

30 March 2015

Committee Secretary
Senate Legal and Constitutional Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Sir/Madam

Re: Submission to committee on the Migration Amendment (Maintaining the Good Order of Immigration Detention Facilities) Bill 2015 [Provisions]

I would like to express my concerns in relation to the Migration Amendment (Maintaining the Good Order of Immigration Detention Facilities) Bill 2015 [Provisions].

I am concerned that the Minister for Immigration alone will be allowed to determine the training and qualification requirements for authorised officers. These qualifications should be listed in the bill.

I am also concerned that while detainees are able to lodge a complaint about their treatment in detention facilities, investigations will be 'conducted in any way the Secretary thinks appropriate'. This is unacceptable. Further, the Secretary may decide not to investigate if it is believed that the complaint is "frivolous, vexatious, misconceived, lacking in substance or is not made in good faith"; or "not justified in the circumstances." This implies that any complaint may be disregarded.

The lack of standards around the treatment of asylum seekers is a source of shame. It is unacceptable that so many detainees suffer physical and psychiatric abuse, and this bill appears to seek to limit these people's rights to fair treatment and redress.

Regards

Justine Donohue