



Review of Catering and Nutrition Baxter Immigration Detention Facility

I

Investigating Officers:
Prof Sandra Capra AM
Ms Mary Hannan-Jones
Coordinated by:
Mr Keith Hamburger AM

22nd October 2004



NOTES

Note 1

Knowledge Consulting Pty Ltd does not take responsibility for any conclusions, observations or findings contained in this report, subsequently found to be misleading, that have been generated as the result of incorrect or misleading information or documentation provided by employees or agents of the Department of Immigration and Multicultural and Indigenous Affairs or Global Solutions GSL (Australia) Pty Ltd or Delaware North Australia DNA Pty Ltd or detainees and or their representatives;

Note 2

Knowledge Consulting Pty Ltd in accordance with protocols approved by DIMIA provided a copy of this Report in Draft form to GSL (Australia) Pty Ltd for input prior to preparation of the Final Report. While GSL (Australia) did provide comment in relation to some matters which have been taken into account, the company has declined to comment in detail on the report unless Knowledge Consulting Pty Ltd explains what is meant by use of the words "*intent*" and "*requirement*" in the Report's Findings in terms of GSL's contract with DIMIA.

Knowledge Consulting's view is that the use of the words is self explanatory in the context within which they have been used and that any consideration of contractual issues is a matter between GSL and DIMIA.

It has not been possible to resolve this issue between GSL (Australia) Pty Ltd and Knowledge Consulting Pty Ltd in the time available such that GSL (Australia) Pty Ltd was prepared to comment in detail on the Draft Report. Therefore, this Final Report has been prepared without the benefit of GSL (Australia) Pty Ltd input in relation to all issues covered by the Report. Knowledge Consulting Pty Ltd remains committed to constructive consideration of any matters that GSL (Australia) Pty Ltd may wish to raise in relation to issues covered in this Final Report.

Correspondence between GSL (Australia) Pty Ltd and Knowledge Consulting Pty Ltd concerning this matter is at Appendix 8.

TABLE OF CONTENTS

Section	Item	Page
1	Introduction	4
2	Terms of Reference	5
3	Methodology	7
4	Summary of Recommendations	10
5	Response to Terms of Reference – Supporting Evidence and Analysis	14
6	Index of Appendices	40

1. Introduction

Knowledge Consulting Pty Ltd, utilizing the professional expertise of Professor Sandra Capra, School of Health Sciences, University of Newcastle and Ms Mary Hannan-Jones, Lecturer in Public Health (Nutrition and Dietetics) Queensland University of Technology, was engaged by the Department of Immigration and Multicultural and Indigenous Affairs (DIMIA) to conduct a review of catering and nutrition at the Baxter Immigration Detention Facility.

The review project was oversighted and coordinated by Mr Keith Hamburger AM, Director, Knowledge Consulting Pty Ltd.

DIMIA provided the following background to the review:

"There have been a range of issues and complaints from detainees about the food standards at the Baxter Immigration Detention Facility (BIDF). The Detention Services Provider (DSP) considers that food standards are met at the BIDF.

Detainees have lodged complaints in regard to the following in relation to the food at BIDF:

- *The blandness of food served to them;*
- *The lack of variety and being served the same meals over a succession of days;*
- *The food contains excessive oil and/or water;*
- *The quantity of food including portion sizes are insufficient;*
- *Serving spoons for meat dishes being used for vegetarian dishes. (Strict vegetarians will not eat food that has been tainted with meat);*
- *Special requests not met ie plain unsweetened yoghurt, white cheese. Apparently Australian yoghurt is too sweet for Middle Eastern taste. DNA state they are having difficulty trying to source the type of yoghurt requested*
- *Prepared food ie fried eggs, kept in warming plates do not taste very good, are not appealing, and are often not at the correct temperature;*
- *Lack of appropriate food for their specific dietary requirements or religious festivals; and*
- *Detainees requesting to soak defrosted meat in water, to rinse out the blood, for cultural reasons, and in some cases being prevented from carrying out this practice.*

The responses to complaints regarding food issues from detainees are logged in the GSL complaints register and the detainees are advised to raise these matters at the Food Delegates meeting scheduled fortnightly. However, detainees have stopped attending the Food Delegates meetings because they feel that nothing is being done to address their concerns in relation to the food".

2. Terms of Reference

Knowledge Consulting was provided with the following Terms of Reference for the review by DIMIA:

“The department has tasked Knowledge Consulting to undertake a review into Catering and Nutrition at the Baxter Immigration Detention Facility including an assessment of compliance with Schedule 2 and the Immigration Detention Standards (IDS) of the Detention Services Contract.

The scope of this review includes, but is not limited to the following:

- a. *Ensuring at BDF that the food is of good quality and nutritional, as well as interesting and appealing. Ensuring the food is sufficiently inviting to ensure that the detainees daily dietary needs are met;*
- b. *Ensuring that food is fresh and sufficient supplies are on site at the centre;*
- c. *Ensuring the temperatures of the food is adequate, including:*
 - *Appropriate containers for holding and conveying food ie “hot box”;*
 - *Food is transported and handled within the centre according to appropriate standards eg salads not delivered in bottom of “hot box”; and*
 - *Food storage and handling.*
- d. *Ensuring menus are regularly reviewed and rotated, including:*
 - *A new 7 day menu introduced every 28 days;*
 - *Input from detainees into the formulation of culturally appropriate menus;*
 - *Detainee involvement in the preparation and serving of meals; and*
 - *Consultation from qualified chefs/cooks with dieticians/nutritionists to create menus.*
- e. *Ensuring detainees are provided with a choice of food that is in sufficient quantities and that meal portion management reflects RDI (recommended daily intake) requirements,*
- f. *The extent to which meals provided daily are delivered according to the specified menu;*
- g. *Ensuring that preparation and provision of food takes into account different ethnic and religious food sensitivities and requirements, including:*
 - *Staff familiarisation with requirements relating to handling, preparation and storage of food required by religious groups; for example, requests for unsweetened yoghurt, white cheese and meat thawing and soaking for cultural reasons.;*

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

- *Food preparation separate from other foods ensuring serving utensils and equipment are kept separate from other utensils*
 - *Cultural appropriateness of the menu for the detainee population including preparation and cooking;*
 - *Provision of appropriate food for religious festivals;*
 - *Provision for different ethnic and religious food sensitivities and requirements, eg pork; and*
 - *Provision for arrangements for religious fasting periods, including Ramadan.*
- h. *Ensuring special dietary needs are catered for, including;*
 - *Seasonal changes;*
 - *Vegetarian meals;*
 - *Diets specific for medical reasons, eg diabetes;*
 - *Nutritional needs and special requirements of infants and children, expectant mothers and lactating women; and*
 - *Special dietary needs recorded in diet book ensuring all special meals are prepared as required.*
- i. *Ensuring there is access to unlimited/24 hour water, tea, coffee, supper snacks and milk for children;*
- j. *There is a clear understanding and implementation of hygiene and cleaning practices governed by relevant State/Territory protocols, including;*
 - *Kitchen staffs ensure best practice in all aspects of food hygiene and associated cleaning and maintenance associated with catering operations, storage, equipment and serving of food and beverages;*
 - *Comprehensive cleaning schedules and daily work orders are maintained; and*
 - *Rostering protocols for food handling and cleaning functions remain independent of each other.*
- k. *Ensuring kitchens, food storage and transport, waste disposal, dining, sanitary and ablution facilities are maintained according to relevant Commonwealth, State and Territory legislation related but not limited to health, hygiene, vermin control, waste disposal and protection of the environment;*
- l. *There is a clear understanding and implementation of State/Territory and Commonwealth food preparation, transportation, storage and handling according to relevant laws, regulations and standards, including the maintenance of appropriate logs and registers;*
- m. *There is a clear understanding of the Occupational Health and Safety (OH&S) legislation and all safety measures are adhered to including use of appropriate protective clothing, use of machinery, health and hygiene practices and protocols;*
- n. *There is a clear understanding amongst both DIMIA and GSL staff of complaint mechanisms in regard to food allowing detainees to pursue their complaint freely without hindrance or fear or adverse consequences for doing so. Including:*

