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'YOU LIVE AND BREATHE IT FROM THE DAY YOU'RE BORN'  
Report on Anti-Aboriginal Discrimination in Perth and  
Surrounding Areas

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*Racial Discrimination Act 1975*

**Office of the Commissioner for Community Relations**

**'YOU LIVE AND BREATHE IT FROM THE DAY YOU'RE BORN'**

Report on Anti-Aboriginal Discrimination in Perth and Surrounding Areas,  
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Aboriginal Homelessness in Perth — The Past  
Aboriginal Homelessness in Perth — The Present  
Care of the Homeless, Perth  
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A visit was made to Perth, the Swan Valley and Pingelly in response to allegations of discrimination from Aborigines living in these areas. It became clear throughout the visit that prejudice and discrimination were rife wherever one looked. In the words of a young Aboriginal woman, 'You live and breathe it from the day you're born'.

To understand the feelings of complete insecurity which Aboriginal individuals and whole communities experience, it is necessary to go back to the immediate past and to appreciate that this is not just a recent matter, but something which has pertained for a lifetime; indeed, for generations. One of the principal areas visited was the Swan Valley, since many complaints of discrimination had come from there, and a brief summary of events of the last few decades may serve to indicate that it is not possible to view reported acts of discrimination as single events, but rather as links in a chain of dispossession, uncertainty and powerlessness.

**ABORIGINAL HOMELESSNESS IN PERTH — THE PAST**

As far back as 29 July, 1908, a West Guildford resident made a complaint that the 'natives' living on the local reserve were 'far from the best and they are within hearing of the road, and there are a lot of children going to and fro'. Police responded to these and similar resentments by moving some of the Aborigines to another reserve at Success Hill. This caused the Town Clerk of the municipality to advise the Aborigines Department in 1910 'that objection is raised to the Aborigines camping on the Success **Hill** Reserve'. As a consequence, a portion of the commonage in South Guildford (48



acres) was set aside for Aborigines, which was later to be known as Allawah Grove.

In April 1941 all Aborigines camped in the Guildford area were instructed to move to the reserve because of 'certain complaints received from various road boards adjacent to the Guildford townships'. Just four months later, continued pressure for the reserve land from the Department of the Army forced the Aborigines to move yet once more to another camping site, known as Lot 124, at Bassendean, which was privately owned. But action of white residents in the neighbourhood, with the backing of the local authorities in the district, eventually resulted in their being dispersed to individual camps in the Bassendean-Bayswater area.

The original reserve was never returned to Aborigines. It was developed and used by the Armed Services during World War II and subsequently. In November 1954, the Town Planning Commissioner (Dr Davidson) urged that the Minister for Native Affairs take over the land and buildings ' . . . in an earnest endeavour to help toward the solution of the most pressing native problem in the Metropolitan Area'. Despite his representations, the former reserve was used as housing for whites, and Aborigines were scattered throughout Perth, most at the old Sanitary Depot Camp. When the depot was abandoned in the early 1950s to make room for the State Housing Commission's expansion of building, Aborigines were once again ousted.

During the 1950s, repeated efforts by the Department of Native Welfare to acquire land suitable for an Aboriginal reserve failed.

A mere rumour that the Department is negotiating for the purchase of a suitable block inevitably results in a spate of publicity and organised protests, in the course of which natives and the Department are subjected to disgraceful, unwarranted criticism states the Annual Report of the Western Australian Department of Native Welfare, 1959. The Report continues:

The inescapable conclusion, therefore, is that natives were not wanted anywhere in the metropolitan area fifty years ago, and they are not wanted today.

(On 2 June 1959, a Perth newspaper, under banner headlines, had used strong language to criticise Aborigines who were then trying to resettle at Allawah Grove.)

The same Native Welfare Report went on to state:

For fifty years attempts to provide them with a sanctuary have been successfully obstructed by white residents of the district concerned, backed up by local authorities; for fifty years Aborigines have been forced to live the typical lives of outcasts and sometimes treated like pye-dogs, and for fifty years they have of course reacted accordingly; and at all times those who occupied the tribal lands of their Aboriginal forebears have been their severest critics. The situation in most material respects remains substantially the same today (1959) as it was in 1908. There are no grounds for believing that there will be any appreciable change in the foreseeable future . . . The situation has developed into a vicious circle. The basic essentials of a suitable reserve are adequate water supply, access to public transport, shopping facilities and schools. Where these exist the area has already been set aside for (white) residential purposes and strong opposition from the local white residents is the immediate reaction to any move made . . . to acquire land for natives. It probably also conflicts with town planning schemes. In the area where the essential facilities do not exist, the natives, understandably, refuse to live. And so it goes on, *ad infinitum, ad nauseam!*

These comments, published in 1959, are an exact description of the situation today and typify the attitudes of influential sections of the general community to having Aborigines housed in their midst.

