

PROPOSED YONGAH HILL IMMIGRATION DETENTION CENTRE HARDENING PROJECT

at

MITCHELL AVENUE, NORTHAM WESTERN AUSTRALIA

STATEMENT OF EVIDENCE

SUBMISSION 1

to the

PARLIAMENTARY STANDING COMMITTEE ON PUBLIC WORKS

Department of Immigration and Border Protection Canberra, ACT

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GLOSSARY

Abbreviation	Meaning
AS	Australian Standard
BCA	Building Code of Australia
DDA	Disability Discrimination Act
DIBP	Department of Immigration and Border Protection (the Department)
EMP	Estate Management Plan
EPBC Act	Environment Protection and Biodiversity Conservation Act (1999) (Cth)
ESD	Ecologically Sustainable Development
FMA	Financial Management Act
IDC	Immigration Detention Centre
IDN	Immigration Detention Network
IHMS	International Health and Medical Services
IMA	Illegal Maritime Arrivals
IRH	Immigration Residential Housing
ITA	Immigration Transit Accommodation
MITA	Melbourne Immigration Transit Accommodation
MNES	Matter of National Environmental Significance
MOU	Memorandum of Understanding
PM/CA	Project Manager and Contract Administrator
PWC	Public Works Committee
YHIDC	Yongah Hill Immigration Detention Centre

1. Executive Summary

1.1. Policy Framework

The Immigration Detention Network (IDN) exists to support the delivery of Government policy including the Department's detention and compliance objectives in relation to immigration and border protection. Immigration detention remains an essential component of effective border management, contributing to national security and community protection.

The held immigration detention population is reducing given lower risk detainees are generally placed in the community as soon as practicable. This has significantly changed the profile of the held immigration detention population, with a growing proportion of the population being medium to high risk. An increasing number of the immigration detention population have had their visas cancelled on character grounds, due to criminal convictions and links to organised crime or outlaw motorcycle gangs. Others are not able to be released into the community for security reasons, or because of behavioural concerns while residing in an immigration detention facility.

Most facilities in the IDN are not fit-for-purpose to manage an increased higher risk cohort, and to maintain separation between cohorts, as they were largely designed to accommodate a low to medium risk caseload. They also do not have appropriate facilities and security to manage the visitors of higher risk individuals, who also present a range of risks to the good order of immigration detention facilities.

DIBP has reviewed its detention capability with a view to contracting the immigration detention footprint, and delivering an onshore IDN that will meet operational requirements now and into the future. Facilities must provide flexibility to manage a range of cohorts, including higher risk groups, and provide sufficient security to support the maintenance of good order.

In the 2016-17 Budget process, the Government announced the closure of three immigration detention facilities over the next 24 months given the reduction in the held detention population, and the decision not to extend the lease of a fourth. It also announced investment in three key remaining facilities in the network to make them fit for purpose to manage increasing numbers of higher risk detainees. These are the Melbourne Immigration Transit Accommodation (MITA), the Yongah Hill Immigration Detention Centre (YHIDC), and Villawood IDC. Timing of some facility closures is linked to establishment of new higher security capability at the three key sites listed above, which are required to support compliance operations in the east and west.

The YHIDC is the subject of this Parliamentary Standing Committee on Public Works (PWC) referral.

1.2. Need for the Works

The IDN is being rationalised given the reduction in the held immigration detention population, and the number of facilities in Perth are reducing.

Perth Immigration Residential Housing (IRH) is closing at the end of 2016, as it is a low security facility and not suitable for the increasing risks posed by the immigration detention population. It is also not required given the reduced numbers in immigration detention.

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Perth IDC is suitable for a short-term caseload only, as it is small and does not have suitable amenity for a long-term population.

YHIDC, therefore, has been selected to be the primary facility in the west. It is a low to medium risk facility, and must be modified to provide capacity to separate different cohorts, and to provide flexibility to house high to extreme risk detainees in some compounds. This will reduce the need for additional guarding which is more expensive.

The Department proposes to upgrade two compounds to provide:

- a) 120 higher security beds;
- b) Adequate amenity to allow the two upgraded compounds to operate self-sufficiently if they are 'locked down' to maintain good order in the facility;
- c) Capacity to separate cohorts within the compounds; and
- d) More sophisticated and suitable security infrastructure.