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

- *A process for complaints from detainees to be followed in appropriate times for acknowledging and responding or otherwise dealing with complaints/comments;*
 - *All detainees being informed by the DSP of their rights and the mechanisms for making complaints/comments, both internally and externally; and*
 - *Ensuring detainees have access to means of making a complaint.*
- n. *There is a clear understanding between GSL and DNA to meet regularly to refine food service processes.*

Methods the contractor would be expected to adopt in the course of the review include, but are not limited to, the following;

- *Converse with the detainees;*
- *Sample the food;*
- *Review menus;*
- *Inspect appropriate areas and facilities;*
- *Participate in discussions with GSL, DIMIA and DNA (Delaware North Australia); and*
- *Review processes and practices”.*

3. Methodology

A systematic approach was used to gather information from the site. A systematic rather than general collection method was selected as in this way comparable data was collected concerning the system. A whole-of-system approach was adopted, with all components of the foodservice system being examined and audited as follows;

- Data collection sheets. This included information on the total system including the production system, the distribution system and a brief audit of the equipment and current status of the facility. Information was also collected on menu type, the definition and number of meals, special diets and staff in various categories. The completed sheets are attached as appendices.
- Focus groups of clients to discuss areas of concern were conducted.
- Data analysis was completed using appropriate analytical tools.
- Photographs were taken to assist in confirming and identifying issues.

The following table identifies the actions and activities undertaken

Action	Activities
Survey detainees	<ul style="list-style-type: none"> • Food Satisfaction survey administered to detainees (paper based tool) translated into 2 languages - administered while at discussion/focus groups – but was voluntary.
Focus groups of detainees including detainees involved in food delegations	<ul style="list-style-type: none"> • Elicit detainees areas of concern re foodservices • Determine detainees involvement in menu formulation, preparation and delivery • Determine and document complaints mechanism

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

Action	Activities
Review weight records (if available)	<ul style="list-style-type: none"> • Sampling of weight records for long stay detainees. Access to health service records not available so detainees who attended the focus groups were invited to weigh themselves and to comment on weight change
Onsite inspection of food delivery and service	<ul style="list-style-type: none"> • Visual inspections food, taste testing • recording of temperatures (comparison to standards) • recording times of hot holding (comparison to standards) • assessing equipment and procedures for food delivery • assessing utensils and procedures for meal service • Visual estimates of portion sizes, weighed samples of portions • Check for consistency with advertised menu
Onsite inspection of food preparation	<ul style="list-style-type: none"> • Review of policy and procedure manual • Visual inspections • Observation • Discussions with on site foodservice staff • Inspection of relevant records, including those relevant to staff training, rosters, cleaning and food safety
Menu review	<ul style="list-style-type: none"> • Inspection of menus, critiquing for variety, flavour, texture etc, including, cultural and, seasonal appropriateness • Nutritional analysis of menu. • Audit using standard menu assessment tools and quality assessment as per Qld Health Standards (1998) • Review of recipes • Review of special diets, and diets for children and pregnant and or lactating women
Review food purchase orders/invoices/receipts	<ul style="list-style-type: none"> • Scrutinise food purchased is sufficient for number of detainees, and meets current dietary recommendations
Interviews with food service manager and other key staff	<ul style="list-style-type: none"> • Verify consultation process in menu formulation and review • Determine staff familiarisation with preparation and storage of food for religious groups, and special diets • Verify procedures, including food hygiene, safety and cleaning • Verify strategies for management of complaints
Inspection of food service facilities	<ul style="list-style-type: none"> • Inspection of kitchen(s), food storage facilities and practices • Inspection of facilities for snacks
Interviews with women (through appropriate avenues)	<ul style="list-style-type: none"> • Determine perceived needs for children, and special foods that are needed
Meeting (s) with GSL and DNA	<ul style="list-style-type: none"> • Review of schedule of meetings held and minutes to determine extent and content of meetings • Gap analysis

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

Action	Activities
Meeting(s) with foodservice staff – manager and workers Meeting with GSL and DNA Meetings with DIMIA staff	<ul style="list-style-type: none"> • Review of policy and procedure manual • Observation of practices • Inspection of records for compliance with Hazard Analysis Critical Control Point (HACCP) requirements of food standards code • Listing of observed risks • Review of risk management strategies • Verification of data collected and review of completed audit to elicit perspective on results

The timetable of onsite activities was:

Tuesday August 24th 2004

Meeting with DIMIA staff, inspection of lunch meals at several compounds, informal discussion with detainees while this was being undertaken, temperature checks, meal weights, inspection of kitchen and delivery system, inspection of purchasing records, HACCP manual, inspection of dinner service.

Wednesday August 25th 2004

Interviewing groups of detainees, completion of questionnaire, collection of records, recipes, observation of kitchen activities, weighing meals, temperature checks, and timing of delivery system.

Thursday August 26th 2004

Interviewing groups of detainees, confirming data, inspection of meals, visiting health center, interviewing GSL managers, scrutiny of records, completion of audit forms.

Friday August 27th 2004

Completion of audit forms, teleconference with DIMIA, undertaking review of audit forms with DNA foodservice manager, completion of alteration of data, final gathering of data, debriefing with DIMIA staff.

4. Summary of Recommendations

Recommendation 1

That GSL give urgent consideration to the following issues raised in Findings 1, 2, 3 and 5 :

- the need to make food served to detainees more appealing and inviting;
- resolution of the differing views in relation to the issue of choice to arrive at an acceptable outcome. In this regard it is suggested that the menu should be altered to include a choice at least at dinner if not both lunch and dinner;
- finalization of recipe development; and
- providing greater flexibility in relation to meal times. This could require development of clear decision criteria to determine when meal times should be changed. For example when 50% do not consume meals before 6.30 pm then the meal time is altered.

Recommendation 2

The quality of the ingredients should be addressed as a matter of urgency to comply with the requirements of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1.

Recommendation 3

The delivery system be reviewed to reduce the excessive hot holding that occurs at present.

Recommendation 4

The temperature checks being conducted external to the compounds should be ceased, with attention directed to the time of hot holding and the temperatures of the bain maries.

Recommendation 5

The delivery system be reviewed examine ways to load the hot boxes more appropriately.

Recommendation 6

Individual meals should not be served in non-thermal take-away containers but if continued should use correct thermal support equipment (for example, insulated domes and underplates).

Recommendation 7

The food safety training programs for mess workers be continued.

Recommendation 8

That duties within the mess area be clarified so that all tasks are completed in a timely fashion, and that the duty statements be translated as necessary.

Recommendation 9

A formal menu review process be instituted.

Recommendation 10

Discussion groups and taste testing should be introduced to increase the feeling of ownership of the menu.

Recommendation 11

Satisfaction surveys should be conducted regularly.

Recommendation 12

DNA should review whether the current mix of detainee labour and paid staff is appropriate to enable it to deliver the contract requirements.

Recommendation 13

A consultant dietitian should be engaged to work with the staff to reduce menu issues, assist in the management of diets and serve a role in quality assurance.

Recommendation 14

The amount of food should be maintained but the pattern of food provided be altered to be more in keeping with the Australian community, weighting the evening meal.

Recommendation 15

GSL should specify an overall direction to DNA guiding meal planning (for example that the meals will be consistent with Australia's Guide to Healthy Eating and be broadly consistent with the general community).

Recommendation 16

A dietician should be engaged to work with detainee groups to provide nutrition education and to assist in adapting to foods more commonly available in the community.