#### ABORIGINAL HOMELESSNESS IN PERTH —THE PRESENT

The Western Australian Department of Community Welfare completed a survey of Aboriginal homelessness in the Swan-Guildford area in August 1976. Four major camps

were included in the survey, as well as two camps on the vineyards. All lacked running water, ablution facilities, adequate storage and power, but they were the only home available to 129 people. About a third of these were itinerant workers, associated with grape-picking on the nearby vineyards, which employ between one and two hundred Aborigines each season; the rest were permanent.

The D.C.W. Report states that 'the socio-economic status of the camping population reflects the typical Australia-wide pattern of Aboriginal marginality in the economic system'. At the time of the survey, 42.6 per cent of the adult population were unemployed; many who were seasonally employed on the vineyards had no other source of employment during the rest of the year. Employment is not covered by an award and there is no union involvement. The Report states: 'There is evidence that some vigneronns pay Aborigines in kind (i.e. wine) and that some renege on agreements with workers. Aborigines in general feel bitter about the conditions of employment, and particularly the conditions of accommodation.' Opportunities for discrimination are therefore manifold and are continuing.

Subsequent to the survey, the Swannee Noongar Association submitted plans to the Swan Shire Council for the upgrading of facilities at one of the camps, that at Widgee Road, with the ultimate aim of developing a housing estate. These plans were rejected by the Shire on the grounds that they did not conform with the Town Planning Act. Aborigines observed that a substantially sized white housing development was being undertaken nearby and that was the real reason why they were not wanted at Widgee Road. Subsequently, the water supply to their camp was cut off to assist road-making for the white development. Early in 1977, the Swan Shire rejected a request from the Presbyterian Church for land on which to develop an Aboriginal Old People's Home, stating that it had no suitable land available.

In March and April of 1977, police received a flood of complaints about Aborigines sleeping in Stirling Park, Guildford and proceeded with what the Friends of the Fringe Dwellers Association (a white group) termed a 'campaign of fear and intimidation against Guildford's itinerant Aborigines'. Early in April the camping ground near Helena Street, Guildford was burnt out and Aborigines accused the Shire of being responsible for the fire. A statement by the Midland police at the time declared: 'When they commit offences and camp in public, we lock them up. But there is no harassment in it.' The police superintendent concerned went on to say that the Midland police made about fifty Aboriginal arrests a month. Twenty-five Aborigines from the burnt camp (previously prevented by police from sleeping in parks and under bridges) were back on the streets with no more than the clothes they were wearing, yet no charitable organisation offered aid, until the Department for Community Welfare came to their rescue.

The Anglican rector of Midland, Reverend Frank Watts, commented at about this time that 'something had to be done other than just shifting people from one place to another'. While Mundaring M.L.A., Mr. Tom Herzfeld, stated at the annual conference of the Moore division of the Liberal Party (30 April 1977), 'It is intolerable in an affluent society such as Perth that an estimated 200-300 homeless Aboriginal people are forced to live on the fringes of the city without such bare necessities as adequate shelter, water and sanitary facilities'.

The publicity following the fire caused a group of whites to inspect camp sites along the Swan River where Aborigines were living. The Rector of Melville, the Reverend Peter Ferguson, commented on 'the hopelessness, the rootlessness and the bitterness of the eternally insecure camp-dwellers'.

The fire also spurred the Aborigines concerned to establish a tent village in the grounds of St. Matthew's Church, Guildford. The Shire of Swan charged the Diocesan Trustees with committing an unlawful act by permitting erection of the tents, and the trustees were duly fined. In a statement outside the court on that occasion (as reported

in the *West Australian*, 18 August 1977) the Archbishop of Perth, the Most Reverend Geoffrey Sambell, stated that the 'charges arose out of the extreme problem of housing Aborigines. For a long time these people lived where they could find shelter, often under bridges'. He concluded outside the court that Australians were racists and this racism was something everyone had to fight.

