

**Submission to the Consultation of Draft Baseline Study for National Human Rights Action Plan**

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**About Sisters Inside**

Established in 1992, Sisters Inside Inc. (SIS) exists to advocate for the human rights of women in the criminal justice system and to address gaps in the services available to these women. We work alongside women in prison to determine the best way to fulfill these roles.

SIS works closely with prisoner and human rights advocacy organisations in Australia and more widely. Nationally, we have a substantial track record for evidence-based advocacy for the rights of women prisoners and other women in State and Federal criminal justice systems. Internationally, SIS has NGO Consultative Status at the United Nations and plays a key role in advocating for international standards to ensure that treatment of women within criminal justice systems is congruent with agreed international human rights standards.

At a service delivery level, SIS uses empowering, rights-based approaches to support criminalised women in prison, and following release from prison, throughout Queensland. We also work with young women in the juvenile justice system and the children of criminalised women.

**General Feedback on Baseline Study**

Sisters Inside broadly supports the position of the Human Rights Law Centre. We agree that this document has some relevance as a first draft. However, the Baseline Study does not provide a sufficiently comprehensive overview of key areas affecting human rights in Australia. SIS supports the statement in the Conclusion of the Baseline Study –*The first step in preparing the National Human Rights Action Plan is to establish a clear benchmark of Australia’s human rights[[1]](#endnote-1).*

If the National Human Rights Action Plan is to genuinely address key issues, it is essential that the final version of the Baseline Study provide a *comprehensive and frank* appraisal of the state of human rights in Australia. In short, much of the Baseline Study seems to be a descriptive defense of existing government policies and practices, rather than a robust collection and analysis of the available data on the current state of human rights in Australia.

SIS does not fully support the contention, also in the Conclusion, that there is a general shortage of data that can be disaggregated on multiples basis. There is no doubt that governments have a poor record of data collection in relation to criminalised women, particularly women prisoners. This failure to collect even the most basic data (e.g. whether women prisoners are mothers of dependent children) has certainly hampered NGO efforts to advocate for the rights of women and children affected by the criminal justice system. However, significant research data and other evidence has been compiled by NGO’s from a wide variety of credible sources. This data clearly demonstrates the inter-connectedness of *multiple bases such as sex, age, disability, cultural identity, national/ethnic origin …, family status, religion and sexual orientation[[2]](#endnote-2).* A significant body of evidence was cited in Sisters Inside’s submission to the National Human Rights Consultation in 2009[[3]](#endnote-3). The final version of the Baseline Study should rely less heavily on government data, and include and value evidence from a much wider variety of sources than the current document.

We are particularly concerned about the absence of detail in areas such as:

* **Addressing the human rights of women facing multiple disadvantages –** particularly the many women from more than one of the following groups: criminalised women; Aboriginal and Torres Strait Islander women; women from CaLD, particularly refugee, backgrounds; women with mental health issues; women with substance abuse issues; homeless women; poor women; women with a history of family violence; women with a history of state care or other institutionalisation; and young women and girls.
* **Discussing Aboriginal and Torres Strait Islander peoples’ human rights** - failure to mention: the need for reconciliation; the Stolen Generations and compensation; *Stolen Wages*; education of the non-Indigenous community about Indigenous rights, CERD, and the Declaration on the Rights of Indigenous Peoples; andprotection and promotion of Aboriginal and Torres Strait Islander land, law and culture.
* **Asserting the rights of specific groups in the community –** including the need for protection against racial vilification; discriminatory treatment of visa applicants from particular countries; and mandatory detention which has a highly punitive effect (despite claims that *immigration detention is administrative in nature[[4]](#endnote-4)*).
* **Protecting community members from abuse of power by police and correctional authorities** - reparation for victims of police use of force; the effect of broad police powers on children; transportation of prisoners and detainees; and prison overcrowding.
* **Advocating a rights-based approach to supporting human rights -** empowerment of people whose rights have been breached, particularly their right to active, informed and influential participation in decision-making which affects their lives.
* **Addressing accessible means to address breaches of human rights** – including judicial remedies for the full range of economic, social and cultural rights (including areas identified above); making complaints systems accessible for the general public, particularly those people most likely to experience breaches; and valuing and sustainable resourcing of small to medium sized NGO’s which advocate for those most affected by breaches.