As YHIDC is a brownfield site there are existing infrastructure and engineering services that can be tapped into for the upgrade. Some facilities, such as the kitchen, medical, classrooms, and oval will be shared by lower and higher risk caseloads on a rostered basis, when security allows, in order to minimise project costs.

Design principles are based on the assumption that the centre will be basic yet functional, and will provide the increased levels of security required for higher risk individuals. The principles also assume that the higher risk compounds will be largely self-sufficient so that they can be managed in lock-down, for a sustained period of time, in the event of detainee unrest.

1.3. Proposed Approach

The design and construction methodology balances the economy of construction with sustainable design principles through the implementation of off-site construction methodology and minimisation of material waste, embodied energy and transport energy when compared with conventional construction methodologies.

Detainee accommodation rooms are proposed to be furnished with basic and functional fittings that are appropriately secure. The facilities would reflect the style of other mainland Australian IDCs that provide higher levels of security.

Buildings will be designed and constructed in such a way that considers the ongoing repairs and maintenance costs to ensure best value for money over the life of the centre, with longevity of the assets a key consideration.

The YHIDC facilities upgrade will include:

- a) Decommissioning of existing bedroom and ancillary amenities accommodation in Eagle and Swan compounds; and
- b) Construction of 120 hardened beds in four compounds at an estimated cost of \$27.4m, including the following amenities and facilities:

- i) New vehicle Sallyport;
- ii) 60 new ensuite bunked bedrooms providing 120 beds across four compounds;
- iii) Small medical services space for routine drug dispensing and consultations;
- iv) New higher risk detainee reception and dispatch;
- v) New internal movement control points;
- vi) A Central spine of facilities for each compound including; recreation room, gym, classroom, tea point, laundry, servery and telephones;
- vii) The introduction of a new sterile zone with visible deterrents and active security surveillance; and
- viii) New officer post.

Costs include associated decommissioning, civil works, in-ground services, ICT, fencing, lighting, security, landscaping, preliminaries, consultant fees and contingency.

2. Need for the Works

2.1. Project Objectives

The project objectives are to achieve:

- a) 120 higher security beds and associated amenity and security at YHIDC;
- b) Flexibility to separate and manage a variety of caseloads;
- c) More sophisticated security arrangements; and
- d) Cost effective and sustainable infrastructure/asset management.

The operational drivers for the YHIDC project are to:

- a) Provide increased higher security accommodation to meet operational requirements;
- b) Effectively manage the welfare of detainees through appropriate access to:
 - i) Education;
 - ii) Training;
 - iii) Health services;
 - iv) Recreation and sporting amenities; and
 - v) A secure and safe environment.
- c) Provide a safe environment for detainees, visitors and staff; and
- d) Provide adequate delay for escape attempts to give the Detention Service Provider time to respond.

2.2. Historical Background

On 18 October 2010 the Minister for (then) Immigration & Citizenship announced the Northam Military Training Camp as the location for a 1500 bed facility to accommodate single male asylum seekers, with a practical completion date of March 2011.

On 9 May 2011 the Minister announced the capacity of the Yongah Hill Immigration Detention Centre (YHIDC) would be reduced from 1500 to 600. This included a reduction in the capital budget.

YHIDC became operational on 27 June 2012 and was designed for low to medium risk detainees.

YHIDC contains four accommodation blocks, education, library, lounge/canteen, health care, counselling, interview, visits, kitchen, a behavioural management unit, and dining facilities. It also contains recreation facilities including a large gymnasium and sports field. Capacity for separation of cohorts is limited and compounds are not self-contained, so lock down capacity is limited to very short periods.

YHIDC has a bed capacity of 600 with no surge capacity.

A site plan of the existing centre is attached (Annexure B).

2.3. Identified Need

In putting forward its 2016-17 Budget proposals, the Department considered options for compressing the immigration detention footprint in Western Australia given numbers in detention were reducing.

Establishment of a new facility was discounted as it was much more expensive.

YHIDC was the only existing facility of a suitable size to meet the long term immigration detention requirements. It was on Commonwealth owned land, and leveraging off an existing facility and services reduced the costs of establishing new higher security capability.

Two compounds at YHIDC must be substantially rebuilt in order to provide 120 higher risk beds. The work will reduce the number of beds available at that site from 600 to 450.

Two existing compounds at YHIDC will continue to accommodate the lower to medium risk cohort.