One of the Aboriginal leaders involved in the struggle for the homeless expressed a similar sentiment from a different viewpoint when he said: 'We want to stop running. We've been running all our lives.'

Meantime, the Minister for Community Welfare, Mr. Ridge, announced (24 May 1977) that a piece of land had been found which the Shire Council would permit Aborigines to use as a camping ground for not longer than two years. This was at Lord Street, Lockridge, where temporary ablution, lavatory facilities and electricity were then installed. As about forty Aborigines moved from Stirling Square outside St. Matthew's church to Lockridge, local residents gathered to watch, many saying they strongly opposed the tent camp.

The local newspaper, the *Swan Express*, commented (30 June 1977) that 'The question of aborigines (sic) being allowed to live in the Lockridge area has created considerable fear among residents for their safety with a resultant call for more police . . . to ensure that adequate policemen are on duty and patrolling the area so that local residents, in particular children, can use local parks and reserves without hindrance or violence.'

Responding to an electors' petition, the Swan Shire called a public meeting on 1 July to protest against the Lockridge camp. Aborigines were refused permission to speak nor would the meeting agree to meet them to discuss their problems.

As part of a bid to obtain publicity and support for the plight of the homeless, a group of Aborigines, supported by a small number of whites, travelled across Australia by car to establish contact with Aboriginal communities on the way and to call on the Minister for Aboriginal Affairs for support. Though no firm promises were extracted to alleviate homelessness, the trip was at least successful in drawing attention to acute and long-enduring problems. The Minister, The Hon. Ian Viner, stated (Hansard, 14 September 1977, Senate, p.823): 'Every effort to obtain a permanent camp in this area (Guildford/Midland) has been opposed by the local shire council and they have also registered this disapproval of the use of the Lockridge site. The Western Australian State Government has made it quite clear that the future of the Lockridge site is tied to the further development of the Pyrton Training Centre for mentally retarded children and that its use cannot be extended beyond two years . . . I would like to make it quite clear that the State Department for Community Welfare and the State Housing Commission have the main responsibility for settling the Lockridge situation . . .' Mr. Viner drew attention to the fact that the Department for Community Welfare had provided certain facilities at the Lockridge camp site, despite which fact Aborigines had had to move to St. Matthew's church hall during the recent storms in Perth. But as from 16 June they had been in the main resident at the temporary camping site at Lockridge. At best, however, this Lockridge camp may be considered a temporary respite for a limited number of people (35 to 40). The 'homes' provided are merely tents, and the ever present threat of eviction, even from these, hangs over the heads of the occupants, whose constant insecurities and anxieties and those of the other fringe-dwellers have been expressed by one of their number, Mr. Robert Bropho:

I've been talking for the last seventeen years and still we are sitting under the trees, under the bridges, in vacant blocks, in old houses, round the cemeteries, in dark lanes — in the shadows of Parliament House.

As a result of a variety of pressures and a considerable spate of publicity, the Swan Shire permitted the building of four new houses (completed in September 1977) on

Aboriginal Lands Trust land at Saunders Street, on condition that all signs of makeshift dwellings be removed. This has been achieved, though it seems likely that permission will not be granted for another four houses to be built in the area, although finance for a total of eight houses had been promised by the Minister for Aboriginal Affairs. The local Swan Valley newspaper, the *Swan Express*, published a letter (April 7 1977) to the editor opposing the building of group housing for Aborigines in the area, asking: 'Why place them in the middle of a white community where only tension, mistrust and hatred will be kindled?' — a view that would be echoed by a number of the adjacent land-owners and rate-payers.

When interviewed on the subject, the President of the Swan Shire Council, again suggested (as he had done on previous occasions) that the solution to Aboriginal homelessness in the area was to build 'an Aboriginal village', which could also serve as a tourist attraction at Wexcome railway estate where, at present, there are three Nissen huts in a remote area. Once again, this would involve uprooting the Aborigines and placing them, against their will, in a distant area where there are none of the normal facilities and where services would prove very costly. Aborigines are against the proposal and maintain that the State Housing Commission, through the Minister for Housing, has the authority to overrule the Shire's objections.

