Australian Human Rights Commission
Celebrating 40 years

Not just an afterthought revisited:

Follow-up inspection of women in immigration detention at Villawood IDC

October 2026



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Acknowledgements

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Commissioner foreword

In 2024, the Australian Human Rights Commission found that women were too often an afterthought in Australia's immigration detention system. Our report *Not just an afterthought: The experience of women in immigration detention* made 31 recommendations aimed at ensuring that the safety, dignity and human rights of women in immigration detention were more effectively recognised and protected. Two years on, this report considers the extent to which that finding remains true.

This follow-up inspection report assesses progress since the 2024 report, with a particular focus on the experiences of women detained at Villawood Immigration Detention Centre. It examines the extent to which previous concerns have been addressed, identifies ongoing issues and considers the impact of significant changes that have occurred across the detention network since 2024.

Some positive steps have been taken. Women are no longer accommodated in the Bryce and Cowan compounds at Villawood, addressing some of the serious privacy and safety concerns identified during the original inspection. We also observed positive examples of committed staff members and constructive efforts on-site to respond to issues affecting women in immigration detention.

However, many of the key concerns identified in 2024 remain. Significant concerns continue regarding mental health and wellbeing, communication and information-sharing, gender-responsive practice, staffing levels, status resolution processes and pathways out of detention.

Some changes have created new challenges. While the move to new accommodation compounds improved privacy and safety, women also felt more isolated and restricted. They described reduced access to facilities, greater reliance on escorts and continuing concerns about safety within the compounds. These findings reinforce the complexity of addressing individual concerns without confronting the broader structural issues shaping the experience of women in immigration detention.

The transition to new detention and healthcare service providers has also presented significant challenges. While the Commission recognises the complexity of major organisational change, during this follow-up inspection important aspects of service delivery and operational management appeared under considerable strain, with women in immigration detention bearing the consequences.

Women's experience of prolonged uncertainty, limited autonomy and difficulties understanding or influencing decisions affecting their future featured prominently in the 2024 report and remain evident. While some individual issues have been addressed and improved, the broader picture remains one in which women continue to experience immigration detention within systems, infrastructure and processes that were not designed with their experiences in mind.

Women comprise only a small proportion of the overall immigration detention population. That fact cannot justify lower standards, slower progress implementing improvements or the failure to adequately address their needs and vulnerabilities. Two years on from the original inspection, the central message remains unchanged: women should not be an afterthought in immigration detention.



Dr Lorraine Finlay

Human Rights Commissioner

Executive summary

In December 2024, the Australian Human Rights Commission (Commission) published *Not just an afterthought: The experience of women in immigration detention.* This found that women were too often an afterthought in an immigration detention system overwhelmingly designed around the needs and experiences of men.

The Commission has subsequently conducted a targeted follow-up inspection to examine progress since that report, focusing primarily on the experience of women detained at the Villawood Immigration Detention Centre and the implementation of the Commission's previous recommendations.

The follow-up inspection found evidence of genuine progress. Most notably, women are no longer accommodated in the Bryce and Cowan compounds, addressing some of the serious privacy and safety concerns previously identified. The Commission also observed examples of strong local leadership, constructive engagement by staff, and efforts to improve conditions for women in detention.

However, many of the underlying concerns identified during the previous inspection remain.

Progress in implementing recommendations has been limited, incomplete or difficult to assess, with particular concerns remaining around gender-responsive training, mental health and wellbeing, communication and information-sharing, and guidance relating to transgender and gender-diverse people in detention.

The follow-up inspection also identified new issues arising from changes made since the previous inspection. While the move to the Hume A and Hume B compounds has improved privacy and safety in some respects, it has also resulted in unintended consequences, including reduced freedom of movement, greater reliance on escorts, restricted access to facilities, and challenges in managing conflict and safety within a smaller accommodation environment. Concerns were also raised regarding staffing levels, continuity of care, Status Resolution processes, and prolonged and uncertain detention.

The central conclusion of this follow-up inspection is that important progress has been made, but the fundamental concerns identified in the 2024 inspection report remain.

Women continue to experience many aspects of a detention system that does not consistently recognise or respond to their distinct needs and circumstances. Their experiences continue to be characterised by uncertainty, limited autonomy and barriers to meaningful participation in decisions affecting their lives.

The ten recommendations in this report focus on key implementation gaps and emerging issues identified during the follow-up inspection, with the aim of better protecting the dignity, safety and human rights of women in immigration detention.

Recommendations

The Commission does not repeat all 31 recommendations from the 2024 inspection report in this follow-up report. Those recommendations remain relevant. This section identifies the priority actions arising from the follow-up inspection. A table listing the recommendations from the 2024 inspection is included at Appendix A.

1. The Department publish a detailed implementation update on the recommendations made in the *Not just an afterthought: The experience of women in immigration detention December 2024* inspection report. The update should identify: what has been completed, what is underway, what has not progressed, what further action is proposed and any barriers to implementing the recommendations.
2. The Department prioritise the development and implementation of gender-responsive training for all staff working in immigration detention centres.
3. The Department review its guidance relating to transgender and gender-diverse people in immigration detention to ensure that it reflects human rights principles, international best practice, and the rights and interests of all individuals affected by accommodation and placement decisions.
4. The Department review the accommodation arrangements for women at Villawood following the move to the Hume A and Hume B compounds, with particular regard to safety, access to facilities and services, freedom of movement, and the ability to separate women according to their individual needs and circumstances.
5. The Department and contracted service providers ensure adequate staffing levels and workforce capability across the immigration detention network to support safe operations and timely access to services.
6. The Department and Healthcare Australia undertake a joint review of mental health service delivery for women in immigration detention and implement measures to improve continuity of care, access to specialist trauma-informed services, and support for women with complex mental health needs.
7. The Department strengthen Status Resolution processes by ensuring regular, meaningful and individualised engagement with women in immigration detention regarding their immigration status and future pathways.
8. The Department strengthen consideration of community-based alternatives to closed detention and establish a transparent and regular review process to ensure continued detention remains necessary, reasonable and proportionate in individual circumstances, with people in detention having access to clear information and advice about that process.
9. The Department improve communication practices across immigration detention facilities to ensure that important information is provided in a way that is accessible, understandable and responsive to individual needs.
10. The Department review policies and practices relating to Hotel APODs and airport turnarounds to ensure that individuals are provided with timely, accessible and comprehensible information about their circumstances, rights and available support.

1. Introduction

This follow-up inspection report examines progress since the Australian Human Rights Commission published its 2024 report *Not just an afterthought: The experience of women in immigration detention.* While important improvements have occurred, particularly the relocation of women from the Bryce and Cowan compounds, significant concerns remain regarding safety, wellbeing, communication and pathways out of detention. The follow-up inspection found that women continued to experience the consequences of an immigration detention system that remains largely designed around the needs and experiences of men.

In December 2024, the Australian Human Rights Commission published *Not just an afterthought: The experience of women in immigration detention* (2024 inspection report). That report examined the experience of women held in closed immigration detention in Australia and found that women were too often an afterthought in a system overwhelmingly designed around men.

The report made 31 recommendations to better protect the human rights of women in immigration detention, as well as improving the quality of the work environment and support for staff.[1] These included recommendations relating to safer accommodation, access to services such as healthcare, education, and meaningful activities, staff training, safety, privacy and the specific needs of women (including transgender women) in immigration detention.

Of these recommendations, the Department of Home Affairs (Department) agreed or partially agreed with 11 recommendations, disagreed with 4, noted 15, and indicated that 1 recommendation required government consideration.[2]

This follow-up inspection report is not a full re-inspection of every issue considered in the 2024 inspection report. It is a targeted follow-up focused primarily on the experience of women at the Villawood Immigration Detention Centre (Villawood), including the transition to new service providers, and continuing concerns about safety, health, daily life, communication, status resolution and pathways out of detention.

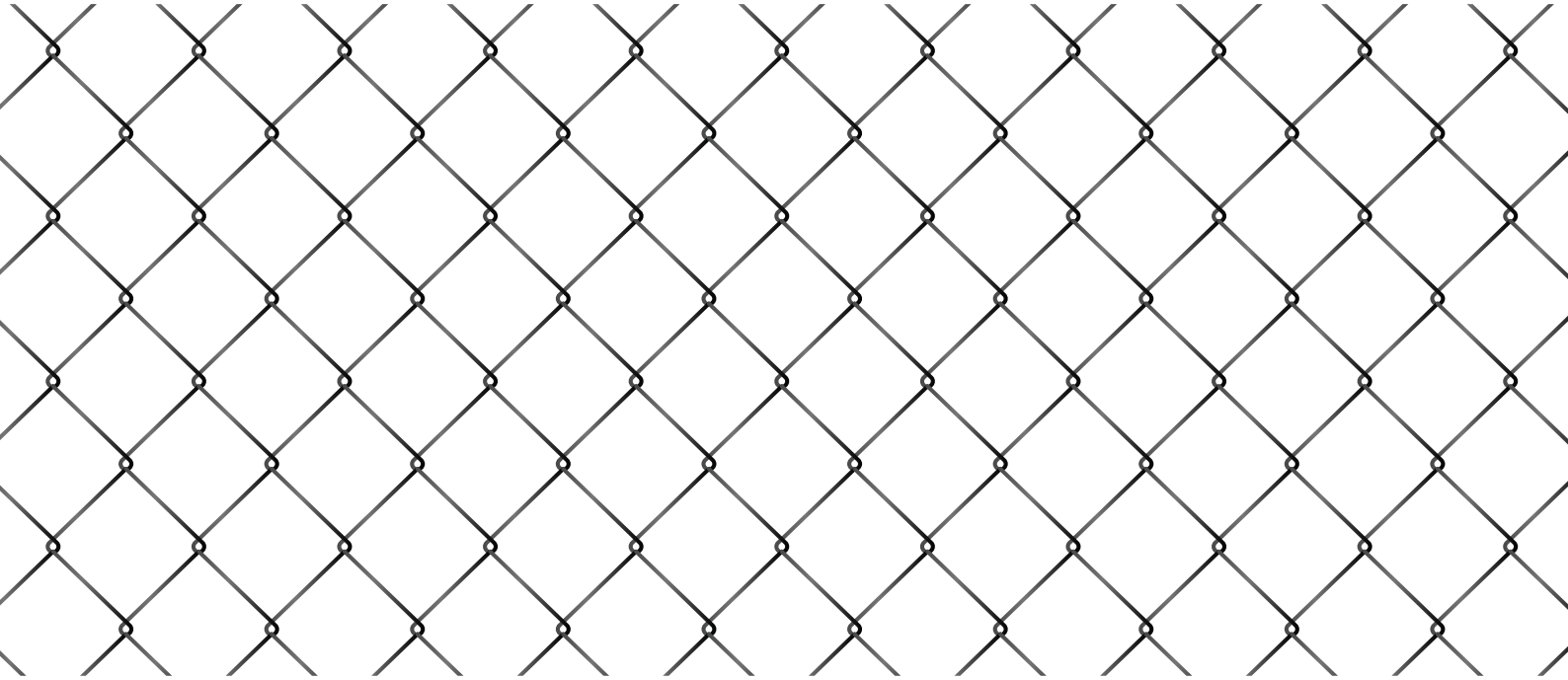
The follow-up inspection found that there have been some important positive developments. A key change is that women are no longer being housed in the Bryce and Cowan compounds, with the Commission also observing evidence of strong individual senior leadership and practical action on some issues that had been raised during the initial inspection.

However, the follow-up inspection also found that some changes have created new risks and that some of the recommendations that have been adopted have been implemented too slowly and only in part.

For example, the move away from the Bryce and Cowan compounds into the Hume A and Hume B compounds is a partial implementation of Recommendation 24 from the 2024 inspection report. It has improved the privacy and safety of women at Villawood with respect to the previous proximity to the Lachlan compound but has also raised concerns about reduced freedom of movement, reduced access to

facilities, fewer options to separate women when safety issues arise and the overall suitability of Villawood for women with complex needs.

The central conclusion of this follow-up report is that the improvements made to date matter, but they have not resolved the fundamental problem that was identified in the 2024 inspection report, namely that women remain too often an afterthought in immigration detention with their separate and specific needs being too frequently either not understood or overlooked.



2. Background

The follow-up inspection focused on the experience of women at Villawood Immigration Detention Centre, monitoring progress on recommendations made in the 2024 inspection report and assessing key developments since that time. These developments included the relocation of women's accommodation, the introduction of new detention and health service providers, and broader legislative and operational changes affecting immigration detention. Despite women comprising a small proportion of the overall detention population, the follow-up inspection found that their distinct needs continue to require targeted and gender-responsive approaches.

2.1 Purpose and Scope

The Commission conducted a follow-up inspection of Villawood (including Miowera Village) on 13 and 14 November 2025. The inspection team also inspected a nearby Hotel APOD (Sydney Hotel APOD) after being informed that two women were being detained there at the time of our inspection visit. The inspection was undertaken as a follow-up to the Commission's 2024 inspection report.

Around the time of our follow-up inspection there were 70 women being held in immigration detention in Australia, including 42 women at the Villawood Immigration Detention Centre (Villawood). The women at Villawood comprise just under 7% of the total population being held in immigration detention.[3] This had risen slightly to just under 8% by August 2026, however, still represents a distinct minority of the overall number of individuals being held in immigration detention in Australia.[4]

The primary aims of the follow-up inspection were to monitor the implementation of previous recommendations, identify improvements and ongoing or emerging concerns, and assess the impact of key environmental changes that had occurred since the original inspection.

