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Mr Graeme Innes AM

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Dear Mr Innes

Access to justice in the criminal justice system for people with disability

Thank you for the invitation to meet with you on your recent visit to Perth to discuss the issue of access to justice for people with disability in the criminal justice system.

I welcome the focus by the Australian Human Rights Commission (AHRC) on this important issue and the wide consultation.

I note that the AHRC is including in the scope of its work people with disability who are victims of crime, accused of crimes, witnesses, defendants and offenders and that five key barriers that limit or prevent access to justice have been identified.

Due to the profound impact the justice system can have on young people and the vulnerability of those children and young people who are coming into contact with the criminal justice system, youth justice has been a priority area for me since my appointment in 2007.

My response will therefore primarily focus on Barrier 1, Barrier 4 and Barrier 5 in relation to children and young people.

**Introduction**

As Western Australia’s inaugural Commissioner for Children and Young People my role is one of broad advocacy. Under the *Commissioner for Children and Young People Act 2006* (WA)(the Act) I have responsibility for advocating for over half a million Western Australian citizens under the age of 18 and for promoting and monitoring their wellbeing.

In performing all functions under the Act the best interests of children and young people must be my paramount consideration and I must have regard to the United Nations Convention on the Rights of the Child. I must also give priority, and have special regard to, the interests and needs of Aboriginal and Torres Strait Islander children and young people, and to children and young people who are vulnerable or disadvantaged for any reason.

Under the Act I have a number of specific functions including monitoring and reviewing laws, policies, practices and services that affect the wellbeing of children and young people.[[1]](#footnote-1)

It is with these responsibilities in mind that I provide my response.

**Western Australia’s children and young people**

Western Australia’s population includes around 540,000 children and young people, around one quarter of the total population. Of these, approximately 31,000 (nearly 6 per cent) are Aboriginal.[[2]](#footnote-2) The non-Aboriginal population of young people is concentrated in the metropolitan area (around 71 per cent), while nearly two-thirds of Aboriginal young people live outside the metropolitan area.[[3]](#footnote-3)

It is estimated that 8.3 per cent of 0 to 14 year-olds in WA are living with disability.[[4]](#footnote-4) Data from the WA Disability Services Commission shows that in 2011 6,667 children and young people in WA had accessed a disability services provider, representing 1.2 per cent of the overall population of 0 to 17 years-olds in WA. Aboriginal children and young people represented 6.3 per cent of clients and male children were more than twice as likely to access a disability services provider as their female counterparts. [[5]](#footnote-5) [[6]](#footnote-6)

**The demographics of youth justice in Western Australia**

Very few children and young people in WA have any sustained contact with the justice system. In 2008 the WA Auditor General found that only around four per cent of children and young people have more than one contact with the justice system.[[7]](#footnote-7) Overall, the Auditor General identified that the majority of offending is concentrated in a core of around 1,000 children and young people (one half of one per cent of the WA population of 10 to 17 year olds).[[8]](#footnote-8)

In the financial year 2010–11, the Australian Bureau of Statistics (ABS) reported that the number of young people in WA ‘proceeded against by police’ decreased to 8,196, around 20 per cent less than the previous year. This category includes any type of police intervention, including formal and informal cautions, referrals to juvenile justice teams, arrests and charges.[[9]](#footnote-9) This number represents around three and a half per cent of the whole 10 to 17 year old population, and for many it is their only contact with the justice system.

In the most recent financial year, 2011–12, the ABS reported that this number had nearly halved, to 4,448.[[10]](#footnote-10) This represents 1.85 per cent of the whole 10 to 17 year old population in WA.

Despite this, the numbers in juvenile detention in WA continue to grow. While there was a 20 per cent decrease in proceedings in 2010–11, the average daily population of 10 to 17 year olds in WA juvenile detention grew by 2.1 per cent.[[11]](#footnote-11) In the five years from 2005 to 2010, the average daily population grew from 125.8 people to 176.2 people, a 40 per cent increase.[[12]](#footnote-12)

Western Australia has one of the highest rates of juvenile detention in Australia. In the last quarter of 2011–12 (the most recent comparable figures) WA had 0.69 young persons per 1,000 in detention, second only to the Northern Territory at 1.55 per 1,000. This compares to states like Victoria, where the rate is 0.12 per 1,000, and an overall Australian rate of 0.35 per 1,000.[[13]](#footnote-13)