#### CARE OF THE HOMELESS, PERTH

The Western Australian Department for Community Welfare in 1976 surveyed fourteen emergency accommodation centres in Perth, three of which did not accept Aborigines. The report points out that the exclusion may be greater, since Aborigines are made to feel unwelcome at other establishments and so do not apply to them for accommodation.

Aboriginal Hostels are fairly inactive in Western Australia and the home for inebriate Aborigines which is run under church auspices is overcrowded and unable to offer rehabilitation programs. A large tin shed nearby, known as Miller's Cave, containing a few old beds and no other facilities whatsoever, serves as night shelter for whatever Aboriginal alcoholics might seek protection there. Others camp in the open. It is hard to believe that anything so primitive could exist in a city of the affluence and sophistication of Perth; nor that Australians in need of care and, in some cases, rehabilitation, could be offered such degrading and wretched conditions.

Sister Bernardine, supervisor of the church home previously mentioned (St. Norbert's) has estimated that there are approximately 900 Aboriginal families on the State Housing Commission waiting list alone, and that there are about 100 homeless Aborigines living in East Perth: 'Eighty are living in a shed (Miller's Cave) and eighty to ninety come regularly to Our gate for food and clothing'.

Aboriginal leaders frequently comment on the fact that the Federal Budget of August 1977 cut Aboriginal housing funds by \$5.6 million to \$35.3 million, thus magnifying the problem of homelessness. The rationale for this drop was that, if Aborigines were assisted with education and employment, they could then compete on the open market for the housing available. This viewpoint, however, is somewhat unrealistic:

- (a) to begin with, the backlog of housing is very great for Aborigines;
- (b) there is an overall shortage of low rental accommodation;
- (c) low levels of formal education and chronic unemployment in the past make it unlikely that a substantial section of the Aboriginal population will be able to find permanent employment, especially in the present economic climate;

- (d) there is very marked discrimination against Aboriginal tenants by private house owners in all areas, making Aborigines almost completely dependent on the State Housing Commission for accommodation.

An additional source of bitterness is the fact that \$4.556 million allocated by the Federal Government to the State Government in 1974-75 for Aboriginal housing remained unspent and that again in 1976-77 something in the vicinity of \$16 million, appropriated for various aspects of Aboriginal affairs within Australia, remained unused, so that the actual cut in Aboriginal housing was even greater than it had appeared in the Budget papers.

#### STATE HOUSING COMMISSION

It can be seen that the S.H.C. has been almost the sole provider of homes for Aboriginal people in Western Australia since responsibility devolved on it from the Department of Aboriginal Affairs in 1972. Complaints of discrimination against this body are legion. Neither individual families nor Aboriginal organisations know on what criteria tenants are selected, and complain that the Welfare Section of the Commission, with which they come most in contact, is harsh and unsympathetic. Liaison of an ongoing kind urgently needs to be established and sensitive personnel employed by the Section to avoid these charges.

The general manager of the Commission, Mr. K.M. McKenna, was recently reported as stating that the policy regarding Aboriginal tenants is as follows (*West Australian*, June 30 1977):

'Having regard to previous inadequate experience on the part of Aboriginal tenants and prospective tenants, the Commission will not insist on tenants maintaining full standards of domestic hygiene, property care and social behaviour right from the beginning of tenancy. It will, however, expect tenants to make and maintain positive endeavour in that direction, including the acceptance of guidance from appropriate agencies. While there is positive response and progressive improvement, the Commission will persevere with the tenancy. But failure to respond will mean action to terminate the tenancy.'

About half the 26 country local authorities circularised with this statement took exception to it on behalf of their white residents. Indeed, the Housing Commission is frequently under pressure from whites against Aborigines.

Many Aboriginal tenants complain (and their complaints were sustained by an officer of the Department of Community Welfare concerned with housing) that in practice 'anti-social behaviour' is considered to have taken place where there has been a complaint from white neighbours, without an investigation having been carried out as to its accuracy; and that to expect tidiness is unrealistic in a house which is grossly over-crowded, as many Aboriginal houses are, due to the acute lack of accommodation; nor can a housewife be expected to display her skills when she and her family are living in a tent.

A veritable 'Catch 22' situation is likely to occur when a family cannot get a house because its children are in care, and cannot get the children out of care because there is no house for them to occupy.