**Limitations of this Submission**

The remainder of this response focuses on issues directly related to the human rights of criminalised women, particularly women in prison. This in no way diminishes SIS’s wider concerns about the lack of details in the Baseline Study in many areas.

**Feedback on the Introduction**

SIS is concerned that the Baseline Study is proposed to respond only to Australia’s responses to the UPR. Members countries of the Human Rights Council made 147 recommendations in response to Australia’s submission to the UPR. On 8 June 2011, Australia responded to these recommendations. Whilst these are occasionally mentioned in very general terms in the Baseline Study, specific recommendations and concerns are rarely articulated and the issues they raise are rarely addressed.

At the very least, the Baseline Study should explicitly provide data relevant to the implied criticisms underlying each of these recommendations. Only then, can the strategies proposed by other countries be properly considered during the process of developing the National Human Rights Action Plan.

**Feedback on Chapter 1**

SIS continues to hold grave concerns about Australia’s failure to **unreservedly support and legislate human rights.** If Australia’s human rights track record and future prognosis is as promising as suggested in documents such as Australia’s national review report to the UPR, there would be no reason for the Australian Government to fear placing the weight of law behind citizen’s human rights. This underpinning concern is reflected in many of the 147 recommendations from member countries of the UN Human Rights Council.

6 recommendations, initiated by 9 countries[[5]](#endnote-5), sought legislative change to incorporate Australia’s international human rights obligations into domestic law. The Australian Government rejected even the consideration of a comprehensive Human Rights Act outright[[6]](#endnote-6). The current Australian system relies on human rights bodies with advisory powers alone. As evidenced through the examples below, this system has been patently inadequate in protecting the rights of many Australian residents – particularly socially disadvantaged and marginalised Australians.

A further 4 recommendations proposed that Australia should lift its reservations to several international conventions[[7]](#endnote-7) (CRC, ICERD, CEDAW and/or ICCPR). Of particular relevance to the human rights of criminalised women is Australia’s continuing refusal to:

* **Guarantee the segregation of male and female prisoners** (currently an Australian reservation to the ICCPR). The vast majority of women prisoners are victims of family violence. Co-location with male prisoners frequently re-traumatises women with a history of violent abuse. Further, the conditions under which women prisoners are detained in mixed prisons are generally discriminatory – that is, women prisoners (in the name of *protection*) are kept under higher security conditions than their male counterparts. Even in so-called low security mixed prisons, women live in a confined space behind barbed wire – the equivalent of high security conditions.
* **Provide compensation for miscarriage of justice** (also a reservation to the ICCPR). There is overwhelming evidence of widespread miscarriages of justice against women at all levels of the criminal justice system. These include systemic discrimination and breaches of women and child prisoners’ human rights at all stages of the criminal justice process (from arrest, to charging, to sentencing, to imprisonment, to parole). In the SIS submission to the National Human Rights Consultation[[8]](#endnote-8), overwhelming evidence was provided of institutionalised discrimination against women, (particularly Aboriginal and Torres Strait Islander women, women with mental health issues and women with substance abuse issues) at all levels of the criminal justice system. Access to compensation for miscarriages of justice, including harm caused by systemic discrimination, is essential to providing incentives for the criminal justice system to become more accountable to the community and more compliant with its human rights obligations.
* **Guarantee the segregation of child prisoners from adult prisoners** (a reservation to the CRC). This reservation appears to largely exist to protect the Queensland Government from meeting its human rights obligations. 17 year old children continue to be incarcerated in adult prisons in Queensland. 17 year old female *child* prisoners are disproportionately incarcerated in protective custody, and have less access than other women prisoners to education and development opportunities. The Australian Government’s reports to the UPR continue to assert that the existence of state and federal anti-discrimination bodies is sufficient to protect human rights in Australia. The Anti-Discrimination Commission Queensland found that placing a 17 year old in Protection is *prima facie* direct discrimination on the basis of her age[[9]](#endnote-9). Yet, the Queensland Government has continued to refuse to implement the 2006 ADCQ Recommendation 48: *That the Queensland Government immediately legislates to ensure that the age at which a child reaches adulthood for the purposes of the criminal law in Queensland be 18 years.*