2.4. Key Legislation

The following key legislation is relevant to this project:

- a) Environment Protection and Biodiversity Conservation Act 1999;
- b) Building and Construction Industry Improvement Act 2005;
- c) Federal Disability Discrimination Act 1992;
- d) Work Health and Safety Act 2011 (Cwlth);
- e) Work Health and Safety Act 2014 (WA);
- f) Financial Management and Accountability Act 1997;
- g) Fair Work Act 2009 (Cwlth); and
- h) Relevant Australian Standards and the National Construction Code are applicable to all design, fabrication and installation works.

2.5. Caseload

The Department proposes to create hardened capability to manage higher risk detainees. There is a significant undersupply of higher risk beds in Western Australia, with a small number currently available at Perth IDC. These beds can only be used for short-term stays as there is inadequate space and amenity for a longer-term population. The Department requires 120 hardened beds at YHIDC to provide operational flexibility in managing a more difficult and longer term caseload that is trending toward high to extreme risk detainees.

Detainees accommodated in the hardened accommodation will be medium to extreme risk of varying nationalities. It is anticipated they will all be male.

Existing compounds in YHIDC can be used flexibly but will generally house lower security caseloads.

2.6. Accommodation Types

New accommodation buildings will be of a modular construction. This form of construction reduces construction time, delivers cost savings through economies of scale, improves quality control, and reduces maintenance costs.

The design reference for the accommodation building is the NSW Corrective Services Industries modular buildings with modifications. This building typology has been successfully integrated within NSW Corrections facilities.

Accommodation buildings are designed to be high security. The external perimeter of the building forms the secure containment including walls, floors and ceiling. External doors and windows will be fabricated and installed to withstand attack. The building will provide a level of containment consistent with the operational needs of the Department.

Two variants of the building provide 10 and 20 bedroom alternatives. Each bedroom is bunked. Each 10 bedroom 'pod' can be securely locked down in the event that cohorts require restricted movement.

Each building is equipped with an officer post, an open communal recreation space and smaller ancillary rooms which can be adapted to multiple uses including multi-faith, storage or computer room, depending on future requirements.

2.7. Level of Amenity

The existing protections and welfare arrangements for detainees will be maintained and include:

- a) Accommodation standard commensurate with risk profile;
- b) Appropriate physical and mental health services; and
- c) Access to recreation, programs and activities.

As the YHIDC site has already been developed, the existing recreation, educational and other amenities will be available for use by the higher risk cohort on a rostered basis.

3. Project Context

3.1. Purpose of Works

Refer to section 2.3 – Identified Need.

3.2. Site Description

YHIDC is located approximately 90km east of Perth and 5km from the town centre of Northam WA. The Shire of Northam is located within the Avon sub-region of the WA Wheatbelt. The Shire is home to more than 11,730 people (ABS 2013) with approximately 62% located in Northam. The location of the facility is shown in **Annexure A** and an existing concept site plan is contained in **Annexure B**.

Northam is the largest town and regional service centre of the Avon Valley and Central Wheatbelt. The town has been established by the State Government as a regional centre, resulting in many government departments maintaining a strong presence there.

The town is home to a number of public facilities that include a library, hospital, senior citizens' centre, recreation centre, three major sporting grounds and an Olympic swimming pool. Northam also has a Senior High School, the CY O'Connor College of TAFE, Muresk Institute of Agriculture (division of Curtin University), three Primary Schools and St Joseph's School, which provides education to Year 10. Bakers Hill and Wundowie also have primary schools.

Northam is also the focal point for important rail and road links to Eastern Australia.

In terms of the immigration detention facility itself, YHIDC is comprised of demountable buildings. There are currently four accommodation compounds with shared amenities. The four accommodation compounds are: YHIDC 1 Eagle, YHIDC 2 Swan, YHIDC 3 Falcon and YHIDC 4 Hawk.

3.3. Land Acquisition, Zoning and Approvals

The land is owned by the Commonwealth (Department of Defence), and is accessed by DIBP under a MOU and as such is not controlled by the State Planning Scheme, therefore there is no requirement for planning and development applications. The design and construction however are subject to sign off by a registered Building Surveyor (who has been appointed to the PM/CA team.)

3.4. Stakeholder Consultation

During the development of the project, consultations with the following key stakeholders have been used to inform the design and operation of YHIDC and consultation with these stakeholders will be on-going throughout the project.