*Remand detainees*

It is of particular concern that around half of the WA youth detention population is there on remand. A proportion of these are unable to obtain bail as they cannot be released to the care of a ‘responsible adult’ as specified in the *Bail Act 1982* (WA)*.* Few of those remanded go on to sentenced detention, for example in 2010–11 less than 15 per cent of young people on remand were subsequently sentenced to custody.[[14]](#footnote-14)

*Aboriginal children and young people*

The situation for Aboriginal children and young people is particularly concerning. WA has the highest rate of detention of Aboriginal young people; from 2006 to 2010 Aboriginal young people 10 to 17 years old were between 39 and 53 times more likely to be in detention than non-Aboriginal people of the same age.[[15]](#footnote-15) At any given time in the last year, between 60 and 80 per cent of young people in detention was Aboriginal. This is despite Aboriginal young people being between five and six per cent of the overall population of young people in WA. The highest rate of detention is among young Aboriginal males. At any given time in 2010, around 1.5 per cent of the overall WA population of Aboriginal males 10 to 17 years were in detention, compared to 0.03 per cent of non-Aboriginal males in that age group.[[16]](#footnote-16)

*Children and young people with disability*

To my knowledge information on whether or not a young person in contact with the WA youth justice system has a disability is not routinely collected.

*Complex problems*

Where children and young people do have persistent and ongoing contact with the justice system, it is rarely in isolation from other factors. The same factors that can lead a child or young person into the justice system are largely the same as those that can lead them into state care – that is, dysfunction at home and in the community, alcohol and drugs, violence, disadvantage and poverty. These issues are covered in detail in the Joint Australian Commissioners and Child Guardians submission to the Inquiry into the over representation of Aboriginal young people in the justice system (Available: http://www.aph.gov.au/parliamentary\_business/committees/house\_of\_representatives\_committees?url=atsia/sentencing/subs.htm)

*Mental Health*

The mental health and wellbeing of children and young people in contact with the justice system is also of great concern. Figures in WA estimate that around half of children and young people in juvenile detention experience mental health issues.[[17]](#footnote-17) A paper on the differences between young offenders and adult offenders cited a 2005 study from New South Wales, which found that 88 per cent of young people in custody reported symptoms consistent with a mild, moderate or severe psychiatric disorder.[[18]](#footnote-18)

My 2011 Inquiry into the mental health and wellbeing of children and young people in Western Australia found that as a state WA focusses primarily on crisis responses for mental health, particularly for vulnerable children and young people.

My *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia* (the Inquiry Report)[[19]](#footnote-19) made four recommendations related to children and young people with disability and the justice system.

* Recommendation 3: A new collaborative service to address the needs of children and young people who have complex needs be established as a demonstration project. The development of this service should consider the models of Wraparound Milwaukee and the People with Exceptionally Complex Needs. (p. 56)
* Recommendation 15: The *Mental Health Act 1996* (WA) and the *Criminal Law (Mentally Impaired Accused) Act 1996* (WA) be reviewed to ensure the rights and needs of children and young people are adequately recognised. (p. 69)
* Recommendation 19: Children and young people appearing before the Children’s Court of Western Australia have access to appropriate, comprehensive mental health assessment, referral and treatment services. (p. 80)
* Recommendation 20: A dedicated forensic mental health unit for children and young people be established. (p. 83)

My Inquiry Report further recommended that to improve mental health services for children and young people with disability:

* The Disability Services Commission work with the Mental Health Commission to identify the services required to address the unique needs and risk factors of children and young people with disabilities in a coordinated and seamless manner. (Recommendation 25, p. 95)

In the following sections Barrier 1, Barrier 4 and Barrier 5 are discussed.

**Barrier 1: Community support, programs and assistance to prevent violence and disadvantage and address a range of health and social risk factors may not be available to some people with disability.**

As identified in the AHRC Issues Paper (pp. 5–6) I am also of the view that the following are issues for children and young people with disability:

* Referrals for assistance and support to service providers outside the disability service system are often not made, or when they are made, they are often declined.
* Costly criminal justice responses are often applied to people with disability when their needs are better addressed by health, disability, rehabilitation and community responses.
* Many people with disability are not identified as a having a disability. This occurs outside and inside the criminal justice system, including education and health. This means people with disability are unable to access early intervention and a range of other supports and services when necessary.

