

30 May 2014

President of the Commission, Professor Gillian Triggs
National Inquiry into Children in Immigration Detention 2014
Australian Human Rights Commission
GPO Box 5218
Sydney NSW 2001
Australia

Dear President,

Re: National Inquiry into Children in Immigration Detention

NAPCAN (National Association for Prevention of Child Abuse and Neglect) welcomes the opportunity to respond to the National Inquiry into Children in Immigration Detention.

NAPCAN is a national not for profit organisation that advocates on behalf of children and young people to promote positive change in attitudes, behaviour, policies, practices and the law to prevent abuse and neglect and ensure the safety and wellbeing of all Australian children.

NAPCAN's strategy is to bring about the changes necessary in individual and community behaviour to stop child abuse and neglect before it starts by:

Promoting quality child abuse prevention research:

Promoting quality research so that the causes and impact of child abuse and neglect can be better understood and effective ways to prevent it can be developed and measured.

Advocating for child safe policies and strategies:

Advocating for changes in policies and strategies that place the wellbeing of children and young people first.

Coordinating National Child Protection Week and promoting the PLAY YOUR PART initiative:

Informing public awareness and attitudes, so providing a safe community for children and young people is a concern shared by all Australians. To provide educational information and resources to ensure everyone has the knowledge and skills needed to take action in small or large ways to support children and families and reduce child

abuse and neglect in Australia.

Demonstrating good practice:

Developing and promoting community led prevention programs and initiatives that are evidenced based and effective in reducing the risk of child abuse and neglect.

This response to the Inquiry is informed by NAPCAN's work with communities across Australia and the knowledge and expertise of staff. It particularly draws on direct observations from NAPCAN's work in providing training to staff working in Detention Centres in the surrounds of Darwin on child safe practices.

NAPCAN recognises that a significant number of submissions will be made to the Commission which will extensively cover the large volume of available research on the impacts of immigration detention on children and families. In this letter we would instead like to share with the Commission our direct observations and experience from working with staff from Wickham Point Detention Centre and Darwin Airport Lodge Detention Centre (the DAL) in Darwin. In these Centres NAPCAN provided training sessions, funded by the Department of Immigration and Citizenship (now the Department of Immigration and Border Protection- DIBP), which all staff were mandated to attend.

Staff attending workshops were primarily from:

- Department of Immigration and Citizenship (now DIBP)
- International Health and Medical Services (IHMS)
- SERCO
- Life Without Barriers (while they were contracted to deliver services in the Centres)
- Maximus Solutions
- Australian Red Cross

In the last two years NAPCAN has provided approximately 40 training sessions to staff working in the detention facilities. Anecdotal feedback received at and from these sessions includes specific concerns around the safety and wellbeing of children, in both the short and long term. These are outlined under particular themes below:

On-shore immigration detention facilities

1. The accommodation at all facilities in and around Darwin are not designed for children or for families or for long-term residency. Children have been living in the same room as their parents for often lengthy periods of time, which is a recognised as a risk factor for abuse and neglect. These risks to children's wellbeing in some facilities extended to parents having no identified 'private' space or room to engage in sexual relations as all space is shared with their children for prolonged periods. This means that in some circumstances children and young people may be exposed to behaviours between their parents that are not conducive to their wellbeing.

2. High risk associated with regular periods of overcrowding particularly affecting Unaccompanied Minors (UAM's). Children experiencing distress due to lack of privacy, gaps in showers and toilet doors, lack of space for prayer & personal space and bullying. Other risks associated with regular periods of overcrowding meant that insufficient cots were available, resulting in babies having to sleep in the same beds as their mothers causing distress to parents concerned about accidentally injuring their child.

Parent-child attachment and understanding parenting roles

1. Common risks identified by staff included children being left unsupervised by parents for lengthy periods of time (due in part to high levels of parental depression, anxiety and isolation) and a perceived reliance on staff to provide a 'Community' supervisory role. This could lead to further potential risks that upon leaving such facilities children are not appropriately supervised when living in communities across Australia.
2. The most common concern (raised at the majority of workshops) was about children staying up very late at night (mostly unsupervised by parents) and then being unwilling to attend school or activities the following day. Consequently children were irritable and if they did attend school, unable to function effectively.
3. Concerns regarding the varied views that parents held regarding safe parenting and particularly on corporal punishment of children that would trigger a child protection response. Many recommendations related to the need for parents to learn about positive parenting practices and also learn about Australian child protection laws.

Staff training and preparedness to deal with issues concerning children's safety and wellbeing

1. Non-medical staff were often unaware of the impact of trauma on children's emotional wellbeing and subsequent behaviour (and the behaviour of families). Staff expressed value in learning strategies to address traumatised behaviour.
2. Many participants advised that this was the only training of its type that they had ever received while working in Immigration Detention facilities in other States and Territories.
3. Participants valued the opportunity to focus on children and using local services to meet their developmental, emotional, and psychological needs. Participants were actively encouraged by DIAC senior management at most workshops that NAPCAN delivered to be proactive and creative to ways to help young people/families experiencing difficulties (or displaying early warning signs of harmful behaviour). Staff were encouraged to address any bonding and attachment between parents and babies/young children by linking them to appropriate services. This is a common and significant risk factor for children's wellbeing and development given the significant levels of anxiety, depression and isolation experienced by most parents living in Immigration Detention Centre environments.

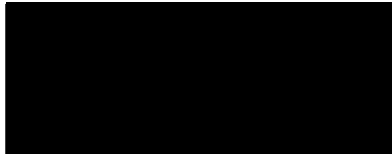
A child's wellbeing and development requires more than freedom from abuse and neglect, it also requires a stable, nurturing and supportive environment for them to thrive.

However if Government policy requires families to be detained either on-shore or off-shore, then to meet the basic needs of children NAPCAN recommends:

1. Enhancing the training that DIBP currently provides to staff. Participants have recommended that similar workshops to that provided by NAPCAN be implemented to all staff delivering services to children and families in Immigration Detention Centres across Australia. Workshops to incorporate:
 - a. information on abuse and neglect laws in each State & Territory
 - b. briefing on risk, protective factors and early warning signs for abuse and neglect
 - c. education on the impact of trauma on children and their caregivers
 - d. time for brainstorming and interactive learning with participants to address common concerns around children and parents
 - e. information about local family and child centred services, and
 - f. referral to additional online and physical resources, tools and information about child development/trauma responses as well as research on relevant topics (for example: child development and trauma informed practice)
2. Unrestricted access to developmentally appropriate facilities – such as preschool, school and play centres.
3. Timely and full access to health professionals (which may include providing translators for visits), including paediatricians and mental health professionals, as well as early childhood specialists who would be able to work with parents and their children on attachment and psychosocial development.
4. Adequate facilities for housing – with Australian standards for sanitation, ensuring limited numbers of individuals are housed in an assigned space to prevent overcrowding with access to appropriate facilities to ensure privacy even in same-gender environments. This would include provision of private space for parents away from their children.
5. Regular access to translators and language classes to enable participation in the community around them and to facilitate understanding of broader circumstances.
6. An independent Guardian or Advocate, particularly for UAM's, to assist them in navigating the challenges of the system and in advocating for decisions that are in their best interests.
7. Independent oversight of centres in which children are detained by the Human Rights Commission or an independent non-government organisation such as the Australian Red Cross – to regularly review facilities and services for children and young people.

NAPCAN appreciates the opportunity to contribute to this Inquiry. We would be pleased to provide more information should you require it.

Yours Sincerely,



Richard Cooke
Chief Executive Officer
National Association for Prevention of Child Abuse and Neglect (NAPCAN)

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