Stakeholder Group	Description
Federal Government	Department of Immigration and Border
	Protection
	Department of Finance
Contractors and service providers	Serco, IHMS

Table 1: Stakeholder Groups

3.5. Impact on Local Community

The upgrade of the facility at YHIDC will have no increased long-term impact on the local community due to its operations because:

- a) The upgraded facility will reside entirely within Commonwealth owned land; and
- b) There is no increase in bed numbers at the site.

Whilst the two upgraded compounds will provide for a more difficult caseload that is trending toward high risk detainees, the internal security will be improved so as to maintain good order. Guarding arrangements are in place to manage this until the new infrastructure is in place.

In the short term there is potential for the local community to be inconvenienced during the course of the construction period. The on-site works will take around 12 months to complete over 2016-17 and 2017-18 financial years. In order to mitigate any impact to the local community during the construction period, the PM/CA will require the head construction contractor to prepare and implement its Site Management Plan as a precursor to taking possession of site.

3.6. Long Term Use

The Department now requires purpose-built higher security compounds at YHIDC to provide operational flexibility in managing a more difficult caseload that is trending toward high risk detainees.

3.7. Environmental Considerations

- a) The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the Australian Government's key environmental legislation. Under the EPBC Act actions that have, or are likely to have, a significant impact on a matter of national environmental significance (MNES) require approval from the Australian Government Minister for the Environment and Energy.
- b) The YHIDC facility resides in a brownfield site. The upgraded facility will be redeveloped within the existing footprint of YHIDC and as such, the Department understands that there are no environmental impacts that need to be taken to account in the redevelopment. Nonetheless the PM/CA and the head construction contractor will have measures in place to limit any impact the project will have on the environment and local community.

3.8. Heritage Considerations

There are no known heritage issues that are required to be addressed in relation to this proposal.

4. Technical Information

4.1. Operational Concept

The following operational drivers underpin the design of this project:

- a) The provision of hardened accommodation to meet the shift in the type of cohorts coming through the centre;
- b) Provision of smaller compounds that can be more easily managed;
- c) Provision of a new detainee reception and dispatch building with search and vetting capability suitable for the type of cohort accommodated in the hardened accommodation;
- d) Introduction of movement control to enable movement of cohorts on site in a way that is safe for both cohorts and staff;
- e) Provision of equitable access to amenities including recreation, health, welfare and educational facilities for cohorts; and
- f) The compounds must be rebuilt in a staged way, as there are not sufficient beds in the IDN to allow closure of two compounds concurrently.

4.2. Planning and Design Concepts

The Concept Design Master Plan is shown at **Annexure B**. The following design considerations have been adopted in developing the design:

- a) The hardened compounds; Eagle A and B and Swan A and B have been designed to accommodate 120 higher risk detainees;
- b) The facility is designed to allow for segregation of the compounds in the event this is required for operational reasons;
- Detainees will be accommodated in one bedroom ensuite bunked accommodation units with access to a shared living area, recreational facilities, telephones, laundry and internet; and
- d) Meals will be provided from the central kitchen and dining area based on a programmed sitting for each cohort. If there is an operational requirement to do so then meals can also be delivered directly to a servery located within each compound.

The scope of work is anticipated to consist of the following major elements:

- a) Decommissioning of existing infrastructure and civil works including site clearance;
- b) Prefabricated construction;
- c) Engineering site services;
- d) Security works including the introduction of a sterile zone with physical and electronic detection; and
- e) Internal roads, shelters, paving and landscape works.

4.2.1. Site Planning

The accommodation buildings are positioned within secure fenced compounds. The main façade of the building acts as part of the compound secure barrier and will include anti-climb treatments so that the compound containment level is maintained.

Orientation of each building is dictated by the overall site planning requirements of each compound. The officer post within each building is positioned to maximise casual surveillance by staff of the internal and outdoor areas. This improves staff interaction with detainee activities and helps reduce reliance on CCTV monitoring.

4.2.2. Bedrooms

Bedrooms are configured as bunk bed accommodation with an internal wet area designed to provide an appropriate level of privacy for the occupants.

Furniture will be fabricated from steel, securely fixed into position and includes:

- a) Bunk bed with integrated bunk access ladder / handrail;
- b) Storage;
- c) Desk;
- d) Wall mounted polished stainless steel mirror; and
- e) Wall mounted noticeboard.

