study.²⁷ Early results of the study indicate that imprisonment of mothers is leading to entrenched inter-generational crime and incarceration. If the women are single parents or represent the more stable partner in an otherwise dysfunctional household with children, their imprisonment might be the catalyst for child abuse, family disintegration or descent into crime by unsupervised children.

“In 2013, almost one third of all women entering the prison system in Western Australia were sent there solely for fine default.”

The Government’s plan to adapt part or the whole of one of the male metropolitan prisons to accommodate women will cost millions of dollars of taxpayers’ money. As women imprisoned for fine default alone represent such a substantial proportion of overall annual female imprisonments, it makes no sense to ignore alternatives to prison for this group.

Table 5: Aboriginal women imprisoned for fine defaulting

Calendar Year	Aboriginal women fine defaulters
2008	33
2009	85
2010	204
2011	134
2012	159
2013	223

Source: Legislative Assembly Question on Notice no LA 3138, 22 October 2014.



Discussion

A potential solution to the problem of large numbers of fine defaulters ending up in prison is to increase funding for the supervision of CSOs. The cost of supervising CSOs is funded at around 12 per cent of the daily rate of supervising a prison inmate, so funding for the supervision of CSOs could be increased dramatically and still result in a significant saving to the taxpayer over imprisonment.

Noting that the annual total sentenced days served by prisoners 'cutting out' fines has not fallen below 6,131 in the past four years, a conservative approach might call for transfer of 6,000 prisoner-days' worth of funding to the annual budget for supervising CSOs. This would equate to \$2.07 million in additional annual funding. Even with this increase, there would still be a saving of at least \$40,000, compared with the cost of continuing with the current policy model.

In reality, the entire savings would only be achieved if all fine defaulters completed their CSOs and avoided prison. The actual final net saving can only be determined following a trial of the new resourcing model. Despite this, the abject failure of the current policy and the potential savings that might be realised through introducing the alternative funding model are compelling reasons for trialling the approach.

Additional funding could be targeted at the geographical locations with the highest rates of fine default leading to imprisonment. This would, in effect, be a form of justice reinvestment²⁸ with the crime hotspots identified and the funding sourced via the redirection of resources otherwise dedicated to imprisonment.

Regardless of how it is employed, an indication of the value of the additional funding can be arrived

at through assessing the number of additional staff it could fund. An annual increase of \$2.07 million could fund 21 additional Community Corrections Officers/Sheriffs or 28 Community Work Officers.²⁹

The failure of the current policy to deter fine default and gather fine revenue for State Government demonstrates that there is a clear need for legislative reform in relation to fine defaulters. The current laws and regulations are resulting in large numbers of fine defaulters not paying fines, entering the prison system and imposing unnecessary costs on taxpayers with little if any discernible benefit.

There is a clear need for a review of the impact of legislation and regulation governing fines enforcement and community service orders. An independent authority such as the Law Reform Commission is best placed to complete such a review. Any review should include a holistic assessment of the effectiveness and value to the community of fine default management, including the cost and consequences of imprisoning people solely for fine default. The review should recommend possible changes to legislation or regulation that will reduce unnecessary and ineffective imprisonment of fine defaulters.

There needs to be better enforcement of conditions on wealthy and corporate debtors on the Fines Enforcement registry. As this paper has demonstrated, it is overwhelmingly the small debtors who are being targeted as part of the Government's debt recovery process.

It is only fair that all debtors are pursued by the Government for their fines.

Issues for consideration

1. Increase funding to supervise fine defaulters serving community service orders
2. Conduct an independent review of the legislation and regulations governing Community Service Orders and fine default to assess the economic and social impact of the current system

Feedback welcome

WA Labor welcomes comment and feedback on this discussion paper. Please send it to: Paul Papalia, PO Box 7387, Secret Harbour, WA 6173 or paul.papalia@mp.wa.gov.au by Friday 13 March 2015.

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End Notes

1. Tabled paper no LA1832, WA Legislative Assembly, 18 February 2014.
2. ABS statistics confirm the WA population grew by 15.7 per cent between end-December 2008 and mid-2014. The adult prison population grew by 33 per cent in the corresponding period.
3. Tabled paper no LA1832, WA Legislative Assembly, 12 August 2014.
4. Question on Notice no LA2465, WA Legislative Assembly, 26 June 2014.
5. Moody's Investor Service, Rating Action: Moody's downgrades Western Australia's rating to Aa1 from Aaa, outlook changed to stable, 25 August 2014.
6. Paige Taylor, Minister defends jail time for fines, *The Australian*, 26 August 2014.
7. *Ibid.*
8. Education and Health Standing Committee (2011), *Alcohol: Reducing the Harm and Curbing the Culture of Excess*, WA Legislative Assembly, 23 June 2011, p xxviii.
9. *Western Australian Budget 2014-2015, Budget Paper 2, Volume 2*, p749.
10. Jim McGinty, Hansard, 20 November 2008, pp7323b-7325a.
11. Christian Porter, Hansard, 10 June 2009, pp4833b-4834a.
12. *Ibid.*
13. Tabled paper no LA1832, WA Legislative Assembly, 18 February 2014.
14. Question on Notice no LA 2465, WA Legislative Assembly, 26 June 2014.
15. Department of Corrective Services Annual Report 2013-2014, p13.
16. Tabled paper no LA2745, WA Legislative Assembly, 13 August 2014.
17. Australian Bureau of Statistics, Report 3238.0.55.001 - Estimates of Aboriginal and Torres Strait Islander Australians, 30 August 2013.
18. Australian Bureau of Statistics, Report 4517.0 – Prisoners in Australia, 5 December 2013.
19. Australian Bureau of Statistics, Report 4517.0 – Prisoners in Australia, 2 April 2013.
20. Royal Commission into Aboriginal Deaths in Custody, *Aboriginal Contact with the Criminal Justice System of WA – 1995 A Statistical Profile*, Volume 2, December 1995, p46.
21. NSW Department of Attorney General and Justice (2011), reported in Don Weatherburn, *Arresting Incarceration- Pathways out of Indigenous Imprisonment*, Aboriginal Studies Press, Canberra, 2014.
22. Weatherburn, *op. cit.*
23. Western Australian Department of Justice, Current custodial count, In-Count for Bandyup prison, 3 June 2008 and Western Australian Department of Corrective Services, Current custodial count, In count for Bandyup prison, 10 November 2014.
24. Inspector of Custodial Services, *Female prisons in Western Australia and the Greenough women's precinct*, July 2014, p. v.
25. *Ibid.*, p. vi.
26. Jessica Strutt, WA Government considers moving women prisoners to Hakea Prison to combat overcrowding at Bandyup, ABC News Online, 27 August 2014.
27. Comments by Jocelyn Jones in Nicolas Perpitch, Family breakdowns causing repeat imprisonment of Aboriginal mums, study finds, ABC News Online, 27 September 2014.
28. Paul Papalia, Justice Reinvestment – An option for Western Australia, *The Brief (Journal of the WA Law Society)*, September 2010.
29. Community Corrections Officers and Sheriffs (in regions) employed at level 4.1 plus 30% on costs or \$94,598.40 each and Community Work Officers (metro supervision) employed at level 2.1 plus 30% on costs or \$73,217.30 each.