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| **Issues that a National Action Plan could address**The evidence clearly indicates that a failure to legislate human rights enables ongoing breaches of human rights in Australia. *Engagement* with key stakeholders at a regional and domestic level (as currently proposed) will not adequately protect the human rights of Australian residents. The Action Plan should include:* Evidence-based review of Australia’s reservations to CRC, ICERD, CEDAW and ICCPR (as agreed in Australia’s responses to the Human Rights Council).
* Robust data collection on breaches of human rights identified by state and federal anti-discrimination bodies which failed to be addressed by the relevant authorities.
* (In the light of this evidence) ongoing review of the need for legislated human rights in Australia.
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**Feedback on Chapter 2**

*Section 2.1: Access to Justice* fails to even mention women as a population group facing particular justice issues. Detailed evidence on these issues is contained in the Sisters Inside submission to the Human Rights Consultation.

*2.1.2 Access to justice principles* focuses on civil justice. This section should examine the evidence on the long term damage done by custodial sentences (including their impact on recidivism), and the impact of this on both individual prisoners and long-term community safety. It should provide detailed data on the excessive use of imprisonment on remand, particularly amongst women and children. It should recognise the multi-generational impact of imprisoning mothers (who comprise the majority of women prisoners). It should include the evidence on the human rights value of increasing the use of non-custodial measures, and discriminatory practices in access to these measures by children and young people, criminalised women in general, and specific populations of women. Detailed evidence on these issues is contained in the Sisters Inside submission to the Human Rights Consultation.

2.3 *Use of force by police* failsto include evidence. This section is almost exclusively a description of current practice in various jurisdictions. Evidence provided in the joint NGO submission to the UPR and other sources should be detailed here. The issues raised by a number of countries at the Human Rights Council[[10]](#endnote-10) should also be directly addressed.

This chapter does not include any data on support for victims of crime, with the exception of victims of human trafficking. The vast majority of women prisoners are also victims of crime, particularly violent family crime and crimes against Aboriginal and Torres Strait Islander women which occurred in the context of colonialisation. The evidence indicates that past failures to support these women has contributed heavily to their criminalisation. Detailed evidence on these issues is contained in the Sisters Inside submission to the Human Rights Consultation.

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| **Issues that a National Action Plan could address***Considering* principles on use of tasers, *examining options* to improve access to justice and collecting data on labour trafficking will not adequately protect the human rights of Australian residents. The Action Plan should include:* Improving data collection and analysis regarding use of force by police.
* Taking effective legal measures to prohibit the use of excessive force by police.
* Setting up new and improved mechanisms for independent investigation of police use of force, police misconduct and police related deaths, and compensation for victims of police abuse of power.
* Reducing the incidence of Aboriginal deaths in custody through implementing the outstanding recommendations of the Royal Commission into Aboriginal Deaths in Custody.
* Improving access to free legal advice with translation services, particularly for Aboriginal and Torres Strait Islander women in remote communities.
* Improving data collection on the use of non-custodial measures.
* Strengthening limitations on the use of remand in custody, particularly for non-violent offences.
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**Feedback on Chapter 3**

Criminalised women fall between the cracks throughout this chapter. Whilst this chapter sometimes recognises the inter-relationship between different areas of social disadvantage and marginalisation, it largely presents a mono-dimensional view in relation to women’s criminalisation. SIS’s submission to the Human Rights Consultation provides detailed evidence that demonstrated the inter-relationship between women’s imprisonment/criminalisation and other aspects of social disadvantage and marginalisation. In particular, it demonstrated that:

* The vast majority of women prisoners are survivors of family violence.
* Aboriginal and Torres Strait Islander women are highly disproportionately arrested, charged, imprisoned. They are highly disproportionally penalised within the prison system through higher-than-average classification and excessive use of administrative segregation measures.
* The vast majority of women prisoners face mental health issues and/or other disabilities and/or physical health issues and/or substance abuse issues.
* The vast majority of women prisoners have a history of homelessness, poverty, unemployment and poor educational outcomes.
* A significant proportion of women prisoners have a history of state care and/or other institutionalisation.

Detailed data on the interaction between these breaches of women’s human rights, the individual discrimination many face on a daily level, ongoing institutional/systemic discrimination and women’s criminalisation – that is, the multiple disadvantage experience by almost every woman prisoner - should be located in every section of Chapter 3.