Recommendation 17

The Health service should take a more active role in health maintenance within the Facility, with more regular weight and general health checks, including nutrition screening.

Recommendation 18

That GSL and DIMIA maintain a monitoring role and document this.

Recommendation 19

That all ethnic groups receive some consideration in the matter of food, or at the very least, choices be introduced including very different foods to give meaningful alternatives.

Recommendation 20

That following implementation of Recommendation 19, DNA should ensure that practices are in place to separate serving utensils and equipment used for halal and non- halal food.

Recommendation 21

That a menu be developed with 2 or 3 choices at lunch and dinner that broadly fit the three major dietaries of Middle Eastern, South Asian and Asian.

Recommendation 22

That a cold choice where detainees can assemble their own meals be introduced at lunch time, that is that lunch consist of 2 cold (Middle Eastern and South Asian) choices and 1 hot choice (Asian).

Recommendation 23

That BBQs be introduced as soon as practicable as a practical solution to providing choice and control over food. These could be rotated through the compounds so that each could receive 1-2 per week until more equipment can be obtained. Appropriate security procedures should be put in place to ensure secure use of the barbecues.

Recommendation 24

That current practice with regards to fasting periods be maintained.

Recommendation 25

That the practice of requiring persons to be always vegetarian or never vegetarian cease, and vegetarian choices be included on the menu for anyone to choose.

Recommendation 26

That individual plated meals for vegetarians cease.

Recommendation 27

That legume dishes be increased as meat choices at lunch time.

Recommendation 28

That a qualified clinical dietitian be employed to review individual detainees regarding their diets, provide appropriate written material and provide kitchen staff with information and support to improve recipes and menus.

Recommendation 29

That terminology used to describe diets be altered to better describe the needs (weight management, lipid lowering, carbohydrate controlled, low GI, etc)

Recommendation 30

That systems be reviewed to identify where delays in forwarding requests occurs.

Recommendation 31

The new system of spreadsheets be reviewed and if satisfactory, maintained.

Recommendation 32

That policy and procedures be translated and made available to detainees working in the kitchen.

Recommendation 33

GSL should examine with DNA the staffing levels within the kitchen to determine the adequacy of staffing levels.

Recommendation 34

That a preventive maintenance program be instituted and conducted by GSL officers.

Recommendation 35

That documented formal training in the use of chemicals (including translation) be instituted.

Recommendation 36

A risk management program should be conducted and documented in addition to the HACCP food safety program.

Recommendation 37

That current OHS material be translated.

Recommendation 38

That all parties commit to providing meaningful feedback to detainees concerning their complaints.

Recommendation 39

That the foodservice manager participates in orientation as per the performance standard, or these standards be reviewed.

Recommendation 40

That staff (senior management, foodservice,) at BDF consume meals regularly in the compounds at least weekly to develop rapport with detainees and collect feedback informally.

Recommendation 41

GSL review the current complaint handling system to ensure that there is faith in the system by detainees.

Recommendation 42

The structure of the service delivery model needs review to ensure accountability is aligned with responsibility.

5. Response to Terms of Reference – Supporting Evidence and Analysis

a. Ensuring at BIDF that the food is of good quality and nutritional, as well as interesting and appealing. Ensuring the food is sufficiently inviting to ensure that the detainees daily dietary needs are met;

Finding 1

The on-site foodservice manager (FSM) is skilled, dedicated and open to suggestion. He has tried hard to please the detainees within the scope of his authority. However the hot meals as are currently served cannot be described as interesting and appealing at all times. Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1. says, “ It is important, therefore, in detention facilities that the food is not only of good quality and nutritional but also interesting and appealing”. “*Appealing*” can be a matter of individual judgement. In this case the investigators formed the view that more could be done to make the meals sufficiently inviting to detainees.

For example, any one meal *may* be appealing to some detainees, but as a whole may not be to a majority of detainees. Some examples follow where the investigators feel that the particular meals are not appealing or inviting to particular groups of detainees:

- o “curried sausages”.

This dish contained cut up cooked sausages within a curry sauce. As such it was not acceptable to particular ethnic groups (middle eastern, Afghani, Asian) nor to particular religious groups (Hindu). As there is currently no choice at BIDF, this meal could not be described as interesting or appealing. (image DSC01588.jpg)



- o “fish and chips”.



While this seems to be one of the most popular dishes overall, fried fish is not acceptable to Afghanis (too dry, fish which is not usually eaten).(image DSC01575.JPG)

- o “sweet and sour chicken”.

This was chicken drumsticks which tasted as though they had been steamed, covered with a small amount of vegetable mix in a very watery sauce (image DSC01519.JPG). On tasting it could not be detected as



sweet and sour to our palates. It was unacceptable to middle eastern people, people from south Asia and people from Afghanistan. It was also observed that Asians thought this was "OK" but would not eat the sauce, that is they selected the chicken and rice only.

Finding 2

The fundamental issue is, that without choice, the meals are unable to meet the needs of many groups, no matter how good individual dishes may be. Differing views have been expressed to the investigators concerning the issue of choice. GSL executives say that choice of meals was reduced following representations from detainees. GSL and DNA staff say that when a choice of meals was available problems occurred with portion control in that some detainees took a selection of the various choices which then caused quantity problems. GSL and DNA staff say that in discussion of this issue with detainees it was agreed that reduction in choice therefore simplifying portioning thus addressing the quantity issue was preferable. Detainees interviewed by the investigators strongly dispute this. In effect they argue that they require both choice and quantity which needs to be met by the service provider, however minutes of the meeting were ambiguous regarding this issue.

The GSL Manager at Baxter indicated to the investigators that he supported more food and more choices.

Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.2 and Section 2.2.2, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix deals with the issue of choice of meals. GSL say that in restricting choice of food they are acting with the agreement of detainees. The reality is that the needs of the detainees cannot be met with a non-selective menu.

This is a matter that requires urgent resolution between DIMIA and GSL.

Finding 3

Some meals are excellent. We observed some very good meals – a date dish being made for a "wake" (image DSC01599.JPG) and a curried fish dish. These were excellent in themselves but not able to satisfy the needs of a multi ethnic group. Similarly the addition of yoghurt and feta cheese makes the meal more interesting for some but not others. Currently recipes are under development. Without recipes and recipe trials it is difficult to anticipate taste. This contributes to issues of variability and unsuitability of meals.



Finding 4

Breakfast, which has a choice of cereals and breads and includes eggs and feta cheese at times, and has flexibility about consumption time, is the most acceptable meal, despite it being the most western in nature.

Finding 5

The meal times are too inflexible.

On questioning, it appeared there had never been an attempt to alter meal times to be more appropriate, nor to change the division of food between the meals. At present a large number of detainees do not rise until quite late and eat their meals late or miss breakfast and/or lunch. The evening meal is served too early for this pattern and would be better served towards 7.00 pm at night or later. GSL staff report that the detainees are very active in the evening and stay up late, especially in the summer months. No attempt has been made to alter meal times. This is understandable as the rostering system at present is for kitchen staff to work 12 hour shifts and this would extend out. With the current staffing levels (2 staff per day, 1 cook, 1 kitchen hand) it would not be easy to manage this, but it does lead to large amounts of food being placed in refrigerators in the compounds and later rethermalised, or excessive hot holding. It has led to requests for eggs to be delivered at night for cooking. On the evenings we observed the foodservice, a minority of detainees had collected meals by 6.30pm (after the meal arriving at 5.30pm). The issue of meal times is dealt with in Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.6.

