

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

31st July 2009

Dear Sir

The Immigration Detention Reform Bill is still badly lacking in many aspects and is not tackling important issues.

Firstly, all detention values and practices must apply to Christmas Island in the same way as the rest of Australia. If this is not done it is just a cop out from decent humane behaviour and smacks of the immoral practices of the Howard Government of which Australia will be ever ashamed and criticized by the rest of the world.

Children must not be held in detention **of any kind**. We were promised that children would not be held in detention and yet in May of this year 100 children under 18 were incarcerated in some form or other, much to our shame.

Clear, specific regulations should be laid down for prompt, timely reviews of those in detention by two or three qualified officials, not just one. Most importantly any recommendations made by the Ombudsman must be enforceable and his independent review should be carried out no later than 90 days after the asylum seeker/refugee has been detained. At the moment detainees are still being held far too long with very often unsatisfactory reviews being held by biased officials and often without adequate translators being present.

Finally it is essential that it is laid down in the Bill that the Minister does not delegate his ministerial powers of intervention, to a DIAC officer. Peoples' whole lives are at stake and they deserve more senior, influential, independent and intelligent attention.

Yours faithfully

Audrey Raymond