#### RESERVES

Aboriginal opinion is divided as to whether or not reserves should be retained. Some say that, if the reserves are closed, the squalor in which they largely exist will be avoided, and townspeople will be forced to accept Aborigines living in their midst. A substantial number of Aborigines, however, (probably the majority) consider that reserves should be retained and upgraded because:



- (a) they are the only economic asset that Aboriginal communities possess;
- (b) given past history, it is most unlikely that white communities in country towns will have a change of heart and make of their town accepting places in which Aborigines may live without constant anxiety and pressure;
- (c) even those who already live in the towns appreciate the existence of an all-Aboriginal community to which to retire temporarily to lick their wounds and obtain solace from their kinship group, the only people on whose support they can rely.

The Minister for Aboriginal Affairs on 20 October stated that Federal Government policy was to close down all Aboriginal reserves in Western Australia within the next few years. The reason indicated for this decision was the degraded state of most reserves, with their sub-standard housing, and lack of amenities and employment opportunities. In August 1977, a newspaper report (*Sunday Independent*, August 21) stated that the local Shire's health surveyor was threatening to bulldoze houses on the Carnarvon reserve, which contained 160 Aborigines, because they did not contain the basic necessary sanitary facilities as required by the Health Act.

It was not possible, in the time available, to visit reserves (other than Pingelly) but a combined report by the West Australian Alcohol and Drug Authority and the Aboriginal Advancement Council, dated January 1977, gives an indication of the degraded conditions of many of these areas:

*Wiluna Reserve*

Situated four miles east of the town, the reserve accommodates about 486 Wongais. The Reserve we can only describe as pathetic. There appear to be a dozen tin shacks which include showers and toilets which do not function and have not done so for some time. . . We noticed many makeshift shelters made of mulga bush, sheets of iron and old blankets . . . Accommodated in these humpies are numerous small children who appeared bored and lethargic.

*Mt. Margaret Mission*

Their tin houses, they said, were 'boiling in summer and freezing in winter.' It was obvious that it had been many years since any maintenance has been done. . . The manager showed us around the mission which looks like a major disaster area. The rains come and wreck the tin buildings and the winds blow them apart. He tries to do the maintenance but there is no money or equipment. He also is not provided with a vehicle and has to use his own car for transporting food and any other requirements. . . His car is also often used as an ambulance. The more we saw of the mission the worse it got. The school can only be described as shocking. The weatherboard building with a corrugated roof is once again very hot in summer and cold in winter. The toilets do not function properly and there is very little useable furniture and little if any educational equipment for the children. Under these conditions it is little wonder that the children lose interest and get bored quickly . . . Not enough money to buy diesel fuel for the electrical plant . . . there was little water.

*Leonora Reserve*

Like other reserves, we saw the people living in small tinshed-type dwellings. A few of the Wongais made their own humpy dwellings out of anything available. Once again the reserve was sadly lacking in trees.

It is almost superfluous to add that people who live in such degraded circumstances are not held in high regard by local whites and suffer acutely from the usual 'blaming the victim' prejudices and discriminations. Indeed, their whole situation could be described as discriminatory, as it is not possible to point to entire white communities anywhere in Australia who live in anything like similar circumstances. But it is not the existence of reserves *per se* which brings about this wholesale degradation; it is the utter decay into which they have been allowed to lapse. An editorial in the *West Australian* (September 8, 1977) comments:

Though much criticised in its time, it (Allawah Grove reserve) appears to have kept its inhabitants happier than they were later under Swan River bridges and in abandoned houses. And at least it provided a small barrier against white envelopment.

The Pingelly reserve has officially been closed and the remaining houses have been allowed to fall into complete decay. There are, however, seven 'transitional' houses occupied by Aboriginal families near the reserve. Originally these houses were built for families coming off the reserve, so that they could accustom themselves to town-style living in easy stages. Such was the rationale. In fact, such houses (in Western Australia and in the other States) were sub-standard from the start were extraordinarily hard, if not impossible, for the housewife to maintain at any reasonable standard. A report on the health of the inhabitants of these seven houses was made on 21st February 1977 by the visiting Health Sister. She comments that temperatures indoors are unbearably hot in summer and cold in winter, that there are no fly-wires on doors or windows, that mice and cockroaches freely breed in the cavity walls, that wood-stove cooking gives rise to fumes and carbon deposits, and that the sewerage disposal system does not function adequately. 'The psychological effect on the people living in these houses . . . is profound . . . Alcoholism, aggression and depression are made worse, living under such difficult and poor conditions.'