A single stainless steel combination toilet and hand basin is provided in a shared 'ensuite' wet area that contains a shower and a single secure floor waste. The ensuite is screened by two blade walls separating it from the sleeping area.

A single secure steel framed window is positioned centrally on the external wall providing partial ventilation and natural light. Ventilation is provided via a manually adjustable louvre. The louvre is secured behind a fine grain stainless steel perforated mesh to eliminate ligature points.

The bedroom door will be a 'life safety' door of robust construction. The door will incorporate a viewing panel and an institutional grade mortice lock and associated door hardware including block hinges. The door will act as a smoke door in the event of a bedroom fire. The steel door frame will be integral with the wall fabric.

4.2.3. Security

The security aims to provide capability to manage higher risk detainees.

Security measures are made up of architectural treatments, controlled access zones, intrusion and duress alarm monitoring, CCTV surveillance and other electronic systems. The security measures enable the efficient and effective monitoring and control of activity and access for the facility without impairing authorised movement.

The DIBP's security requirements will be implemented across the hardened compounds and include new internal fencing of the compounds of 4.5 metre height. There is an existing sterile zone and an external fence 5.4 metre in height.

4.2.4. Provision for People with Disabilities

Access and facilities for detainees with disabilities will be provided where required in accordance with the Disability Discrimination Act (DDA), the relevant technical requirements of the National Construction Code - Building Code of Australia, Access to Premises Standard (2010) and associated Australian Standards.

4.2.5. Work Health and Safety

Construction of the proposed works will be undertaken within the requirements of the Work Health and Safety Act 2011 (Commonwealth), Work Health and Safety Act 2014 (WA) and the National Guideline to AFP Health Safety Management Arrangements 2007 - 2012.

DIBP is committed to improving occupational health and safety outcomes in the building and construction industry. In accordance with Section 35(4) of the Building and Construction Industry Improvement Act 2005 (Commonwealth), contractors will be required to hold full occupational health and safety accreditation from the Office of the Federal Safety Commissioner under the Australian Government Building Construction Occupational Health and Safety Accreditation Scheme.

Safety in design workshops will be undertaken during the design phases of the project.

4.2.6. Materials and Finishes

Materials and finishes will be selected from those readily available locally for their functionality, durability, low maintenance and for their ecologically sustainable design properties.

New buildings will be constructed off-site as modular components and transported to site for installation. Modular construction reduces construction time frames, minimises wastage of materials and improves quality control.

Material selection and specification will achieve the containment requirements of high security accommodation, be fire retardant / non-combustible and of low maintenance.

A steel sheet laminated fibre cement product will form the main internal lining for the new accommodation buildings providing a robust, lightweight and repairable painted interior.

4.2.7. Mechanical Services

Reverse cycle air conditioning (heating and cooling) will be provided to all habitable areas throughout the facility.

Ventilation including fresh air and exhausts will be provided in accordance with the relevant Australian Standards

4.2.8. Electrical Services

Power infrastructure will be modified for the site to suit the new arrangement and in accordance with AS 3000 and other relevant standards. New lighting, lighting control and exit and emergency lighting systems will be provided for the areas of work. Internal lighting will be specified based on life cycle, and safety considerations such as high impact ratings. External lighting will be provided to be

suitable for safe movement and a CCTV environment. Telecommunications infrastructure will be provided to suit the functional requirements of the installation.

4.2.9. Hydraulic Services

Cold water and sewer infrastructure shall be modified to suit the new site arrangement in accordance with the relevant standards and authority requirements. Hot water plant and equipment will be provided locally adjacent to the buildings served as a series of satellite plant installations. Hot water temperature control will be installed throughout the area of works.

4.2.10. Fire Protection and Security Measures

Smoke detection will be provided throughout each building, except in areas such as kitchen and bathrooms, which may be subject to spurious alarms and will be served by heat detectors. The fire detection system will be interfaced to the security system to enable remote release of doors as required by the operational requirements of the facility to enable safe and secure control.

Active fire protection through hydrants, hose reels and extinguishers will be provided in accordance with the requirements of the National Construction Code (NCC).

4.2.11. Environmental Sustainability of the Project

The project will be designed in accordance with the Energy Efficiency requirements of Section J of the NCC.