**Aboriginal and Torres Strait Islander women**

Criminalisation of Aboriginal and Torres Strait Islander women is barely mentioned in this section. It is difficult to over-state the extent to which these women are over-represented and discriminated against at all levels in the criminal justice system. This warrants a detailed section, which outlines the overwhelming evidence of breaches of human rights of the kind available in the SIS submission to the Human Rights Consultation.

**Women in general**

*Section 3.2.1 Freedom from Violence* almost exclusively focuses on domestic violence. It fails to recognise criminalised women, when discussing the impact of family violence on specific populations. This section also fails to even mention systemic violence which impacts on women throughout the criminal justice system. Women prisoners are entitled to be protected from violence and sexual abuse whilst in prison. (Evidence of ongoing systemic and individual violence against women prisoners by correctional staff is further discussed below.)

**Children and young people**

*Section 3.3.3 The rights of children in the criminal justice system* properly recognises the over-representation of socially disadvantaged and marginalised young people, particularly Aboriginal and Torres Strait Islander young people, in the juvenile justice system. It also recognises the inter-relationship between key issues such as poverty, sexual abuse, state care and mental health issues and criminalisation of young people.

The massive increase in the proportion of untried young people imprisoned on remand (from 21% to 60% over the past 30 years) is mentioned in passing. This section also fails to address breaches of young people’s human rights whilst they are in youth and adult prisons. Overwhelming evidence exists of the adverse affects of imprisonment on young people, and breaches of their rights in areas such as health, education, employment and safety whilst imprisoned.Detailed national evidence on the long term impact of imprisonment on young people is available in a discussion paper by the Coalition Against Inappropriate Remand[[11]](#endnote-11).

**Homelessness**

Again, this Baseline Study acknowledges the nexus between homelessness and various specific populations. It fails to detail the integral relationship between homelessness and criminalisation. The SIS submission to the Human Rights Consultation provides substantial evidence about this relationship

SIS supports the importance of considering measures to mitigate the criminalisation of activities directly related to homelessness and the fact that homeless people are disproportionately subjected to police power, as proposed for the National Action Plan. Further evidence on these areas should be included in the Baseline Study. It is critical that, over the next 5 years, more than simply *considering* the issues is achieved.

**Disability**

*3.7.3 Freedom from exploitation and violence* – SIS strongly supports the recommendation of the NGO Shadow Report on the implementation of CEDAW that the Australian Government address, as a priority, the abuse of women with disability living in institutions and other settings. It is critical that prisons are included in this focus. There is overwhelming evidence, from both government and NGO sources, on the particular issues and needs of women with mental health issues – who, as recognised in the draft, are disproportionately imprisoned. Further, there is ample evidence to demonstrate that mental health issues are frequently exacerbated by imprisonment – and that many standard procedures within Australian prisons function as torture and/or degrading treatment for women with a history of sexual abuse and/or mental health issues.

**Refugees, asylum seekers and migrants**

3.10.3 Access to justice – SIS notes that *difficulties with English, lack of familiarity with Australian law, limited awareness of available legal services and distrust of law enforcement based on past negative experiences in other countries …*  **frequently …** *create challenges for recently arrived refugees, asylum seekers and migrants interacting with the justice system.* The Baseline Study claims that non-English speakers are generally eligible to access free interpreting services throughout the criminal justice system. This is inconsistent with the evidence which suggests that the majority of women only have access to an interpreter upon admission to prison, that prison staff rely on other prisoners as translators (with negative outcomes in many cases), that many CaLD women do not understand prison rules and procedures and are unfairly penalised, that critical signage in most prisons is only in English, that many do not have access to resources in their own language. The ADCQ[[12]](#endnote-12) identified a varieties of areas in which CaLD women are, or may be, discriminated against in Queensland prisons, and similar findings from elsewhere in Australia are articulated in the SIS submission to the Human Rights Consultation.