Recommendation 1

That GSL give urgent consideration to the following issues raised in Findings 1,2,3 and 5 above:

- the need to make food served to detainees more appealing and inviting;
- resolution of the differing views in relation to the issue of choice to arrive at an acceptable outcome. In this regard it is suggested that the menu should be altered to include a choice at least at dinner if not both lunch and dinner;
- finalization of recipe development; and
- providing greater flexibility in relation to meal times. This could require development of clear decision criteria to determine when meal times should be changed. For example when 50% do not consume meals before 6.30 pm then the meal time is altered.

b. Ensuring that food is fresh and sufficient supplies are on site at the centre;**Finding 6**

The total amount of food served provides adequate energy.

During our visit and on inspection of the purchasing dockets and inventory, there were sufficient supplies on site for the time period expected to be covered. Review of the purchase orders for June 2004 verified that adequate supplies were available to cater for the number of detainees in the centre during this period.

Milk is not fresh but UHT, which seems to be variable in popularity. There appear to be concerns whether children will consume the UHT milk. We observed it being held at ambient temperature in one compound. The issue of whether food is *“appealing”* was dealt with in Finding 1 and relates to Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1. In the case of UHT milk, it is the view of the investigators that this milk would be more appealing if it was chilled prior to serving.

Finding 7

The quality of the meat is not satisfactory in terms of the criteria set in Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1. wherein it states, *“...the food is not only of good quality and nutritional but also interesting and appealing”*.

The word *“quality”* holds different meaning for different people. The CSIRO identify that it has 4 major constructs with respect to meat.

“The phrase ‘Meat Quality’ refers to a broad range of meat attributes that include sensory, nutritional, hygienic and technological factors. Examples of attributes within each of these four factors are toughness, iron availability, E.coli contamination and texture of manufactured meats”. (source, CSIRO, 2004)

“Marbling is a beef quality trait that is loaded with contradictions. On one hand, Australian beef is considered by some in the Japanese markets to have too little marbling. On the other hand, Australian domestic consumers avoid beef that has too much marbling, because they don’t want saturated fats in their diets”. (CSIRO, 2004)

In the context of a healthy diet, quality meat refers to lean muscle which is digestible. In terms of menu planning it includes concepts of variety of cut, and conformation of the meat as well as the way the meat is prepared. So, for example, rare meat is a poor quality product in a population or system more prone to health risk from food safety factors, but might be high quality within a fine dining context.

A quote from *“Food for Health; Dietary Guidelines for Australian Adults – A guide to healthy eating”* NH&MRC, 2003, p 65

“This guideline (include lean meat, fish, poultry and/or alternatives) specifically refers to the inclusion of lean cuts of meat and poultry. Some meats and some meat and poultry products or dishes that are popular in Australia—such as pies; sausages; crumbed and fried meats, fish or poultry; and mettwurst and salami—can contain significant amounts of saturated fat, either from the ingredients themselves (including non-meat components such as pastry or fillers) or from added cooking fats. These foods can be included occasionally in a balanced diet, but care does need to be taken with the rest of the diet, so as to avoid over consumption of saturated fats. In addition, these types of products do not provide the same level of iron, zinc and Vitamin B12 as the lean cuts. Selection of lean mince and removal of visible fat from meat and poultry cuts before cooking can also help to limit fat intake.....

Vegetarians should choose from a variety of legumes, nuts and seeds to obtain protein, iron and zinc. Wholegrain or wholemeal cereals are also good sources of zinc and iron, and supplemented varieties are available. Drinking fruit juice or eating fruit at the same meal increases absorption of iron and zinc.”

Meat is frozen and is required to be as there is no local Halal butchery. However, it is felt to be low quality, (the main complaint) and tasteless but this is likely to be preparation methods rather than due to freezing. It is understood from the foodservice manager, that a butcher in Adelaide has been found and that better quality meat and more varieties in cuts will be secured in the near future.

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

Therefore the judgement on meat quality was made on the basis of:

- excess visible fat – diced meat, minced meats, sausages;
- Presentation – lamb shanks; and
- monotony of cut – drumsticks only for chicken except once per fortnight when marylands served.

There is no suggestion that the meats were unsafe to eat. The texture of those meats tasted was tough, but this could be overcome by additional cooking.

Evidence:

Picture of lean diced meat – this is “75% trim” ie no visible fat on diced meat, 75% of all fat removed.



Picture of diced meat from Baxter



REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY



Moderately lean minced meat – some fat visible – this would be about 8-10% fat



minced meat from Baxter – high level of fat visible



Sausages from Baxter – high level of fat



Presentation – lamb shanks – normal presentation and “quality” – note trim and meat conformation



Lamb shanks at Baxter – note – fat level, little trimming





Other foods felt to be low quality by detainees are some fruit (bananas named) bread and melted ice-cream. Some quality issues have been addressed by the foodservice manager (eg tea bags), others are the outcome of too few deliveries (bananas) and others a perception (the bread is frozen and is therefore out of its 'best by' date).

Recommendation 2

The quality of the ingredients should be addressed as a matter of urgency to comply with the requirements of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1.

c. Ensuring the temperatures of the food is adequate, including:

- **Appropriate containers for holding and conveying food ie "hot box";**

Finding 8

The equipment is not designed for the excessive hot holding that is undertaken in the current system thus resulting in a breach in the intent of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.4 and does not meet the standard set in Section 2.2.2.1, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix relating to relevant laws, regulations and standards.

That is, this is in breach of the intent of the Food Safety Programs, Standard 3.2.1, adopted by the SA government. Section 3.3 Catering Operations serving food to the general public. This adopts a risk management approach and includes areas of concern that relate to *"catering operations where there is a transport step between the preparation of the food and its sale"*. Section 3.1.1 of Proposal P290 (FSANZ) specifically lists *"prison catering"* as included under this standard and guideline. In referring to *"prison catering"* the investigators are using this particular standard as relevant in terms of institutional catering which is applicable to a detention facility environment. Its use is not to infer that the investigators are comparing detention facilities to prisons in terms of their overall operation.

There is a breach of 3.1.2.1 of Standard P290 relating to transport. Regardless, good practice in large scale food service is that food is held in a safe manner and this is breached.

Section 3.1.1 of Proposal P290, Catering Operations Serving Food to the General Population, says that catering was defined by the National Risk Validation Project as any method of preparation and service of potentially hazardous foods which utilises an intended time period during preparation and service or when food is served to large numbers of people simultaneously. The project considered that such catering operations would include those listed above in Section 2.2.2.1 of Schedule 3 of the

REVIEW OF CATERING AND NUTRITION AT BAXTER IMMIGRATION DETENTION FACILITY

IDS (e.g. defence catering, prison catering, boarding schools and school canteens, university and college catering, function catering, camp catering, fete/fair/festival/market catering, airline and other tourist catering).

The hot boxes are insulation only and rely on the food within to be at high temperature or very chilled, in order to maintain temperature. Insulation works well if this is observed, and if foods are packed well. Some boxes are not in good repair



in terms of handles (image DSC01610.JPG). Insulation is an excellent form of thermal support for a limited time, usually less than 45 minutes. Longer holding times are unlikely to lead to adequate thermal support depending upon the number of times the doors are opened. Timed delivery and observation indicated that hold holding can continue for more than 90 minutes, prior to being placed in bain maries. The foods were at a sufficiently high temperature when placed in the hot boxes.

Finding 9

Not all practices are consistent with good heat retention.

The opening of the hot boxes to check the temperature leads to loss of thermal support, as well as allowing flies to enter. It was noted though that foods kept in the hot box while the first part of the meal was served, maintained their heat better than those placed in inadequately heated bain maries.

Recommendation 3

The delivery system be reviewed to reduce the excessive hot holding that occurs at present.

Recommendation 4

The temperature checks being conducted external to the compounds should be ceased, with attention directed to the time of hot holding and the temperatures of the bain maries.

- **Food is transported and handled within the centre according to appropriate standards eg salads not delivered in bottom of "hot box";**

Finding 10

The standard of the documentation for food safety is high.

The food safety procedures are well documented and a HACCP system is used for both suppliers and within the Facility.