Modular design and construction approach demonstrates better environmental characteristics for the whole of life when compared to conventional construction approach. This includes a reduction in waste, resources, material, embodied energy and transport energy and a reduction of both on-site and off-site construction times.

4.3. Related Projects

a) Hardening of two compounds at Melbourne Immigration Transit Accommodation (MITA).

4.4. Project Construction Scope

The scope for the self-contained secure accommodation works includes at least the following:

- a) Decommissioning and removal of existing accommodation within the Eagle and Swan compounds at the YHIDC, where possible retaining existing shared amenity;
- b) Construction of a new secure 120 hardened bed accommodation within four compounds. The Department has identified a suitable modular accommodation solution based on correctional service style accommodation (**Annexure C**);
- c) The compound will provide capacity for internal separation of detainee groups;
- d) The compound is to be self-contained and include detainee amenities such as laundry, telephones, internet facilities and recreational space;
- e) The project will introduce a new sterile zone to secure both the perimeter via anticlimb fencing and internal separation fencing to meet functional requirements;

- f) Other security elements will include CCTV capability, perimeter detection and security lighting;
- g) The project will include completion of any and all necessary civil works including connection of existing services; and
- h) As YHIDC will remain operational during the works, all works will have to be staged with the successful contractor(s) to ensure interruptions to the management of the Centre are minimised.

4.5. Applicable Codes and Standards

The building design must comply with the latest edition of:

- a) National Construction Code of Australia 2016;
- b) Relevant Australian & New Zealand standards for design; and
- c) Local authority requirements (i.e. local council, utilities, fire services).

5. Cost Effectiveness and Public Value

5.1. Outline of Project Costs

The Department has established a budget of \$27.427 million (excluding GST) for the provision of 120 hardened new beds and supporting accommodation on the basis of the current conceptual design. This budget includes provision for contingencies, cost escalation and associated professional fees. Funding for this initiative is through funds appropriated to the Department.

5.2. Project Delivery Strategy

The Department has engaged a PM/CA for the development of the works for the YHIDC facility in Northam. The PM/CA is responsible for the design of the permanent facilities and infrastructure, project management of all phases and contract administration of the construction contract on behalf of the Commonwealth.

The design team liaised with the modular supply market during the design development phase to rationalise and improve the design of the secure modules in order to drive the best value outcome.

Following an evaluation of the most appropriate procurement approach for the project, delivery of the works will be by a Principal Contractor. Following a competitive tender process a contract will be awarded under a construction contract modified by the Australian Government Solicitor to meet the specific requirements of this project.

The Principal Contractor will take on the risk and responsibility for interdisciplinary interfaces (e.g. civil, building, services and security) by managing the subcontracts for each individual trade.

5.3. Public Value

While the held immigration detention population is reducing, detained demographics are changing significantly with a growing population being higher risk. A growing number of the detention

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population have had their visas cancelled on character grounds, due to criminal convictions and links to organised crime or outlaw motorcycle gangs. Facilities in the IDN are consequently not fit for purpose to manage an increased higher risk cohort, as they were largely designed to accommodate a low to medium risk caseload. This shift in detainees has seen the requirement for hardened accommodation to ensure the Department has suitable accommodation to deal with the change in cohorts.

Public value associated with this proposal is realised through the ability of the Department to provide a secure environment whilst the status of detainees is resolved.

5.4. Revenue

No revenue will be derived from the project.

6. Master Program

A copy of the Master Program for the YHIDC upgrade project is contained in **Annexure D** and, subject to Parliamentary approval, construction is expected to be undertaken in two phases commencing in March 2017 and complete in March 2018.

In order to achieve the above master program dates it will be necessary to obtain PWC approval for concurrent documentation.