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| **Issues that a National Action Plan could address in relation to criminalised women’s human rights**The Action Plan should include:* Improving data collection and analysis regarding use of force and systemic sexual abuse by correctional staff.
* Taking effective legal measures to prohibit the use of excessive force and systemic sexual abuse by correctional staff.
* Setting up new and improved mechanisms for independent investigation of use of force, misconduct, sexual abuse and staff related deaths.
* To establish a system of compensation for victims of abuse of power by correctional staff.
* Withdrawing Australia’s reservation to the CRC, and implementing changes to ensure that young people are not imprisoned with adult prisoners.
* Taking effective legal measures to significantly reduce the rates of imprisonment on remand amongst women and children.
* Implementing measures to protect and promote young people’s rights whilst in youth or adult prisons.
* Modifying anti-discrimination laws to prohibit discrimination against people on the basis of homelessness or mental health.
* Establishing mechanisms to address criminalisation as a result of homelessness and divert homeless women and children from prison, particularly models such as the Special Circumstances Court in Queensland.
* Move urgently to outlaw standard prison practices which function to exacerbate women’s mental health issues.
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**More Detailed Commentary on Section 3.9**

**3.9 People in prisons**

Corrective Services legislation in many jurisdictions fails to meet the national Standard Guidelines for Corrections in Australia, and the international instruments on which this is based. It is essential that The national project to annually review the alignment of the Standard Guidelines is useful, and should be strengthened through implementation of enabling legislation.

Evidence for the concerns raised in submissions, and at the National Consultation focus groups about the protection for prisoners’ rights, both in prison and after release should be included in the Baseline Study. These should include *the impact of prison on physical and mental health, the impact of prison management procedures on women, prisoners’ access to justice and discrimination on the basis of irrelevant criminal record hindering re-integration into society*.

**3.9.1 Right to highest attainable standard of health care**

Evidence of the concerns raised by The Special Rapporteur on the right to health in 2009 should be included in the Baseline Study. These included delays in accessing primary health care, concerns about the capacity of primary health services to manage complex chronic diseases, and limits on prisoners’ access to benefits under Medicare or the PBS. The Baseline Study should also include further details on findings of *The Health of Australia’s Prisoners 2009*, with specific reference to the health issues of women prisoners. Further evidence on the particular health needs of women prisoners, and the failure of prisons to meet these needs, are available in the SIS submission to the National Human Rights Consultation.

Approximately 17% of women prisoners (compared with 7% of men) are imprisoned for drug-related offences. The majority of women prisoners in Queensland report continuing to inject drugs whilst in prison. Rates of Hepatitis C are particularly high amongst women prisoners, placing them at particular risk of transmission. (Sources for this data are available in the SIS submission to the National Human Rights Consultation.) It is therefore a matter of particular urgency that women prisoners have access to sterile injecting equipment.

Like the Special Rapporteur, there is substantial evidence available of women’s lack of access to rightful mental health care whilst in prison. Again, it is essential that data on prisoners with mental health issues (both upon entry to prison and upon release) be properly collected by properly qualified staff – preferably independent professionals.

The draft Baseline Study raises concerns about the appropriateness of detaining *forensic patients* in prisons. However, it fails to include or address the overwhelming evidence on the damage done to women with a history of sexual abuse and/or mental health issues. This evidence should be included in the Baseline Study and addressed through the National Action Plan.

The 2008 concerns of the Committee against Torture addressed the treatment of detainees in supermax facilities. There is substantial evidence of similar practices – including prolonged isolation and 24/7 observation of women in “crisis support units” or similar by male officers – routinely being implemented in women’s prisons throughout Australia.

**3.9.2 Rights of women in prisons**

This section provides very limited data on both:

* Issues affecting women prisoners.
* The complex interrelationship between criminalised women and other issues addressed in this chapter

As evidenced in the Sisters Inside submission to the National Human Rights Consultation, prison disproportionately affects women due to use of security classification systems that are tailored to men. The Baseline Report should include the available evidence of human rights breaches in areas such as employment of male prison officers (including in roles such as strip searching and observation of naked women). Contrary to indications in the current draft, at least some governments **do** collect detailed data on the number of strip searches conducted on women prisoners. The data presented by Sisters Inside was accessed through a FOI request from the Queensland Department of Corrections. It is important that this data – that between August 1999 and August 2002, 41,728 strip searches were conducted on women in Queensland prisons, and only 2 found drugs of any kind[[13]](#endnote-13) – is recognised as credible and an indicator of the information that is collected by (and available through) correctional departments. Further evidence of the credibility of this data is reflected in the concerns about the impact of strip searching expressed by the ADCQ in its review of women in prison in Queensland[[14]](#endnote-14).