Finding 11

There is inappropriate food loading of the "hot boxes".

The "hot boxes" are insulation containers, not "hot boxes". In themselves they do not have thermal support, they rely on insulation. As such, as long as very cold foods are



grouped together, or very hot foods grouped, temperatures should be maintained. It is correct procedure to place salads and cold foods in one box and hot foods in another.

It was observed that ice cream was transported on top of the boxes with no insulation, and without freezers in the compounds, this is an unacceptable practice (image DSC01573.JPG). The ice cream should have been in a cold compartment.



It was also observed that hot, individually served meals in plastic containers were placed in the "cold" section with bread and fruit for at least one evening meal, due to lack of space (image IMG_1365.JPG).

The foregoing is a breach of the intent of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.4 and does not meet the standard set in Section 2.2.2.1, of Schedule 3: Immigration Detention

Standards, Performance Measures and Performance Linked fee Matrix relating to relevant laws, regulations and standards.

That is, this is in breach of the intent of the Food Safety Standard 3.2.1 and the Ministerial Policy Guidelines on Food Safety Management in Australia: Food Safety Programs (2003). Section 3.3 Catering Operations serving food to the general public, specifically *"Catering operations where there is a transport step between the preparation of the food and its sale"*.

Finding 12

Individually served meals (diets, vegetarians etc) are served in inappropriate containers.

FSANZ proposal 290 section 2.1.3 describes food safety programs. The intent of the Food Safety Standards Australia is that "prisons" be included as catering to the public and therefore fall under this standard. The standard specifies a risk management approach, usually suggested as a HACCP system. Lack of thermal support is a hazard. In addition, poor temperature control even if not a food safety issue, becomes an organoleptic issue. The failure to maintain adequate temperature in pre-portioned meals is therefore a breach of this standard.



They are served in plastic "take-away" type boxes with lids (image DSC01580.JPG). These have no thermal support at all, and cannot be placed in the bain maries. Hence all such meals were at inadequate temperatures. The bain maries are limited in size and it is not possible to place such containers over the water, as all spaces in the bain maries are needed.

Recommendation 5

The delivery system be reviewed examine ways to load the hot boxes more appropriately

Recommendation 6

Individual meals should not be served in non-thermal take-aways containers but if continued should use correct thermal support equipment (for example, insulated domes and under-plates)

- **Food storage and handling.**

Finding 13

The food storage and handling at the kitchen seemed excellent. There are plenty of storerooms and they were clean, neat and well ordered during our inspections (images DSC01544.JPG, DSC01545.JPG, DSC01546.JPG). Records of cleaning,



temperature checks are maintained and seemed in order. Those of the last several weeks were viewed. At the compound messes, food handling was variable. Training programs have been introduced with mixed success and have now been made mandatory. The supervision provided by GSL officers at the messes seemed variable in amount and quality. This should be drawn to the attention of GSL management.



Finding 14

There is overlap in the duty statements of the mess attendants and GSL officers which could lead to lack of clarity.

Duty statements for the detainee mess attendant and GSL officers with respect to the food handling and cleaning were viewed. They seem in order, but there are duties which are common to both. It was not clear if the detainee attendants had translated versions, as few could read English to the level required to understand the statements, and it was unclear what happens in those tasks allocated to both Officers and Detainees for completion.

Finding 15

At the compounds the general food storage and handling was variable. Examples:

- o Rubbish bins inside mess when instructed not to be, in some compounds;



- o Rubbish bins full at start of meal times in some messes with some smell and many flies;
- o Refrigerators not always clean (image DSC01516.JPG);



- o Breakfast cereals seemed to be stored in open bags and boxes. One mess has a cupboard for storage (although the bags were open within the cupboard) but all others visited had open containers on the benches. This leads to loss of freshness (images DSC1528.JPG, IMG_1302.jpg).



Recommendation 7

The food safety training programs for mess workers be continued.

Recommendation 8

That duties within the mess area be clarified so that all tasks are completed in a timely fashion, and that the duty statements be translated as necessary.

d. Ensuring menus are regularly reviewed and rotated, including:

- ***A new 7 day menu introduced every 28 days;***

Finding 16

The menus are reviewed but this is not a formalized or regular process. This is a requirement of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.2 and does not meet the standard set in Section 2.2.2.1 (b), of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

At present there are *ad hoc* changes to the menu in response to detainee concerns. The current menu is a new 4 week cycle menu, posted on August 5th, 2004, that is, the week reviewed was the last “new week” of the introduced menu. However there is some uncertainty about other menu changes. For example, the reduction of the choice from 2 meals to 1 each meal times has been reported to have occurred in the last 2 months, representing another new menu introduced at that time. At present the salad menu to accompany lunch is a 1 week menu, the menu for those detainees who have been identified as vegetarians is 1 week. There is no menu for desserts, with decisions being made on what appears to be a day-to-day basis.

Recommendation 9

A formal menu review process be instituted

- ***Input from detainees into the formulation of culturally appropriate menus;***

Finding 17

Detainee input into menus is variable. This input is a requirement of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.2 and does not meet the standard set in Section 2.2.2.1 (b), of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

The complaints system whereby detainees may voice concerns to influence the menu is operating. No menu committee exists. The regular meetings between the foodservice manager and detainees seem to be via the formalized meetings between food delegates and GSL, DNA and DIMIA. These have not been well attended of recent times, due to a perception of inaction. As to whether other formal systems are operating well, reports vary. Those detainees who work in the kitchen have input but they do not represent all the nationalities and this is one area of tension. The foodservice manager tries to respond to the concerns. Of late, additions have been made to the menu, so that items not on the posted menu are served. An example during our observation, was chick peas added to the fish, chips and salad meal, egg and yoghurt and feta cheese to some areas.

Recommendation 10

Discussion groups and taste testing should be introduced to increase the feeling of ownership of the menu.

Recommendation 11

Satisfaction surveys should be conducted regularly

- ***Detainee involvement in the preparation and serving of meals;***

Finding 18

The Foodservice is dependent on detainee labour at the present time. In the view of the investigators there are insufficient paid staff to operate the foodservice to the level required. There are more than a dozen detainees working within the kitchen as kitchen hands, with some food preparation being undertaken under supervision. The meats for the dinner meal were being cooked by detainees on the days that we observed. The desserts are prepared by detainees. We observed special foods for religious events being prepared by detainees. Detainees assist with loading and delivering the hot boxes.

At the messes, the food is placed in the bain maries and served by detainee mess workers.

The foodservice manager has a difficult time in this situation. The detainees are not always very fluent in English and require a great deal of supervision and assistance. Some tasks seem to take too long. Detainees prepare the salads and hence they are the same every day. There are so many issues on a daily basis that ensuring variety in vegetables and their cut in this situation is hard. The mess workers are not under the control of the foodservice manager but report to GSL officers. It is therefore hard for the foodservice manager to ensure quality. However he is to be congratulated for attempting to conduct food safety training for these workers.

Concerning the level of paid staff, one cook per day is hard pressed to provide the level of meals required. If regard is had to benchmarks in the long term care, fresh cook industry, then you can use approx 8000 – 9000 meals per year per FTE based on information from previous extensive consulting work. If 250 people to be fed is used as an average number per day, this gives an estimate of 30-34 FTE (including service and delivery staff). Using production (cooking) only, then this would be 30000-35000 meals per year, that is, 8-9 FTE cooks. If breakfast is discounted as a meal, then the system would need 5-6FTEs of cooks compared to the 2FTE equivalent observed. In addition, there would need to be staff to manage ware washing, hygiene, inventory, supply management, trolley loading and trolley delivery functions. Comparison facility catering for 800 high security detainees without complex ethnic and religious requirements has 10 FTE chef and 48 detainee kitchen assistants all fluent in English.