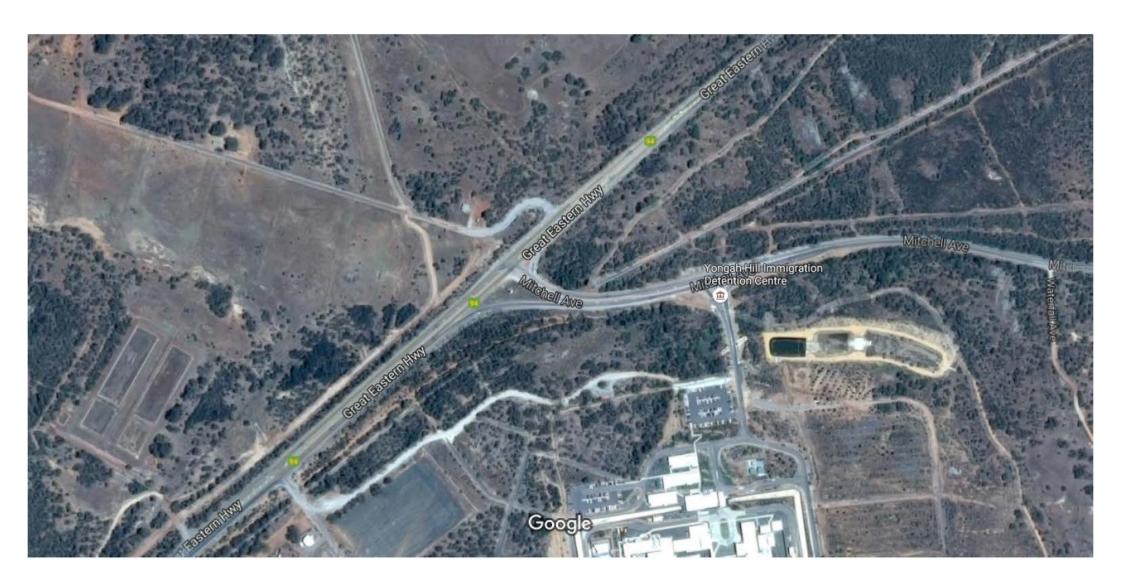
Proposed Yongah Hill Immigration Detention Centre Hardening Project at Mitchell Avenue, Northam, WA Submission 1

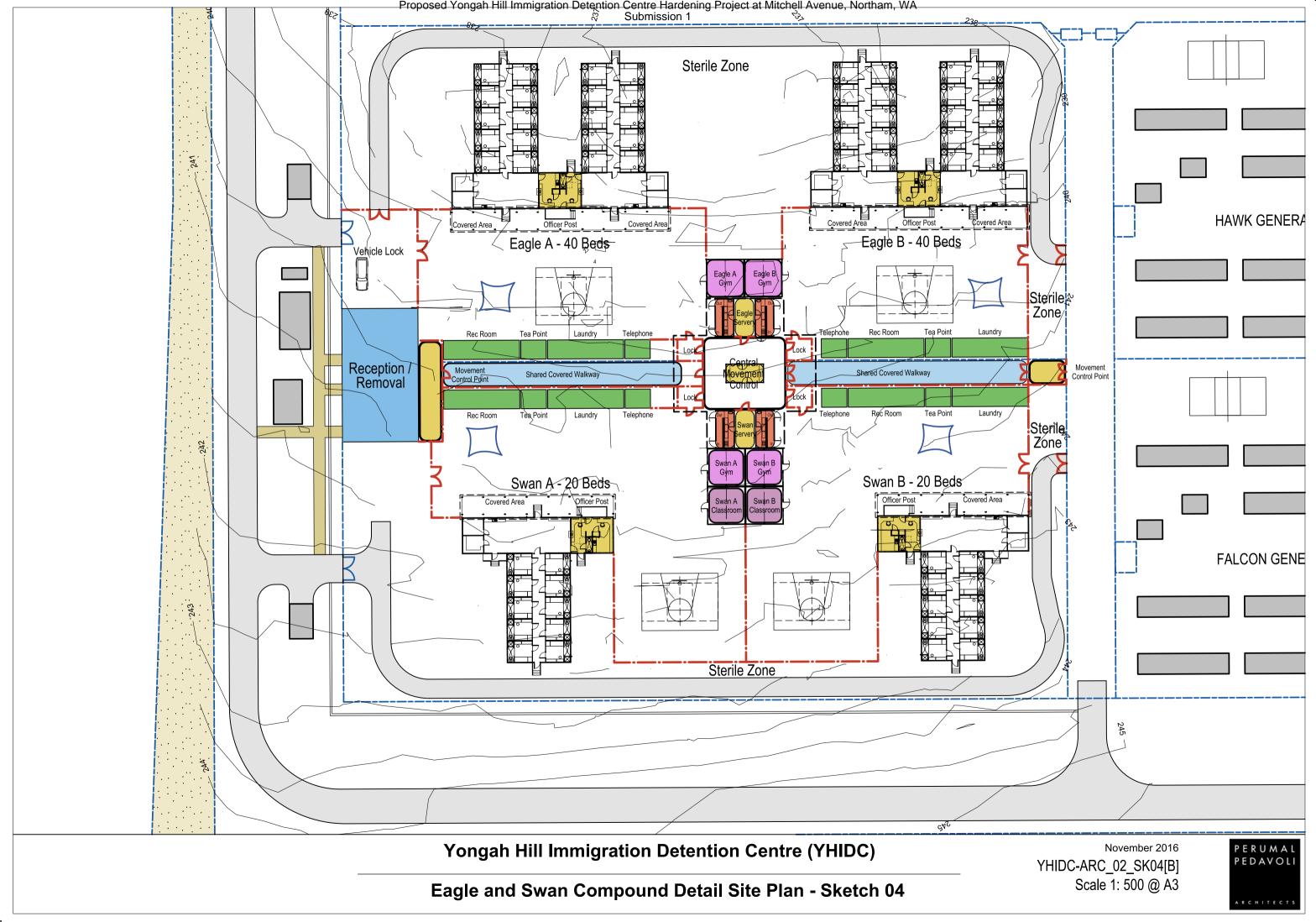
Department of Immigration and Border Protection