Evidence should be provided for a wide variety of other human rights issues particularly affecting women prisoners in the Baseline Study. In addition to those raised earlier in this submission, these should include – impact of imprisoning mothers on children’s rights, imprisonment of women for minor offences, discrimination in sentencing for minor offences (e.g. women’s much lower average sentence than men), limited application of non-custodial sentences for women, discrimination in non-custodial sentencing amongst women (e.g. lower rates amongst Indigenous women), application of security classification tools designed for the criminogenic profile of men, disproportionate use of coercion and violence against women prisoners compared with men, discrimination in women prisoners’ access to education and employment (compared with men), discrimination in women’s access to core programs and therefore parole (compared with men), discrimination in all these areas amongst women prisoners (e.g. Indigenous women, CaLD women, women with cognitive disabilities).

**3.9.3 Oversight mechanisms for systemic human rights concerns**

SIS strongly supports the recommendations made during the UPR which called on Australia to ratify the Optional Protocol to the CAT and establish a National Preventative Mechanism. Evidence of breaches of human rights in women’s prisons, and the need for independent scrutiny of prisons has been called for by a wide variety of authorities including the ADCQ. Official visitor schemes, inspectors located within Correctional Departments and inspectors who are required to advise prison authorities prior to visits cannot provide the independent scrutiny required. It is essential that schemes with statutory powers such as the Western Australian Inspector of Custodial Services be treated as the only model with the potential to collect data and act on human rights complaints without conflict of interest.

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| **Issues that a National Action Plan could address**An effective and forward looking National Action Plan on Human Rights should also include:* Developing national legislation which requires state correction services legislation to conform with the national Standard Guidelines for Corrections in Australia and all international obligations.
* Implementing prison based needle and syringe exchange programs in all Australian women’s prisons.
* Ratifying the Optional Protocol to the CAT and implementing a National Preventative Mechanism with similar powers to the Western Australian model.
* Creating prison systems (including security classification tools) tailored to women’s criminogenic profile and needs, to ensure equitable treatment of women prisoners
* Increasing the use of non-custodial sentences, particularly to address the over-representation of Aboriginal and Torres Strait Islander women, homeless women and women with mental health issues in prisons.
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**Issues that the National Plan Should Address**

These have been detailed at the end of each section in this submission.

**Endnotes**

1. Page 92 [↑](#endnote-ref-1)
2. ibid [↑](#endnote-ref-2)
3. Sisters Inside (2009) Submission to the National Human Rights Consultation: Rights of Women Prisoners at <http://www.sistersinside.com.au/reports.htm> [↑](#endnote-ref-3)
4. Paragraph 137, Australian Government (2010) **Universal Period Review National Report – Australia** at <http://www.ag.gov.au/www/agd/agd.nsf/Page/Humanrightsandanti-discrimination_InternationalHumanRights_UniversalPeriodicReview> [↑](#endnote-ref-4)
5. Recommendations 17, 19, 19, 20, 21, 22 – initiated by Sweden, France, Jordon, Argentina, Timor-Leste, Canada, Ukraine, Russian Federation and Norway. [↑](#endnote-ref-5)
6. Australia’s responses to all recommendations, including rejection of Recommendation 22 which was initiated by 4 countries, is at <http://www.ag.gov.au/www/agd/agd.nsf/Page/Humanrightsandanti-discrimination_InternationalHumanRights_UniversalPeriodicReview> [↑](#endnote-ref-6)
7. Recommendations 13, 14, 15, 16 [↑](#endnote-ref-7)
8. Sisters Inside (2009) op cit [↑](#endnote-ref-8)
9. Anti-Discrimination Commission Queensland (2006) **Women in Prison: A Report by the Anti-Discrimination Commission Queensland**, ADCQ, Brisbane, page 116 at

<http://www.adcq.qld.gov.au/pubs/WIP_report.pdf> [↑](#endnote-ref-9)
10. See particularly recommendations 88, 89, 95, 96. [↑](#endnote-ref-10)
11. CAIR (2008) Rethinking Youth Remand and Enhancing Community Safety at [www.yanq.org.au](http://www.yanq.org.au) [↑](#endnote-ref-11)
12. Anti-Discrimination Commission Queensland (2006) **Women in Prison: A Report by the Anti-Discrimination Commission Queensland**, ADCQ, Brisbane, page 116 at

<http://www.adcq.qld.gov.au/pubs/WIP_report.pdf> [↑](#endnote-ref-12)
13. Sisters Inside 2009:43 [↑](#endnote-ref-13)
14. ADCQ 2006:74 [↑](#endnote-ref-14)