This report focuses on the key issues arising from that follow-up inspection. It assesses progress since the 2024 inspection report, considers the impact of subsequent developments (such as the transition to new service providers), and includes observations from the separate inspection of a nearby Hotel APOD (which did not form part of the original inspection). It does not attempt to update every finding from the 2024 inspection report or assess every one of the 31 recommendations in detail. Instead, it identifies the most significant follow-up issues arising from the Commission's inspections and the supporting material reviewed.

The need for gender-responsive detention environments was a key theme of both the 2024 inspection and this follow-up inspection. Throughout this report, gender-responsive refers to policies, services and practices designed to meet the distinct needs and experiences of women.

2.2 Methodology

The follow-up inspection was conducted by the Human Rights Commissioner, Lorraine Finlay and 4 Commission staff, including the Specialist Advisor – Immigration & OPCAT and the Specialist Advisor – Sexual Orientation, Gender Identity & Intersex (SOGII). The team was assisted by Professor Angela Nickerson, who is a practising clinical psychologist and internationally recognised researcher in refugee mental health who

leads the Refugee Trauma and Recovery Program at University of New South Wales.

Before undertaking the inspection, the Commission engaged with and received written information from a range of civil society organisations who work directly with people currently and formerly detained in immigration detention. The inspection itself was conducted across two days and included interviews or conversations with women in detention, meetings with relevant agencies and service providers, discussions with staff, and observations of the physical environment at Villawood and the Sydney Hotel APOD. This report is based on the inspection of places of detention and information gathered further to the inspection.

In particular, we wish to note our appreciation to all staff at the Department, Australian Border Force (ABF) and Villawood for facilitating our inspection visit and for the professional and constructive manner with which they engaged with us throughout.

The Commission considered the evidence gathered during the inspection against human rights standards derived from international law that are relevant to immigration detention.[5]

The Commission approached the inspection using trauma-informed principles. Inspections conducted by the Commission differ from our formal individual complaints process,[6] and are designed to identify systemic issues and have a preventative focus. The purpose is not only to document conditions at a particular point in time, but to identify risks, root causes and opportunities to prevent harm. This is particularly important in relation to women in detention, many of whom may have histories of trauma, violence, family separation, mental health concerns or other vulnerabilities.

2.3 Key developments since 2024

There have been significant operational changes at Villawood since the 2024 inspection report. Women are now accommodated in the Hume A and Hume B compounds, having been moved from the Cowan and Bryce compounds that were being used at the time of the previous inspection.

This change altered the accommodation arrangements for women within the centre and the physical environment in which they are detained.

There has also been a transition to new service providers across the immigration detention network. In December 2024, Healthcare Australia started rolling out primary and mental health services, replacing International Health and Medical Services across the Australian detention network.

In March 2025, Secure Journeys (a subsidiary of the United States-based company Management & Training Corporation, which runs numerous detention and custodial facilities in the US) officially took over security and facilities management from Serco. There was a six-month transition period and staged rollout across the detention network in Australia, leading to a complex transition phase at major sites, including Villawood.

The broader legislative context has also changed since the 2024 inspection report. New laws have been introduced relating to prohibited items in immigration detention,[7] third country processing arrangements, consequences for non-cooperation with removal processes and civil liability protections,[8] and the exercise of migration and removal powers, including changes to procedural fairness requirements and statutory validation provisions.[9]

The profile of women in immigration detention has also changed over time. Since approximately 2017, women whose visas have been cancelled on character grounds under section 501 of the *Migration Act 1958* (Cth) have comprised an increasing proportion of the women held in immigration detention.[10] Although women continue to represent a relatively small proportion of the overall detention population, the cohort includes individuals with a diverse range of backgrounds, experiences and support needs.

3. Progress since 2024 report

The follow-up inspection identified some meaningful progress since 2024, including improved accommodation arrangements and examples of strong local leadership. However, implementation of many recommendations remains limited, incomplete or difficult to assess. The Commission remains concerned that key systemic issues, including gender-responsive training and broader structural barriers affecting women, have not yet been adequately addressed.

As noted above, the most significant change for the women detained at Villawood since the 2024 inspection report has been the move into the Hume A and Hume B compounds. This is a partial implementation of **Recommendation 24** from the 2024 inspection report, and, while it has resulted in new concerns that are discussed in further detail below,[11] at the time of the follow-up inspection women were in accommodation that offered greater privacy with no direct oversight from areas containing men.

The Commission also acknowledges strong individual senior leadership that was observed during the inspection. This included reports of enhanced visibility and engagement on the ground by senior ABF leadership, and examples of responsiveness to specific concerns that were raised during the inspection.

These developments matter. The Commission recognises that the staff at Villawood (and all other immigration detention centres) are working in a difficult environment and that there are examples of genuine efforts being made to improve conditions for women in detention. The Commission also recognises that the transition to new service providers has created operational complexity and that local staff are working within broader policy, contractual and infrastructure constraints.

At the same time, the extent of positive progress should not be overstated.

The Commission considers that progress on implementation of the 31 recommendations from the 2024 inspection report remains limited and unclear, despite ongoing positive engagement with the Department. This view is consistent with the Commonwealth National Preventive Mechanism's (Commonwealth NPM's) observation in June 2025 that previous recommendations they had made on range of matters were unaddressed or only partially addressed.[12] These included recommendations relating to complex psychiatric or neurological conditions, placement options for women, access to stimulating and engaging activities, pat searches, staff training and policy for transgender and gender non-conforming people.

The most recent Post Visit Summary by the Commonwealth NPM highlights key recommendations that have been accepted by the Department and which the Department intends to implement by the end of 2026.[13]

Together, these observations underscore the importance of ongoing independent monitoring to ensure that commitments and accepted recommendations are not only acknowledged in principle, but are implemented in practice and result in tangible improvements for women in immigration detention.

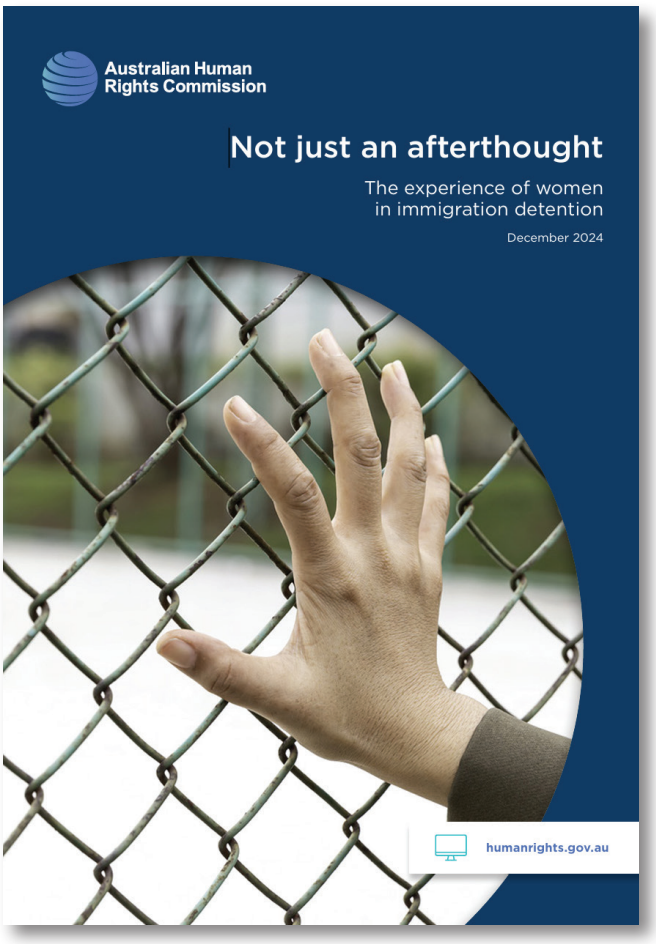
One area where progress remains unclear concerns the recommendations made in the 2024 inspection report relating to gender-responsive training for staff working in immigration detention.[14]

The Commission acknowledges and appreciates the constructive engagement that has occurred with the Department on this issue since the publication of the 2024 inspection report. However, the Commission had not – at either the time of the follow-up inspection or publication of this report – been provided with evidence that dedicated gender-responsive training had been developed and delivered in response to the recommendations made in the 2024 inspection report.

This remains an important area for further action. Women comprise a small minority of the overall immigration detention population and often have experiences and support needs that differ from those of men in detention. Staff working with women in immigration detention should be equipped with an understanding of the impacts of trauma, family violence, sexual violence, coercive control, caregiving responsibilities and other gendered experiences that commonly arise within the detention context.

The Commission considers that gender-responsive capability should not depend solely on individual experience or initiative. It should be supported by formal training, ongoing professional development and operational guidance that is consistently available across the immigration detention network.

The follow-up inspection presents a mixed picture. Some immediate risks have been reduced, and positive progress has been made in relation to some issues. But many of the underlying concerns remain. The experience of women at Villawood is still shaped by the limitations of a detention system that remains overwhelmingly designed around men and that too often fails to recognise the specific needs of women.



4. Service provider transition

The transition to new detention and healthcare providers created opportunities for improved collaboration and service delivery, but also introduced significant operational challenges. Women in detention and staff reported concerns about staffing levels, continuity of care, access to services and delays associated with escorts and appointments. The follow-up inspection found that the impacts of the transition have been felt directly by women in detention and continue to affect their daily experience.

This follow-up inspection occurred after significant changes to service provision across the immigration detention network in Australia. Secure Journeys, a subsidiary of Management & Training Corporation, commenced as the detention services provider in March 2025, replacing Serco. Healthcare Australia (HCA) commenced as the detention health services provider in December 2024, replacing International Health and Medical Services (IHMS).

The transition to new providers created both opportunities and risks. During the inspection, the Commission observed evidence of efforts to establish new operating models and improve collaboration between staff. Multiple staff members described stronger integration and information-sharing than had existed previously, and a number referred to a more collaborative 'one team' approach. Secure Journeys stated that they had increased welfare staffing at Villawood and adopted a greater focus on de-escalation and engagement in responding to challenging behaviour. These developments support the stated commitment to a more welfare-focused operating culture.

However, the Commission's inspection also highlighted the importance of assessing these changes by reference to the day-to-day experience of individuals in detention. Despite ABF and contracted service providers reporting changes in operating philosophy and service delivery, the Commission continued to receive and observe evidence of delays, restrictions and barriers affecting access to services. Concerns were raised about staff shortages, workforce capability, food quality, movement restrictions, increased escort requirements, incidents involving violence and safety, and difficulties recruiting and retaining suitably experienced staff. To give just one example, we were told that women sometimes experienced lengthy waits for escorts, delays in collecting medication and difficulties accessing appointments and services in a timely manner, which was consistent with the direct experiences of the inspection team who also experienced delays waiting for escorts while at Villawood. It was broadly acknowledged that the transition had resulted in the departure of experienced staff and a loss of institutional knowledge.

The transition to HCA also generated concerns regarding continuity of healthcare and access to specialist services. Key concerns raised with us included delays in referral pathways, difficulties accessing specialist services, and challenges associated with the transfer of medical records and treatment information between practitioners and detention facilities.

Civil society organisations also raised concerns about difficulties communicating with detention facilities following the transition, with delays in responses to emails and telephone calls, difficulties contacting

facilities outside business hours, barriers to arranging face-to-face visits, and challenges organising professional assessments and meetings for tribunal and court proceedings.

The concerns identified by the Commission are consistent with previous observations made by the Commonwealth NPM that 'identified several systemic issues and concerns related to the service provider transition, which impacted the overall safety and security of the [immigration detention network] and the day to day lives and experiences of people in detention'.[15]

The evidence emerging from this inspection demonstrates that the effects of the transition are not merely administrative. Changes in service delivery arrangements have directly affected women's daily experiences of detention. Where transitions are not effectively managed, individuals who are detained may experience the consequences through delays, uncertainty and reduced access to essential services.

The Commission recognises that substantial organisational changes have occurred since the commencement of the new service delivery arrangements, and that staff identified areas in which collaboration and service coordination had improved. However, the evidence collected during the inspection demonstrates that significant concerns remain regarding the practical impact of the transition on women in detention.

Women in immigration detention should not bear the burden of organisational change. Service provider transitions must be managed in a way that protects and ensures accountability for the mental and physical care, privacy, safety and dignity of people in detention, and that ensures improvements in policy and practice translate into tangible improvements in women's everyday experiences of detention.

The transition to new providers is therefore not a background administrative matter. It directly affects women's daily experience of detention: whether they can move around the centre, access health care, attend religious services, meet with lawyers or support workers, make complaints and receive consistent care.

The Commission recognises that transitions of this kind are complex. However, the complexity of the system should not fall on women in detention to navigate or manage. Service provider transitions must be managed in a way that protects continuity of care, access to services, safety, dignity and accountability.

5. Accommodation and safety

The relocation of women to the Hume A and Hume B compounds has improved privacy and reduced exposure to men's accommodation areas, addressing some of the most serious concerns identified in 2024. However, the new arrangements have also generated concerns regarding isolation, restricted movement, interpersonal conflict, drug use and access to facilities. The follow-up inspection found that Villawood continues to present significant challenges for safety accommodating women with complex needs and vulnerabilities.