*Young People with Exceptionally Complex Needs*

Recommendation 3 of the Inquiry Report was for a new collaborative service to address the needs of children and young people who have complex needs based on the models of Wraparound Milwaukee and the People with Exceptionally Complex Needs.

The Western Australian People with Exceptionally Complex Needs (PECN) pilot comprised six individuals with exceptionally complex needs including a range of disabilities including mental illness, intellectual disability and acquired brain injury.[[20]](#footnote-20) They were also those who tend to use a range of services provided by government and non-government organisations including health, disability, drug and alcohol, housing, police and corrective services. An evaluation of the pilot in 2010 found that with appropriate support and assistance, people with exceptionally complex needs are able to make and maintain positive changes in their lives including compliance with medication and reduction in admissions into emergency department.[[21]](#footnote-21) Further that the changes can also produce positive outcomes for the community including reduction in contact with the criminal justice system and improved relationships. PECN is an example of a whole of government approach and tailoring services to meet the needs of the client.

In 2012 the WA State Government established the Young People with Exceptionally Complex Needs (YPECN) program. This program targets young people with two or more of - a mental health issue, an acquired brain injury, an intellectual disability, a significant substance abuse problem, and in addition pose a significant risk of harm to themselves or others, require extensive support and would benefit from receiving coordinated services and for whom the existing system is not working as it should. The program is now supporting 11 young people and there is evidence of positive outcomes for the young people involved.

*Mental Health Court Service*

Recommendation 19 of my Inquiry Report was for children and young people appearing before the Children’s Court of Western Australia to have access to appropriate, comprehensive mental health assessment, referral and treatment services.

In the 2012 State Budget, the WA State Government announced an early intervention pilot project would be established at the Perth Children’s Court to provide specialised mental health expertise. This project provides assessments, referrals and treatment, with the intention of diverting young people away from the justice system.[[22]](#footnote-22)

Rapid expansion of this service is needed to ensure that children and young people appearing before any WA court have access to appropriate, comprehensive mental health assessment, referral and treatment services.

**Barrier 4: Specialist support, accommodation and programs may not be provided to people with disability when they are considered unable to understand or respond to criminal charges made against them (‘unfit to plead’).**

As identified in the AHRC Issues Paper (pp. 10–11) I am also of the view that the following are issues for children and young people with disability:

* There is a lack of alternative accommodation and disability and therapeutic support options for people with disability if they cannot stand trial. Often prisons are the only accommodation options.
* When alternative accommodation is available and provided to people with disability who are found ‘unfit to plead’ concerns still may exist about the specialist accommodation and support provided.
* Many people with disability who have been found unfit to plead are subjected to a range of harmful practices in prison including medical and physical restraint and seclusion.
* Access to processes that can divert people with disability out of the criminal justice system varies considerably and in some jurisdictions there are no diversionary options available.

*Review of the Mental Health Act 1996* (WA) *and the* *Criminal Law (Mentally Impaired Accused) Act 1996 (WA)*

A significant area of work for my office has been advocating for the specific interests and needs of children and young people to be taken into account in the formulation of new Western Australian mental health laws.

Recommendation 15 of my Inquiry Report was for the *Mental Health Act 1996* (WA) and the *Criminal Law (Mentally Impaired Accused) Act 1996* (WA) to be reviewed to ensure the rights and needs of children and young people are adequately recognised.

Since that time a green Mental Health Bill 2012 has been released for public consultation by the WA State Government and the *Criminal Law (Mentally Impaired Accused) Act 1996* (WA) is currently under review.

I am of the view that four fundamental principles should underpin this legislative reform:

* best interests of the child
* the right to be heard
* involvement of family (including Aboriginal and Torres Strait Islander kinship relationships)
* the special age-related needs of children must be recognised and provided for.

My submissions on the relevant legislation are as follows and are available on my website (<http://www.ccyp.wa.gov.au/content/Mental-health.aspx>):

* *Position statement on the Mental Health Act 1996 (WA) and the Criminal Law (Mentally Impaired Accused) Act 1996 (WA)*
* Green Mental Health Bill 2012
* Review of the *Criminal Law (Mentally Impaired Accused) Act 1996* (WA)
* Draft Declared Places (Mentally Impaired Accused) Bill 2012

*Forensic mental health unit for children and young people*

Recommendation 19 of the Report was that a dedicated forensic mental health unit for children and young people be established.

At present there is no dedicated, secure mental health facility for young people in WA.