Recommendation 12

DNA should review whether the current mix of detainee labour and paid staff is appropriate to enable it to deliver the contract requirements.

- ***Consultation from qualified chefs/cooks with dieticians/nutritionists to create menus.***

Finding 19

The menus are not created with the assistance of a qualified dietitian which is a requirement of the intent of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.2 and does not meet the standard set in Section 2.2.2.1 (b), of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

The chefs employed by DNA are qualified. The original menu analysed by a consultant dietitian in Sydney is not in use at BPDF. There appears to be no overall menu plan in terms of food groups or quantities as far as we could tell. The Foodservice Manager has had no assistance from a dietitian in the creation of the current menu. The detainees on special diets have not been assisted by dietitians.

Recommendation 13

A consultant dietitian should be engaged to work with the staff to reduce menu issues, assist in the management of diets and serve a role in quality assurance.

e. Ensuring detainees are provided with a choice of food that is in sufficient quantities and that meal portion management reflects RDI (recommended daily intake) requirements

Finding 20

The issue of “choice” has been dealt with in Finding 2 above.

Further to the information contained in Finding 2, there is no choice other than to have bread and spreads if a meal is disliked. Up to fairly recently the vegetarian choice was available to all detainees, however at the present time, a person must specify that they are vegetarian and then these choices are pre-portioned into disposable containers with the detainee’s number written on the lid (image IMG_1349.JPG). The menu contains a single menu item which is appropriate for some cultural groups but rarely suits all groups.



There is sufficient total food served, however waste is very high due to the unacceptable nature of the menu items to many. We observed the discard of ¾ of one meal as it was unacceptable to the detainees in the compound we visited, so that, even though there was enough food available, it was perceived to not be available due to its form.

On speaking with detainees, it became clear that some use the term “enough” differently to common usage. While we normally take this to mean total volume, some were using it to refer to types of foods. Hence it was reported that there was “not enough” food, because the chicken legs served were unacceptable, not because there was an insufficient quantity.

The Health service would not permit scrutiny of health records for weight status. However, of those detainees who attended the focus groups who were willing to be weighed, a majority reported weight loss over the last year. This cannot be confirmed without accessing records. It is unclear whether weight records exist.

The current health service provider has instituted an excellent record of body mass index (BMI) a weight for height indicator of healthy weight, but this commenced early 2004.

Finding 21

Sufficient nutrients are available on the menu as a whole but not to every cultural group. This appears to be a breach of the intent of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.1, 9.1.2 and 9.1.3 and does not seem to meet the standard set in Section 2.2.2.1, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

A nutritional analysis of the portion sizes of the foods as observed and on the menu indicates that with the exception of calcium and magnesium, all nutrients are provided. The menu does not identify additional foods sent, such as yoghurt and additional fetta cheese, which would rectify this. However, within the group as a whole there are cultural groups for whom there are concerns. Middle Eastern foods are unacceptable to many of the cultural groups. From speaking to people from Vietnam for example, there appears to be some dependence on dried instant noodles several days each week and this is not appropriate. Some of the Asian detainees report eating as few as 3-4 of the main meals a week, but this cannot be confirmed.

Finding 22

The meat serves are adequate, but distributed in a way that suggests otherwise. Concerns were voiced as to the adequacy of the meat serves. At present the serve size is 150g but meat is served twice per day that is a total of 300g. The issue more clearly lies that lunch and dinner are similar sized meals, rather than reflecting the usual eating pattern within Australia. Many detainees do not eat lunch and then perceive the 150g night meal as too small. On our observations there was plenty of meat served, the issue was that when it was unpopular there was no alternative. However there is room to reconfigure the meat serve to more closely match the way the community at large eats.

Recommendation 14

The amount of food should be maintained but the pattern of food provided be altered to be more in keeping with the Australian community, weighting the evening meal.

Recommendation 15

GSL should specify an overall direction to DNA guiding meal planning (for example that the meals will be consistent with Australia's Guide to Healthy Eating and be broadly consistent with the general community)

Recommendation 16

A dietician should be engaged to work with detainee groups to provide nutrition education and to assist in adapting to foods more commonly available in the community.

Recommendation 17

The Health service should take a more active role in health maintenance within the Facility, with more regular weight and general health checks, including nutrition screening.

f. The extent to which meals provided daily are delivered according to the specified menu;

Finding 23

Since the introduction of the new menu on August 5th, the foods served have been consistent with the menu, with some additional foods being made available. DIMIA records dating from February 2004, indicate that prior to the new menu being posted on August 5th there were numerous deviations from the menu. These deviations were not merely the same ingredients reorganised but often were entirely different foods. For example

- Sausage casserole instead of chicken and pasta on June 2nd
- Vegetarian burgers instead of grilled fish on June 23rd
- beef curry and rice in place of hot dogs on July 20th
- lamb and dhal instead of chicken and pasta on July 21st

Some of these alterations were in response to concerns, but that does not explain all of the variation.

Since the new menu was posted on August 5th, all monitored meals have been consistent with the menu. However it should be noted that extras were being sent from time to time as well as the temporary additional foods organised for one of the compounds.

Recommendation 18

That GSL and DIMIA maintain a monitoring role and document this.

g. Ensuring that preparation and provision of food takes into account different ethnic and religious food sensitivities and requirements, including:

- ***Staff familiarisation with requirements relating to handling, preparation and storage of food required by religious groups; for example, requests for unsweetened yoghurt, white cheese and meat thawing and soaking for cultural reasons.;***

Finding 24

While the meats being served suit some of the cultural groups, the needs of others are not met. This does not appear to meet the requirements of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.3 and does not seem to meet the standard set in Section 2.2.2.1, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

All meats used are Halal. We observed all meats being relaxed in refrigerators under water. The yoghurt and cheese are appropriate. However, this only meets the needs of some cultural groups. Others with different religions, for example Hindu are not met, while others such as Christians are assumed to accept any foods, with no allowances currently being made. Some minority groups such as those from South Asia expressed feelings of discrimination. For example, it precludes popular foods like pork being prepared for specific groups.

It was reported to us, that the menu was designed on a proportional basis, that is, that if 60% of detainees were Middle Eastern, 60% of the menu items should be Middle Eastern. While this is a laudable attempt to satisfy all groups, it fails to recognise that most groups were/are unwilling to eat foods that were clearly from different dietary patterns. The exception was chicken biriani, a popular meal with all but Asian people.

Recommendation 19

That all ethnic groups receive some consideration in the matter of food, or at the very least, choices be introduced including very different foods to give meaningful alternatives.

- ***Food preparation separate from other foods ensuring serving utensils and equipment are kept separate from other utensils.***

Finding 25

Since all foods are Halal, there is no current need for different utensils.

Recommendation 20

That following implementation of Recommendation 19, DNA should ensure that practices are in place to separate serving utensils and equipment used for halal and non-halal food.

- ***Cultural appropriateness of the menu for the detainee population including preparation and cooking;***

Finding 26

The menu is a current no choice *“one size fits all”* and is unsuitable as such. We observed considerable disquiet and large amounts of waste as an outcome of this practice. In our opinion, the cultural groups at BDF can roughly be grouped into 3 very different dietaries:

- Middle Eastern who prefer foods to be tasty, spicy but not with chilli. Prefer wheat based starch sources such as cous cous and breads, raw vegetables and fruits. In addition the food should not be too dry but should not be watery, but include oil (for example in rice). Not too much fish, include no pork, include yoghurt, eggs, legumes and cheese. Meat most days but not twice per day;
- South Asian who prefer spicy and tasty foods with chilli with rice or wheat based starch sources such as flat breads. Prefer foods cooked individually (for example vegetable curry separate from meat curry). Hindus do not eat beef but chicken, lamb and legumes as well as vegetables. Include yoghurt eggs and legumes;
- Asian who prefer seafood, chicken and pork with less beef and lamb, tasty but not curried or chilli. Prefer rice and wheat as noodles as starch sources. Prefer vegetables cooked. Do not enjoy very oily food (for example on rice);

From scrutiny of the menu, it is clear that a single meal will not serve all these groups. The cooking method is often appropriate but the excessive hot holding leads the foods to develop a “stewed” appearance and taste at times. The meals we observed were very wet at times, the sauce unthickened and tasteless (DSC01518.JPG), or dried out.