The accommodation and safety of people in immigration detention engages fundamental rights to dignity, humane treatment and protection from abuse. Article 10(1) of the *International Covenant on Civil and Political Rights* (ICCPR) requires that people deprived of their liberty be treated with humanity and respect for their inherent dignity, while article 7 protects against torture and cruel, inhuman or degrading treatment. The *United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Offenders* (Bangkok Rules) further recognises the particular needs and vulnerabilities of women in detention, including the need to protect women from violence and sexual harassment. These human rights standards require accommodation and security arrangements to be responsive to women's individual circumstances, needs and risks, including their gender, history and vulnerabilities.

Relocation

The relocation of women's living quarters to the Hume A and Hume B compounds represents a significant change from the arrangements examined in the 2024 inspection report and has addressed some longstanding concerns. This relocation is responsive to **Recommendations 20, 21** and **24-28** of the 2024 inspection report, which identified significant concerns about the safety, separation, accommodation and living conditions of women at Villawood Immigration Detention Centre. However, the evidence gathered during the follow-up inspection indicates that the resettlement has also given rise to new challenges affecting women's safety and wellbeing.

The 2024 inspection report raised serious concerns about the accommodation of women in the Cowan and Bryce compounds, including the proximity of women's accommodation to the men's compounds (specifically the Lachlan compound) and the resulting impacts on privacy and safety. Women reported feeling watched, harassed and unsafe, particularly when using outdoor areas. The Commission recommended that Miowera Village be repurposed as a dedicated women's compound and that the use of the Bryce and Cowan compounds for women's accommodation should be discontinued.[16]

The move to accommodate women in the Hume A and Hume B compounds has addressed important aspects of those concerns. During the inspection, the Commission was advised that women no longer need to pass through men's areas to access key facilities and that the relocation has reduced opportunities for unwanted attention from men in detention. The relocation was described as providing greater separation from the men's compounds and greater flexibility to

accommodate women according to their individual circumstances and support needs.

These are important improvements that respond to concerns identified in the 2024 inspection report and address risks that were specific to the previous accommodation arrangements.

However, the evidence gathered during the follow-up inspection demonstrates that the move has not resolved broader concerns about whether women at Villawood are being held in accommodation that is safe, appropriate and responsive to their needs.



Photo: Outdoor space at Hume A compound.



Photo: Outdoor space at Hume B compound.



Photo: Hume B compound.



Photo: Common area in Hume B compound.

Restriction and isolation

A consistent theme emerging from the follow-up inspection was that many women described the new accommodation compounds as more restrictive and isolating than the previous arrangements.

While women were no longer exposed to the same privacy and safety concerns associated with nearby men's compounds, some women described feeling confined, boxed in and cut off from facilities that had previously been available to them. Concerns were raised about the limited size of the accommodation area, reduced opportunities for movement, and the perception that men retained access to a broader range of facilities within Villawood.

The follow-up inspection also identified concerns regarding access to communal facilities, activities and outdoor spaces. This is directly relevant to **Recommendation 21** of the 2024 inspection report, which identified that separating women and men can create de facto isolation and restrict women from accessing broader facilities and services.

During the follow-up inspection, women reported losing access to some areas that had previously formed part of their daily life, including facilities used for recreation, social engagement and activities. During the inspection, we were advised by ABF staff that women were unable to access the sports field, although arrangements were being developed to provide access and some women had been granted limited opportunities to use the oval. Since December 2025 the women have been able to access the oval for one hour each day from Monday to Friday.

Delays in escorts

Women also reported delays in obtaining escorts to access services and facilities located outside their specific compounds, reinforcing perceptions of confinement and dependence on staff availability.

Delays in arranging or undertaking escorts may result in people in immigration detention missing medical appointments, meetings with legal representatives, religious services, and other activities. This was directly observed by the Commission inspection team during our time at Villawood. This issue has a particular impact on women, who may be required to rely on escorts to move between their accommodation and other areas of the facility because of their accommodation arrangements, including the location of their living quarters in relation to other services and facilities.

Personal safety

The follow-up inspection also identified ongoing concerns regarding conflict and interpersonal safety within the relatively small accommodation compounds.

Staff indicated that the availability of two compounds provided an important mechanism for managing conflict and separating people where necessary. However, this did not appear to be sufficient to ensure that all women felt safe. A number of women spoke about their concerns about conflict, intimidation and violence between people in detention, and indicated that they felt unsafe and fearful on a daily basis.

These concerns were particularly significant in the context of the relocation to smaller and more confined compounds. Unlike the arrangements described in the 2024 inspection report, the new configuration did not provide the same capacity to separate people according to risk and behaviour.

The previous inspection had identified risk and behaviour-based separation as having contributed to improvements in safety. The evidence gathered during the follow-up inspection indicated that these improvements had not been sustained following the relocation, with women reporting increased concerns about conflict and interpersonal safety in the more confined accommodation environment.

Alcohol and drug use

Drug use also emerged as a significant safety concern. Healthcare staff described drug use as a major issue within the detention environment. While it was claimed that one benefit of the relocation was to reduce the women's exposure to pressures associated with contraband movement and interactions with men in detention, concerns about drug use within the compounds and its impact on safety and wellbeing continued to be raised with us. For example, one woman described being pressured by other detainees to participate in drug and alcohol use and reported ongoing fears arising from that environment.

Privacy

During the inspection, we also received evidence of a range of practical accommodation concerns. These included reports relating to privacy, room sharing, maintenance issues, temperature control, water pressure, and damaged facilities. In particular, several women raised concerns about privacy and room sharing, particularly where they were required to share rooms despite experiencing significant emotional distress or mental health challenges.

These issues should not be dismissed as minor matters of comfort. In a closed detention environment, accommodation conditions have a direct impact on dignity, privacy, safety and mental health. The ability to access outdoor spaces, obtain respite from conflict, maintain privacy, regulate one's environment and feel secure in living arrangements all contribute to wellbeing and a sense of personal autonomy. This is particularly important in immigration detention, which is not intended to be punitive.[17]

Women with complex needs

The follow-up inspection also reinforced concerns about the suitability of Villawood's physical infrastructure for women with complex needs, including women with serious mental health conditions, physical disabilities, and other vulnerabilities that require safe, accessible and appropriately tailored accommodation and support services.

Staff acknowledged that some areas of the centre are not well suited to people in detention with significant mental health needs, and highlighted the challenges associated with accommodating women with diverse support requirements within such a limited space. In particular, aspects of the accommodation environment, such as the use of bunk beds, may be unsuitable for women with mobility impairments, chronic pain, or other physical limitations, creating additional barriers to safety, independence and dignified living conditions.

As recommended in the 2024 inspection report, Miowera Village remains relevant to the question of safe and appropriate accommodation for women. Accommodation of women in Miowera Village would significantly ease mental health impacts, remove women from the harassment and psychological stress caused by their proximity to the men, provide access for children and families (see **Recommendations 10 and 11**) and ameliorate other accommodation concerns (see **Recommendations 27 and 28**). These considerations remained directly relevant at the time of the Commission's follow-up inspection.



Photo: Bedroom in Hume B compound.



Photo: Miowera Village

The Commission accepts that there are inevitable trade-offs in accommodation decisions within Villawood. The move to the Hume A and Hume B compounds has addressed some important concerns identified in the 2024 inspection report, particularly those relating to women's privacy and exposure to men in detention. The follow-up inspection indicates that these improvements have been accompanied by new concerns regarding confinement, access to facilities, interpersonal safety, drug use, and overall wellbeing. Taken together, the evidence reinforces the broader conclusion that Villawood remains ill-suited to the long-term detention of women with complex and intersecting needs.

Departmental statistics show that the average period of detention was 456 days as at 30 June 2026, with a substantial proportion of people detained for more than one year.[18] While immigration detention facilities were not intended to accommodate people for extended periods, the inspection findings suggest that existing infrastructure, operating arrangements and support services are insufficient to mitigate the risks that arise when detention is prolonged, particularly for women with significant mental health needs, disabilities or histories of trauma.

6. Searches and restraints

The follow-up inspection raised concerns regarding restrictive escort, search and restraint practices and their impact on women in detention. While security considerations are important, restrictive measures should be based on individual risk assessments and applied only where necessary and proportionate. The Commission remains concerned about any approach that normalises restraints as a routine rather than exceptional measure.

Searches and the use of force or restraints engage rights to dignity, bodily integrity, privacy and the security of the person. Articles 7, 9, 10(1) and 17 of the ICCPR, together with articles 2 and 16 of the *Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (CAT), are relevant to the treatment of people subjected to searches, force or restraints. The *Bangkok Rules* require particular safeguards in relation to searches of women and the use of restraints. Use of searches and restraints must be lawful, necessary and proportionate, and carried out in a manner that protects women's dignity, privacy and bodily integrity, with particular safeguards against practices that may cause physical and psychological harms.

The follow-up inspection raised concerns about searches, restraints and movement within Villawood. These measures impact a broad range of rights, including the rights to dignity, humane treatment, freedom of religion, health and equality, and can have a particular impact on women with histories of trauma, violence or coercion.

The Commission was advised that the use of mechanical restraints had reduced significantly in the period following the transition to Secure Journeys. However, the evidence available to the Commission indicates that restraint and escort practices continue to be a significant issue. We were repeatedly told about restrictive escort arrangements, and of some women declining external specialist appointments because of concerns regarding escort and restraint practices. These concerns suggest that any early reduction in the use of restraints has not necessarily translated into a sustained reduction in the experiences reported by women in detention.

During the follow-up inspection, the Commission was informed that the use of restraints during off-site escorts had become significantly more common following a serious incident in May 2025 in which a detained person allegedly stabbed two escort officers while being transported from Villawood Immigration Detention Centre to Sydney Airport and subsequently escaped.[19] The Commission was advised that escort and transport arrangements were reviewed following that incident and that restraint practices had temporarily become more restrictive as a result.

This is consistent with information reported by the Commonwealth NPM of a 'national ABF directive providing that the use of mechanical restraints for all transport and escort movements for all persons in detention across the immigration detention network is the default position'.[20] This directive was reported to 'not appear to be subject to the individual's risk assessment' and 'appears to have arisen in response to an increase in escapes and attempted escapes during escort activities and the serious assault during escort activity at [Villawood]'.[21]

The Commission acknowledges the importance of protecting the safety of staff, people in detention and the broader community. However, restrictive practices should only be used where they are necessary, proportionate and based on an individualised assessment of risk.

Subsequent public reporting suggests that restraint practices may have become even more restrictive after the follow-up inspection. In April 2026, it was reported that Secure Journeys had directed detention facility staff that handcuffs were to be used during all transport and escort activities, including for people in detention assessed as low risk, unless medically contraindicated. The reporting indicated that this change followed a series of escapes and attempted escapes across the immigration detention network.[22]

The Commission is concerned by any approach that treats restraints as a default rather than an exceptional measure justified by individual circumstances. Many women in immigration detention have experienced prior trauma, including family violence, sexual violence, persecution or coercive control. For these women, the use of restraints may be particularly distressing and, in some cases, retraumatising. Decisions regarding restraints should be based on individual risk assessments, guided by least restrictive principles and subject to regular review.

The Commission also heard concerns from women regarding the impact of searches on their daily lives, including concerns regarding the frequency and intrusiveness of some searches. During interviews, women reported delays associated with searches and movement procedures, including when attending religious services. Women described situations where they were required to wait for escorts and then experienced further delays because of search requirements.

While the Commission recognises that searches may serve legitimate security purposes, their cumulative effect can create practical barriers to participation in religious, recreational and other ordinary activities within the immigration detention environment.

The Commission notes that the framework introduced by the *Migration Amendment (Prohibiting Items in Immigration Detention Facilities) Act 2024* (Cth) – which broadened existing powers by enabling more extensive searches and seizures within immigration detention facilities in specified circumstances – had not been implemented at Villawood at the time of the follow-up inspection. The expanded search and seizure powers introduced by that framework were therefore not directly observed during the inspection. Nevertheless, the Commission considers that any future exercise of those powers should remain consistent with the principles of necessity, proportionality and individual assessment.

Searches, restraints and movement restrictions must be lawful, necessary, proportionate, individualised and trauma-informed. They should never be imposed as a matter of administrative convenience, to compensate for staffing shortages or routine practice. A detention environment cannot be made safe simply by adopting the most restrictive response. Lasting safety requires appropriately resourced escort arrangements, effective risk assessment processes and practices that protect both security and human dignity.

7. Health and welfare

Mental health remained one of the most significant issues identified during the follow-up inspection, particularly in the context of prolonged and uncertain detention. While some positive developments in healthcare delivery were observed, concerns persist regarding continuity of care, access to specialist services, gender-responsive healthcare and the effects of drug use within the detention environment. Women continue to face barriers that can undermine their health, wellbeing and recovery from prior trauma.

People in immigration detention retain their fundamental human rights, including the right to be treated with humanity and respect for their dignity. Article 12 of the *International Covenant on Economic, Social and Cultural Rights* (ICESCR) recognises the right to the highest attainable standard of physical and mental health. The *Bangkok Rules* recognise the particular physical and mental health needs of women in detention and the importance of gender-responsive health care.