In 2013 the WA Disability Services Commission (DSC) began work on a new Disability Justice Service. Two Disability Justice Centres are in development to accommodate people (16 years and over) with intellectual or cognitive disability (as assessed by DSC) who have been charged with an offence but are not able to understand the court process and are deemed unfit to plead. The Disability Justice Service includes an in-reach service to prisons and youth detention centres.[[23]](#footnote-23)

I continue to be concerned about the lack of a declared place specifically for mentally impaired children and young people. The Disability Justice Centres will not improve the predicament of children who are aged less than 16 years and who are subject to a custody order as a consequence of being found unfit to stand trial or acquitted on account of unsoundness of mind.

I am of the view that an appropriate child-specific place in the community be declared as a ‘declared place’ for children and young people who are subject to a custody order under the *Criminal Law (Mentally Impaired Accused) Act 1996* (WA). This is clearly preferable to accommodating children and adults in the same facility and would provide a suitable alternative option for children who are aged less than 16 years.

**Barrier 5: Support, adjustments and aids may not be provided to prisoners with disability so that they can meet basic human needs and participate in prison life. They often face inhuman and degrading treatment, torture and harmful prison management practices.**

As identified in the AHRC Issues Paper (pp. 11–12) I am also of the view that the following are issues for children and young people with disability:

* Many people with disability are not being identified as having a disability on entry into prison or while in prison. As a result no supports or special services are provided.
* Communication support may not be provided to prisoners with disability so that they can interact with other prisoners and prison staff. They may not be able to participate in health, education, employment and rehabilitation programs.
* . . . there is no access to appropriate healthcare and treatment and support services, including mental health services. People with disability are released without necessary medication, health plans or referrals to services in place. There is also a lack of culturally relevant and appropriate support and services inside and outside the criminal justice system.

I am of the view that significant improvement and focus on rehabilitation and therapeutic services in WA youth detention facilities is required. This would include:

* Disability supports
* Employment and training programs
* Psychiatric and psychological services
* Mental health services
* Drug and alcohol services
* Education programs
* Relationship and family support programs.

In February 2013 the WA Council of Social Services, the Youth Affairs Council of WA and the Youth Legal Service produced a report and recommendations of the 2012 Youth Justice Think Tank.[[24]](#footnote-24) This report calls for:

* A change of approach to youth justice in WA.
* Increased collaboration and cooperation between agencies working with young people in the youth justice system.
* Increased funding and supports to young people to prevent them coming into contact with the youth justice system.
* Improved services to young people during detention and post release from detention.

Other states have reviewed their youth justice systems and developed coordinated and innovative programs, recent reviews have been conducted in Queensland, ACT and NSW. In late February 2013 the NSW Attorney General announced Youth on Track – an early intervention program which provides a holistic approach. The program was developed by the Department of Attorney General and Justice, in consultation with NSW Police and the Ministry for Police and Emergency Services, the departments of Education and Communities, Family and Community Services, and Health, and with non-government agencies.[[25]](#footnote-25)

Whilst there have been some improvements in youth justice in WA in the last five years there remains major structural and implementation issues which require a concerted effort from all agencies related to youth justice to achieve better outcomes for children and young people coming into contact with the youth justice system.

For children and young people with disability, including those who have a mental illness, this is especially important as they are among the most vulnerable of an already highly vulnerable group.

I have consistently identified the following as priority areas for action:

* Investing in programs that divert children and young people away from the criminal justice system is a critical priority area.[[26]](#footnote-26) [[27]](#footnote-27)
* Safe houses in communities across WA where children can go when it is not safe for them to be at home.[[28]](#footnote-28)
* Establishment of a state-wide 24 hour bail service.[[29]](#footnote-29)
* The significant over-representation of Aboriginal children and young people in contact with the justice system.[[30]](#footnote-30)
* To address the ‘correctionalising’ of youth justice, responsibility for youth justice should be transferred from the Department of Corrective Services to either a stand-alone department or to the Department of Child Protection to address more appropriately the underlying causes of children and young people offending, improve accountability for outcomes, and reduce government expenditure.[[31]](#footnote-31) [[32]](#footnote-32)
* Improved coordination and collaboration between agencies working with young people in the justice system.
* Children and young people appearing before the Children’s Court of Western Australia must have access to appropriate, comprehensive mental health assessment, referral and treatment services; and a dedicated forensic mental health unit should be established.[[33]](#footnote-33)
* Development of a whole of government collaborative approach in relation to youth justice, incorporating a strategic framework or blueprint and implementation plan.