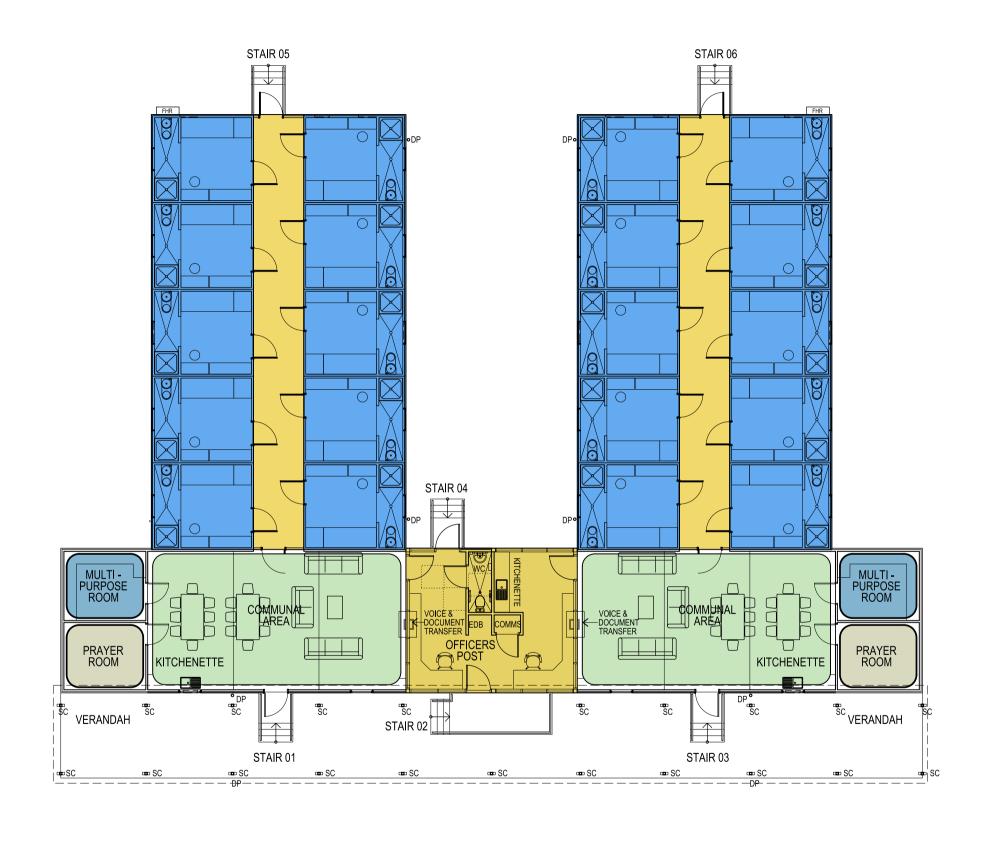
Yongah Hill Immigration Detention Centre

ANNEXURES

Yongah Hill Immigration Detention Centre – location







Modular Accommodation Building

MOD-ARC_03_011[A] Scale 1:150 @ A3

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