Mental health and drug use emerged as significant health and welfare issues during the follow-up inspection. This is consistent with the Commission's findings in the 2024 inspection report and with the broader evidence received during the follow-up process regarding the effects of prolonged detention, uncertainty, trauma and separation from family and community supports on women's health and wellbeing. The Commission heard from individuals in immigration detention, service providers and staff that mental health concerns are prevalent across the detention population and that many women enter immigration detention with pre-existing experiences of trauma, family violence, persecution, abuse and other vulnerabilities.

Mental health and prolonged detention

A recurring theme was the connection between prolonged and uncertain detention and deteriorating mental health outcomes. The 2024 inspection report highlighted high rates of depression, anxiety, post-traumatic stress disorder, self-harm and psychological distress among women in detention, and recognised that uncertainty regarding immigration status and future pathways was a major source of ongoing distress. Our interactions with women in Villawood during the follow-up inspection reflected these concerns.

The Commission also remains concerned about the interaction between deteriorating mental health and a person's ability to engage with immigration processes. Evidence received during the follow-up inspection suggested that, in some cases, prolonged detention and declining mental health may affect a woman's capacity to understand information, participation in decision-making and engage meaningfully with efforts to progress her immigration matter. These circumstances highlight the importance of considering alternatives to closed detention where ongoing detention is contributing to significant mental health deterioration.

The Commission also received evidence regarding delays and barriers in accessing mental health services. While some people that we spoke to reported receiving psychological support and expressed satisfaction with the care they were receiving, other evidence that was received raised concerns about delays in referrals to specialist trauma counselling services, interruptions to treatment following transfers between facilities, access to interpreters and difficulties maintaining continuity of care. Concerns were also raised about missed appointments and women not always receiving timely access to external specialist services when needed. These differing experiences suggest that access to and experiences of mental health support are not always consistent across the cohort.

Continuity of care

The inspection identified broader concerns regarding continuity of healthcare. Examples were given of reported delays in transferring medical records between facilities and concerns that treatment plans were not always continued following interstate transfers. Staff similarly advised the Commission that obtaining medical records from external providers, correctional facilities and hospitals could be challenging and sometimes delayed. Continuity of care is particularly important for women with complex health needs, chronic conditions, mental illness or histories of trauma. In the 2024 inspection report, **Recommendation 16** highlighted this issue by calling for improved arrangements for the timely transfer of medical information, which is essential to supporting ongoing treatment, avoiding gaps in care and facilitating appropriate clinical responses upon entry into immigration detention

The Commission observed that practical barriers can also affect access to healthcare. Concerns were raised during the follow-up inspection regarding delays associated with escort arrangements for external appointments, medication collection and movement around the centre. Evidence provided to the Commission indicated that transport and escort arrangements have, at times, contributed to declined or missed external appointments, and that this an issue that particularly impacted women in detention given their location within Villawood.

Access to medications and basic healthcare products also requires ongoing attention. The Commission heard descriptions of medications previously prescribed for people in detention not being available and occasions where requests for medical assistance resulted only in being provided paracetamol and being told to wait for the clinic to open. We also heard concerns regarding access to menstrual products and the limited range of products available to women. Access to basic medications and menstrual products should be timely, dignified and responsive to individual needs.

Access to gender-responsive health care

Women's health was a key focus of the follow-up inspection. In the 2024 inspection report, **Recommendations 15-19** concerned women's access to appropriate and gender-responsive health care and wellbeing. HCA advised the Commission that women's health services have expanded since the previous inspection, including efforts to strengthen preventive health screening and improve access to women's healthcare. The Commission was informed that three of the four on-site GPs at Villawood were women, and that women in detention could access women practitioners where requested. HCA also described screening processes that include reproductive and sexual health assessments, contraception discussions, cervical screening and follow-up care.

While these developments are welcome, others continued to raise concerns regarding access to reproductive healthcare and specialist women's health services. The Commission reiterates the importance of ensuring that women in detention have access to comprehensive and gender-responsive healthcare that is equivalent to that available in the broader community.

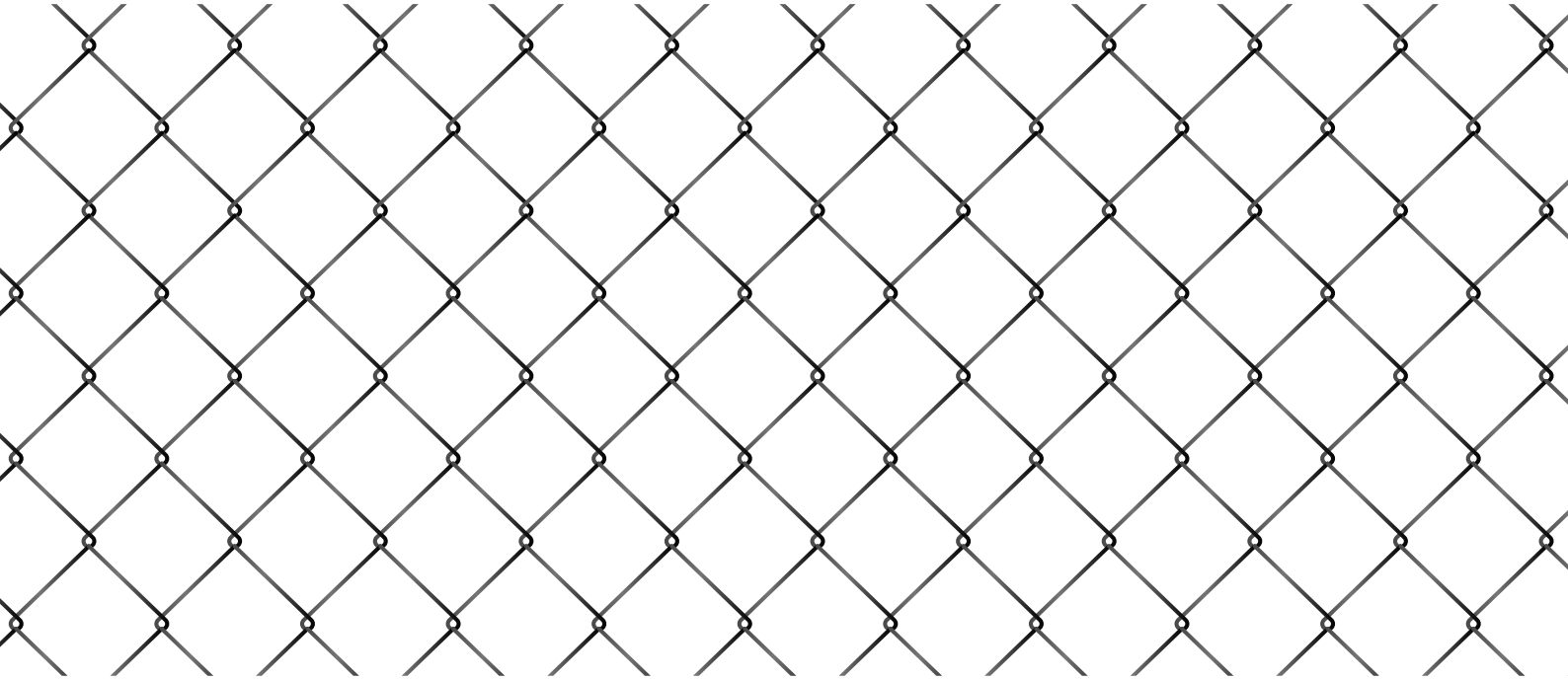
Drug and alcohol use

Numerous participants identified drug use as a significant concern affecting both health and safety within the women's compound. Drug and alcohol use within immigration detention facilities can have a disproportionate impact on women, particularly where women are accommodated in a single compound and have limited ability to remove themselves from drug-related conflict, intimidation and violence. Healthcare staff described heroin and methamphetamine use as a major issue within the detention environment. Interviews identified concerns relating to drug use within the detention environment, pressure to participate in drug use, and the effect this may have on detainees' sense of safety and wellbeing.

The Commission notes the efforts being made to respond to these issues, including multidisciplinary risk assessment processes, dedicated alcohol and other drug clinicians, and the operation of SMART Recovery programs, including women-only groups. Nevertheless, the evidence received suggests that drug use continues to have significant consequences for women's health, safety and wellbeing within immigration detention.

The Commission also notes a number of positive developments identified during the follow-up inspection. HCA reported a multidisciplinary model of care involving nurses, general practitioners, psychologists, psychiatrists, mental health nurses, allied health practitioners and alcohol and other drug specialists. Additional services, including physiotherapy, medical imaging and expanded women's health screening, have been introduced. Some women interviewed by the Commission reported positive experiences accessing healthcare and mental health services and expressed satisfaction with the support they had received.

Notwithstanding these positive developments, the weight of the evidence received during the follow-up inspection demonstrates that significant concerns remain regarding mental health, continuity of care, access to specialist services, barriers created by escort arrangements, drug use within the detention environment, and the particular vulnerabilities experienced by women with histories of trauma. Women in immigration detention should have timely access to trauma-informed, gender-responsive and culturally safe healthcare, and should not face avoidable barriers in accessing essential healthcare services.



8. Transgender and gender-diverse people in detention

The follow-up inspection also considered progress in implementing the recommendations made in the 2024 inspection report regarding transgender and gender-diverse individuals in immigration detention.

Transgender people in immigration detention are entitled to the same human rights as all other people without discrimination. Article 2(1) of the ICCPR requires rights to be respected without distinction of any kind, while Article 26 guarantees equality before the law and equal protection of the law without discrimination. Articles 7 and 10(1) are also engaged where treatment, accommodation or security arrangements expose transgender detainees to humiliation, violence or other forms of degrading treatment. These principles require detention authorities to assess accommodation, searches, health care, privacy, safety and other detention arrangements in a manner that respects each person's gender identity, and protects them from discrimination and violence, while simultaneously recognising and protecting the human rights of others.

While the inspection identified positive developments, including active social work involvement and access to external specialist gender health expertise, these measures should be considered in light of the significant challenges previously reported by transgender individuals in immigration detention, particularly in relation to isolation and poor mental health outcomes.

The experience of transgender people in immigration detention – supported by the direct observations made by the inspection teams during both the original and follow-up inspections – continues to highlight the need for an approach that extends beyond physical safety and considers social connection, dignity, inclusion and psychological wellbeing.

The Commission welcomes the development of dedicated guidelines and operational practice addressing the welfare, security, management and accommodation of transgender and gender-diverse people in detention, which responds to **Recommendation 12** in the 2024 inspection report.

These formal guidelines, which we have been informed were introduced by the ABF in early 2026, are an important and positive step and reflect recognition of the need for a more structured approach in this area.

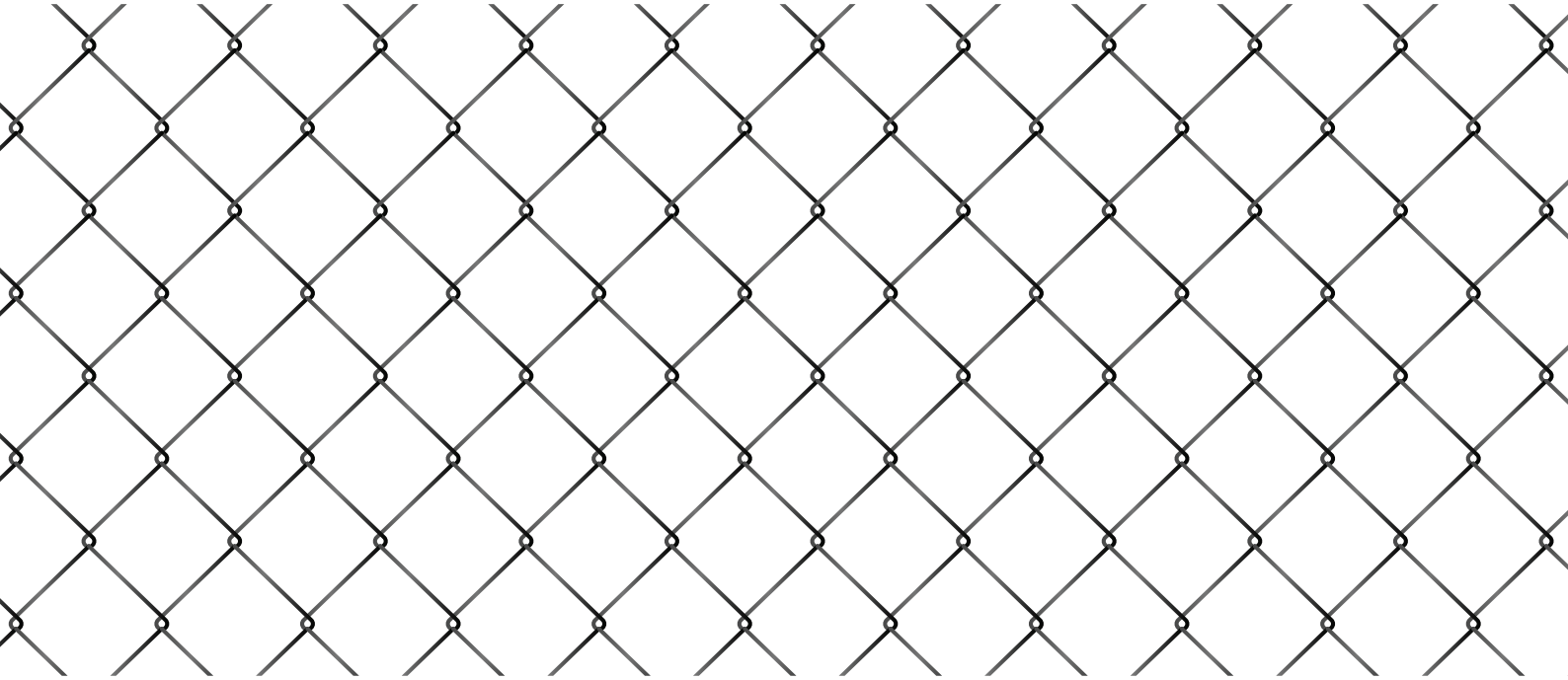
However, the Commission has raised concerns about the contents of the guidelines. These include the definitions used in relation to gender and gender diversity, the scope and application of the guidelines, the extent to which staff are supported through appropriate training, and the approach to conducting pat and strip searches. The Commission is concerned that the guidelines do not fully reflect the recommendations made in the 2024 inspection report or contemporary human rights standards in these areas. The Commission recommended that these guidelines be informed by human rights principles, including the Yogyakarta Principles +10, be co-designed with transgender people and their representative organisations, and provide for the safety of transgender people while appropriately recognising and managing risks to others.