The issues referred to in this letter are discussed in more detail in my:

* *Submission to the Inspector of Custodial Services Inquiry into the Banksia Hill incident* (Available: http://www.ccyp.wa.gov.au/files/resource/Submission%20to%20the%20Inspector%20of%20Custodial%20Services%20-%20Inquiry%20into%20Banksia%20Hill%20incident.PDF)
* *Youth Justice* issues paper(Available: http://www.ccyp.wa.gov.au/files/IssuesPapers/Youth%20Justice%20Issues%20Paper%20May%202013.pdf)
* *Children and young people in contact with the criminal justice system* policy brief (Available: http://www.ccyp.wa.gov.au/files/POLICY%20BRIEFS%202013/Policy%20brief%20-%20youth%20justice%20-%20children%20and%20young%20people%20in%20contact%20with%20the%20criminal%20justice%20system%20-%20~%20February%202012.PDF)

I thank you again for the opportunity to discuss the issue of access to justice for people with disability in the criminal justice system.

I am happy to provide any further information or clarification should this be required.

Yours sincerely

Michelle SCOTT

Commissioner for Children and Young People WA

August 2013

1. *Commissioner for Children and Young People Act 2006* (WA), section 19. [↑](#footnote-ref-1)
2. This submission follows the preferred practice in WA of using the term ‘Aboriginal’ to refer to Aboriginal and Torres Strait Islander peoples. [↑](#footnote-ref-2)
3. Demographic information available in Commissioner for Children and Young People WA 2013, *Wellbeing Monitoring Framework: Profile of children and young people in Western Australia*, Available: http://www.ccyp.wa.gov.au/maps/ [↑](#footnote-ref-3)
4. Ibid. [↑](#footnote-ref-4)
5. The Disability Services Commission was established in December 1993 under the Disability Services Act 1993 (WA). It is the State Government agency responsible for advancing opportunities, community participation and quality of life for people with disabilities. The Commission provides a range of direct services and support and also funds non-government agencies to provide services to people with severe and profound disabilities, their families and carers. For more information refer to The Disability Services Act 1993, http://www.austlii.edu.au/au/legis/wa/consol\_act/dsa1993213/ [↑](#footnote-ref-5)
6. WA Disability Services Commission 2012*, Custom Report* in Commissioner for Children and Young People WA 2013, *Profile of children and young people in Western Australia*, Available: http://www.ccyp.wa.gov.au/maps/ [↑](#footnote-ref-6)
7. Office of the Auditor General 2008, *The Juvenile Justice System: Dealing with Young People under the Young Offenders Act 1994: Performance Examination,* Office of the Auditor General, p.17. [↑](#footnote-ref-7)
8. Office of the Auditor General 2008, *The Juvenile Justice System: Dealing with Young People under the Young Offenders Act 1994: Performance Examination,* Office of the Auditor General, p.16. [↑](#footnote-ref-8)
9. Australian Bureau of Statistics 2012, *Recorded Crime - Offenders, 2010–11,* cat. no. 4519.0 Table 1 Youth Offenders WA, [website], viewed 13 August 2013, http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/4519.02010–11?OpenDocument [↑](#footnote-ref-9)
10. Australian Bureau of Statistics 2013, *Recorded Crime - Offenders, 2011-12*, cat. no. 4519.0 Table 7, [website], viewed 13 August 2013, http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/4519.02011-12?OpenDocument [↑](#footnote-ref-10)
11. Unpublished report, supplied by Department of Corrective Services, June 2011 [↑](#footnote-ref-11)
12. Ibid. [↑](#footnote-ref-12)
13. Australian Institute of Health and Welfare (AIHW) 2012, *Juvenile detention population in Australia 2012,* Juvenile justice series no. 11, Cat. no. JUV 11, table S10, AIHW, Canberra. [↑](#footnote-ref-13)
14. Department of Corrective Services email communication, 12 December 2011. [↑](#footnote-ref-14)
15. Commissioner for Children and Young People WA 2012, *The State of Western Australia’s children and young people: Edition One,* Commissioner for Children and Young People WA, Perth, p.173. [↑](#footnote-ref-15)