It is not surprising to learn that such woeful living conditions give rise to equally woeful health. The statistics collated by the Sister give a horrifying picture: In December 1976, 16 people from these seven houses were admitted to hospital, and in January 1977, 14. Many more sick people were treated at home. Most had chest infections or bronchitis, others had ear and eye infections, diarrhoea, boils and sores, scabies and impetigo. The Sister comments: 'People feel ashamed and looked down on by more fortunate inhabitants at Pingelly'. Once more, in a country which prides itself on high health standards, the contrast between black and white amounts to a fierce and continuing discrimination.

#### POLICE

It is doubtful whether there are many Perth Aboriginal families who have not had dealings with police. Almost all maintain that there is continuous discrimination against them. Such documentation as is available would support that claim. (*Fear, Favour or Affection*, Elizabeth Eggleston, A.N.U. 1975; Report of the Royal Commission 1975-1976). Among the epithets used by some individual police to describe Aborigines were: 'this peanut', 'bloody coons', 'boongs'. The Laverton Report into the Skull Creek incident, which was highly critical of police proceedings in the matter, did not, as far as is known, produce any act of discipline against the police concerned. There is a realisation among Aborigines that police are the agents of white society and have to do its bidding, but some are seen to do their duty in this regard with unnecessary gusto.

Following on the Skull Creek episode, a Special Cabinet Committee on Aboriginal-Police Relationships was set up under the chairmanship of the Director of Community Welfare, Mr. Keith Maine. Individual complaints against the police are not handled. (So far, these could only be reported to the Aboriginal Legal Service, which has limited facilities and is only equipped to handle complaints of a legal nature). Officers of the Department of Community Welfare have delivered a total of 75 45-minute lectures to police personnel during 1977 on traditional culture and social work issues, and it is proposed to increase this number in 1978. Despite these efforts, complaints of discrimination by Aborigines against various police personnel abound and it seems clear that further administrative arrangements are required to develop police-Aboriginal ongoing liaison in each district, something along the lines of those which have proved successful in South Australia.

## ROLE OF THE MEDIA

During the period of nine to ten months in 1977 when the plight of the Aboriginal homeless was receiving considerable attention, the attitude of the media was, on the whole, sympathetic, and included photographs of the appalling living conditions of many Perth Aboriginal families. This did not, however, prevent the publication of material of an inaccurate and overtly racist nature, such as a letter to the editor (*West Australian* 27 September 1977) claiming that the inhabitants of Saunders Street were 'ransacking nearby homes' and committing 'assault and harassment' while police stood idly by. When a group of Aborigines made a protest trip from Lockridge to Canberra, to contact Aboriginal communities and to draw attention to their sorry state, media coverage became less favourable. Emphasis was given to the statement by the Minister for Aboriginal Affairs that the Aborigines concerned were being manipulated by whites. The comment of the Aborigines — that this was a slur on them — was not sought. In general, this follows the line of the media presentation of Aboriginal matters in other States (with notable exceptions) where wretched living conditions are highlighted and sympathetically portrayed, but where the many stoic and successful efforts of Aborigines to right wrongs done to them are denigrated or ignored.

## CONCLUSION

Not only in Western Australia, but as part of a nation-wide trend of considerable proportions, more and more Aborigines are leaving rural areas and coming to the city, in search of employment and housing and to escape the pressures of prejudice. And yet, because the city brings closer contact with whites, the amount of discrimination appears to be increasing against Aborigines in Western Australia. Aborigines themselves and officers of government and private organisations tell of predictable and endless discrimination on the part of employers, landlords and legal administrators. A Consultative Committee to the Commissioner for Community Relations has recently been formed, with the assistance of the Anglican diocese (though it spans interests beyond the churches) to which individual cases of discrimination in Perth can be brought for conciliation. This banding together of black and white in an endeavour to tackle the problem is an indication of the awareness of sections of the general community as to its dimensions and to a prevalent concern for social justice. Admirable as this initiative is, it is doubtful whether it can be expected to mount the wholesale attack on ingrained prejudice which a government agency, acting on behalf of the total community, could achieve by conciliation, community education and, where all else fails, by legal action.