The Commission also recommended that the guidelines be accompanied by sound operational procedures as a priority.

Despite ongoing engagement between the Commission and the Department following the publication of the 2024 inspection report, the Commission was not provided with a direct opportunity to review or provide input into the details of the guidelines during development.

The Commission considers that the guidelines that have been developed should now be reviewed in light of the recommendations made in the 2024 inspection report and informed by contemporary human rights standards. Any such review should consider not only the rights and interests of transgender and gender-diverse people in detention, but also the rights, safety, dignity and wellbeing of all individuals in immigration detention who may be affected by accommodation, placement and management decisions.

The Commission's position remains that decisions affecting transgender and gender-diverse people in detention (see **Recommendations 13 and 14** in the 2024 inspection report) should be individualised, evidence-based and protect the human rights of the individual concerned, as well as all other individuals detained in immigration detention and staff working in that environment. Such decisions should not rely solely on broad policy settings or inflexible categorisations, but should recognise the diversity of experiences and needs that exist within both transgender and broader detention populations.



9. Daily life

The lack of meaningful activities, education and opportunities for personal development remains a major concern for women in detention. Although some additional programs and recreational opportunities have been introduced, many women continued to describe daily life as characterised by boredom, uncertainty and a lack of purpose. The inspection found that meaningful activity remains critical to dignity, wellbeing and mental health.

The lack of meaningful activities was a major concern identified in the 2024 inspection report and remains a significant issue following the follow-up inspection.

The 2024 inspection report found that women in detention consistently described available activities as limited, gender-stereotyped and insufficiently connected to education or skills development. Women expressed a desire for activities that provided purpose, education, vocational training and meaningful opportunities for self-development.

Evidence gathered during the follow-up inspection indicates that these concerns persist. During interviews and discussions with women detained at Villawood, the Commission continued to hear concerns about the limited availability of meaningful activities and educational opportunities. Women continued to express a desire for activities that would better prepare them for life after immigration detention and provide practical skills rather than simply occupying time.

The Department advised that women at Villawood have access to a range of facilities and activities, that consultation processes had been established to seek women's views regarding activities, and that additional recreational opportunities had been introduced as a result of that feedback. The activities that were offered in terms of group-based activities and recreational games included pickleball, modified games of soccer and touch football, badminton and walking, while social recreation activities included colouring and board games (such as rummy and triominos).



Photo: Schedule of activities for women in detention

The existence of facilities and programs, however, does not necessarily mean that women experience them as adequate, meaningful or accessible. A recurring theme across the follow-up inspection was the gap between what is available in principle and what women experience in their daily lives.

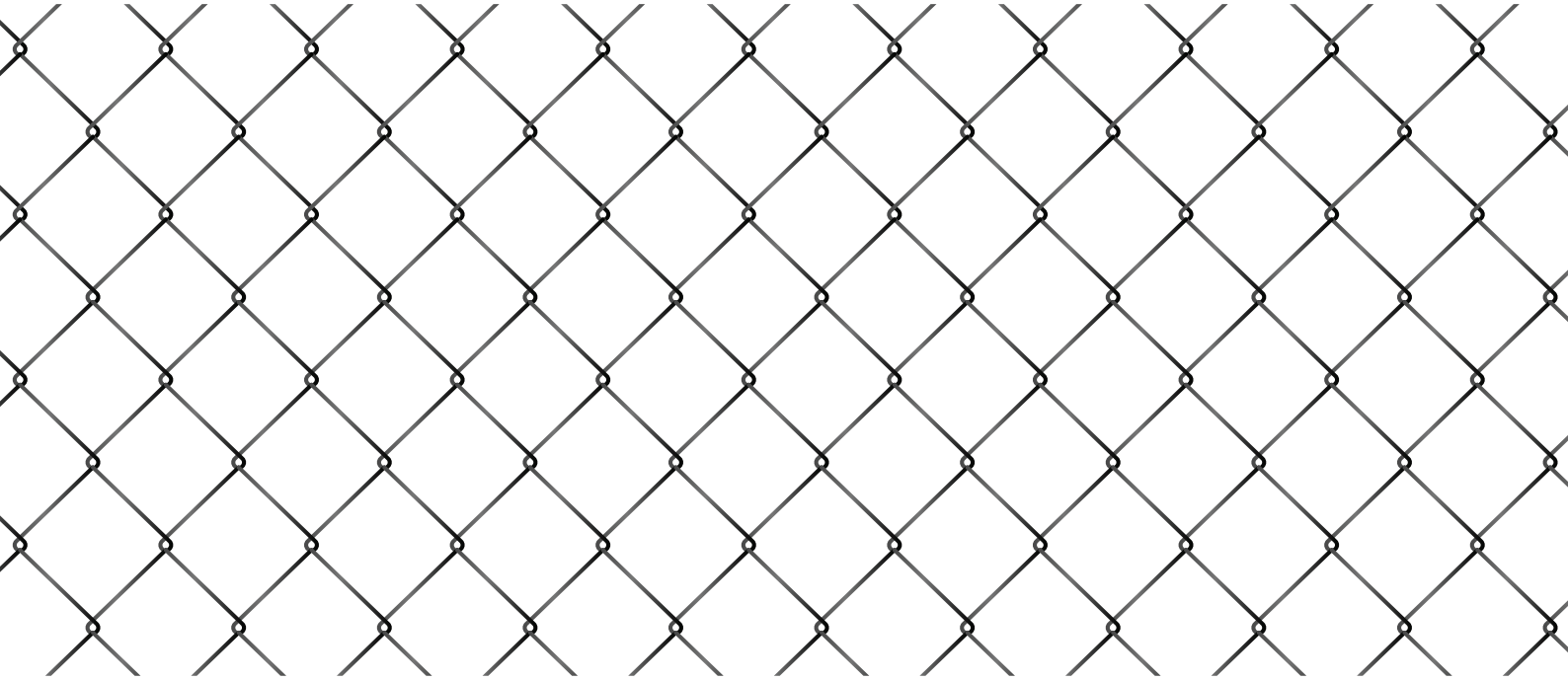
While some women spoke positively about aspects of the activities program, others described limitations in both the range and usefulness of available activities. One woman told the Commission that many activities were useful for "passing time" but did not provide skills that would assist her in the future, explaining that she wanted activities to be "more practical". This suggests that, notwithstanding improvements in the availability of programs, further work may be required to fully implement **Recommendation 3** of the 2024 inspection report by ensuring that activities are experienced by women as meaningful, responsive to their needs and supportive of their personal development.

The Commission also heard concerns regarding access to outdoor spaces and recreation. Some women reported that the move to the Hume compounds had reduced access to facilities they had previously enjoyed, including outdoor social spaces and recreational activities. At the time of the follow-up inspection, women had access to outdoor gym equipment but did not have access to the sports field, although plans were underway to address this.

The Department has subsequently advised that from 15 December 2025 women at Villawood have had access to the sports field for one hour each day from Monday to Friday.

The Commission is particularly concerned about the relationship between daily life in detention and women's mental health. Throughout the follow-up inspection, boredom, lack of purpose and uncertainty about the future were consistently identified as significant factors affecting wellbeing. Women who spoke with the Commission frequently described feeling stuck, unable to move forward, and uncertain about what their future would hold.

This evidence reinforces that meaningful activity is not simply a recreational matter and should not be viewed as an optional luxury. Opportunities for education, skill development, social connection, physical activity and personal growth are important components of dignity, wellbeing and mental health. This is particularly the case for women who may spend extended periods in closed immigration detention while experiencing uncertainty regarding their future pathway and immigration status. In those circumstances, daily life cannot be reduced to simply waiting. Women in immigration detention should have access to meaningful activities, education and vocational opportunities that promote autonomy, purpose, wellbeing and preparation for life beyond detention.



10. Information and communication

Access to clear, timely and understandable information remains a significant challenge for many women in immigration detention. Language barriers, literacy needs and the complexity of detention and immigration processes often limited women's ability to understand their circumstances and exercise their rights. The follow-up inspection highlighted the need for communication practices that focus on genuine understanding rather than the simple provision of information.

Access to information and communication is central to the ability of people in immigration detention to understand and exercise their rights. Article 19 of the ICCPR protects the freedom to seek, receive and impart information, while article 17 protects against arbitrary or unlawful interference with privacy and family life. The *Mandela Rules* recognise the importance of detainees being provided with information about the conditions of detention, their rights and obligations, and mechanisms available to them, in a form they can understand. Communication with family, legal representatives, advocates and support networks are particularly important safeguards for women to support family life and prevent isolation.

Women in detention need clear, accessible and timely information about the rules, processes and supports that affect their daily lives. The follow-up inspection identified continuing concerns regarding access to information, understanding of detention processes, and the extent to which information is communicated in a way that enables women to make informed decisions.

Issues relating to access to information and communication are not new concerns. For example, the *Post Visit Summary: Villawood Immigration Detention Centre* that was published by the Commonwealth NPM on 13 September 2024 recommended that the 'Department must explore new ways to share information and communicate with people in detention to ensure that it provides them with clear and current information in a timely manner'.[23]

During the follow-up inspection, the Commission observed barriers relating to language, literacy, access to documents and understanding of processes. These barriers affected women's ability to navigate both detention-related processes and matters concerning their immigration status and visa applications. Women raised concerns about difficulties obtaining information, understanding forms and written material, accessing translated documents, and obtaining copies of documents they required. The Commission acknowledges that efforts have been made to provide translated materials and interpreter support in some contexts, and that staff identified ongoing work to improve communication with people in detention from diverse linguistic backgrounds. However, the Commission also observed that some information appeared to be available only in English and that women could experience difficulties navigating administrative processes and daily life within Villawood without assistance.

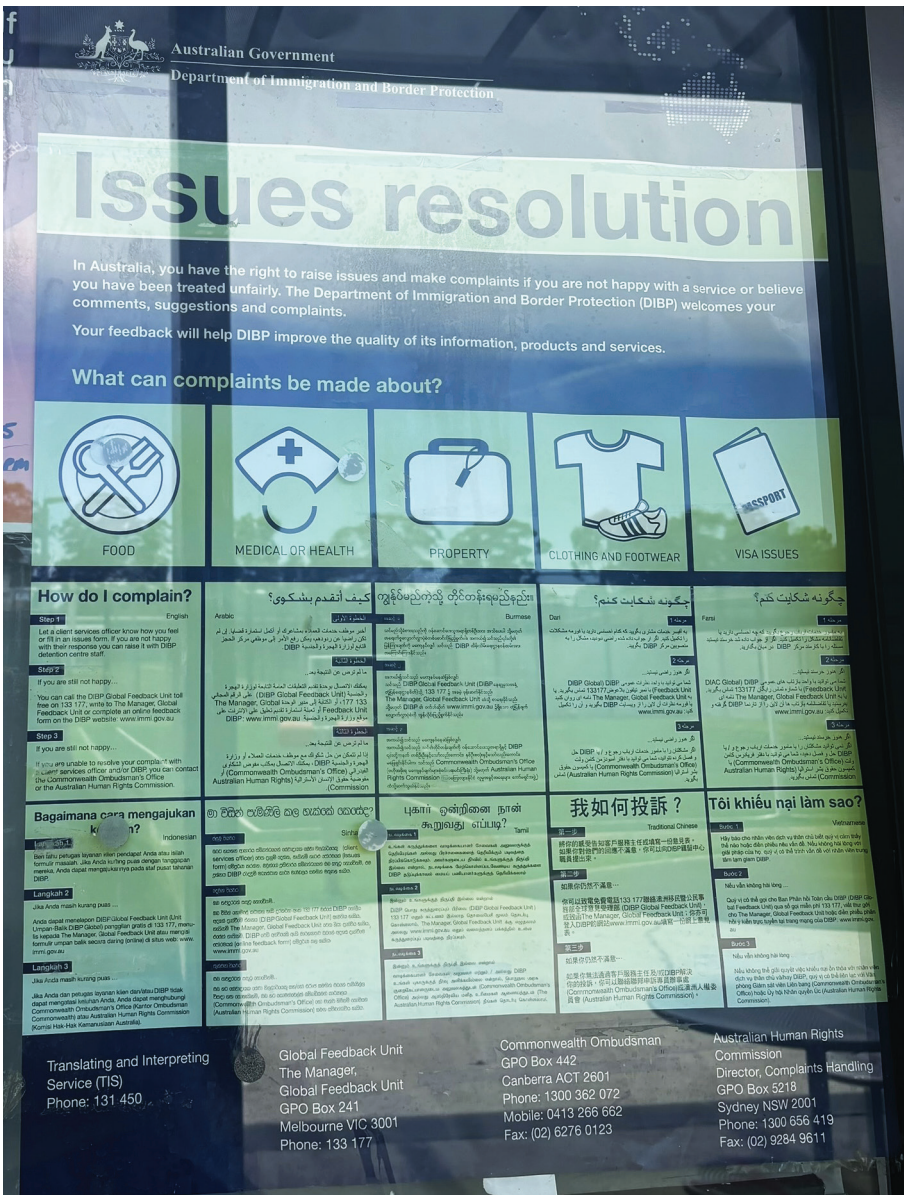


Photo: Issues resolution photo displayed in detention compound

These barriers are significant because detention is an environment in which people have limited control over many aspects of their lives. When information is unclear, inaccessible or inconsistently provided, women may become dependent on informal sources of information, including other people in detention. During the inspection, it became apparent that women within Villawood frequently provided both information and communication assistance to one another. While peer support can be valuable, there is a risk that reliance on these sources can result in information being incomplete, inaccurate or misunderstood.