16. Ibid, p.175. [↑](#footnote-ref-16)
17. Commissioner for Children and Young People WA 2011, *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia,* Commissioner for Children and Young People WA, Perth, p.81. The figure was stated in a submission from the Inspector of Custodial Services. [↑](#footnote-ref-17)
18. Richards K 2011, *What makes juvenile offenders different from adult offenders?,* Trends and issues in crime and criminal justice, no. 409, Australian Institute of Criminology, Canberra, p.4. [↑](#footnote-ref-18)
19. The *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia* is available: http://www.ccyp.wa.gov.au/files/MentalWellbeingInquiry/CCYP%20Mental%20Health%20Inquiry%20-%20Report%20to%20Parliament.pdf [↑](#footnote-ref-19)
20. Mental Health Commission (WA) 2010, *People with Exceptionally Complex Needs (PECN): Interim Evaluation Report*, 2010, Mental Health Commission, Perth, p.6. [↑](#footnote-ref-20)
21. Ibid, p.12. [↑](#footnote-ref-21)
22. Mental Health Commission 2013, ‘Program *Links* young offenders with mental health support’ *head2head,* Mental Health Commission, Perth, pp. 8–9. [↑](#footnote-ref-22)
23. Information provided by Disability Service Commission at an information and consultation session 31 July 2013. See also information available on the Disability Services Commission website: http://www.disability.wa.gov.au/reform1/reform/disability-justice-centres/ [↑](#footnote-ref-23)
24. Western Australian Council of Social Service (WACOSS), Youth Affairs Council of Western Australia & Youth Legal Service 2013, *The report and recommendations of the 2012 Youth Justice Think Tank,* WACOSS, Available: http://www.wacoss.org.au/Libraries/State\_Election\_2013\_Documents/Youth\_Justice\_Think\_Tank\_Report.sflb.ashx [↑](#footnote-ref-24)
25. Smith G and Gallacher M 2013, *Early Intervention to keep youth on track,* Ministerial Media Statements, NSW Government  <http://www.lawlink.nsw.gov.au/lawlink/Corporate/ll\_corporate.nsf/vwFiles/27022013\_MR13\_Youth\_on\_Track.pdf/$file/27022013\_MR13\_Youth\_on\_Track.pdf> [↑](#footnote-ref-25)
26. Commissioner for Children and Young People WA 2013, *Youth Justice,* Policy Brief May 2013, Available: http://www.ccyp.wa.gov.au/files/IssuesPapers/Youth%20Justice%20Issues%20Paper%20May%202013.pdf [↑](#footnote-ref-26)
27. Blagg H 2009, *Youth Justice in Western Australia*, Commissioner for Children and Young People WA, p.6. Available: http://www.ccyp.wa.gov.au/files/2009-Harry%20Blagg%20report%20-%20Youth%20Justice%20in%20Western%20Australia.pdf [↑](#footnote-ref-27)
28. Commissioner for Children and Young People WA 2010, *Annual Report 2009-2010,* pp.16 and 44, Available: *http://www.ccyp.wa.gov.au/files/Annual%20Report%202010/Annual%20Report%202009-10%20-%20FINAL.pdf*  [↑](#footnote-ref-28)
29. Commissioner for Children and Young People 2010, *Submission to the Department of the Attorney General’s review of the Bail Act 1982:* *Issues Paper and Questions,* pp.30-32, Available: http://www.ccyp.wa.gov.au/files/resource/Submission%20to%20the%20Department%20of%20the%20Attorney%20General's%20review%20of%20the%20Bail%20Act%201982%20(WA).pdf [↑](#footnote-ref-29)
30. Letter, Commissioner for Children and Young People WA to Attorney General, 22 October 2008. [↑](#footnote-ref-30)
31. Commissioner for Children and Young People WA 2009, *Submission to the Economic Audit Committee,* Available: http://www.ccyp.wa.gov.au/files/resource/Second%20Submission%20to%20the%20Economic%20Audit%20Committee%20-%2031%20August%202009.pdf [↑](#footnote-ref-31)
32. Blagg H 2009, *Youth Justice in Western Australia,* Commissioner for Children and Young People, p.8, Available: http://www.ccyp.wa.gov.au/files/2009-Harry%20Blagg%20report%20-%20Youth%20Justice%20in%20Western%20Australia.pdf [↑](#footnote-ref-32)
33. Commissioner for Children and Young People WA 2011, *Report of the Inquiry into the mental health and wellbeing of children and young people in Western Australia,* Commissioner for Children and Young People WA, Perth, pp.80-83. [↑](#footnote-ref-33)