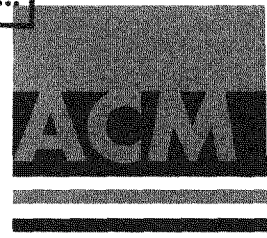


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5 January 2004

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**Ms Gillian Gould  
Committee Secretary  
Joint Standing Committee on Treaties  
Parliament House  
CANBERRA ACT 2600**

Dear Ms Gould

**Re: Inquiry into the Optional Protocol to the Convention against  
Torture and Other Cruel, Inhuman or Degrading Treatment or  
Punishment**

I refer to your letter dated 19 December 2003 advising of the Joint Standing Committee on Treaties Inquiry into the Protocol to the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. Thank you for providing Australasian Correctional Management (ACM) with the opportunity to comment on the Protocol.

The Protocol has been reviewed by ACM. As a service provider to Government, ACM responds to and cooperates with all Government requirements and accountability mechanisms. Our interpretation of the Protocol is that the objective of establishing a system of regular visits by independent international and national bodies to places of detention is a further accountability mechanism to ensure the Convention is upheld.

Given the definition of places of detention, the Protocol will apply to all facilities operated by ACM. However as each of these facilities operates as part of a broader State or Federal Government jurisdiction, the requirements relating to official accountability mechanisms of external independent visitors is a matter of policy for the respective Government agency. ACM does not involve itself in Government policy issues.

ACM complies with existing requirements for external accountability and will comply with any requirements of the respective Government Departments arising from the Inquiry into the Protocol.

I trust this information is of assistance to the Joint Standing Committee and again, thank you for the opportunity to comment.

Yours sincerely

**Kevin Lewis  
Managing Director**