The Commission heard concerns that communication challenges extend well beyond immigration processes. Women require accessible information about healthcare appointments, complaints mechanisms, legal assistance, available activities and programs, access to personal items, shop arrangements, detention rules and everyday operational matters. Difficulties understanding these processes can have practical consequences, including limiting access to services and reducing confidence in available supports.

Evidence gathered during the inspection suggested that language and literacy barriers continue to affect many women in detention. The women detained at

Villawood represented diverse linguistic, cultural and educational backgrounds. The Commission notes that literacy and English language proficiency among people in immigration detention may vary significantly, and that the range of languages spoken can shift over time as the detained population changes. These factors can create challenges in accessing information, understanding processes and communicating effectively where information is not provided in an accessible format.

During interviews, some women indicated that documents had been provided to them in English despite their limited ability to understand the language. While interpretation services can be accessed – for example, they were readily available to facilitate our interviews throughout the follow-up inspection – the women that we spoke to were often not aware that these services were available and, in any event, would only be able to potentially access translation services in a limited range of circumstances. The impact that language and literacy barriers have in navigating daily life within Villawood was clearly apparent during the follow-up inspection.

The inspection also highlighted broader concerns about whether the provision of information is accompanied by genuine understanding. Many individuals arrive in immigration detention while experiencing trauma, stress, shock, mental distress or language barriers that can significantly affect their ability to process information. Important information can be misunderstood even when it has technically been provided. The Commission was told that individuals sometimes rely on fellow people in detention to interpret information, creating additional risks that important messages may be distorted or lost.

The Commission heard repeatedly that communication should be individualised rather than relying solely on standardised written materials. Put simply, there is no "standard person in detention" and communication methods need to account for individual circumstances, language needs, literacy levels, disabilities, trauma histories and mental health conditions. There were repeated examples during the follow-up inspection where individuals appeared not to understand their current circumstances or available supports despite having previously been given information. This highlights the importance of ongoing conversations and repeated explanations, rather than treating significant communications as complete once information has been handed over.

At the same time, the Commission notes evidence of positive practices. For example, HCA advised that professional interpreters are routinely used in medical consultations and assessments, and that interpreter preferences, including gender preferences and trauma-related considerations, are taken into account where possible.

The Commission recognises that it is not reasonable to expect detention facilities to provide immediate access to interpretation services for every language and individual at all times. At the same time, every effort should be made to ensure that language barriers do not prevent people in detention from understanding and exercising their rights or accessing essential services.

Effective communication is a fundamental safeguard within places of detention. Access to information influences a person's ability to understand and exercise their rights, engage with available services, make informed decisions and maintain a sense of agency. The Commission considers that information should be available in relevant languages, in plain language and in formats that accommodate literacy needs, disability, trauma and mental health considerations.

Information provision should be regarded as an ongoing process rather than a single communication event. Communication should be assessed by reference to actual understanding, not merely whether a document has been provided or a procedure has been followed. This is particularly critical in circumstances where communication is critical to an individual's rights, wellbeing or safety.

11. Complaints

The follow-up inspection identified ongoing concerns about the accessibility, transparency and effectiveness of complaints processes at Villawood. Women reported barriers to making complaints and uncertainty regarding whether concerns raised had been investigated or resolved.

Effective, accessible and independent complaints mechanisms are an essential safeguard for the human rights of people in immigration detention. Article 2(3) of the ICCPR requires an effective remedy for the violation of ICCPR rights, while articles 7 and 10(1) are particularly relevant where complaints concern treatment or conditions that may amount to cruel, inhuman or degrading treatment.

The Mandela Rules require accessible mechanisms through which people in detention can make requests and complaints and provides safeguards against reprisals. For women in detention, complaint mechanisms must recognise and protect women's particular vulnerability to abuse and provide protection and support for allegations to be investigated appropriately and confidentially.

A complaints process is only meaningful if people can use it safely, understand it and receive a response. The follow-up inspection highlighted that the complaints process at Villawood continues to raise concerns, particularly internally.

During the follow-up inspection, the Commission observed that women seeking to make a complaint to the detention service provider were generally required to do so in written hardcopy format, obtaining official complaint forms from the staff office. While people in detention could also raise concerns through other channels, including by telephone, online complaint mechanisms and direct contact with oversight bodies, the reliance on hardcopy forms for complaints to the service provider may present practical obstacles to access, particularly for people with limited literacy, language skills or confidence in approaching staff.

A complaints process should not require a person to identify themselves to staff before they are able to access the means of making a complaint.

The follow-up inspection also identified accessibility concerns. Women who have limited English proficiency, low literacy or difficulty understanding written information may face additional barriers in navigating the complaints process. The Commission heard that some women rely on others in detention to explain information or assist with written forms. While peer support can be helpful, reliance on other women in detention may create risks that information is misunderstood, inaccurately conveyed or influenced by interpersonal dynamics within the detention environment.

Women that we spoke with also raised concerns about what happens after a complaint is submitted. Several women described experiences of making complaints or raising concerns without receiving clear information about the process, the progress of the complaint or the outcome. Some reported that they were not spoken to about their complaint after it had been lodged, while others said that they were unaware whether any action had been taken in response.



Photo: Complaint boxes in detention facility



Photo: Complaint boxes in detention facility

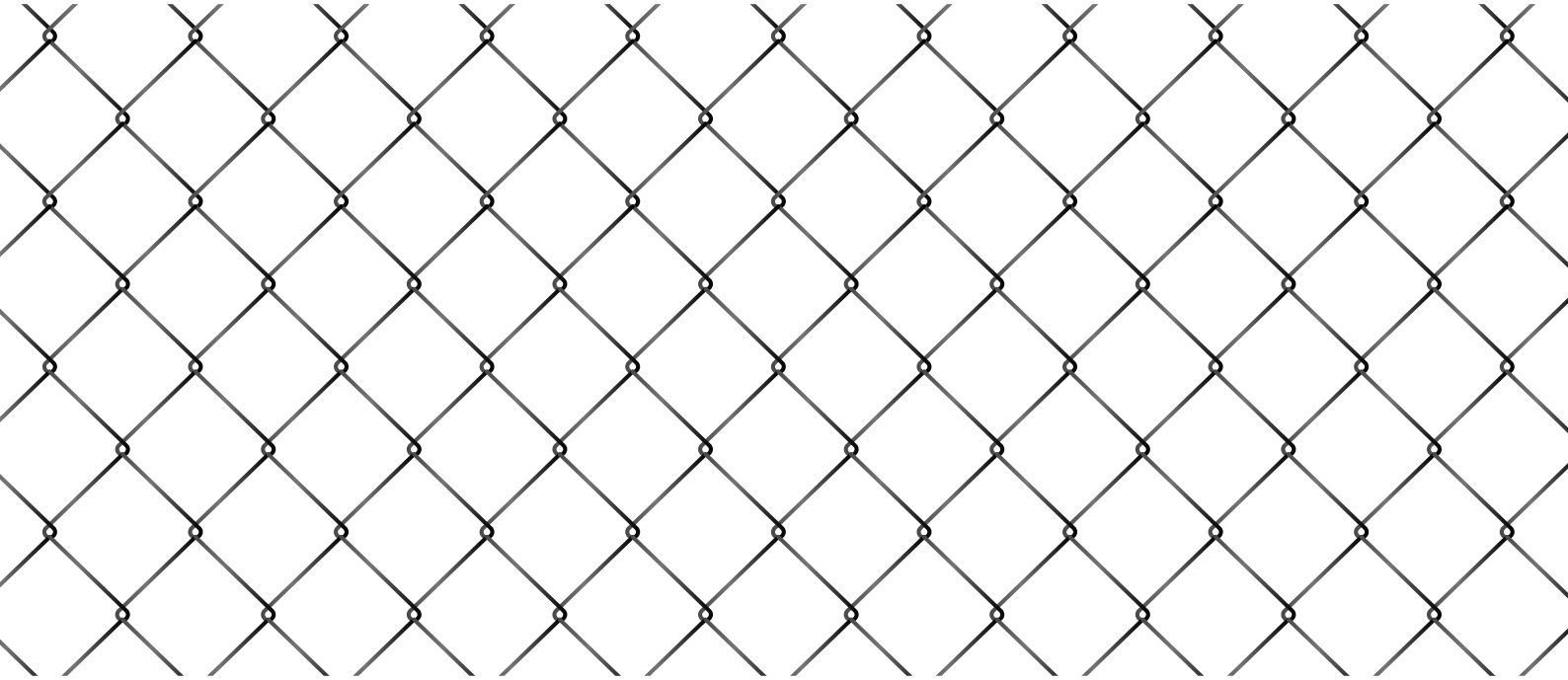
Others suggested that they generally felt comfortable raising concerns with detention officers, who they perceived as receptive. Despite some positive feedback, it was still clear that there were issues identified regarding the clarity and consistency of complaints processes at a systemic level.

The follow-up inspection further identified concerns regarding complaint and incident reporting practices. Information provided to the Commission suggested that incidents and complaints were not always being followed through in a way that inspired confidence among people in detention. In some cases, there appeared to be uncertainty about whether complaints remained active, had been resolved or had been closed. The Commission is concerned that a lack of transparency regarding complaint handling can undermine confidence in the system and discourage future reporting.

These concerns are particularly significant in the context of allegations relating to safety, harassment, violence and other harms. Effective complaint mechanisms are an essential safeguard within closed environments. Women must be able to raise concerns without fear of repercussions and with confidence that those concerns will be taken seriously, investigated appropriately and responded to in a timely manner.

The Commission considers that complaint forms and other complaint mechanisms should be freely and privately available without requiring women to approach staff to obtain them. Information about complaint processes should be provided in accessible formats and available in relevant languages. Women should also be able to make complaints confidentially and, where appropriate, anonymously.

Women who make complaints should receive acknowledgement that their complaint has been received, clear information about the process that will be followed, reasonable updates regarding progress and information about the outcome where appropriate. A system that receives complaints but does not provide feedback risks undermining trust in the complaints process and discouraging individuals from reporting future concerns and allows human rights infringements to escalate or go unaddressed.



12. Status resolution

Uncertainty regarding immigration status and future outcomes was consistently identified as one of the greatest sources of distress for women in detention. Many women reported limited engagement with Status Resolution processes and difficulties obtaining clear information about their cases. The follow-up inspection found that greater communication, transparency and in-person support is required to ensure women can understand and meaningfully engage with decisions affecting their future.

Timely and fair resolution of immigration status is relevant to the protection of the right to liberty and the prohibition of arbitrary detention for all people in immigration detention. Article 9 of the ICCPR protects against arbitrary detention and requires that deprivation of liberty be justified in individual circumstances. For women in immigration detention, the potential for prolonged detention to compound existing vulnerabilities and disrupt family, community and support networks is significant.

The uncertainty associated with unresolved immigration status, including the often complex and lengthy process of Status Resolution, was identified during the follow-up inspection as one of the greatest sources of stress for women in detention.

Status Resolution refers to the process by which the Department of Home Affairs determines a person's lawful immigration status. This can include being granted a visa and being permitted to remain in Australia or being refused and detained and/or removed. Decisions relating to visa status, detention, removal and release have profound implications for a person's liberty, family life, mental health and sense of autonomy. Access to clear information, meaningful engagement and effective support throughout those processes is therefore critical.

Women consistently told the Commission that they did not know who was responsible for their case, had experienced changes in case managers, had not spoken with their case manager for extended periods, or were not receiving regular updates regarding the progress of their matter. During interviews, women reported not knowing how long they would remain in detention, expressed confusion about immigration processes and, in some cases, demonstrated limited understanding of information that had previously been provided to them.