Other dishes (for example a spicy chick pea dish served on Aug 24th, image IMG_1334.jpg) were excellent as it was served in two forms (mild and chilli), was very tasty, well cooked, looked nice and was wet without being watery or oily.



Detainees reported that the cooks were unfamiliar with the preparation methods. However, when detainees prepare the foods, there appears to be a greater acceptance from the particular cultural group from which the detainee comes. It should also be noted that in many of the cultures represented at BDF, it is unusual for men to cook and to rely on them as the source of knowledge of foods and preparation

methods may be unwise at times. Reference to local communities may be more appropriate but does not seem to have occurred.

It should be noted that it is very difficult to determine what detainees “prefer” as food can assume an importance not warranted normally. It is often used as a focal point for dissent. Hence, while there appeared to be a willingness to compromise on the part of some detainees on the matter of culturally appropriate foods, others asserted they would not try an unfamiliar food no matter how good it was, others felt discriminated against, others wanted equity, long term detainees felt they should take precedence and particular religions thought they should have precedence.

Recommendation 21

That a menu be developed with 2 or 3 choices at lunch and dinner that broadly fit the three major dietaries of Middle Eastern, South Asian and Asian.

Recommendation 22

That a cold choice where detainees can assemble their own meals be introduced at lunch time, that is that lunch consist of 2 cold (Middle Eastern and South Asian) choices and 1 hot choice (Asian).

- ***Provision of appropriate food for religious festivals;***

Finding 27

Islamic festivals are catered for. There seems to be a significant effort made to meet these needs. The festivals of other religions were not observed.

- ***Provision for different ethnic and religious food sensitivities and requirements, eg pork;***

Finding 28

This relates to the issue of choice which has been dealt with previously.

Pork and non-halal foods are not served at present. It should be possible to offer a second choice, more legume based products and offer “specials” and BBQs to assist. GSL appear to have no problem with providing BBQs on a regular basis. One exists

and can be wheeled to different compounds on a rotational basis. At present this is done at breakfast we understand, but it was reported by senior GSL staff that there was no impediment to using it at night. A separate BBQ would have to be purchased with its own tools for use by Asian and Christian people who like to eat pork. Allowing lunches to be assembled from ingredients sent in bulk might help (for example filled pocket breads).

GSL in written advice provided say that gas barbecues may pose a security risk. However, a gas barbecue is currently in use in the centre and the investigators are aware of gas barbecues being used in a high security prison environment. In the prison environment the gas bottle is removed when the barbecue is not in use.

Recommendation 23

That BBQs be introduced as soon as practicable as a practical solution to providing choice and control over food. These could be rotated through the compounds so that each could receive 1-2 per week until more equipment can be obtained. Appropriate security procedures should be put in place to ensure secure use of the barbecues.

- **Provision for arrangements for religious fasting periods, including Ramadan.**

Finding 29

Meal times and staff shift times are changed to meet the needs of Ramadan. While not observed we believe this is met. The Foodservice Manager reports altering shift times and foods to meet these needs.

Recommendation 24

That current practice with regards to fasting periods be maintained.

h. Ensuring special dietary needs are catered for, including;

- **Seasonal changes;**

This was not observed

Vegetarian meals;

Finding 30

The system for service of vegetarian meals needs attention. Detainees have to declare themselves vegetarian or non vegetarian, rather than being able to choose a predominantly plant based diet as a choice. The issue is therefore "choice" which has been covered previously in this report.



The vegetarian meals are one a 7 day menu, individually pre-portioned and numbered (images DSC01585.JPG, DSC01586.JPG). There is no need for this. Most of the detainees at BIDF do not eat meat twice a day and prefer vegetable based foods. Some detainees are "vegetarian" to avoid red meat. We observed excellent foods being available for the non-

vegetarians, while the vegetarians were provided with steamed vegetables and a vegetable savoury which was less appetizing and too cool.



The vegetarians, did not seem to understand why they were denied the chick pea dish, chips and salad. The menu needs to be adjusted to better serve this group. The problem seems to be a perception that a detainee must declare themselves as a vegetarian or non vegetarian, rather than accepting that people might prefer vegetarian meals once or twice a day but not every meal.

It would seem that there are concerns that detainees would take too much food (for example some of each dish). There were discrepant reports as to who asked for the vegetarian dish to be removed and not made available to all. There were discrepant reports as to the make up of the previous vegetarian meals.

Regardless, there could be better use made of legumes or eggs in lieu of meat (they are part of the "meat" group in Australia's Guide to Healthy Eating). At present for those who are not vegetarians lunch and dinner are both meat based. Since the thrust of nutrition education is to reduce meat in the diet this is consistent with good practice.

Recommendation 25

That the practice of requiring persons to be always vegetarian or never vegetarian cease, and vegetarian choices be included on the menu for anyone to choose.

Recommendation 26

That individual plated meals for vegetarians cease.

Recommendation 27

That legume dishes be increased as meat choices at lunch time.

- ***Diets specific for medical reasons, eg diabetes;***

Finding 31

The special diet meals were inappropriate and rarely collected or eaten.

There are no instructions within the foodservice and the Health service provides no assistance under the current arrangements as it is a different company. No dietitian is consulted. It appeared that the meals for people with diabetes were decided on a meal by meal basis by kitchen staff using their own knowledge.



We observed steamed fish and vegetables twice each day for people with diabetes, not one of which was consumed (images DSC01520.jpg IMG_1301.JPG, and IMG_1340.JPG, DSC01586.jpg). The order for "ulcer diet" is used to indicate low spice.

Using terms such as this is very difficult for the foodservice as an "ulcer diet" is in modern convention, anything a person can tolerate, and without individual assistance this is very difficult. Terms such as "cardiac" diet are not in common usage – presumably this refers to a lipid lowering diet or perhaps a weight reduction diet or perhaps a low fat diet.



It seems to us that a very rigid approach has been adopted in the face of insufficient resources in terms of personnel and information. We spoke to 2 detainees with diabetes and neither had received advice that they could report, nor describe any understanding of their diets, even with interpreters present. Since the foodservice has no control over the carbohydrates actually eaten, nor any information about the energy level required, or the medications used, sending a meal believed to be consistent with the diet is inadequate.



The foregoing appears not to meet the requirements of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.2 and does not seem to meet the standard set in Section 2.2.2.1, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

Recommendation 28

That a qualified clinical dietitian be employed to review individual detainees regarding their diets, provide appropriate written material and provide kitchen staff with information and support to improve recipes and menus.

Recommendation 29

That terminology used to describe diets be altered to better describe the needs (weight management, lipid lowering, carbohydrate controlled, low GI, etc)

- ***Nutritional needs and special requirements of infants and children, expectant mothers and lactating women;***

Finding 32

Special needs of mothers and babies were not always attended to in a timely fashion. This does not appear to meet the requirements of Schedule 2 – Detention Services, Part 9 Food and Beverages, Paragraph 9.1.5 and does not seem to meet the standard set in Section 2.2.2.3, of Schedule 3: Immigration Detention Standards, Performance Measures and Performance Linked fee Matrix.

There are only 2 infants at the BIDF at present. One mother refused to speak with us. The other had major difficulty in accessing suitable food, and it appeared to have taken a very long time to organize access to the kitchen for her to prepare foods or to acquire the correct infant formula (months). This delay did not appear to

have been caused at the foodservice which actioned it within one day of receiving the request.