For women in detention, Status Resolution is not simply an administrative process. It determines whether they may be released, removed, transferred or continue to be detained. Uncertainty regarding these outcomes can have a significant impact on mental health and wellbeing, family relationships, legal preparation and a person's ability to make informed decisions about their future. The Commission observed throughout the inspection that uncertainty regarding visa outcomes and immigration processes appeared to be a major contributor to distress among women in detention.

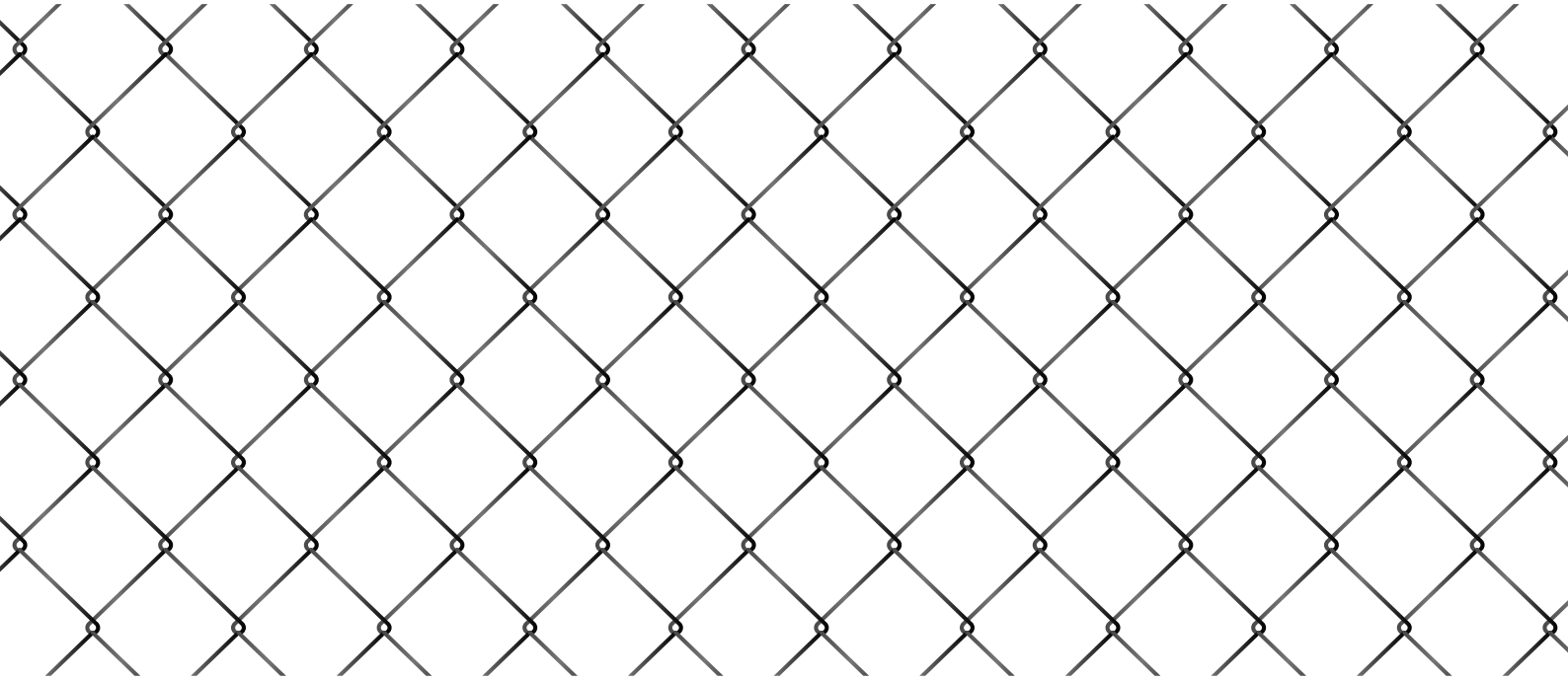
A recurring concern raised during the inspection was the lack of direct, meaningful engagement between women and Status Resolution staff. The Commission heard concerns that Status Resolution Officers generally communicate with people in detention by telephone rather than meeting face-to-face. There was also a consistent impression that communication was focused

on meeting procedural requirements rather than ensuring that people in detention genuinely understand their circumstances, available options and likely pathways forward.

The follow-up inspection also highlighted the importance of stronger coordination between Status Resolution staff and other detention service providers. Decisions relating to immigration status can have significant implications for an individual's mental health, wellbeing and behaviour. Providing effective support to people in detention requires communication and information sharing across Status Resolution, welfare and healthcare teams. Status Resolution processes should ideally form part of a holistic approach to wellbeing for people in detention, rather than operating as a largely separate administrative function.

As stated above, a one-size-fits-all approach to communication is not enough. There is no standard person in detention. Information must be individualised, accessible, timely and repeated where necessary. Staff should take reasonable steps to confirm that women have understood information that is provided, particularly where language, literacy, trauma, mental health, cognitive or other barriers may affect comprehension.

Communication should be informative rather than merely directive. Women should know who is responsible for their case, what stage their matter has reached, what decisions are pending, what options remain available, what timeframes apply where known and where they can obtain legal or other assistance. Regular, meaningful engagement can reduce uncertainty, support informed decision-making and help ensure that women are treated with dignity throughout the detention process.



13. Pathways out of detention

The follow-up inspection highlighted continuing concerns about prolonged detention and the limited pathways available for women to move into less restrictive settings. Many women described experiencing uncertainty before entering detention and confusion about options for release, removal or community placement. The Commission remains concerned that insufficient consideration is being given to alternatives to closed detention, particularly for women with significant vulnerabilities.

The right to liberty requires that immigration detention be necessary, proportionate and not arbitrary, and that detention be used for only as long as it is justified. Article 9 of the ICCPR is therefore directly engaged by decisions about whether a person can safely be released from detention or accommodated in a less restrictive setting. Decisions about release or less restrictive alternatives should therefore take account of women's individual circumstances, and any particular vulnerabilities, with closed detention used only where necessary.

Related to the above concerns regarding Status Resolution, the follow-up inspection also highlighted broader issues regarding pathways into and out of immigration detention, particularly for women transferred directly from prison following visa cancellation.

For many women, the transition from prison to immigration detention was characterised by uncertainty, inadequate information and a lack of meaningful engagement about what would happen after the completion of their sentence.

The Commission was repeatedly told by women in detention that they often reached the end of their custodial sentence without a clear understanding of whether they would be released into the community, transferred to immigration detention, removed from Australia or become subject to further immigration decision-making. The Commission also heard concerns that some women were not aware that a transfer to immigration detention was likely until shortly before it occurred.

Similarly, it was suggested to the Commission that visa cancellation notifications and related correspondence may not always be received in a timely way and are often provided only in English. Concerns were raised that culturally and linguistically diverse women may have difficulty understanding complex legal terminology, the consequences of visa cancellation, available review processes and relevant timeframes, particularly where access to legal advice is limited.

These concerns are significant because the consequences of visa cancellation extend far beyond a person's period of imprisonment. Women who have completed a custodial sentence may nevertheless face prolonged immigration detention while revocation requests, immigration assessments or removal processes remain unresolved.

Evidence provided to the Commission suggested that revocation processes can take many months and, in some cases, years to resolve. When a decision has not been made by the completion of a prison sentence, the practical outcome is often a direct transfer into immigration detention.

For many women, this experience can feel like a continuation of punishment after their sentence has ended. The 2024 inspection report documented that women frequently

experienced detention in this way, particularly where immigration detention continued for lengthy periods after the completion of their criminal sentence. The follow-up inspection suggests that these concerns remain relevant.

The uncertainty surrounding pathways out of detention emerged as a recurring theme throughout the follow-up inspection. Women frequently reported that they did not know how long they would remain in detention, what options were available to them, or what steps remained outstanding in their case. Some women reported that they had not received meaningful engagement from the Department regarding future pathways since arriving in detention. Others expressed frustration about delays, changing circumstances and the absence of clear information about their prospects for release or resolution.

The consequences of this uncertainty are not merely administrative. Unresolved immigration status and uncertainty about future pathways can have a profound impact on mental health, family relationships and overall wellbeing.

The follow-up inspection also highlighted the importance of earlier intervention and support while women remain in prison. There is a clear need for women facing possible immigration consequences to receive timely information, access to legal advice and meaningful engagement well before the completion of their custodial sentence. Women should not reach the end of a prison sentence without understanding whether they are likely to be released, transferred to immigration detention, removed from Australia or subject to ongoing decision-making processes.

The Commission also heard concerns regarding the limited pathways available for women to transition into less restrictive settings while their immigration matters are being resolved. Where risks can be effectively managed outside a closed detention environment, greater use should be made of community-based options as an alternative to detention.

These concerns go to the heart of the Commission's longstanding position on immigration detention. As outlined in the 2024 inspection report, detention should not be automatic or indefinite. Decisions about detention should be based on individual circumstances and risk, subject to regular review, and directed towards identifying the least restrictive option available.[24] Without a structured review mechanism, there may be insufficient review of continued detention, undermining procedural fairness and increasing the risk of arbitrary detention.

While improved communication and case management are important, they cannot fully address concerns arising from prolonged and uncertain detention itself. Many of the difficulties identified during the follow-up inspection stem from the fact that women remain detained for extended periods while immigration outcomes remain unresolved, and therefore experience all of the impacts of long-term detention.

The follow-up inspection reinforces the need for greater consideration of alternatives to closed detention, particularly for women with histories of trauma, complex mental health needs, disability, caring responsibilities, strong community supports or other circumstances that may make detention especially harmful. The Commission remains of the view that pathways out of detention should be actively identified and pursued wherever risks can be managed through less restrictive measures.

14. Sydney Hotel APOD

The inspection of the Sydney Hotel APOD did not identify significant concerns about the physical accommodation itself, which was being used for short-term detention. However, concerns were raised regarding access to information, interpreters, legal assistance and understanding of immigration processes. The inspection reinforced the importance of ensuring procedural fairness and effective communication, even during brief periods of detention.

The Commission also inspected a Sydney Hotel APOD as part of the follow-up inspection process, after being informed that two women were being held there at the time of our follow-up inspection. The issues identified in relation to the Sydney Hotel APOD were distinct from those arising at Villawood.

Most people accommodated in the Sydney Hotel APOD were individuals involved in airport turnaround processes or pending imminent departure from Australia. This was the case with respect to the two women we spoke with, who had been transferred from the airport to the APOD less than 24 hours previously and were expected to be placed on outgoing flights within the next 24 hours. The Commission did not identify significant concerns regarding the physical accommodation itself, although noting that this conclusion is based upon the information provided that the Sydney Hotel APOD was used exclusively as a short-term accommodation option for periods of up to 72 hours. However, concerns were raised regarding access to information, translation services and understanding of immigration processes.

The principal concerns related not to the accommodation environment, but to the processes surrounding arrival, detention and departure. During the inspection, concerns were identified regarding access to legal assistance, the provision and explanation of documents, access to food and other essential items, communication about immigration processes, access to interpreters and information about expected timeframes.

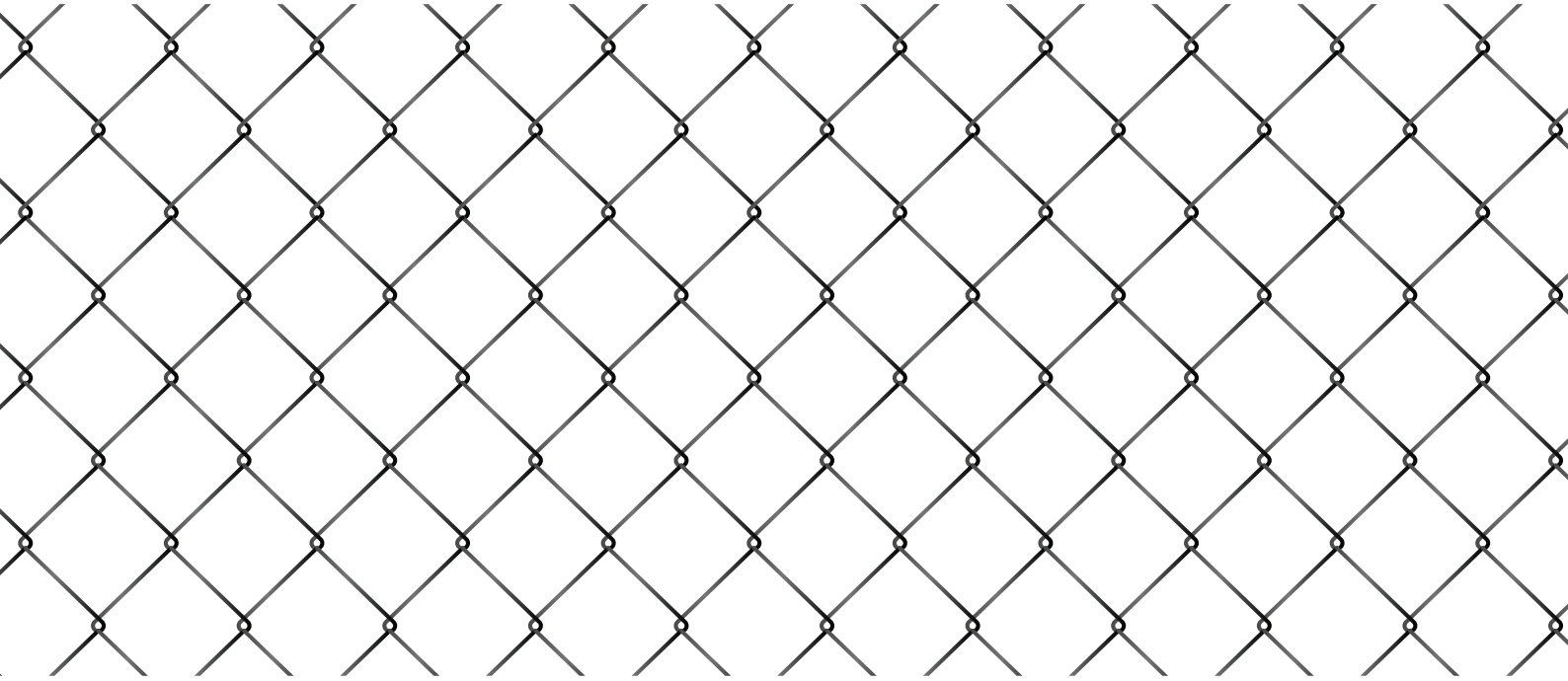
It is essential that individuals subject to airport turnaround[25] and removal processes understand what is happening and what options may be available to them. Individuals in these circumstances may be detained for only a short period, may be unfamiliar with Australian immigration procedures and may be experiencing significant stress, confusion or fatigue. In some cases, they may have limited English-language proficiency and limited opportunity to obtain legal advice or other assistance before departure. The practical ability to understand and respond to decisions affecting them may therefore depend on the timeliness, accuracy and accessibility of information that is provided.

The inspection also reinforced broader concerns identified elsewhere in this report regarding information provision and communication. Language barriers, literacy limitations, trauma, stress and uncertainty can affect a person's ability to understand complex immigration information. The Commission considers that these challenges may be particularly acute in the airport turnaround context, where decisions often occur within compressed timeframes and opportunities for clarification may be limited.

People accommodated in a Hotel APOD (like all people held in closed immigration

detention) should receive clear, accessible and timely information about their circumstances. This should include information, in a language and format they understand, about where they are, why they are being accommodated there, the immigration process that applies to them, any documents that have been provided, what will happen next, how they can contact a lawyer or other support service and any relevant flight or removal timeframes.

Clear communication is particularly important where a person's detention is brief. The fact that an individual may spend only a short period in a Hotel APOD does not diminish the need for procedural fairness, meaningful access to information and respect for their dignity and rights. Rather, it heightens the importance of ensuring that these safeguards are available from the outset.



Appendix

Appendix A: Recommendations from 2024 inspection report

Recommendations	Government response
Recommendation 1 The Government should replace the current system of mandatory immigration detention with a case-by-case assessment process that takes individual circumstances into consideration. Closed detention should only be used as a last resort in circumstances where all of the following elements are present: a) detention is necessary and proportionate to an immigration purpose (for example, a brief period of immigration detention may be necessary to conduct health, security and identity checks before a visa is granted) b) the person has been individually assessed as posing a risk of absconding or an unacceptable risk to the Australian community, and that risk cannot be managed in a less restrictive way c) the necessity for continued detention is subject to periodic re-evaluation and judicial review, and d) the duration of detention is subject to a maximum time limit.	For Government Consideration
Recommendation 2 The Government and Department should, in consultation with facility staff and people in detention, review its policy on access to recognised programs of study, work and vocational training in immigration detention to enhance opportunities for rehabilitation and reintegration.	Disagree
Recommendation 3 The Department should ensure that women in immigration detention have access to a broad range of meaningful activities on an equal footing with their male counterparts and ensure that programs and activities on offer are responsive to the needs of women in detention, age appropriate and not based on gender stereotypes.	Note

Recommendations	Government response
Recommendation 4 The Department should immediately end its use of operational quarantine and other COVID-19 restrictions across the immigration detention network and return to a 'business-as-usual' approach, with the virus being treated like other transmissible respiratory diseases.	Partially agree
Recommendation 5 All staff working in immigration detention centres where women are detained should be provided with initial and ongoing training on the supervision of women in immigration detention and gender sensitivity. As a minimum, training should cover: a) the gender-specific needs and human rights of women in immigration detention b) the main concerns relating to women's health in detention, and c) guidance on safeguarding women from any gender-based physical or verbal violence, abuse and sexual harassment including intimate partner violence and family violence perpetuated between or against LGBTIQA+ women.	Agree
Recommendation 6 Women in immigration detention should, as far as possible, be attended to and supervised only by women officers and staff. Where this is not possible, the majority of officers should be women.	Note
Recommendation 7 Gender-sensitive tasks (such as searches, use of force operations which involve physical contact or providing clothing or feminine hygiene products) or tasks undertaken in specific areas of the accommodation (such as bathrooms, sleeping areas and under observation) should only be undertaken or supervised by women officers and staff.	Note

Recommendations	Government response
Recommendation 8 The Department and Serco should, as a matter of priority, develop plans for the recruitment and retention of female Emergency Response Team officers and analyse what structural reasons are stopping women from applying and being retained.	Partially agree
Recommendation 9 The Government and Department should make every effort to avoid the interstate separation of women in immigration detention from their family and supports by: a) ensuring appropriate accommodation for women is made available in all states/territories, and b) ensuring alternatives to closed immigration detention are made available to women where this is not possible.	Note
Recommendation 10 The Department should ensure that its existing visiting facilities foster an environment that is conducive to a positive visiting experience, particularly for child. The Department should provide child visitors with access to a wide variety of age appropriate play activities, facilities and outdoor spaces.	Agree
Recommendation 11 The Department should proactively encourage the extended contact of women in detention with their children as much as possible. This may include offering extending visiting times, facilitating regular activity days for women and their children and offering reasonable transportation assistance where necessary.	Note

Recommendations	Government response
Recommendation 12 The Department and Serco should develop policy and procedural guidance relating to the accommodation, welfare, security, and management of transgender persons in immigration detention. This guidance should: a) be informed by human rights principles including but not limited to the Yogyakarta Principles +10 b) be co-designed with input from transgender persons and their representative organisations, and c) effectively protect the individual from others who may wish to cause them harm, and to limit the risk that they may be placed in a location in which they may cause harm to others.	Agree
Recommendation 13 The Department should ensure that the application of protective measures for transgender persons in immigration detention do not involve the imposition of more restrictive conditions or reduced opportunities for those individuals.	Agree
Recommendation 14 The Department should ensure that alternatives to closed immigration detention are considered where the security of a transgender person cannot be guaranteed.	Note
Recommendation 15 The Department and IHMS should ensure that women in immigration detention have access to a female doctor at each facility where women are accommodated. Women in immigration detention should also be provided with access to female allied health staff wherever this is possible.	Note
Recommendation 16 As a priority, the Department and IHMS should liaise with state and territory corrective services and justice health agencies to improve strategies for ensuring the timely transfer of medical information to facilitate continuity of care for people entering immigration detention.	Note

Recommendations	Government response
Recommendation 17 When considering the transfer of an individual from one immigration detention facility to another, the Department should consider, on equal terms to other factors, the advice from IHMS that a transfer would impact on the waiting time for a treatment regime.	Note
Recommendation 18 The Department and IHMS should ensure that the process for auditory testing is initiated during the medical screening provided at induction and conducted within the first two weeks of detention.	Note
Recommendation 19 The Department and Serco should revise its policy on the prohibition of women obtaining and using hair dye and align it with the Queensland Corrective Services policy. Melbourne Immigration Detention Centre and Broadmeadows Residential Precinct: Centre specific issues and concerns	Partially Agree
Recommendation 20 The Department should ensure that the BRP is used only to accommodate women.	Disagree
Recommendation 21 The Department and Serco should ensure that separate accommodation for men and women is embedded in all policy and guidance documentation. Observance of this rule should not lead to situations of de facto isolation if only one or a few women are being held in an immigration detention facility.	Partially agree
Recommendation 22 The Department and Government should ensure that the MIDC and BRP are able to facilitate the accommodation and care needs of people with disabilities. Wherever possible, people who require specialised disability assistance and care should not be detained in immigration detention facilities.	Note

Recommendations	Government response
Recommendation 23 The Department and the Government should ensure women at the BRP have access to their own gymnasium and canteen, separate to that provided at the MIDC. These facilities should be specific to the needs of women. Villawood Immigration Detention Centre: Centre specific issues and concerns	Disagree
Recommendation 24 The Department and Government should, as a matter of extreme priority, and for the safety and wellbeing of women detained at VIDC: a) repurpose the Miowera Village as the women's compound and discontinue the use of Bryce and Cowan for women's accommodation, and b) ensure the necessary infrastructure changes are made to allow the Miowera Village to operate completely secure from the VIDC and self-contained with adequate services.	Disagree
Recommendation 25 The Department and Serco should continue to explore other least restrictive measures for women who require separation where they pose a risk of harm to themselves or others. Placement in HCA should always be as a last resort and for the least amount of time necessary.	Note
Recommendation 26 Where placement in HCA is necessary, women should not be placed in HCA within any of the men's compounds. The Department and Government should ensure the necessary infrastructure changes are made to allow for a space for single separation within the Miowera Village.	Partially agree
Recommendation 27 Whilst women are still accommodated in the Bryce and Cowan compounds, the Department should, as a matter of priority, install appropriate heating and air conditioning in all bedrooms.	Agree

Recommendations	Government response
Recomendation 28 Whilst women are still accommodated in the Bryce and Cowan compounds, the Department should, as a matter of priority, install fly screens to all bedroom windows.	Agree
Recomendation 29 Whilst women are still accommodated in the Bryce and Cowan compounds, the Department should, as a matter of priority, ensure they are able to physically access the shop to make personal purchases.	Note
Reccomendation 30 The Department should ensure that women at VIDC are offered regular access to a qualified female hairdresser and hairdressing facilities, specific to the needs of women. Perth Immigration Detention Centre: Centre specific issues and concerns	Note
Recommendation 31 The Department should ensure that PIDC is only used for the shortest periods of detention possible. Where this is not possible, every effort should be made to provide women with alternatives to closed immigration detention rather than transfer to an interstate facility	Note

Endnotes

1 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024).

2 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024).

3 Department of Home Affairs, *Immigration Detention and Community Statistics Summary* (October 2025, released 27 November 2025). <https://www.homeaffairs.gov.au/research-and-stats/files/immigration-detention-community-statistics-31-oct-2025.pdf>.

4 Department of Home Affairs, *Immigration Detention and Community Statistics Summary* (June 2026, released 6 August 2026). <https://www.homeaffairs.gov.au/research-and-stats/files/immigration-detention-community-statistics-30-june-2026.pdf>.

5 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024),19.

6 See <https://humanrights.gov.au/complaints>.

7 *Migration Amendment (Prohibiting Items in Immigration Detention Facilities) Act 2024* (Cth).

8 See *Migration Amendment (Removal and Other Measures) Act 2024* (Cth).

9 *Home Affairs Legislation Amendment (2025 Measures No. 1) Act 2025* (Cth).

10 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024), 16.

11 See Chapter 5 – Accommodation and safety.

12 Commonwealth National Preventive Mechanism, *Post Visit Summary: Villawood Immigration Detention Centre and Miowera Village (APOD)* (June 2025).

13 Commonwealth National Preventive Mechanism, *Post Visit Summary: Villawood Immigration Detention Centre and Miowera Village (APOD)* (June 2025).

14 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024).

15 Commonwealth National Preventive Mechanism, *Onshore Immigration Detention: Risks arising from the change of detention service providers* (OPCAT in Action, 10 March 2026), 5.

16 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024), Recommendation 24.

17 See, for example, *NZYQ v Minister for Immigration, Citizenship and Multicultural Affairs* [2023] HCA 37.

18 Department of Home Affairs, *Immigration Detention and Community Statistics Summary* (June 2026, released 6 August 2026). <https://www.homeaffairs.gov.au/research-and-stats/files/immigration-detention-community-statistics-30-june-2026.pdf>.

19 Ariel Bogle and Christopher Knaus, 'Kia Carnival escape one of 12 since US firm took control of Australian immigration detention, damning report finds' (The Guardian, 10 March 2026). <https://www.theguardian.com/australia-news/2026/mar/10/australian-immigration-detention-escapes>.

20 Commonwealth National Preventive Mechanism, *Onshore Immigration Detention: Risks arising from the change of detention service providers* (OPCAT in Action, 10 March 2026), 26-27.

21 Commonwealth National Preventive Mechanism, *Onshore Immigration Detention: Risks arising from the change of detention service providers* (OPCAT in Action, 10 March 2026), 26-27.

22 Christopher Knaus and Ariel Bogle, 'All Australian immigration detainees to be handcuffed while travelling, US company says after spate of escapes' (*The Guardian, 13 April 2026).* <https://www.theguardian.com/australia-news/2026/apr/13/all-australian-immigration-detainees-to-be-handcuffed-while-travelling-us-company-says-after-spate-of-escapes-ntwnfb>.

23 Commonwealth National Preventive Mechanism, *Post Visit Summary: Villawood Immigration Detention Centre* (13 September 2024), 4 (Recommendation 2).

24 Australian Human Rights Commission, *Not just an afterthought: the experience of women in immigration detention* (2024).

25 An "airport turnaround" refers to a situation where a person arrives in Australia by air but is not allowed to enter the country. They may be held in immigration detention while arrangements are made for them to return overseas, often within a short period of time.



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