Recommendation 30

That systems be reviewed to identify where delays in forwarding requests occurs.

- ***Special dietary needs recorded in diet book ensuring all special meals are prepared as required.***

Finding 33

An excel spreadsheet has been implemented in the last 3 weeks which lists all the special diets, but the naming of the diets is inaccurate and not always appropriate.

Recommendation 31

The new system of spreadsheets be reviewed and if satisfactory, maintained.

- i. Ensuring there is access to unlimited/24 hour water, tea, coffee, supper snacks and milk for children;***

Finding 34

There is access to unlimited/24 hour water, tea, coffee, supper snacks and milk for children. Snacks of sweet biscuits and fruit are available on a 24 hour basis for children.

- j. There is a clear understanding and implementation of hygiene and cleaning practices governed by relevant State/Territory protocols, including;***

- ***Kitchen staffs ensure best practice in all aspects of food hygiene and associated cleaning and maintenance associated with catering operations, storage, equipment and serving of food and beverages;***

Finding 35

The policy and procedure manual for food hygiene is well done and records are maintained. However, these documents were not translated into the relevant detainee languages. Records are sent weekly to the head office for archiving. These records for the month of June 2004 were audited by the investigators and were found to be well maintained.

Practices within the kitchen appeared to comply and at our inspection all matters were well attended to. We observed good practice in terms of cleaning within the kitchen. The storerooms are plentiful and neat and tidy on our visits. There was concern within others we spoke with that this was not "usual practice" but this cannot be confirmed as our inspections demonstrated good practice. We did not observe any staff member using the hand washing facility within the kitchen.

Recommendation 32

That policy and procedures be translated and made available to detainees working in the kitchen.

- ***Comprehensive cleaning schedules and daily work orders are maintained; and***

Finding 36

Cleaning schedules are documented and recorded. The cleaning we observed was well done and thorough.

- ***Rostering protocols for food handling and cleaning functions remain independent of each other.***

Finding 37

There is only one kitchen hand rostered on each day and this person combines some cleaning with food handling but they were sequential. The detainees who were working in the kitchen were rostered to separate duties.

Recommendation 33

GSL should examine with DNA the staffing levels within the kitchen to determine the adequacy of staffing levels.

- k. ***Ensuring kitchens, food storage and transport, waste disposal, dining, sanitary and ablution facilities are maintained according to relevant Commonwealth, State and Territory legislation related but not limited to health, hygiene, vermin control, waste disposal and protection of the environment;***

Finding 38

The kitchen was maintained but there is no apparent preventive maintenance program in place, but rather matters are attended to as they arise. The floor is in poor condition but is soon to be repaired. There are reported issues with some of the equipment, in that it was reported that parts are hard to secure and items have to be sent away and can be missing for some time.

Finding 39

No vermin (other than flies) were detected. Waste disposal at the kitchen was well carried out, but was less than desirable at the messes, where full rubbish bins were observed prior to the commencement of meals.

Finding 40

Other aspects such as the appropriate use of chemicals seem to be in order. There is no formal training but chemical companies provide on site information from time to time.

Recommendation 34

That a preventive maintenance program be instituted and conducted by GSL officers.

Recommendation 35

That documented formal training in the use of chemicals (including translation) be instituted.

- l. ***There is a clear understanding and implementation of State/Territory and Commonwealth food preparation, transportation, storage and handling according to relevant laws, regulations and standards, including the maintenance of appropriate logs and registers;***

This was not observed by the consultants and therefore no finding is made.

- m. ***There is a clear understanding of the Occupational Health and Safety (OH&S) legislation and all safety measures are adhered to including use of appropriate protective clothing, use of machinery, health and hygiene practices and protocols;***

Finding 41

DNA has OHS material for staff on a CD provided to workers. There is also a manual. To date, since DNA have been involved, it was reported there had only been 2 accidents which were minor in nature and seemed appropriately managed with recording and follow up. These records are now archived in Sydney and were not viewed.

Finding 42

There is no risk management strategy used, other than the HACCP program which is very well articulated.

Finding 43

All workers were appropriately clothed and wearing good footwear. The floor covering was of a linoleum material and therefore offered some leg protection, given the long shifts the staff work. Neither staff we spoke to had suffered any injury but both seemed very tired towards 6pm and we wondered if this led to mistakes and other issues.

Recommendation 36

A risk management program should be conducted and documented in addition to the HACCP food safety program.

Recommendation 37

That current OHS material be translated.

n. There is a clear understanding amongst both DIMIA and GSL staff of complaint mechanisms in regard to food allowing detainees to pursue their complaint freely without hindrance or fear or adverse consequences for doing so. Including:

- *A process for complaints from detainees to be followed in appropriate times for acknowledging and responding or otherwise dealing with complaints/comments;*

Finding 44

There are discrepant views on the complaint process in place. All but one detainee interviewed could describe the process well. Detainees maintained that they do not receive responses and there is a general feeling that *"nothing happens"*. GSL staff maintain that all complaints receive a written and timely response. Scrutiny of minutes of the meetings identify that issues are *"closed"* without resolution. An example:

- A complaint that 2 loaves of bread were sent with the evening meal for 45 detainees. Response – there are 6 slices per day supplied. Action: *"closed"*

Finding 45

Of late, there has been some reluctance to attend the meetings held between all parties to resolve food issues. They used to be held once per fortnight. But seem to have been less frequent of late.

Recommendation 38

That all parties commit to providing meaningful feedback to detainees concerning their complaints.

- *All detainees being informed by the DSP of their rights and the mechanisms for making complaints/comments, both internally and externally; and*

Finding 46

Orientation to the foodservices is listed as an activity of the foodservice but this has never happened. Orientation and information concerning complaint procedures are provided by other staff. Detainees are aware that they can complain formally through their delegates (if there is one) to their DIMIA case worker or directly on a DNA complaints form.

Recommendation 39

That the foodservice manager participates in orientation as per the performance standard, or these standards be reviewed.

Recommendation 40

That staff (senior management, foodservice,) at BDF consume meals regularly in the compounds at least weekly to develop rapport with detainees and collect feedback informally.

- ***Ensuring detainees have access to means of making a complaint.***

Finding 47

It would seem that all detainees have access to the means of making a complaint, but there is a lack of interest due to the belief that there will be no change. Reports were made that temporary improvement occurred but they were not sustained.

Recommendation 41

GSL review the current complaint handling system to ensure that there is faith in the system by detainees.

- o. ***There is a clear understanding between GSL and DNA to meet regularly to refine food service processes.***

Finding 48

GSL and DNA meet regularly. They do not appear to work together on resolving issues but it would appear to us they work as very separate entities. DNA are deemed responsible for the foodservice and although there is understanding of issues, it is hard to see how actions are undertaken. GSL manages the maintenance of equipment but this seems reactive. GSL also manages the service and other issues relating to mess activities. By having 2 separate entities managing components of the service the opportunity for systems breakdowns increases. Technically DIMIA staff do not speak to DNA directly concerning foodservice but issues are slowed down if managed through GSL. There is a general feeling from detainees that GSL and DNA use the system to delay changes being introduced, but we could not determine the veracity of this. There appeared to be blame shifting at times between the various companies undertaking components of the work.

Recommendation 42

The structure of the service delivery model needs review to ensure accountability is aligned with responsibility.

6. Appendices

- Appendix 1 – Audit of full foodservice system
- Appendix 2 – Audit of compliance with 8.1 Menu Production and Dining Arrangements
- Appendix 3 – Results of detainee focus groups
- Appendix 4 – Menu analysis
- Appendix 5 – Audit of food safety standards
- Appendix 6 – Food temperatures, food quality assessment
- Appendix 7 – Results of satisfaction survey
- Appendix 8 – Correspondence